

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

3rd September 2021

Dear Stakeholder,

EXETER AIRPORT – AIRSPACE CHANGE PROJECT

We are writing to you today to let you know what has happened since we last engaged with you in 2019 and explain what happens next with our Airspace Change Proposal (ACP).

Why do we need to change the airspace at Exeter?

The primary driver behind Exeter Airport's ACP is to address specific and significant operational safety risks associated with the lack of protective airspace around Exeter Airport. These risks were identified by the CAA Inspector Air Traffic Services (Operations) in his oversight report of 2018 citing Exeter's continued experience of general aviation aircraft passing through the final approach track without advising Exeter Air Traffic Control (ATC). Audit of the airport's Unit Competence Scheme (UCS) and incident investigation process '*gives defining evidence of the need to have the protection of Controlled Airspace (CAS) to avoid [airprox¹ events]*'.

What happened in 2020?

You may remember that in May 2020, Exeter Airport 'paused' our ACP. The key driver for the pause was that Exeter Airport and many of our key aviation stakeholders, like most airports in the UK, made necessary and extensive use of the government furlough scheme. We made the following statement on the CAA airspace portal:

<https://airspacechange.caa.co.uk/PublicProposalArea?plD=62>

Due to the restrictions on movement of people, and the non-availability of many of our key stakeholders, we are pausing our ACP. Thank you to all of our stakeholders and neighbours for your continued interest in our proposals; we hope to re-engage with you all in due course.

How will we restart our ACP?

During the pandemic, the DfT and CAA made funding available to those airports that were part of the Future Airspace Strategy Implementation (FASI) programme and they made the following statement:

"We are pleased to announce that we will be providing funding to enable FASI airspace change sponsors to restart their change proposals through a grant administered by the CAA. This will enable sponsors to continue through Stage 2 of the airspace change process known as CAP²1616 as part of the government's commitment to supporting restart in the aviation sector and decarbonisation".

¹ Airprox: an Airprox is a situation in which, in the opinion of a pilot or air traffic services personnel, the distance between aircraft as well as their relative positions and speed have been such that the safety of the aircraft involved may have been compromised.

² CAP – Civil Aviation Publication

“The investment has been made available to airports involved in the Airspace Modernisation Strategy to ensure this vital project remains on track, reflecting the government’s commitment to modernising the airways while supporting the aviation sector as we recover from the pandemic”.

We are pleased to confirm that Exeter Airport was approved for grant funding of Stage 2 of our ACP and this has enabled us to progress with Stage 2 in this challenging time.

Does our ACP need remain the same, given the continued impact of the pandemic on air travel?

Yes. There are no changes to our operating environment. The 2020 collapse of Flybe (predating the pause of our ACP) was expected to have a big impact on the airport. However, other airlines are now operating routes previously operated. All airports across the UK have been affected by a reduction in traffic levels associated with government restrictions because of the global pandemic, however movements at Exeter are forecast to return to pre COVID levels within the implementation timeframe of the project.

The principle area of concern regarding operations at Exeter remains the limited protection currently afforded to Commercial Air Transport (CAT) aircraft flying final approach and initial departure routes through Class G Uncontrolled Airspace, outside the Aerodrome Traffic Zone (ATZ). Currently, ATC tactical intervention is repeatedly required for CAT aircraft on final approach on initial departure routes in order to maintain separation from local and transitory general aviation users.

Explanation of AMS, Masterplan and FASI S, how Exeter fits into FASI S programme.

The UK’s airspace structure is an essential, but largely invisible, part of our national transport infrastructure which is a key gateway between Europe and North America, the world’s busiest intercontinental air corridor, and its efficient operation is crucial for international air traffic management. UK airspace is some of the most complex in the world, yet its design dates back to the 1950s and 1960s. It is therefore essential that the UK’s airspace is modernised.

The Government has jointly tasked the Department for Transport (DfT) and the CAA with preparing and maintaining a co-ordinated strategy and plan for the use of UK airspace for air navigation up to 2040, including for the modernisation of the use of such airspace. The Airspace Modernisation Strategy (AMS) responds to that requirement, setting out the detailed initiatives that industry must deliver to achieve the objectives envisaged in current government policy. Airspace modernisation will need to be delivered by a range of aviation organisations; airports will need to develop their own airspace modernisation proposals in conjunction with each other where there are interdependencies between their airspace designs.

The strategy sets out the ends, ways and means of modernising airspace. The ends are derived from UK Government and relevant international policy and the ways of achieving them include new airspace design, new operational concepts and new technologies. To establish the means of delivering modernised airspace, such as the resources needed, this strategy requires industry to draw up delivery plans, with delivery overseen by the CAA. One such plan will be a macro-level co-ordinated implementation plan (an airspace change masterplan) detailing which interdependent airspace changes are deemed necessary and when.

Commissioned by the DfT and CAA, who are the co-sponsors of the AMS, the Airspace Change Masterplan will be a high-level co-ordinated implementation plan that identifies which individual but interdependent airspace design changes need to be developed to deliver the range of benefits that airspace modernisation will bring. The plan will not show the detail of proposed airspace changes such

as flight paths. These will be publicly consulted on separately over the next few years by airports and NATS, as the sponsors of the airspace changes.

The purpose of the Masterplan is to:

- identify where and when airspace changes are required to support delivery of the objectives of the Airspace Modernisation Strategy;
- identify potential interdependencies between airspace change proposals and the coordination of those proposals;
- identify potential conflicts between individual airspace changes; and
- determine trade-offs proposed by ACOG to resolve those conflicts.

