Exeter Airport Airspace Change Proposal

Design Principles – Stakeholder Review

Airport Consultative Committee

Document Details

Reference	Description
Document Title	Exeter Airport Airspace Change Proposal
	Design Principles – Stakeholder Review
Document Ref	71189 019
Issue	Issue 2
Date	22nd July 2019
Client Name	Exeter & Devon Airport Ltd

Issue	Amendment	Date
Issue 1	Initial	5th July 2019
Issue 2	Updated	22nd July 2019

Table of Contents

Table of Tables

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. The responses we have received have helped us to derive a comprehensive list of potential Design Principles that reflect the statements made during focus group events and from questionnaires received. As with any engagement activity, it should be noted that opposing views were expressed by stakeholders in a number of areas.

The Design Principles will be used as the qualitative framework against which the alternative design options will be considered. It is therefore important that your views have been accurately captured. This document has been prepared to share the list of Design Principles developed and we now need your help to provide further comments on the list and to help us understand which Design Principles are most important to you or your organisations.

Any changes to airspace arrangements must maintain or enhance safety. This is the main priority of the CAA in accordance with its statutory duties set out in Section 70(1) of the Transport Act 2000. The principle area of concern regarding current operations for Exeter Airport is the limited protection currently afforded to Commercial Air Transport flying final approach and initial departure routes from the airport. Safety is the main driver for change for this Airspace Change Proposal and as such, has not been included as a Design Principle, but will be the overarching principle against which the design options will be developed.

1.2 Stakeholder Review Requirements

Please take a look at the attached Design Principles in Table 1 below. For each of the Design Principle listed we would like you to state whether or not you agree that the statement constitutes a Design Principle. If you do not agree, please provide detail in the comment box provided.

In addition, we would like you to rank the Design Principles according to the priority of you or your organisation. Please rank the Design Principles from 1 (Highest priority) to 16 (Lowest priority). If you feel any of the Design Principles are not applicable to you, please mark it as '0'. Please add any amplifying comments you wish to include, also in the comments box.

Please complete Table 2 to provide any additional comments if there any areas of concern that you feel have not been considered or to suggest any additional Design Principles you feel ought to be considered by Exeter Airport.

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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 Design Principle or question to which your response relates.

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

Please respond by mid-day Friday 2nd August 2019.

1.4 Next Steps

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Passing through the CAA DEFINE Gateway will then allow us to commence detailed airspace design work. Further engagement activities will take place during this time to seek your views on the designs developed ahead of the DEVELOP and ASSESS Gateway currently planned for late November. It is anticipated that the formal consultation will be conducted between March and July 2020. Exeter Airport will ensure any views expressed through this earlier engagement activity will also be recorded to inform the full consultation report.

2 Review of Design Principles

2.1 Your Responses

Please complete Table 1 and Table 2 below in line with the information provided in Section 1. Please use as much space as you require, the size of the response box will expand as you type your response.

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP1	Any new airspace should not restrict flying operations in or around the airspace	The lateral or vertical (including base heights) of any new airspace should not jeopardise the safe operation of all types of aviation traffic.	No	
Comments: Radio/transponder equipped aircraft should experience minimal restrictions to their flight path providing there are no ATC operational constraints. **Controlled airspace will inevitably restrict the passage of some types of aircraft (not fitted with radio/transponder), especially those made of composite materials that do not provide a satisfactory return on primary radar. Powered aircraft that are able to navigate a predetermined course may be given a transit clearance by prior arrangement with ATC. Apart from the terminal area, the base of controlled airspace must provide sufficient vertical clearance from all terrain to allow for the safe passage of aircraft below Class G airspace.**				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP2	Airspace should be designed to minimise the impact of noise	One of the Government's key environmental objectives is to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise.	Yes	2
Comments:				
DP3	Any new airspace should not create funnelling or choke points for other airspace users	Airspace should allow transit aircraft to safely bypass without creating bottlenecks or pinch points over geographical features or high ground that could create a greater environmental impact of noise or increasing the danger of a mid-air collision.	Yes	1
Comments:				
DP4	Airspace should connect to the airways structure to protect Commercial Air Transport	Commercial Air Transport should remain inside Controlled Airspace at all times during arrival at and departure from Exeter Airport. This protection will lower the risk to commercial operations, whilst introducing predictability of tracks therefore reducing track miles flown and minimising emissions.	Yes	3

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP5	Any new airspace should use the minimum volume necessary	The volume of new airspace should be the minimum volume consistent with safe and efficient air traffic operations and not block the transit of other aviation traffic.	Yes	4
Comments: Much depends on the ability of ATC to see the aircraft on primary/secondary radar.				
DP6	Any new airspace should facilitate continuous climb and descent profiles	Steeper and continuous climbs and descents will introduce environmental as well as flight efficiency benefits. The impact of noise on communities will be reduced and will also allow the execution of an optimal flight profile for aircraft, leading to a benefit in fuel use and emissions. Routes will become more consistent and predictable which could lead to a minimisation of controlled airspace footprint.	Yes	3
Comments:				
DP7	Any new airspace should allow equitable access to all airspace users	Any regulatory change or airspace amendment must continue to facilitate access to the airspace for all aviation users and to implement airspace that will work for everyone.	No	

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments: In the interests of aviation safety it is not possible provide access to controlled airspace for aircraft that cannot be tracked by primary/secondary radar.				
DP8	Consider the Flexible Use of Airspace	Any proposal for a revised airspace structure should be adaptable to minimise the impact on other aviation operators. Only having airspace activated in accordance with requirements is encouraged, providing flexibility for the access of other aviation.	No	
Comments: Exeter Airport has H24 operations.				
DP9	New airspace should protect critical stages of flight	The final approach is the most critical portion of flight, with Commercial Air Transport aircraft being slow and less manoeuvrable.	Yes	1
Comments:				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP10	Create a known traffic environment	There is an increased risk on busy days to Commercial Air Transport due to the large number of aircraft operating outside controlled airspace due to the increased separation requirements against unknown, potentially non-transponding traffic.	Yes	1
Comments: The risk to life is greatly increased by the presence of aircraft constructed almost entirely of composite materials and those that are not radio/transponder equipped. The cost of fitting a mode S transponder/GPS unit is around £2000.				
DP11	Designs should consider areas of local tranquillity	Airspace change and management can impact on the natural environment, and on people's experience of the natural environment. Visitors seek these natural and peaceful surroundings to escape the impacts of urbanisation, including increased aviation traffic and resultant noise.	Yes	5
Comments: This affects a relatively large number of people.				
DP12	Accommodate traffic with limited/no Radio Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a radio capability should be considered.	Yes	6

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments: This affects a relatively small proportion of leisure aircraft.				
DP13	Accommodate traffic without Transponder Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a transponder capability should be considered.	Yes	6
Comments: Reasonably safe so long as the aircraft can be identified on primary radar.				
DP14	Any new CAS should be proportionate to the requirement	Any new controlled airspace should be no bigger than required to ensure safety is not compromised for all airspace users.	Yes	3
Comments: The time/fuel efficient descent/climb profile of transport aircraft results in reduced pilot workload at a critical point in flight.				
DP15	Any new airspace should use the minimum categorisation necessary	All categories of airspace should be considered so that the least restrictive categorisation of airspace necessary to ensure safety is not compromised for all airspace users.	Yes	4
Comments: It is inevitable that some airspace will have to be class D so as to protect Exeter's H 24 operation.				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP16	Any new airspace should be as uncomplicated as possible	The design of any new airspace should not be so complex that it will lead to more infractions from other airspace users.	Yes	2
Comments:				

Table 1 – Design Principle Prioritisation

If there are any other areas of concern that you feel have not been considered, please provide additional comments below.
Comments:
Are there other Design Principles not included in the list that you feel should be considered as candidates for the final shortlist? If so, please provide your comments.
Comments:

Table 2 – Additional Comments

Exeter Airport Airspace Change Proposal

Design Principles – Stakeholder Review

Devon Air Ambulance Trust

Document Details

Reference	Description
Document Title	Exeter Airport Airspace Change Proposal
	Design Principles – Stakeholder Review
Document Ref	71189 019
Issue	Issue 1
Date	5th July 2019
Client Name	Exeter & Devon Airport Ltd

Issue	Amendment	Date
Issue 1	Initial	5th July 2019

Table of Contents

Table of Tables

1 Exeter Airport Airspace Change Proposal

1.1 Introduction

Thank you very much for responding to our Design Principles Questionnaire or for attending a focus group event. We are very grateful for everybody's engagement with the process and for all of the views expressed by the various representative bodies and individuals. The responses received in the questionnaires and the discussions during the focus groups have helped us to derive a comprehensive list of potential Design Principles that reflect the statements made during these events. As with any engagement activity, it should be noted that opposing views were expressed by stakeholders in a number of areas.

The Design Principles will be used as the qualitative framework against which the alternative design options will be considered. It is therefore important that your views have been accurately captured. This document has been prepared to share the list of Design Principles developed and we now need your help to provide further comments on the list and to help us understand which Design Principles are most important to you or your organisations.

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1.2 Stakeholder Review Requirements

Please take a look at the attached Design Principles in Table 1 below. For each of the Design Principle listed we would like you to state whether or not you agree that the statement constitutes a Design Principle. If you do not agree, please provide detail in the comment box provided.

In addition, we would like you to rank the Design Principles according to the priority of you or your organisation. Please rank the Design Principles from 1 (Highest priority) to 16 (Lowest priority). If you feel any of the Design Principles are not applicable to you, please mark it as '0'. Please add any amplifying comments you wish to include, also in the comments box.

Please complete Table 2 to provide any additional comments if there any areas of concern that you feel have not been considered or to suggest any additional Design Principles you feel ought to be considered by Exeter Airport.

1.3 How to Respond

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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 Design Principle or 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 26th July 2019.

1.4 Next Steps

The development of Design Principles will mark the completion of Stage 1 (Define Stage) of the Exeter Airport Airspace Change Proposal. The response you now provide will help us to refine the Design Principles ahead of the CAA DEFINE Gateway scheduled for Friday 30th August 2019.

Passing through the CAA DEFINE Gateway will then allow us to commence detailed airspace design work. Further engagement activities will take place during this time to seek your views on the designs developed ahead of the DEVELOP and ASSESS Gateway currently planned for late November. It is anticipated that the formal consultation will be conducted between March and July 2020. Exeter Airport will ensure any views expressed through this earlier engagement activity will also be recorded to inform the full consultation report.

2 Review of Design Principles

2.1 Your Responses

Please complete Table 1 and Table 2 below in line with the information provided in Section 1. Please use as much space as you require, the size of the response box will expand as you type your response.

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP1	Any new airspace should not restrict flying operations in or around the airspace	The lateral or vertical (including base heights) of any new airspace should not jeopardise the safe operation of all types of aviation traffic.	Yes	8
Comments: A sound principle but, would rather see protection for traffic inside the zone, even if it means a (slightly) larger zone.				
DP2	Airspace should be designed to minimise the impact of noise	One of the Government's key environmental objectives is to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise.	Yes	6
Comments: Again, an agreed principle. The zone should allow traffic operating to / from it to comply with noise regulations anyway.				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP3	Any new airspace should not create funnelling or choke points for other airspace users	Airspace should allow transit aircraft to safely bypass without creating bottlenecks or pinch points over geographical features or high ground that could create a greater environmental impact of noise or increasing the danger of a mid-air collision.	Yes	5
Comments: Pinch / choke points are a nightmare for users and ATC alike. Any proposal must not create any possible areas of conflict.				
DP4	Airspace should connect to the airways structure to protect Commercial Air Transport	Commercial Air Transport should remain inside Controlled Airspace at all times during arrival at and departure from Exeter Airport. This protection will lower the risk to commercial operations, whilst introducing predictability of tracks therefore reducing track miles flown and minimising emissions.	Yes	10
Comments: As a rotary operator this is not a high priority for us. I think the airlines might think differently.				
DP5	Any new airspace should use the minimum volume necessary	The volume of new airspace should be the minimum volume consistent with safe and efficient air traffic operations and not block the transit of other aviation traffic.	No	12

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments: This should not be a principle for design. Take the minimum space required and then add a percentage as a safety margin. It needs to be as big as it needs to be not the minimum required.				
DP6	Any new airspace should facilitate continuous climb and descent profiles	Steeper and continuous climbs and descents will introduce environmental as well as flight efficiency benefits. The impact of noise on communities will be reduced and will also allow the execution of an optimal flight profile for aircraft, leading to a benefit in fuel use and emissions. Routes will become more consistent and predictable which could lead to a minimisation of controlled airspace footprint.	Yes	7
Comments: Again, one more for the airlines but, we can see the environmental advantages of this principle.				
DP7	Any new airspace should allow equitable access to all airspace users	Any regulatory change or airspace amendment must continue to facilitate access to the airspace for all aviation users and to implement airspace that will work for everyone.	Yes	13
Comments: Wherever possible this should be the case. However, priority traffic will always have priority.				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP8	Consider the Flexible Use of Airspace	Any proposal for a revised airspace structure should be adaptable to minimise the impact on other aviation operators. Only having airspace activated in accordance with requirements is encouraged, providing flexibility for the access of other aviation.	Yes	15
Comments: A low principle as we would rather see permanent airspace rather than 'only during certain hours'. Permanent airspace is there and everyone gets used to it. Saves any confusion as to "is it open or isn't it?".				
DP9	New airspace should protect critical stages of flight	The final approach is the most critical portion of flight, with Commercial Air Transport aircraft being slow and less manoeuvrable.	Yes	1
Comments: Top priority and the main reason for controlling airspace.				
DP10	Create a known traffic environment	There is an increased risk on busy days to Commercial Air Transport due to the large number of aircraft operating outside controlled airspace due to the increased separation requirements against unknown, potentially non-transponding traffic.	Yes	2

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments: Any design should have a known environment. This principle is the opposite to DP8 and a much higher priority.				
DP11	Designs should consider areas of local tranquillity	Airspace change and management can impact on the natural environment, and on people's experience of the natural environment. Visitors seek these natural and peaceful surroundings to escape the impacts of urbanisation, including increased aviation traffic and resultant noise.	Yes	11
Comments: A sound and 'neighbourly' principle which ties in with steeper approach / climb out and noise regulations – DP6 and DP2				
DP12	Accommodate traffic with limited/no Radio Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a radio capability should be considered.	No	16
Comments: Part of the present issue is non-radio traffic crossing the final approach / climbout. Non-radio traffic should not be allowed to operate inside controlled airspace. However, non-radio is allowed in Class G airspace so there's not a lot we can do about that.				
DP13	Accommodate traffic without Transponder Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a transponder capability should be considered.	Yes	14

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments: Electronic conspicuity is becoming one of the biggest safety issues both here and in Europe. The issue is there are a number of systems available that don't really talk to each other. That's a bad enough situation to have without aircraft with no conspicuity operating close to the zone.				
DP14	Any new CAS should be proportionate to the requirement	Any new controlled airspace should be no bigger than required to ensure safety is not compromised for all airspace users.	Yes	9
Comments: See comments for DP5. Work out the size and add some moer, don't make it as small as possible.				
DP15	Any new airspace should use the minimum categorisation necessary	All categories of airspace should be considered so that the least restrictive categorisation of airspace necessary to ensure safety is not compromised for all airspace users.	Yes	3
Comments: Makes sense. We don't need Class A / B airspace when probably Class D will suffice.				
DP16	Any new airspace should be as uncomplicated as possible	The design of any new airspace should not be so complex that it will lead to more infractions from other airspace users.	Yes	4

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments: Keep it simple, works every time. Don't make it soo complicated that it becomes an issue itself.				

Table 1 – Design Principle Prioritisation

Do you agree that the list of Design Principles captures the specific areas of concern you have articulated in either a questionnaire or during participation in one of the focus groups?
Comments: Yes
Are there other Design Principles not included in the list that you feel should be considered as candidates for the final shortlist? If so, please provide your comments.
Comments: No

Table 2 – Additional Comments

Exeter Airport Airspace Change Proposal

Design Principles – Stakeholder Review

Devon Strut

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DP1	Any new airspace should not restrict flying operations in or around the airspace	The lateral or vertical (including base heights) of any new airspace should not jeopardise the safe operation of all types of aviation traffic.	Yes	2
Comments: Simple, minimalistic and connected for CAT				
DP2	Airspace should be designed to minimise the impact of noise	One of the Government's key environmental objectives is to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise.	Yes	15
Comments: Where realistic i.a.w procedures for CAT				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP3	Any new airspace should not create funnelling or choke points for other airspace users	Airspace should allow transit aircraft to safely bypass without creating bottlenecks or pinch points over geographical features or high ground that could create a greater environmental impact of noise or increasing the danger of a mid-air collision.	Yes	7
Comments: Vital for all flight safety				
DP4	Airspace should connect to the airways structure to protect Commercial Air Transport	Commercial Air Transport should remain inside Controlled Airspace at all times during arrival at and departure from Exeter Airport. This protection will lower the risk to commercial operations, whilst introducing predictability of tracks therefore reducing track miles flown and minimising emissions.	Yes	8
Comments: Vital for all flight safety				
DP5	Any new airspace should use the minimum volume necessary	The volume of new airspace should be the minimum volume consistent with safe and efficient air traffic operations and not block the transit of other aviation traffic.	Yes	3

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments:				
DP6	Any new airspace should facilitate continuous climb and descent profiles	Steeper and continuous climbs and descents will introduce environmental as well as flight efficiency benefits. The impact of noise on communities will be reduced and will also allow the execution of an optimal flight profile for aircraft, leading to a benefit in fuel use and emissions. Routes will become more consistent and predictable which could lead to a minimisation of controlled airspace footprint.	Yes	9
Comments: Where realistic i.a.w procedures for CAT				
DP7	Any new airspace should allow equitable access to all airspace users	Any regulatory change or airspace amendment must continue to facilitate access to the airspace for all aviation users and to implement airspace that will work for everyone.	Yes	1
Comments: Simple, minimalistic and connected for CAT				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP8	Consider the Flexible Use of Airspace	Any proposal for a revised airspace structure should be adaptable to minimise the impact on other aviation operators. Only having airspace activated in accordance with requirements is encouraged, providing flexibility for the access of other aviation.	Yes	14
Comments: May cause issues if pilots get timings wrong				
DP9	New airspace should protect critical stages of flight	The final approach is the most critical portion of flight, with Commercial Air Transport aircraft being slow and less manoeuvrable.	Yes	10
Comments: Simple, minimalistic and connected for CAT				
DP10	Create a known traffic environment	There is an increased risk on busy days to Commercial Air Transport due to the large number of aircraft operating outside controlled airspace due to the increased separation requirements against unknown, potentially non-transponding traffic.	Yes	11
Comments: Any such area must be as small as is comparable with flight safety				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP11	Designs should consider areas of local tranquillity	Airspace change and management can impact on the natural environment, and on people's experience of the natural environment. Visitors seek these natural and peaceful surroundings to escape the impacts of urbanisation, including increased aviation traffic and resultant noise.	Yes	16
Comments: Where realistically possible				
DP12	Accommodate traffic with limited/no Radio Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a radio capability should be considered.	Yes	12
Comments: Notification by telephone to ACT with approximate route / timings or shepherd a/c				
DP13	Accommodate traffic without Transponder Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a transponder capability should be considered.	Yes	13
Comments: Notification by telephone to ACT with approximate route / timings or shepherd a/c				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP14	Any new CAS should be proportionate to the requirement	Any new controlled airspace should be no bigger than required to ensure safety is not compromised for all airspace users.	Yes	5
Comments: Simple, minimalistic, connected are the key factors				
DP15	Any new airspace should use the minimum categorisation necessary	All categories of airspace should be considered so that the least restrictive categorisation of airspace necessary to ensure safety is not compromised for all airspace users.	Yes	6
Comments: Simple, minimalistic, connected are the key factors				
DP16	Any new airspace should be as uncomplicated as possible	The design of any new airspace should not be so complex that it will lead to more infractions from other airspace users.	Yes	4
Comments: Simple, minimalistic, connected are the key factors				

Table 1 – Design Principle Prioritisation

If there are any other areas of concern that you feel have not been considered, please provide additional comments below.
Comments: We found this document unwieldy to handle due to its structure and layout. We feel that it would have been greatly improved if it had been grouped into relevant sections, such as CAT considerations, GA considerations, Environmental etc. We feel that it would have been easier to examine the Design Principles within that context, unless of course there was a particular design of which we are not aware of? Please accept this comment in the spirit of improvement in which it is offered.
Are there other Design Principles not included in the list that you feel should be considered as candidates for the final shortlist? If so, please provide your comments.
Comments: We consider the Design Principles cover the relevant areas.

Table 2 – Additional Comments

Exeter Airport Airspace Change Proposal

Design Principles – Stakeholder Review

Exeter Airport Response

Date: 22nd July 2019
Revision: Issue 2
Document Ref: 71189 019

Document Details

Reference	Description
Document Title	Exeter Airport Airspace Change Proposal
	Design Principles – Stakeholder Review
Document Ref	71189 019
Issue	Issue 2
Date	22nd July 2019
Client Name	Exeter & Devon Airport Ltd

Issue	Amendment	Date
Issue 1	Initial	5th July 2019
Issue 2	Updated	22nd July 2019

Table of Contents

Table of Tables

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. The responses we have received have helped us to derive a comprehensive list of potential Design Principles that reflect the statements made during focus group events and from questionnaires received. As with any engagement activity, it should be noted that opposing views were expressed by stakeholders in a number of areas.

The Design Principles will be used as the qualitative framework against which the alternative design options will be considered. It is therefore important that your views have been accurately captured. This document has been prepared to share the list of Design Principles developed and we now need your help to provide further comments on the list and to help us understand which Design Principles are most important to you or your organisations.

Any changes to airspace arrangements must maintain or enhance safety. This is the main priority of the CAA in accordance with its statutory duties set out in Section 70(1) of the Transport Act 2000. The principle area of concern regarding current operations for Exeter Airport is the limited protection currently afforded to Commercial Air Transport flying final approach and initial departure routes from the airport. Safety is the main driver for change for this Airspace Change Proposal and as such, has not been included as a Design Principle, but will be the overarching principle against which the design options will be developed.

1.2 Stakeholder Review Requirements

Please take a look at the attached Design Principles in Table 1 below. For each of the Design Principle listed we would like you to state whether or not you agree that the statement constitutes a Design Principle. If you do not agree, please provide detail in the comment box provided.

In addition, we would like you to rank the Design Principles according to the priority of you or your organisation. Please rank the Design Principles from 1 (Highest priority) to 16 (Lowest priority). If you feel any of the Design Principles are not applicable to you, please mark it as '0'. Please add any amplifying comments you wish to include, also in the comments box.

Please complete Table 2 to provide any additional comments if there any areas of concern that you feel have not been considered or to suggest any additional Design Principles you feel ought to be considered by Exeter Airport.

1.3 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 Design Principle or 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 2nd August 2019.

1.4 Next Steps

The development of Design Principles will mark the completion of Stage 1 (Define Stage) of the Exeter Airport Airspace Change Proposal. The response you now provide will help us to refine the Design Principles ahead of the CAA DEFINE Gateway.

Passing through the CAA DEFINE Gateway will then allow us to commence detailed airspace design work. Further engagement activities will take place during this time to seek your views on the designs developed ahead of the DEVELOP and ASSESS Gateway currently planned for late November. It is anticipated that the formal consultation will be conducted between March and July 2020. Exeter Airport will ensure any views expressed through this earlier engagement activity will also be recorded to inform the full consultation report.

2 Review of Design Principles – Exeter Airport

2.1 Your Responses

Please complete Table 1 and Table 2 below in line with the information provided in Section 1. Please use as much space as you require, the size of the response box will expand as you type your response.