The Masterplan is strategically important for coordinating the delivery of two of the key initiatives under the AMS, one of which is the coordination of design changes in the south of the UK (FASI S). In line with these points, Exeter Airport will coordinate their proposal in line with Bristol Airport, Cardiff Airport and NERL³ due to the potential interdependencies that exist.

What was the outcome of Stage 1?

During Stage 1 of the airspace change process, Exeter Airport developed a set of Design Principles that will be used as a framework against which airspace change design options developed during Stage 2, can be evaluated. These Design Principles were developed with our stakeholders through a number of engagement activities throughout 2019 to ensure that those stakeholder groups that may be affected have a good level of understanding of the proposed change, and to ascertain what design considerations are important to them.

During these engagement activities in 2019, stakeholder organisations expressed concern that Exeter Airport might be operating in isolation, and this might result in suboptimal ACP design options with respect to the impact on the GA community. The stakeholder suggested that full coordination with other airports under the FASI South (FASI S) programme be incorporated as a Design Principle. In response we added the HARMONISATION design principle to our Design Principles Report.

[...after Safety, the highest priority and mandatory Design Principle for this ACP will be:

- *HARMONISATION- Airspace design must accord with the CAA's published Airspace Modernisation Strategy (AMS) and any future plans associated with it.]*

During the development of our Design Principles in Stage 1, Exeter Airport was not part of FASI S but now will be, as suggested by stakeholders, to ensure that coordination takes place with neighbouring ACPs. Exeter is now part of the FASI West Deployment Programme specifically aimed at coordinating the programme and designs of the three ACPs in the West Deployment of the Airspace Change Masterplan – Exeter, Bristol, and Cardiff Airports.

Exeter Airport's inclusion in FASI S has resulted in some small textual changes to Section 5 of the Design Principles Report that was published in November 2019. An updated version of the report (Version 2.1) will be uploaded to the airspace change portal, showing these changes. The change states that Exeter Airport is now included as part of FASI S and the work we have carried out to date in defining the Design Principles remains valid as we have already included the mandatory HARMONISATION design principle as a result of stakeholder feedback. The HARMONISATION design principle references the published AMS and 'any future plans associated with it.' The 'masterplan' is

³ NERL – NATS En-Route plc; the sole provider of civilian en-route air traffic control over the UK.

one of those ‘future plans’ and Exeter plans to ensure that our airspace designs accord with the masterplan.

All documents and information relating to this ACP can be found on the CAA airspace change portal at the following link:

<https://airspacechange.caa.co.uk/PublicProposalArea?pID=62>

Inclusion of Options for Performance Based Navigation (PBN) Procedures

During the course of the two-way stakeholder engagement in Stage 1, it became apparent that the implementation of PBN arrival and departure routes might have benefits for several stakeholders (including airlines and local general aviation groups) as well as operational opportunities for Exeter Airport. A necessary further round of engagement was carried out with stakeholders in respect of the Design Principles to support this potential change in requirements. The evidence presented at Stage 1 Gateway satisfied the CAA that the necessary engagement had been carried out.

Exeter Airport had long considered PBN Standard Instrument Departures (SIDs) and Standard Arrival Routes (STARs) to be a future requirement, however, after careful consideration of the stakeholder feedback and the safety, environmental, efficiency and operational opportunities for bringing forward this requirement (to the current ACP), Exeter Airport made the decision to include options for developing PBN SIDs and STARs within the ACP.

What happens at Stage 2?

Having passed the Define gateway, Stage 2 is where Exeter Airport develops options for the airspace change. This stage is split into two steps; Step 2A is concerned with developing a comprehensive list of design options for our ACP based on the Design Principles and any other physical, operational, and safety constraints that may exist in our operational environment. At this Step, we will also evaluate the list of design options against the Design Principles. Step 2B requires us to carry out an Initial Options Appraisal to identify a list of options to take forward to Stage 3. Full public consultation takes place in Stage 3.

What happens next?

We will develop a comprehensive list of options that address the Statement of Need and that align with the Design Principles from Stage 1. We are required to test these design options with our stakeholders to ensure that you are satisfied that the design options are aligned with the design principles and that we have properly understood and accounted for stakeholder concerns specifically related to the design options. We will invite you to take part in a stakeholder focus group during October/November this year. We will send the invites out four weeks ahead of the event.

During the stakeholder events, we will describe how we arrived at our list of design options and show you these as map overlays and ask for your comments. Your comments will be taken into account when we formally assess the design options against the Design Principles and a shorter list of options may emerge at the end of Step 2A.

At Step 2B we will carry out an initial options appraisal on the remaining options. We are required to assess the designs against the set of criteria contained in CAP 1616 Table E2 – including environment, emissions, noise and costs. At the end of Step 2B we may have reduced the number of options again. We will submit everything to the CAA for assessment at the Stage 2 Gateway, currently scheduled for the end of March 2022.

What about Public Consultation?

A full public consultation will take place at Stage 3. We expect this to take place towards the end of 2022 or early in 2023, although we may need to align our timescales with other neighbouring ACPs.

We would like to thank all our stakeholders for your continued input into this project and look forward to engaging with you again as we restart this airspace change proposal.

Yours sincerely,

Operations Director and Accountable Manager
Exeter and Devon Airport Limited