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP1	Any new airspace should not restrict flying operations in or around the airspace	The lateral or vertical (including base heights) of any new airspace should not jeopardise the safe operation of all types of aviation traffic.		6
Comments:				
DP2	Airspace should be designed to minimise the impact of noise	One of the Government's key environmental objectives is to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise.		14
Comments:				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP3	Any new airspace should not create funnelling or choke points for other airspace users	Airspace should allow transit aircraft to safely bypass without creating bottlenecks or pinch points over geographical features or high ground that could create a greater environmental impact of noise or increasing the danger of a mid-air collision.		9
Comments:				
DP4	Airspace should connect to the airways structure to protect Commercial Air Transport	Commercial Air Transport should remain inside Controlled Airspace at all times during arrival at and departure from Exeter Airport. This protection will lower the risk to commercial operations, whilst introducing predictability of tracks therefore reducing track miles flown and minimising emissions.		3
Comments:				
DP5	Any new airspace should use the minimum volume necessary	The volume of new airspace should be the minimum volume consistent with safe and efficient air traffic operations and not block the transit of other aviation traffic.		15

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments:				
DP6	Any new airspace should facilitate continuous climb and descent profiles	Steeper and continuous climbs and descents will introduce environmental as well as flight efficiency benefits. The impact of noise on communities will be reduced and will also allow the execution of an optimal flight profile for aircraft, leading to a benefit in fuel use and emissions. Routes will become more consistent and predictable which could lead to a minimisation of controlled airspace footprint.		4
Comments:				
DP7	Any new airspace should allow equitable access to all airspace users	Any regulatory change or airspace amendment must continue to facilitate access to the airspace for all aviation users and to implement airspace that will work for everyone.		10
Comments:				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP8	Consider the Flexible Use of Airspace	Any proposal for a revised airspace structure should be adaptable to minimise the impact on other aviation operators. Only having airspace activated in accordance with requirements is encouraged, providing flexibility for the access of other aviation.		7
Comments:				
DP9	New airspace should protect critical stages of flight	The final approach is the most critical portion of flight, with Commercial Air Transport aircraft being slow and less manoeuvrable.		2
Comments:				
DP10	Create a known traffic environment	There is an increased risk on busy days to Commercial Air Transport due to the large number of aircraft operating outside controlled airspace due to the increased separation requirements against unknown, potentially non-transponding traffic.		1
Comments:				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP11	Designs should consider areas of local tranquillity	Airspace change and management can impact on the natural environment, and on people's experience of the natural environment. Visitors seek these natural and peaceful surroundings to escape the impacts of urbanisation, including increased aviation traffic and resultant noise.		13
Comments:				
DP12	Accommodate traffic with limited/no Radio Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a radio capability should be considered.		12
Comments:				
DP13	Accommodate traffic without Transponder Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a transponder capability should be considered.		11
Comments:				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP14	Any new CAS should be proportionate to the requirement	Any new controlled airspace should be no bigger than required to ensure safety is not compromised for all airspace users.		8
Comments:				
DP15	Any new airspace should use the minimum categorisation necessary	All categories of airspace should be considered so that the least restrictive categorisation of airspace necessary to ensure safety is not compromised for all airspace users.		16
Comments:				
DP16	Any new airspace should be as uncomplicated as possible	The design of any new airspace should not be so complex that it will lead to more infractions from other airspace users.		5
Comments:				

Table 1 – Design Principle Prioritisation

If there are any other areas of concern that you feel have not been considered, please provide additional comments below.
Comments:
Are there other Design Principles not included in the list that you feel should be considered as candidates for the final shortlist? If so, please provide your comments.
Comments:

Table 2 – Additional Comments

Exeter Airport Airspace Change Proposal

Design Principles – Stakeholder Review

Response to this Design Principles Stakeholder Review by the British Gliding Association represented by Bath Wilts and North Dorset Gliding Club. July 2019.

Our comments are included in the section "Review of Design Principles" and this document is saved as a revised version of the EDAL 5th July document, and its revised edition 2, as requested in the submission instructions.

We wish to emphasise that The Devon and Somerset Gliding Club (DSGC) has its own very specific issues with the proposed ACP and will respond in its own right as an affected party. We strongly support its needs and comments as submitted.

Document Details

Reference	Description
Document Title	Exeter Airport Airspace Change Proposal
	Design Principles – Stakeholder Review
Document Ref	71189 019
Issue	Issue 1
Date	5th July 2019
Client Name	Exeter & Devon Airport Ltd

Issue	Amendment	Date
Issue 1	Initial	5th July 2019

Table of Contents

Table of Tables

1 Exeter Airport Airspace Change Proposal

1.1 Introduction

Thank you very much for responding to our Design Principles Questionnaire or for attending a focus group event. We are very grateful for everybody's engagement with the process and for all of the views expressed by the various representative bodies and individuals. The responses received in the questionnaires and the discussions during the focus groups have helped us to derive a comprehensive list of potential Design Principles that reflect the statements made during these events. As with any engagement activity, it should be noted that opposing views were expressed by stakeholders in a number of areas.

The Design Principles will be used as the qualitative framework against which the alternative design options will be considered. It is therefore important that your views have been accurately captured. This document has been prepared to share the list of Design Principles developed and we now need your help to provide further comments on the list and to help us understand which Design Principles are most important to you or your organisations.

Any changes to airspace arrangements must maintain or enhance safety. This is the main priority of the CAA in accordance with its statutory duties set out in Section 70(1) of the Transport Act 2000. The principle area of concern regarding current operations for Exeter Airport is the limited protection currently afforded to Commercial Air Transport flying final approach and initial departure routes from the airport. Safety is the main driver for change for this Airspace Change Proposal and as such, has not been included as a Design Principle, but will be the overarching principle against which the design options will be developed.

1.2 Stakeholder Review Requirements

Please take a look at the attached Design Principles in Table 1 below. For each of the Design Principle listed we would like you to state whether or not you agree that the statement constitutes a Design Principle. If you do not agree, please provide detail in the comment box provided.

In addition, we would like you to rank the Design Principles according to the priority of you or your organisation. Please rank the Design Principles from 1 (Highest priority) to 16 (Lowest priority). If you feel any of the Design Principles are not applicable to you, please mark it as '0'. Please add any amplifying comments you wish to include, also in the comments box.

Please complete Table 2 to provide any additional comments if there any areas of concern that you feel have not been considered or to suggest any additional Design Principles you feel ought to be considered by Exeter Airport.

1.3 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 Design Principle or 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 26th July 2019.

1.4 Next Steps

The development of Design Principles will mark the completion of Stage 1 (Define Stage) of the Exeter Airport Airspace Change Proposal. The response you now provide will help us to refine the Design Principles ahead of the CAA DEFINE Gateway scheduled for Friday 30th August 2019.

Passing through the CAA DEFINE Gateway will then allow us to commence detailed airspace design work. Further engagement activities will take place during this time to seek your views on the designs developed ahead of the DEVELOP and ASSESS Gateway currently planned for late November. It is anticipated that the formal consultation will be conducted between March and July 2020. Exeter Airport will ensure any views expressed through this earlier engagement activity will also be recorded to inform the full consultation report.

2 Review of Design Principles

2.1 Your Responses

Please complete Table 1 and Table 2 below in line with the information provided in Section 1. Please use as much space as you require, the size of the response box will expand as you type your response.

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP1	Any new airspace should not restrict flying operations in or around the airspace	The lateral or vertical (including base heights) of any new airspace should not jeopardise the safe operation of all types of aviation traffic.	Yes	1
Comments: Neither should any new airspace design unduly reduce the amenity and access to airspace currently available to non EDAL GA air traffic.				
DP2	Airspace should be designed to minimise the impact of noise	One of the Government's key environmental objectives is to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise.		10

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments: Consequential noise impacts arising from newly constrained air traffic outside of controlled airspace should be considered as a consequence of any CAS design proposed, and treated as a direct consequence of any new airspace design.				
DP3	Any new airspace should not create funnelling or choke points for other airspace users	Airspace should allow transit aircraft to safely bypass without creating bottlenecks or pinch points over geographical features or high ground that could create a greater environmental impact of noise or increasing the danger of a mid-air collision.	Yes	1
Comments: This applies not just to high ground and geographical features but also to the creation of bottlenecks above, below or adjacent to any new airspace structures. Neither should any new airspace design unduly reduce the amenity and access to airspace currently available non EDAL GA air traffic.				
DP4	Airspace should connect to the airways structure to protect Commercial Air Transport	Commercial Air Transport should remain inside Controlled Airspace at all times during arrival at and departure from Exeter Airport. This protection will lower the risk to commercial operations, whilst introducing predictability of tracks therefore reducing track miles flown and minimising emissions.	Yes	5

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments: GA traffic is generally less concerned about air traffic above 6000ft so connectivity is less important to it above those heights. Connectivity should therefore be designed in at the highest possible altitude, so leaving the lower airspace easily available to non EDAL GA traffic.				
DP5	Any new airspace should use the minimum volume necessary	The volume of new airspace should be the minimum volume consistent with safe and efficient air traffic operations and not block the transit of other aviation traffic.	Yes	1
Comments: The 2016 design proposed by EDAL for its ACP should <u>not</u> be taken as the template for this 2019 design exercise. It was excessively large and took little account of the needs of pre-existing airspace users. Any new design should occupy the lowest possible volume, especially at lower levels where GA traffic predominates. We understand that retaining current RNAV approaches would require significantly larger airspace volumes when compared with using more modern profiles being adopted across Europe. **The draft design principle refers to not "blocking" the transit of other traffic. Specifically we propose that the transit of non EDAL GA traffic (including non radio and non transponding) should not be impeded by any new controlled airspace.**				
DP6	Any new airspace should facilitate continuous climb and descent profiles	Steeper and continuous climbs and descents will introduce environmental as well as flight efficiency benefits. The impact of noise on communities will be reduced and will also allow the execution of an optimal flight profile for aircraft, leading to a benefit in fuel use and emissions. Routes will become more consistent and predictable which could lead to a minimisation of controlled airspace footprint.	Yes	1

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments: We understand that such practices will be mandatory in the foreseeable future, and question the need stated by EDAL in its Design Principles consultation to encapsulate all previously used flight profiles in its design. This ACP process should be treated as an opportunity for a ground-up review and redesign taking account of EDAL's future needs. Cost cutting by not exploring such options will be opposed by those affected as the potential for negative impacts is high.				
DP7	Any new airspace should allow equitable access to all airspace users	Any regulatory change or airspace amendment must continue to facilitate access to the airspace for all aviation users and to implement airspace that will work for everyone.	Yes	1
Comments: It should also retain the ability of those not wishing to make use of EDAL's services to operate without restriction in Class G airspace with minimal change from the existing situation. There must also be a permanent and binding commitment by EDAL to resourcing the control of any new airspace to enable optimal access by all who may wish to use it. We currently see Bristol and Cardiff refusing access to airspace citing a shortage of resources to manage flights. This is entirely unacceptable and not within the terms on which controlled airspace was created.				
DP8	Consider the Flexible Use of Airspace	Any proposal for a revised airspace structure should be adaptable to minimise the impact on other aviation operators. Only having airspace activated in accordance with requirements is encouraged, providing flexibility for the access of other aviation.	Yes	1

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments: The use of the term "other" here when referring to non EDAL operations appears clumsy and exclusive. You are referring to non EDAL traffic and should say so. **The use of flexible airspace as employed on the continent of Europe was ignored and discounted in the 2016 Exeter ACP. It should be properly researched and evaluated as a way of bringing the needs of all airspace users to the debate and of generating equitable and workable solutions. Innovative solutions must be considered and properly researched with affected parties.**				
DP9	New airspace should protect critical stages of flight	The final approach is the most critical portion of flight, with Commercial Air Transport aircraft being slow and less manoeuvrable.	Yes	1
Comments: We question the term "slow" for CAT traffic. It is generally much faster than most GA traffic. **It is recognised that manoeuvrability of airliners in tightly controlled corridors is limited. It is questionable to us how EDAL allowed its business to grow in class G airspace to a point where it routinely flies commercial aircraft requiring such precise conditions and the exclusion of other traffic. Its commercial ambitions should not be the cause of significant loss of freedoms for non EDAL traffic and operations. If necessary EDAL should seek to protect its final approach and climb out paths using the minimum volumes of airspace, and to keep such paths as high and narrow as possible using new technology and methodologies, and in co-operation with non EDAL users.**				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP10	Create a known traffic environment	There is an increased risk on busy days to Commercial Air Transport due to the large number of aircraft operating outside controlled airspace due to the increased separation requirements against unknown, potentially non-transponding traffic.	Yes	5
Comments: The risk is both *to* and *from* EDAL traffic. As before, the design should be of the minimum size, categorisation and duration. A design as simple as an RMZ should not be discounted. EDAL clearly seeks to improve the safety and commercial success of its own operations, but it must not be achieved by reducing the safety, amenity and business prospects of its neighbours.				
DP11	Designs should consider areas of local tranquillity	Airspace change and management can impact on the natural environment, and on people's experience of the natural environment. Visitors seek these natural and peaceful surroundings to escape the impacts of urbanisation, including increased aviation traffic and resultant noise.		0
Comments:				
DP12	Accommodate traffic with limited/no Radio Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a radio capability should be considered.	Yes	1

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments: The term "considered" is too neutral and could easily lead to these matters being discounted. We propose that it should be "mandatory", not "considered".				
DP13	Accommodate traffic without Transponder Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a transponder capability should be considered.	Yes	1
Comments: The term "considered" is too neutral and could easily lead to these matters being discounted. We propose that it should be "mandatory", not "considered".				
DP14	Any new CAS should be proportionate to the requirement	Any new controlled airspace should be no bigger than required to ensure safety is not compromised for all airspace users.	Yes	1
Comments: Safety of non EDAL traffic is not the only consideration. Any new airspace design should not unduly reduce the amenity and access currently available to non EDAL air traffic, especially to GA traffic not wishing to use CAS.				
DP15	Any new airspace should use the minimum categorisation necessary	All categories of airspace should be considered so that the least restrictive categorisation of airspace necessary to ensure safety is not compromised for all airspace users.	Yes	1

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments: The justification comment as written does not make sense. It should preferably say "should be proposed" between "airspace" and "necessary". **Safety is not the only consideration. Any new airspace design should not unduly reduce the amenity and access currently available to non EDAL air traffic.**				
DP16	Any new airspace should be as uncomplicated as possible	The design of any new airspace should not be so complex that it will lead to more infractions from other airspace users.	Yes	4
Comments: Boundaries should be logical, obvious and aligned with ground features wherever possible.				

Table 1 – Design Principle Prioritisation

Do you agree that the list of Design Principles captures the specific areas of concern you have articulated in either a questionnaire or during participation in one of the focus groups?
Comments: As modified above, yes, but <u>not as written</u> in the version submitted to consultees herewith or at issue 2.
Are there other Design Principles not included in the list that you feel should be considered as candidates for the final shortlist? If so, please provide your comments.

Comments:

The BGA has a set of principles that inform its response to consultations such as this EDAL one. For completeness these are listed below. We propose them as important principles to be taken into account as the EDAL ACP is developed.

BGA ACP Principles

- An assumption that GA including sporting and recreational aviation is entitled to continued safe use of airspace and that commercial aviation does not have a right to limit airspace access
- Sponsors must show how they are integrating their proposal within the overall UK airspace modernisation context (for example, proposals which do not connect efficiently between upper and lower airspace (potentially under different airspace "management") would only inhibit overall airspace efficiency and therefore not receive our support)
- Reiteration that the UK airspace's default classification is G
- Reiteration that Class E airspace default is without the addition of a TMZ or RMZ
- Expectation that data used, particularly forecasts, will be verifiable including details of any and all assumptions
- Proper validation of forecast traffic levels
- Proper analysis of overall airspace safety changes, ie based on modelling and evidence rather than purely subjective opinion.
- Minimum size of controlled airspace
- Steeper and continuous climbs and descents for cost and environmental benefits as well as minimisation of CAS footprint
- Use of Class E airspace as an alternative to class A, C or D airspace
- Optimisation of the development work above and below the 8,000ft NATS en-route split.
- Flexible use of airspace including interoperability with existing e-conspicuity, eg FLARM and PilotAware
- Efficient consultation

Table 2 –

FASI South Considerations

We are aware that a major exercise is taking place to re-plan the airspace in the southern UK. We are participating in other ACP consultation at a number of airports across the region and with NATS in its re-planning exercise for the upper airspace.

It is somewhat surprising that Exeter Airport appears not to be a participant in the grouping of 16 airports, including Southampton and Bristol, who are working on plans. Please clarify what plans EDAL has to integrate with the work of these other airports. It seems obvious that there could be advantages in combining with others to ensure that the most efficient design is produced for the region.

Dartmoor National Park Authority, Parke, Bovey Tracey, Newton Abbot, Devon TQ13 9JQ. T: 01626 832093 E: hq@dartmoor.gov.uk

Sent by email: acpexeterenquiries@exeter-airport.co.uk

Direct Line: 01626831018

2nd August 2019

Dear [redacted]

Dartmoor National Park Authority (DNPA) has become aware of the Exeter airport airspace change proposal. We believe that this change has the potential to effect Dartmoor National Park and the reasons for which it has been designated. We would appreciate if you could include the Authority in any future consultation regarding these proposals.

DNPA is the public body responsible for ensuring the conservation and enhancement of Dartmoor National Park. The Authority has two statutory purposes:

1. to conserve and enhance the natural beauty, wildlife and cultural heritage of the area
2. to promote opportunities for the understanding and enjoyment of the parks' special qualities by the public.

Pursuant to s11a of the 1949 National Parks and Access to the Countryside Act a statutory duty is also placed on all relevant authorities to have regard to National Park purposes when exercising or performing functions in relation to, or so as to affect, land within these areas. Defra have produced guidance for complying with this duty, it is available online:

https://webarchive.nationalarchives.gov.uk/20130402204840/http://archive.defra.gov.uk/rural/documents/protected/npaonb-duties-guide.pdf

Civil Aviation Authorities (CAAs) are specifically listed as one of the key relevant authorities to whom the above duty applies.

Tranquillity

Tranquillity is one of Dartmoor National Park's special qualities for which it is designated. It is our responsibility to ensure that tranquillity is conserved and enhanced. We therefore support the inclusion of tranquillity in the design principles, but would query what is meant by 'local areas of tranquillity'. Any air space changes should ensure that the National Park's tranquillity is conserved and enhanced.

Tranquillity is subjective and relative: whether a place feels tranquil will feel different for everyone, however there are common characteristics which have been identified through consultation and research which can help refine your understanding. We recommend that CPRE's research and associated mapping be used to identify places of relative tranquillity. This is available online:

https://www.cpre.org.uk/what-we-do/countryside/tranquil-places

The definition DNPA use in the emerging Local Plan is consistent with CPRE's research and is provided below:

> *"Tranquillity can be understood as being made up of a variety of sounds and experiences which help people find peace and a sense of well-being within the landscape. Most commonly these factors include:*
> - *feeling close to nature and wildlife*
> - *feeling solitude and remoteness*
> - *hearing natural sounds*
> - *seeing unspoilt natural beauty"*

Air Quality

Exeter airport and the CAA should also consider the air quality impacts that emissions associated with air travel have, not only on human health, but also the designated wildlife sites in the vicinity of Exeter airport. Dartmoor National Park includes three internationally important wildlife sites Dartmoor, South Dartmoor Woods and South Hams Special Areas of Conservation (SAC).

All of these sites are known to be under pressure from nitrogen deposition, which is where nitrogen oxides emitted from the combustion of fossil fuels are absorbed by precipitation (rain, fog and snow) and transported to the earth's surface and deposited as Nitrogen (N). Nitrogen (N) is a major growth nutrient required by all plants for growth. It is absorbed by vascular plants mainly through the roots and by lichens and bryophytes in gaseous form through the plant's surface. N deposition has the greatest impacts on bryophytes and on plant communities characterised by slow-growing, small or low-growing species which are typically found in Dartmoor's rare and valued habitats. When exposed to high N concentrations slow growing species are easily outcompeted for light or other limited resources by more vigorous species (often grasses) able to exploit increased N made available by N deposition.

N deposition is attributable to various sources, including emissions of ammonia from livestock, international shipping, road and air transport, and imported emissions. Further information and data on nitrogen deposition is available on the Air Pollution Information System website:

http://www.apis.ac.uk/

There is the potential for a change in Exeter airport's air space to have an impact on the N deposition experienced on Dartmoor's and other designated wildlife sites in the vicinity of Exeter airport. The JNCC list vulnerabilities for European wildlife sites, air pollution is already identified as having a high negative effect on the Dartmoor and South Dartmoor Woods SACs which are within the area potentially affected by these proposals. The Conservation of Habitats and Species Regulations 2017 put a duty on public bodies to have regard to the protection of these areas in the exercise of any of their functions. Where there is the potential for likely significant effects on a European wildlife site, either within the National Park or within another authority, a Habitat Regulations Assessment (HRA) would be required. We therefore believe air quality and its impact on designated wildlife sites should form a design principle for these proposals.

I trust the above is clear and of assistance. Should you require any further information, please do not hesitate to contact me.

Yours faithfully

[redacted]

Forward Planner
Dartmoor National Park Authority

[redacted]

1 Review of Design Principles – Responses of Devon and Somerset Gliding Club (DSGC) at North Hill Airfield.

1.1 Your Responses

Please complete Table 1 and Table 2 below in line with the information provided in Section 1. Please use as much space as you require, the size of the response box will expand as you type your response.

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP1	Any new airspace should not restrict flying operations in or around the airspace	The lateral or vertical (including base heights) of any new airspace should not jeopardise the safe operation of all types of aviation traffic.	Yes	1
DSGC Comments on DP1: **DSGC agrees that critical stages of flight should be protected. EDAL should seek to protect the final approach and climb out paths, using the minimum volumes of uncomplicated airspace to keep such paths as high and narrow as possible, using new technology and methodologies, whilst taking account of non-EDAL aviation users needs.**				
DP2	Airspace should be designed to minimise the impact of noise	One of the Government's key environmental objectives is to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise.	Yes	14

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DSGC Comments on DP 2: **(1) If CAS is proposed to be introduced beyond the critical stages of flight, this Design Principle can be achieved by use of multiple PBN routes as highlighted in the Airspace Modernisation Strategy (AMS) paragraphs 4.24 – 4.30. This permits noise to be dispersed/'shared'.** **(2) Within Exeter's low-altitude CAT footprint (up to 7000 feet), its transit heights in relation to population centres, and its relatively low traffic volumes, have little noise impact. For this reason DSGC does not consider the issue of noise to be a high priority.** **(3) EDAL should be aware that by the introduction of new CAS beyond the critical stages of flight, new flight patterns for non-EDAL GA traffic are likely to be created with new noise impacts.**				
DP3	Any new airspace should not create funnelling or choke points for other airspace users	Airspace should allow transit aircraft to safely bypass without creating bottlenecks or pinch points over geographical features or high ground that could create a greater environmental impact of noise or increasing the danger of a mid-air collision.	Yes	1
DSGC Comments on DP3: **(1) EDAL should be aware that any reduction in the height available to non-EDAL aviation traffic, and particularly gliders, outside the area of critical stages of flight, significantly reduces both the safety and amenity of existing glider activities.** **(2) DSGC is concerned that funnelling and choke points, both laterally and vertically, is a significant safety issue and will increase noise in those areas**				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP4	Airspace should connect to the airways structure to protect Commercial Air Transport	Commercial Air Transport should remain inside Controlled Airspace at all times during arrival at and departure from Exeter Airport. This protection will lower the risk to commercial operations, whilst introducing predictability of tracks therefore reducing track miles flown and minimising emissions.	Yes	12
DSGC Comments on DP4: **It is the view of DSGC that a MATZ-style ATZ would provide the level of protection for CAT appropriate to the existing identified problems, without undue impact on other aviation stakeholders.**				
DP5	Any new airspace should use the minimum volume necessary	The volume of new airspace should be the minimum volume consistent with safe and efficient air traffic operations and not block the transit of other aviation traffic.	Yes	1
DSGC Comments on DP5: **The previously proposed 2017 ACP design was clearly unrealistic in the volume and complexity, DSGC request that any new airspace design will be more compatible with the needs of other aviation users.**				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP6	Any new airspace should facilitate continuous climb and descent profiles	Steeper and continuous climbs and descents will introduce environmental as well as flight efficiency benefits. The impact of noise on communities will be reduced and will also allow the execution of an optimal flight profile for aircraft, leading to a benefit in fuel use and emissions. Routes will become more consistent and predictable which could lead to a minimisation of controlled airspace footprint.	Yes	12
DSGC Comments on DP6: **1. Unless the change sponsor is proposing to seek a massive footprint of CAS similar to the 2017 ACP which was refused, then it is understood that these CDAs and CCDs would need to be facilitated by new designated IFPs (in particular, the introduction of SIDs and STARs) within CAS. This would imply changes to comparatively ad hoc current routing arrangements arising from tactical intervention, which results in a wide dispersion of flight tracks.** **2. The above Rationale for DP6 states *"Routes will become more consistent and predictable which could lead to a minimisation of controlled airspace footprint".* This clearly indicates some adjustment of the routing of CAT.** **3. Routing changes were not included in the Statement of Need, were not mentioned as required in the Notes of the CAA Assessment Meeting, and new IAPs have been (initially at least) ruled out by paragraph 3.3 of Design Principles Questionnaire.** **4. DSGC is therefore unclear how CDAs and CCDs can be introduced within the terms of the Statement of Need without replicating the 2017 ACP - which was unacceptable.**			
DP7	Any new airspace should allow equitable access to all airspace users	Any regulatory change or airspace amendment must continue to facilitate access to the airspace for all aviation users and to implement airspace that will work for everyone.	Yes	1

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DSGC Comments on DP7: **DSGC believes this design principle is fundamental to any airspace change.**				
DP8	Consider the Flexible Use of Airspace	Any proposal for a revised airspace structure should be adaptable to minimise the impact on other aviation operators. Only having airspace activated in accordance with requirements is encouraged, providing flexibility for the access of other aviation.	Yes	1
DSGC Comments on DP8: **1. It should be noted that the Report of The Lord Kirkhope Inquiry into Airspace change for the All Party Parliamentary Group has recommended the CAA should implement a more flexible approach to airspace design, including for example the power of 'turning on and off' Airspace depending on the time of day and the time of year.** **2. This recommendation from the Inquiry effectively gives endorsement to DSGC's proposal for FUA set out in its written response to the Design Principles Questionnaire, as submitted in May 2019.** **3. The word "Consider" in Design Principle 8 should be removed.**				
DP9	New airspace should protect critical stages of flight	The final approach is the most critical portion of flight, with Commercial Air Transport aircraft being slow and less manoeuvrable.	Yes	1

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DSGC Comments on DP9: **DSGC agrees that critical stages of flight should be protected. EDAL should seek to protect the final approach and climb out paths, using the minimum volumes of uncomplicated airspace to keep such paths as high and narrow as possible, using new technology and methodologies, whilst taking account of non-EDAL aviation users needs.**				
DP10	Create a known traffic environment	There is an increased risk on busy days to Commercial Air Transport due to the large number of aircraft operating outside controlled airspace due to the increased separation requirements against unknown, potentially non-transponding traffic.	Yes	16
DSGC Comments on DP10: **DSGC agrees that critical stages of flight should be protected. EDAL should seek to protect the final approach and climb out paths, using the minimum volumes of uncomplicated airspace to keep such paths as high and narrow as possible, using new technology and methodologies, whilst taking account of non-EDAL aviation users needs.**				
DP11	Designs should consider areas of local tranquillity	Airspace change and management can impact on the natural environment, and on people's experience of the natural environment. Visitors seek these natural and peaceful surroundings to escape the impacts of urbanisation, including increased aviation traffic and resultant noise.	Yes	16
DSGC Comments on DP 11: **Within Exeter's low-altitude (up to 7000 feet) CAT footprint, its transit heights in relation to population centres, and its relatively low traffic volumes, have little noise impact.**				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP12	Accommodate traffic with limited/no Radio Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a radio capability should be considered.	Yes	1
DSGC Comments on DP12: **The ability for non-EDAL aircraft to continue to operate in the local area without the necessity to rely on a radio capability should be fundamental to an airspace design change.**				
DP13	Accommodate traffic without Transponder Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a transponder capability should be considered.	Yes	1
DSGC Comments on DP13: **The ability for non-EDAL aircraft to continue to operate in the local area without the necessity to rely on a transponder capability should be fundamental to an airspace design change.**				
DP14	Any new CAS should be proportionate to the requirement	Any new controlled airspace should be no bigger than required to ensure safety is not compromised for all airspace users.	Yes	1
DSGC Comments on DP14: **The previously proposed 2017 ACP design was clearly unrealistic in the volume and complexity, DSGC request that any new airspace design will be more compatible with the needs of other aviation users.**				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP15	Any new airspace should use the minimum categorisation necessary	All categories of airspace should be considered so that the least restrictive categorisation of airspace necessary to ensure safety is not compromised for all airspace users.	Yes	1
DSGC Comments on DP15: **The previously proposed 2017 ACP design was clearly unrealistic in the volume and complexity, DSGC request that any new airspace design will be more compatible with the needs of other aviation users.**				
DP16	Any new airspace should be as uncomplicated as possible	The design of any new airspace should not be so complex that it will lead to more infractions from other airspace users.	Yes	1
DSGC Comments on DP16: **The previously proposed 2017 ACP design airspace was very complicated in terms of base heights. The number of different areas and the differing step heights cause a major problem to those operating outside of the airspace, increasing the likelihood of infringement., DSGC request that any new airspace design will be more compatible with the needs of other aviation users.**				

Table 1 – Design Principle Prioritisation

Do you agree that the list of Design Principles captures the specific areas of concern you have articulated in either a questionnaire or during participation in one of the focus groups?
Comments: Yes, provided our comments are read in conjunction with these Design Principles and the Rationale.

Are there other Design Principles not included in the list that you feel should be considered as candidates for the final shortlist? If so, please provide your comments.

Comments:

DSGC believes that from the viewpoint of aviation stakeholders, the principles which should guide any changes proposed to local airspace are set out in the appropriate legislative and industry guidance, as highlighted below. These principles should therefore guide the development and assessment of options.

1. **The statutory framework:** the established hierarchy of principles and priorities set out in the Transport Act 2000 Section 70, including footnotes 1 – 3. (See https://www.caa.co.uk/Commercial-industry/Airspace/Airspace-change/Legislative-framework-to-airspace-change/) .
2. Compliance with all other statutory and CAA guidance on changes to and the modernisation of airspace, including and subject to the following provisions.
3. "The principle that the least restrictive categorisation of airspace should be the norm in UK airspace design, with more restrictive classifications only being established where necessary when the safety need is clearly demonstrated". (Taken from SARG's Policy Statement dated 14 August 2015 for Radio Mandatory Zones and Transponder Mandatory Zones, paragraph 1.2).
4. "Any airspace design is to use the minimum volume of CAS, consistent with safe and efficient air traffic operations". (So as to comply with the relevant Airspace Modernisation Strategy Objective/parameter, see AMS page 23).
5. "Airspace developments at lower altitudes must…consider the need to safely integrate other airspace users within the airport vicinity, including General Aviation…" (AMS paragraph 4.24) with the related principle that "airspace modernisation should satisfy the requirements of operators and owners of all classes of aircraft across the commercial, General Aviation and military sectors". (AMS paragraph 3.5).
6. Additional Note: DSGC feels that airspace structures in terms of zones and CTAs should not be overly complicated. This principle appears to have had backing from NATS during the 2017 ACP process. [*"NATS raised concerns relating to the airspace design which was assessed as potentially complicating Air Traffic Management (ATM) arrangements in the area":* , quote from Consultations Report, Executive Summary: this was understood to relate to the number, size and varying bases of the CTAs].

Summary

The principles set out above enable a subsequent test to be applied to the preferred option which is proposed to form an ACP submission:

(a) Has the safety need for any change from the status quo been clearly demonstrated? (So as to comply with the SARG principle referred above).
(b) Do the proposals constitute the least restrictive categorisation of airspace required to meet the demonstrated need? (Ditto).
(c) In the event of a demonstrable need for controlled airspace, has the change sponsor clearly demonstrated that its proposal will…*"use the minimum volume of CAS, consistent with safe and efficient air traffic operations?"* (So as to comply with the relevant AMS Objective/parameter, see AMS page 23).

Ministry of Defence

Defence Airspace Air Traffic Management
Floor 1E
CAA, Aviation House,
Gatwick South
RH6 0YR
Telephone: [redacted]

Email: [redacted]

25 July 2019

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

MOD RESPONSE TO THE EXETER AIRSPACE CHANGE PROPOSAL – DESIGN PRINCIPLES STAKEHOLDER ENGAGEMENT DOCUMENT

Please see below the MOD response to your DP questionnaire.

As MOD do not comment on environmental or noise, I have removed these from the table. I believe that some of the DPs overlap, so in lieu of providing numerical priority, I have indicated whether I believe them to be a priority or not.

In the response submitted on 30 May, I highlighted detail of MOD operations that would need to be safeguarded. Furthermore, whilst I acknowledge that Exeter provide a vital service to MOD aircraft, I asked what you had based your figures on but have had no response. Can you confirm what you based your figures on?

It is imperative that MOD operations are not hindered as a result of any ACP. In this case, impact on RNAS Yeovilton is particularly relevant, however, as stated in the correspondence on 30 May, there are also multiple RW operations and other low level transits to consider. Furthermore, any changes to classification to airspace/delegated portions of N864 may have an impact on ATS provision at RNAS Yeovilton, Plymouth Mil and RAF(U) Swanwick. We would therefore request that: "There is minimised negative impact to MOD operations" is considered as a separate DP. The potential for LOAs can be addressed via this DP.

The MOD are keen to understand your views on the issues surrounding D012 and D013. I would invite you to please contact the MOD, via the DAATM at your earliest convenience.

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? YES/NO priority
DP1	Any new airspace should not restrict flying operations in or around the airspace	The lateral or vertical (including base heights) of any new airspace should not jeopardise the safe operation of all types of aviation traffic.	YES	YES

DP3	Any new airspace should not create funnelling or choke points for other airspace users	Airspace should allow transit aircraft to safely bypass without creating bottlenecks or pinch points over geographical features or high ground that could create a greater environmental impact of noise or increasing the danger of a mid-air collision.	YES	YES
DP4	Airspace should connect to the airways structure to protect Commercial Air Transport	Commercial Air Transport should remain inside Controlled Airspace at all times during arrival at and departure from Exeter Airport. This protection will lower the risk to commercial operations, whilst introducing predictability of tracks therefore reducing track miles flown and minimising emissions.	YES **partially**	NO
Comments: MOD cannot comment, before seeing design options, on whether the track miles will be reduced, with resulting lowering of emissions. It is acknowledged that this will introduce predictability. Lowering risk should not result in increased risk to other airspace users.				
DP5	Any new airspace should use the minimum volume necessary	The volume of new airspace should be the minimum volume consistent with safe and efficient air traffic operations and not block the transit of other aviation traffic.	YES	YES
Comments: Consideration to other ATS providers – specifically RNAS Yeovilton. Access to airspace users needs to be maintained – irrespective of size or classification of airspace.				
DP7	Any new airspace should allow equitable access to all airspace users	Any regulatory change or airspace amendment must continue to facilitate access to the airspace for all aviation users and to implement airspace that will work for everyone.	YES	YES
Comments: Specifics detailed in the response provided on 30 May. Current access to N864 needs to be preserved for Plymouth Mil Radar, RNAS Yeovilton and RAF(U) Swanwick.				
DP8	Consider the Flexible Use of Airspace	Any proposal for a revised airspace structure should be adaptable to minimise the impact on other aviation operators. Only having airspace activated in accordance with requirements is encouraged, providing flexibility for the access of other aviation.	YES	YES
DP9	New airspace should protect critical stages of flight	The final approach is the most critical portion of flight, with Commercial Air Transport aircraft being slow and less manoeuvrable.	YES	
Comments: Safety critical. Irrespective of type of aircraft. Potentially captured in the overall safety element which underpins any ACP. Hence no priority given.				

DP10	Create a known traffic environment	There is an increased risk on busy days to Commercial Air Transport due to the large number of aircraft operating outside controlled airspace due to the increased separation requirements against unknown, potentially non-transponding traffic.	Unsure	NO
Comments: The MOD are wholly supportive of interoperable electronic conspicuity. The results of the CAA's EC call for evidence has not yet been released. However, the MOD see interoperable electronic conspicuity as a key enabler for increasing UK airspace capacity. If this would limit classification of airspace options, then we would be hesitant to support this as a DP.				
DP12	Accommodate traffic with limited/no Radio Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a radio capability should be considered.	YES	YES
Comments: Further details in the survey response submitted on 30 May 19, there will be continued requirement for MOD RW activity ivo CTCRM Lympestone and Woodbury Common.				
DP13	Accommodate traffic without Transponder Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a transponder capability should be considered.	YES	NO
Comments: The MOD are wholly supportive of interoperable electronic conspicuity. The results of the CAA's EC call for evidence has not yet been released. However, the MOD see interoperable electronic conspicuity as a key enabler for increasing UK airspace capacity. We therefore would rate this DP as the lowest possible priority.				
DP14	Any new CAS should be proportionate to the requirement	Any new controlled airspace should be no bigger than required to ensure safety is not compromised for all airspace users.	YES	YES
DP15	Any new airspace should use the minimum categorisation necessary	All categories of airspace should be considered so that the least restrictive categorisation of airspace necessary to ensure safety is not compromised for all airspace users.	YES	YES
DP16	Any new airspace should be as uncomplicated as possible	The design of any new airspace should not be so complex that it will lead to more infractions from other airspace users.	YES	NO

If you have any questions, please do not hesitate to contact me. I would again request that ALL MOD interaction with respect to the ACP is done in the first instance, via the DAATM.

Yours sincerely

[redacted]

[redacted]
Squadron Leader
S02 Airspace Operations

National Trust

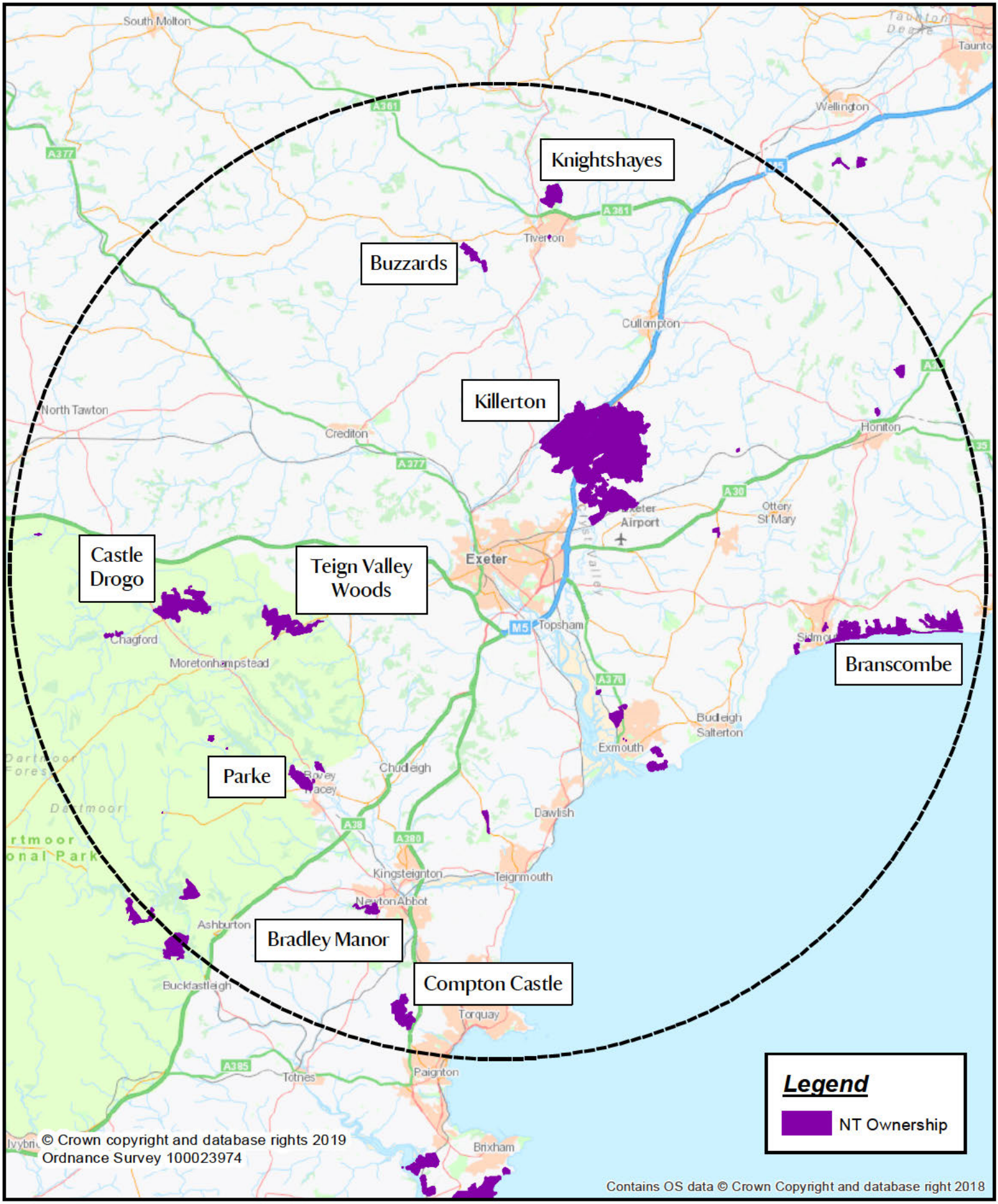
Exeter Airport Airspace Change

NT Environmentally Sensitive Areas

Scale: 1:300,000 @ A4
Grid Ref: 292,701 89,860
Date: 18/06/2019
Document Name: airspace expansion

South West: Exeter Consultancy Hub,
Killerton House, Broadclyst, Exeter EX5 3LE
Telephone 01392 881691

N



Date: 23 July 2019
Our ref: 288376
Your ref: Exeter Airport's Airspace Change project

[redacted]
Osprey Consultants Services

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY
acpexeterenquiries@exeter-airport.co.uk

Dea[redacted]

Planning consultation: Exeter Airport - Design Principles
Location: Exeter Airport, Exeter, Devon EX5 2BE

Thank you for your consultation on the above dated and received by Natural England on 08 July 2019.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

Sites of Special Scientific Interest Impact Risk Zones
The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

[redacted]
Consultations Team

Annex A – Additional advice

Natural England offers the following additional advice:

Landscape
Paragraph 170 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Landscape Institute Guidelines for Landscape and Visual Impact Assessment for further guidance.

Best and most versatile agricultural land and soils
Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 170 and 171). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in GOV.UK guidance

Agricultural Land Classification information is available on the Magic website on the Data.Gov.uk website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra *Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.*

Protected Species
Natural England has produced standing advice[1] to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Local sites and priority habitats and species
You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 171 and174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found here[2]. Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

[1] https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals
[2] http://webarchive nationalarchives.gov.uk/20140711133551/http:/www naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx

Ancient woodland, ancient and veteran trees
You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a SSSI or in exceptional circumstances.

Environmental enhancement
Development provides opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175). We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Access and Recreation
Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Rights of Way, Access land, Coastal access and National Trails
Paragraphs 98 and 170 of the NPPF highlights the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way, coastal access routes and coastal margin in the vicinity of the development and the scope to mitigate any adverse impacts. Consideration should also be given to the potential impacts on any nearby National Trails, including the England Coast Path. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer.

Biodiversity duty
Your authority has a duty to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available here.

Exeter Airport Airspace Change Proposal

Design Principles – Stakeholder Review

Flybe

Document Details

Reference	Description
Document Title	Exeter Airport Airspace Change Proposal
	Design Principles – Stakeholder Review
Document Ref	71189 019
Issue	Issue 2
Date	22nd July 2019
Client Name	Exeter & Devon Airport Ltd

Issue	Amendment	Date
Issue 1	Initial	5th July 2019
Issue 2	Updated	22nd July 2019

Table of Contents

Table of Tables

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. The responses we have received have helped us to derive a comprehensive list of potential Design Principles that reflect the statements made during focus group events and from questionnaires received. As with any engagement activity, it should be noted that opposing views were expressed by stakeholders in a number of areas.

The Design Principles will be used as the qualitative framework against which the alternative design options will be considered. It is therefore important that your views have been accurately captured. This document has been prepared to share the list of Design Principles developed and we now need your help to provide further comments on the list and to help us understand which Design Principles are most important to you or your organisations.

Any changes to airspace arrangements must maintain or enhance safety. This is the main priority of the CAA in accordance with its statutory duties set out in Section 70(1) of the Transport Act 2000. The principle area of concern regarding current operations for Exeter Airport is the limited protection currently afforded to Commercial Air Transport flying final approach and initial departure routes from the airport. Safety is the main driver for change for this Airspace Change Proposal and as such, has not been included as a Design Principle, but will be the overarching principle against which the design options will be developed.

1.2 Stakeholder Review Requirements

Please take a look at the attached Design Principles in Table 1 below. For each of the Design Principle listed we would like you to state whether or not you agree that the statement constitutes a Design Principle. If you do not agree, please provide detail in the comment box provided.

In addition, we would like you to rank the Design Principles according to the priority of you or your organisation. Please rank the Design Principles from 1 (Highest priority) to 16 (Lowest priority). If you feel any of the Design Principles are not applicable to you, please mark it as '0'. Please add any amplifying comments you wish to include, also in the comments box.

Please complete Table 2 to provide any additional comments if there any areas of concern that you feel have not been considered or to suggest any additional Design Principles you feel ought to be considered by Exeter Airport.

1.3 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 Design Principle or 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 2nd August 2019.

1.4 Next Steps

The development of Design Principles will mark the completion of Stage 1 (Define Stage) of the Exeter Airport Airspace Change Proposal. The response you now provide will help us to refine the Design Principles ahead of the CAA DEFINE Gateway.

Passing through the CAA DEFINE Gateway will then allow us to commence detailed airspace design work. Further engagement activities will take place during this time to seek your views on the designs developed ahead of the DEVELOP and ASSESS Gateway currently planned for late November. It is anticipated that the formal consultation will be conducted between March and July 2020. Exeter Airport will ensure any views expressed through this earlier engagement activity will also be recorded to inform the full consultation report.

2 Review of Design Principles

2.1 Your Responses

Please complete Table 1 and Table 2 below in line with the information provided in Section 1. Please use as much space as you require, the size of the response box will expand as you type your response.

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP1	Any new airspace should not restrict flying operations in or around the airspace	The lateral or vertical (including base heights) of any new airspace should not jeopardise the safe operation of all types of aviation traffic.	Y	16
Comments:				
DP2	Airspace should be designed to minimise the impact of noise	One of the Government's key environmental objectives is to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise.	Y	8
Comments:				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP3	Any new airspace should not create funnelling or choke points for other airspace users	Airspace should allow transit aircraft to safely bypass without creating bottlenecks or pinch points over geographical features or high ground that could create a greater environmental impact of noise or increasing the danger of a mid-air collision.	Y	9
Comments:				
DP4	Airspace should connect to the airways structure to protect Commercial Air Transport	Commercial Air Transport should remain inside Controlled Airspace at all times during arrival at and departure from Exeter Airport. This protection will lower the risk to commercial operations, whilst introducing predictability of tracks therefore reducing track miles flown and minimising emissions.	Y	1
Comments:				
DP5	Any new airspace should use the minimum volume necessary	The volume of new airspace should be the minimum volume consistent with safe and efficient air traffic operations and not block the transit of other aviation traffic.	Y	15

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments:				
DP6	Any new airspace should facilitate continuous climb and descent profiles	Steeper and continuous climbs and descents will introduce environmental as well as flight efficiency benefits. The impact of noise on communities will be reduced and will also allow the execution of an optimal flight profile for aircraft, leading to a benefit in fuel use and emissions. Routes will become more consistent and predictable which could lead to a minimisation of controlled airspace footprint.	Y	2
Comments:				
DP7	Any new airspace should allow equitable access to all airspace users	Any regulatory change or airspace amendment must continue to facilitate access to the airspace for all aviation users and to implement airspace that will work for everyone.	Y	7
Comments:				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP8	Consider the Flexible Use of Airspace	Any proposal for a revised airspace structure should be adaptable to minimise the impact on other aviation operators. Only having airspace activated in accordance with requirements is encouraged, providing flexibility for the access of other aviation.	Y	14
Comments:				
DP9	New airspace should protect critical stages of flight	The final approach is the most critical portion of flight, with Commercial Air Transport aircraft being slow and less manoeuvrable.	Y	3
Comments:				
DP10	Create a known traffic environment	There is an increased risk on busy days to Commercial Air Transport due to the large number of aircraft operating outside controlled airspace due to the increased separation requirements against unknown, potentially non-transponding traffic.	Y	4
Comments:				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP11	Designs should consider areas of local tranquillity	Airspace change and management can impact on the natural environment, and on people's experience of the natural environment. Visitors seek these natural and peaceful surroundings to escape the impacts of urbanisation, including increased aviation traffic and resultant noise.	Y	13
Comments:				
DP12	Accommodate traffic with limited/no Radio Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a radio capability should be considered.	N	5
Comments: For risk mitigation at Flybe it is desirable for all aircraft to have radio and transponder capability flying at EGTE.				
DP13	Accommodate traffic without Transponder Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a transponder capability should be considered.	N	6
Comments:				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP14	Any new CAS should be proportionate to the requirement	Any new controlled airspace should be no bigger than required to ensure safety is not compromised for all airspace users.	Y	12
Comments:				
DP15	Any new airspace should use the minimum categorisation necessary	All categories of airspace should be considered so that the least restrictive categorisation of airspace necessary to ensure safety is not compromised for all airspace users.	N	9
Comments: Flybe requires at least Class D as Class E does not give adequate separation against non-transponding VFR traffic.				
DP16	Any new airspace should be as uncomplicated as possible	The design of any new airspace should not be so complex that it will lead to more infractions from other airspace users.	Y	10
Comments:				

Table 1 – Design Principle Prioritisation

If there are any other areas of concern that you feel have not been considered, please provide additional comments below.
Comments:
Are there other Design Principles not included in the list that you feel should be considered as candidates for the final shortlist? If so, please provide your comments.
Comments:

Table 2 – Additional Comments

Exeter Airport Airspace Change Proposal

Design Principles – Stakeholder Review

Honourable Company of Air Pilots

Date: 22nd July 2019
Revision: Issue 2
Document Ref: 71189 019

Document Details

Reference	Description
Document Title	Exeter Airport Airspace Change Proposal
	Design Principles – Stakeholder Review
Document Ref	71189 019
Issue	Issue 2
Date	22nd July 2019
Client Name	Exeter & Devon Airport Ltd

Issue	Amendment	Date
Issue 1	Initial	5th July 2019
Issue 2	Updated	22nd July 2019

Table of Contents

Table of Tables

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. The responses we have received have helped us to derive a comprehensive list of potential Design Principles that reflect the statements made during focus group events and from questionnaires received. As with any engagement activity, it should be noted that opposing views were expressed by stakeholders in a number of areas.

The Design Principles will be used as the qualitative framework against which the alternative design options will be considered. It is therefore important that your views have been accurately captured. This document has been prepared to share the list of Design Principles developed and we now need your help to provide further comments on the list and to help us understand which Design Principles are most important to you or your organisations.

Any changes to airspace arrangements must maintain or enhance safety. This is the main priority of the CAA in accordance with its statutory duties set out in Section 70(1) of the Transport Act 2000. The principle area of concern regarding current operations for Exeter Airport is the limited protection currently afforded to Commercial Air Transport flying final approach and initial departure routes from the airport. Safety is the main driver for change for this Airspace Change Proposal and as such, has not been included as a Design Principle, but will be the overarching principle against which the design options will be developed.

1.2 Stakeholder Review Requirements

Please take a look at the attached Design Principles in Table 1 below. For each of the Design Principle listed we would like you to state whether or not you agree that the statement constitutes a Design Principle. If you do not agree, please provide detail in the comment box provided.

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

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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.

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

Please respond by mid-day Friday 2nd August 2019.

1.4 Next Steps

The development of Design Principles will mark the completion of Stage 1 (Define Stage) of the Exeter Airport Airspace Change Proposal. The response you now provide will help us to refine the Design Principles ahead of the CAA DEFINE Gateway.

Passing through the CAA DEFINE Gateway will then allow us to commence detailed airspace design work. Further engagement activities will take place during this time to seek your views on the designs developed ahead of the DEVELOP and ASSESS Gateway currently planned for late November. It is anticipated that the formal consultation will be conducted between March and July 2020. Exeter Airport will ensure any views expressed through this earlier engagement activity will also be recorded to inform the full consultation report.

2 Review of Design Principles

2.1 Your Responses

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	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP1	Any new airspace should not restrict flying operations in or around the airspace	The lateral or vertical (including base heights) of any new airspace should not jeopardise the safe operation of all types of aviation traffic.	Yes	1=
Comments: It is important that increased controlled airspace does not create choke points that degrade safety for those operating outside it. It is also important that GA continues to have access to the volumes it currently uses; this may mean that Exeter has to increase its ATC manning to ensure there is sufficient staff to accommodate crossing/penetration requests as they occur and safely.				
DP2	Airspace should be designed to minimise the impact of noise	One of the Government's key environmental objectives is to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise.	NO	16

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments: Airspace design must enable safe and efficient aviation; only when those have been assured should the possible noise impact be considered.				
DP3	Any new airspace should not create funnelling or choke points for other airspace users	Airspace should allow transit aircraft to safely bypass without creating bottlenecks or pinch points over geographical features or high ground that could create a greater environmental impact of noise or increasing the danger of a mid-air collision.	YES	4
Comments: Note comment at DP1 about sustaining GA access through adequate ATC manning.				
DP4	Airspace should connect to the airways structure to protect Commercial Air Transport	Commercial Air Transport should remain inside Controlled Airspace at all times during arrival at and departure from Exeter Airport. This protection will lower the risk to commercial operations, whilst introducing predictability of tracks therefore reducing track miles flown and minimising emissions.	NO	0
Comments: This pre-supposes that controlled airspace is the only way to assure the safety of commercial air transport; experience across the world shows that it is not. (We would not wish anything that reduced the safety of commercial air transport and would expect Exeter to ensure that is the case, but expanding the volume of controlled airspace is not acceptable without investigating all other options.				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP5	Any new airspace should use the minimum volume necessary	The volume of new airspace should be the minimum volume consistent with safe and efficient air traffic operations and not block the transit of other aviation traffic.	Yes	5=
Comments: Consideration should also be given to reducing present volumes that are no longer necessary to achieve this principle.				
DP6	Any new airspace should facilitate continuous climb and descent profiles	Steeper and continuous climbs and descents will introduce environmental as well as flight efficiency benefits. The impact of noise on communities will be reduced and will also allow the execution of an optimal flight profile for aircraft, leading to a benefit in fuel use and emissions. Routes will become more consistent and predictable which could lead to a minimisation of controlled airspace footprint.	Yes	8
Comments: Facilitating continuous climb should take priority over continuous descent to minimise emissions.				
DP7	Any new airspace should allow equitable access to all airspace users	Any regulatory change or airspace amendment must continue to facilitate access to the airspace for all aviation users and to implement airspace that will work for everyone.	Yes	1=
Comments: See comment at DP1				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP8	Consider the Flexible Use of Airspace	Any proposal for a revised airspace structure should be adaptable to minimise the impact on other aviation operators. Only having airspace activated in accordance with requirements is encouraged, providing flexibility for the access of other aviation.	Yes	1=
Comments: This is a fundamental principle that should be applied in parallel with present DPs 1, 7 & 8.				
DP9	New airspace should protect critical stages of flight	The final approach is the most critical portion of flight, with Commercial Air Transport aircraft being slow and less manoeuvrable.	Yes	5=
Comments: Nil				
DP10	Create a known traffic environment	There is an increased risk on busy days to Commercial Air Transport due to the large number of aircraft operating outside controlled airspace due to the increased separation requirements against unknown, potentially non-transponding traffic.	Yes	5=
Comments: A known traffic environment protects everyone, where inside or outside Exeter's allocated airspace.				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP11	Designs should consider areas of local tranquillity	Airspace change and management can impact on the natural environment, and on people's experience of the natural environment. Visitors seek these natural and peaceful surroundings to escape the impacts of urbanisation, including increased aviation traffic and resultant noise.	Yes	11=
Comments: This is supported with the caveat that overall safety (for those in the air and those on the ground) must come first.				
DP12	Accommodate traffic with limited/no Radio Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a radio capability should be considered.		13=
Comments: If safety can be sustained with occasional non-radio operations by exception				
DP13	Accommodate traffic without Transponder Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a transponder capability should be considered.		13=
Comments: If safety can be sustained with occasional non-transponder operations by exception				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP14	Any new CAS should be proportionate to the requirement	Any new controlled airspace should be no bigger than required to ensure safety is not compromised for all airspace users.	No – already covered by DP5	0
Comments: Same as DP5				
DP15	Any new airspace should use the minimum categorisation necessary	All categories of airspace should be considered so that the least restrictive categorisation of airspace necessary to ensure safety is not compromised for all airspace users.	Yes	11=
Comments:				
DP16	Any new airspace should be as uncomplicated as possible	The design of any new airspace should not be so complex that it will lead to more infractions from other airspace users.	Yes	11=
Comments:				

Table 1 – Design Principle Prioritisation

If there are any other areas of concern that you feel have not been considered, please provide additional comments below.
Comments: Nil
Are there other Design Principles not included in the list that you feel should be considered as candidates for the final shortlist? If so, please provide your comments.
Comments: Revised airspace should also support procedures that are simple and predictable from the flight deck and ATC perspective, such as (where it is possible) fewer routes with fewer interactions rather than too many options that attempt to 'spread out' the noise footprint.

Table 2 – Additional Comments

Exeter Airport Airspace Change Proposal

Design Principles – Stakeholder Review

Plymouth Military

Document Details

Reference	Description
Document Title	Exeter Airport Airspace Change Proposal
	Design Principles – Stakeholder Review
Document Ref	71189 019
Issue	Issue 1
Date	5th July 2019
Client Name	Exeter & Devon Airport Ltd

Issue	Amendment	Date
Issue 1	Initial	5th July 2019

Table of Contents

Table of Tables

1 Exeter Airport Airspace Change Proposal

1.1 Introduction

Thank you very much for responding to our Design Principles Questionnaire or for attending a focus group event. We are very grateful for everybody's engagement with the process and for all of the views expressed by the various representative bodies and individuals. The responses received in the questionnaires and the discussions during the focus groups have helped us to derive a comprehensive list of potential Design Principles that reflect the statements made during these events. As with any engagement activity, it should be noted that opposing views were expressed by stakeholders in a number of areas.

The Design Principles will be used as the qualitative framework against which the alternative design options will be considered. It is therefore important that your views have been accurately captured. This document has been prepared to share the list of Design Principles developed and we now need your help to provide further comments on the list and to help us understand which Design Principles are most important to you or your organisations.

Any changes to airspace arrangements must maintain or enhance safety. This is the main priority of the CAA in accordance with its statutory duties set out in Section 70(1) of the Transport Act 2000. The principle area of concern regarding current operations for Exeter Airport is the limited protection currently afforded to Commercial Air Transport flying final approach and initial departure routes from the airport. Safety is the main driver for change for this Airspace Change Proposal and as such, has not been included as a Design Principle, but will be the overarching principle against which the design options will be developed.

1.2 Stakeholder Review Requirements

Please take a look at the attached Design Principles in Table 1 below. For each of the Design Principle listed we would like you to state whether or not you agree that the statement constitutes a Design Principle. If you do not agree, please provide detail in the comment box provided.

In addition, we would like you to rank the Design Principles according to the priority of you or your organisation. Please rank the Design Principles from 1 (Highest priority) to 16 (Lowest priority). If you feel any of the Design Principles are not applicable to you, please mark it as '0'. Please add any amplifying comments you wish to include, also in the comments box.

Please complete Table 2 to provide any additional comments if there any areas of concern that you feel have not been considered or to suggest any additional Design Principles you feel ought to be considered by Exeter Airport.

1.3 How to Respond

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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.

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

Please respond by mid-day Friday 26th July 2019.

1.4 Next Steps

The development of Design Principles will mark the completion of Stage 1 (Define Stage) of the Exeter Airport Airspace Change Proposal. The response you now provide will help us to refine the Design Principles ahead of the CAA DEFINE Gateway scheduled for Friday 30th August 2019.

Passing through the CAA DEFINE Gateway will then allow us to commence detailed airspace design work. Further engagement activities will take place during this time to seek your views on the designs developed ahead of the DEVELOP and ASSESS Gateway currently planned for late November. It is anticipated that the formal consultation will be conducted between March and July 2020. Exeter Airport will ensure any views expressed through this earlier engagement activity will also be recorded to inform the full consultation report.

2 Review of Design Principles

2.1 Your Responses

Please complete Table 1 and Table 2 below in line with the information provided in Section 1. Please use as much space as you require, the size of the response box will expand as you type your response.

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP1	Any new airspace should not restrict flying operations in or around the airspace	The lateral or vertical (including base heights) of any new airspace should not jeopardise the safe operation of all types of aviation traffic.	NO	0
Comments: The entire point is to restrict (and therefore have better control and management of) flying operation in the new airspace.				
DP2	Airspace should be designed to minimise the impact of noise	One of the Government's key environmental objectives is to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise.	YES	11
Comments: A good consideration, but secondary to Flight Safety.				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP3	Any new airspace should not create funnelling or choke points for other airspace users	Airspace should allow transit aircraft to safely bypass without creating bottlenecks or pinch points over geographical features or high ground that could create a greater environmental impact of noise or increasing the danger of a mid-air collision.	YES	9
Comments:				
DP4	Airspace should connect to the airways structure to protect Commercial Air Transport	Commercial Air Transport should remain inside Controlled Airspace at all times during arrival at and departure from Exeter Airport. This protection will lower the risk to commercial operations, whilst introducing predictability of tracks therefore reducing track miles flown and minimising emissions.	YES	10
Comments: Protection during critical stages of climb out and approach are essential, but perhaps not all the way to controlled airspace. Very similar DP to DP6 and DP9				
DP5	Any new airspace should use the minimum volume necessary	The volume of new airspace should be the minimum volume consistent with safe and efficient air traffic operations and not block the transit of other aviation traffic.	YES	5

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments:				
DP6	Any new airspace should facilitate continuous climb and descent profiles	Steeper and continuous climbs and descents will introduce environmental as well as flight efficiency benefits. The impact of noise on communities will be reduced and will also allow the execution of an optimal flight profile for aircraft, leading to a benefit in fuel use and emissions. Routes will become more consistent and predictable which could lead to a minimisation of controlled airspace footprint.	YES	13
Comments: Critical stages of flight are more important that continuous climb/decent, but still a reasonable DP.				
DP7	Any new airspace should allow equitable access to all airspace users	Any regulatory change or airspace amendment must continue to facilitate access to the airspace for all aviation users and to implement airspace that will work for everyone.	YES	12
Comments: Equitable access, provided that that users are speaking to Exeter ATC to deconflict.				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP8	Consider the Flexible Use of Airspace	Any proposal for a revised airspace structure should be adaptable to minimise the impact on other aviation operators. Only having airspace activated in accordance with requirements is encouraged, providing flexibility for the access of other aviation.	YES	3
Comments: Very useful, particularly if areas collapse outside of operating hours.				
DP9	New airspace should protect critical stages of flight	The final approach is the most critical portion of flight, with Commercial Air Transport aircraft being slow and less manoeuvrable.	YES	1
Comments: Absolutely essential for safety for all aircraft, not just commercial traffic, given the presentation by head of Exeter ATM services.				
DP10	Create a known traffic environment	There is an increased risk on busy days to Commercial Air Transport due to the large number of aircraft operating outside controlled airspace due to the increased separation requirements against unknown, potentially non-transponding traffic.	YES	2

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments: All aircraft operating in the area should make themselves known to Exeter ATC, and be equipped to operate in that airspace (radio, transponder etc)				
DP11	Designs should consider areas of local tranquillity	Airspace change and management can impact on the natural environment, and on people's experience of the natural environment. Visitors seek these natural and peaceful surroundings to escape the impacts of urbanisation, including increased aviation traffic and resultant noise.	NO	0
Comments: Already covered by DP5				
DP12	Accommodate traffic with limited/no Radio Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a radio capability should be considered.	NO	0
Comments: Absolutely not – how can this be safe? Use of radios is an enormous mitigation in any risk to life (Mid Air Collisions), and is key in the argument that residual risk is as low as reasonably practicable				
DP13	Accommodate traffic without Transponder Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a transponder capability should be considered.	YES	4

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments: But requires working radios to mitigate the lack of transponder				
DP14	Any new CAS should be proportionate to the requirement	Any new controlled airspace should be no bigger than required to ensure safety is not compromised for all airspace users.	YES	6
Comments: Same as DP5				
DP15	Any new airspace should use the minimum categorisation necessary	All categories of airspace should be considered so that the least restrictive categorisation of airspace necessary to ensure safety is not compromised for all airspace users.	YES	8
Comments: Protecting ac in the critical stages of take off and landing. Same argument as DP9, but believe that (for example) Class D will be of more use than a Transponder Mandatory Zone.				
DP16	Any new airspace should be as uncomplicated as possible	The design of any new airspace should not be so complex that it will lead to more infractions from other airspace users.	YES	7
Comments: Simplicity will encourage proper use by local GAT.				

Table 1 – Design Principle Prioritisation

Do you agree that the list of Design Principles captures the specific areas of concern you have articulated in either a questionnaire or during participation in one of the focus groups?
Comments: Yes, although some have overlaps. But content that areas of concern in focus group have been captured.
Are there other Design Principles not included in the list that you feel should be considered as candidates for the final shortlist? If so, please provide your comments.
Comments: Nil.

Table 2 – Additional Comments

Exeter Airport Airspace Change Proposal

Design Principles – Stakeholder Review

TUI

Document Details

Reference	Description
Document Title	Exeter Airport Airspace Change Proposal
	Design Principles – Stakeholder Review
Document Ref	71189 019
Issue	Issue 2
Date	22nd July 2019
Client Name	Exeter & Devon Airport Ltd

Issue	Amendment	Date
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Issue 2	Updated	22nd July 2019

Table of Contents

Table of Tables

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2 Review of Design Principles

2.1 Your Responses

Please complete Table 1 and Table 2 below in line with the information provided in Section 1. Please use as much space as you require, the size of the response box will expand as you type your response.

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP1	Any new airspace should not restrict flying operations in or around the airspace	The lateral or vertical (including base heights) of any new airspace should not jeopardise the safe operation of all types of aviation traffic.	YES	1
Comments:				
DP2	Airspace should be designed to minimise the impact of noise	One of the Government's key environmental objectives is to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise.	YES	13
Comments:				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP3	Any new airspace should not create funnelling or choke points for other airspace users	Airspace should allow transit aircraft to safely bypass without creating bottlenecks or pinch points over geographical features or high ground that could create a greater environmental impact of noise or increasing the danger of a mid-air collision.	YES	12
Comments: However, has a transit corridor (not defined track) for non radio/transponder aircraft been considered to at least create a predictable flow of traffic that is not in contact with ATC.				
DP4	Airspace should connect to the airways structure to protect Commercial Air Transport	Commercial Air Transport should remain inside Controlled Airspace at all times during arrival at and departure from Exeter Airport. This protection will lower the risk to commercial operations, whilst introducing predictability of tracks therefore reducing track miles flown and minimising emissions.	YES	4
Comments:				
DP5	Any new airspace should use the minimum volume necessary	The volume of new airspace should be the minimum volume consistent with safe and efficient air traffic operations and not block the transit of other aviation traffic.	YES	11

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments:				
DP6	Any new airspace should facilitate continuous climb and descent profiles	Steeper and continuous climbs and descents will introduce environmental as well as flight efficiency benefits. The impact of noise on communities will be reduced and will also allow the execution of an optimal flight profile for aircraft, leading to a benefit in fuel use and emissions. Routes will become more consistent and predictable which could lead to a minimisation of controlled airspace footprint.	YES	3
Comments:				
DP7	Any new airspace should allow equitable access to all airspace users	Any regulatory change or airspace amendment must continue to facilitate access to the airspace for all aviation users and to implement airspace that will work for everyone.	YES	5
Comments: However, has a transit corridor (not defined track) for non radio/transponder aircraft been considered to at least create a predictable flow of traffic that is not in contact with ATC.				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP8	Consider the Flexible Use of Airspace	Any proposal for a revised airspace structure should be adaptable to minimise the impact on other aviation operators. Only having airspace activated in accordance with requirements is encouraged, providing flexibility for the access of other aviation.	YES	7
Comments: Priority should be given to commercial air traffic				
DP9	New airspace should protect critical stages of flight	The final approach is the most critical portion of flight, with Commercial Air Transport aircraft being slow and less manoeuvrable.	YES	2
Comments: Take-off is also a critical stage of flight with relatively high workload in the first few thousand feet as the aircraft is re-configured, checklists completed and frequency change.				
DP10	Create a known traffic environment	There is an increased risk on busy days to Commercial Air Transport due to the large number of aircraft operating outside controlled airspace due to the increased separation requirements against unknown, potentially non-transponding traffic.	YES	6
Comments:				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP11	Designs should consider areas of local tranquillity	Airspace change and management can impact on the natural environment, and on people's experience of the natural environment. Visitors seek these natural and peaceful surroundings to escape the impacts of urbanisation, including increased aviation traffic and resultant noise.	YES	16
Comments: However, flight safety takes priority				
DP12	Accommodate traffic with limited/no Radio Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a radio capability should be considered.	YES	15
Comments: However, as their unpredictable flight path can and does lead to seperation issues, has consideration been given to transit corridors (not defined single track) for this type of traffic.				
DP13	Accommodate traffic without Transponder Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a transponder capability should be considered.	YES	14
Comments: However, as their unpredictable flight path can and does lead to seperation issues, has consideration been given to transit corridors (not defined single track) for this type of traffic.				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP14	Any new CAS should be proportionate to the requirement	Any new controlled airspace should be no bigger than required to ensure safety is not compromised for all airspace users.	YES	10
Comments:				
DP15	Any new airspace should use the minimum categorisation necessary	All categories of airspace should be considered so that the least restrictive categorisation of airspace necessary to ensure safety is not compromised for all airspace users.	YES	9
Comments:				
DP16	Any new airspace should be as uncomplicated as possible	The design of any new airspace should not be so complex that it will lead to more infractions from other airspace users.	YES	8
Comments:				

Table 1 – Design Principle Prioritisation

If there are any other areas of concern that you feel have not been considered, please provide additional comments below.
Comments: Has any consideration been given to raising the missed approach altitude slightly (from 2500 to 3000/3500ft) to reduce cockpit workload at this very busy and although anticipated, unplanned stage of flight. In a B737, the go-around is a very high workload manoeuvre as on a Cat 1 ILS or non-precision approach, the aircraft reverts to manual flight, requires reconfiguration and the completion of a number of checklists. Apart from the additional climb, this will also reduce noise pollution at missed approach altitude.
Are there other Design Principles not included in the list that you feel should be considered as candidates for the final shortlist? If so, please provide your comments.
Comments:

Table 2 – Additional Comments

1 Review of Design Principles UKFSC

1.1 Your Responses

Please complete Table 1 and Table 2 below in line with the information provided in Section 1. Please use as much space as you require, the size of the response box will expand as you type your response.

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP1	Any new airspace should not restrict flying operations in or around the airspace	The lateral or vertical (including base heights) of any new airspace should not jeopardise the safe operation of all types of aviation traffic.	Yes	
Comments:				
DP2	Airspace should be designed to minimise the impact of noise	One of the Government's key environmental objectives is to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise.	Yes	
Comments:				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP3	Any new airspace should not create funnelling or choke points for other airspace users	Airspace should allow transit aircraft to safely bypass without creating bottlenecks or pinch points over geographical features or high ground that could create a greater environmental impact of noise or increasing the danger of a mid-air collision.	Yes	
Comments:				
DP4	Airspace should connect to the airways structure to protect Commercial Air Transport	Commercial Air Transport should remain inside Controlled Airspace at all times during arrival at and departure from Exeter Airport. This protection will lower the risk to commercial operations, whilst introducing predictability of tracks therefore reducing track miles flown and minimising emissions.	No	
Comments: This is a desire, not a principle. There is no defined requirement for contiguous access to the en-route structure.				
DP5	Any new airspace should use the minimum volume necessary	The volume of new airspace should be the minimum volume consistent with safe and efficient air traffic operations and not block the transit of other aviation traffic.	Yes	
Comments:				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP6	Any new airspace should facilitate continuous climb and descent profiles	Steeper and continuous climbs and descents will introduce environmental as well as flight efficiency benefits. The impact of noise on communities will be reduced and will also allow the execution of an optimal flight profile for aircraft, leading to a benefit in fuel use and emissions. Routes will become more consistent and predictable which could lead to a minimisation of controlled airspace footprint.	No	
Comments: This needs "where possible" adding to it. Continuous climb/descent is desirable, not essential.				
DP7	Any new airspace should allow equitable access to all airspace users	Any regulatory change or airspace amendment must continue to facilitate access to the airspace for all aviation users and to implement airspace that will work for everyone.	Yes	
Comments:				
DP8	Consider the Flexible Use of Airspace	Any proposal for a revised airspace structure should be adaptable to minimise the impact on other aviation operators. Only having airspace activated in accordance with requirements is encouraged, providing flexibility for the access of other aviation.	yes	
Comments:				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP9	New airspace should protect critical stages of flight	The final approach is the most critical portion of flight, with Commercial Air Transport aircraft being slow and less manoeuvrable.	Yes	
Comments: But you need to avoid labelling aspects of the approach as critical without evidence to do so.				
DP10	Create a known traffic environment	There is an increased risk on busy days to Commercial Air Transport due to the large number of aircraft operating outside controlled airspace due to the increased separation requirements against unknown, potentially non-transponding traffic.	No	
Comments: Laudable aim, but I do not see how you can create a known traffic environment without adding to the electronic conspicuity requirements for traffic that is outside CAS. You would need to create a TMZ (or at minimum an RMZ) to achieve this.				
DP11	Designs should consider areas of local tranquillity	Airspace change and management can impact on the natural environment, and on people's experience of the natural environment. Visitors seek these natural and peaceful surroundings to escape the impacts of urbanisation, including increased aviation traffic and resultant noise.	Yes	
Comments:				

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
DP12	Accommodate traffic with limited/no Radio Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a radio capability should be considered.	yes	
Comments:				
DP13	Accommodate traffic without Transponder Capability	The ability for aircraft to continue to operate in the local area without the necessity to rely on a transponder capability should be considered.	Yes	
Comments:				
DP14	Any new CAS should be proportionate to the requirement	Any new controlled airspace should be no bigger than required to ensure safety is not compromised for all airspace users.	Yes	
Comments:				
DP15	Any new airspace should use the minimum categorisation necessary	All categories of airspace should be considered so that the least restrictive categorisation of airspace necessary to ensure safety is not compromised for all airspace users.	Yes	

	Design Principle	Rationale	Do you agree this is a Design Principle? (Yes or No)	How would you rank this Design Principle as a priority? (1-16 or 0)
Comments:				
DP16	Any new airspace should be as uncomplicated as possible	The design of any new airspace should not be so complex that it will lead to more infractions from other airspace users.	Yes	
Comments:				

Table 1 – Design Principle Prioritisation

If there are any other areas of concern that you feel have not been considered, please provide additional comments below.
Comments:
Are there other Design Principles not included in the list that you feel should be considered as candidates for the final shortlist? If so, please provide your comments.
Comments:

Table 2 – Additional Comments