[redacted]

From: ACP Exeter Enquiries <ACPExeterEnquiries@Exeter-airport.co.uk>
Sent: 09 September 2021 10:03
Subject: [EXTERNAL] Exeter Airport - Airspace Change Project
Attachments: 71581 004 Stage 2 Letter to Stakeholders Issue 1.pdf

Dear Exeter Airport Stakeholder,

EXETER AIRPORT – AIRSPACE CHANGE PROJECT

We are pleased to inform you that Exeter Airport has restarted its Airspace Change Proposal (ACP), following a formal request made to the Civil Aviation Authority (CAA).

Exeter and Devon Airport Ltd (EDAL) is seeking to adapt the airspace structure surrounding the airport to assist Air Traffic Control (ATC) in providing enhanced levels of information to aircraft operating in and out of Exeter Airport and to aircraft operating in the local area.

The ACP was paused in May 2020 as a result of the Covid-19 pandemic and its impact on Exeter Airport. In March 2021, the DfT announced that they would be providing funding to 20 UK airports allowing them to continue with Stage 2 of their ACP. This is in support of the UK Airspace Modernisation Strategy which has committed to modernising the UK airspace – both low level around airports and the wider network at a higher level. 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.

The attached letter provides more detail on what has happened so far with this project and what will happen next. We look forward to working with you again and involving you in our design process. Thank you in advance for taking the time to help us with this project.

Yours Sincerely

[redacted]

ExeterAirport
Part of Regional & City Airports

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Airspace Change
Exeter & Devon Airport Ltd
Clyst Honiton
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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* [airprox[1] 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?pID=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 administrated by the CAA. This will enable sponsors to continue through Stage 2 of the airspace change process known as CAP[2]1616 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 NERL[3] 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,

[redacted]

Operations Director and Accountable Manager
Exeter and Devon Airport Limited

[redacted]

From: ACP Exeter Enquiries <ACPExeterEnquiries@Exeter-airport.co.uk>
Sent: 18 November 2021 12:10
Subject: [EXTERNAL] EXETER AIRPORT – AIRSPACE CHANGE PROJECT
Attachments: 71581 005 - EDAL Design Options Comprehensive List Issue 1.pdf

Dear Exeter Airport Stakeholder,

EXETER AIRPORT – AIRSPACE CHANGE PROJECT

Exeter and Devon Airport Ltd (EDAL) is seeking to adapt the airspace structure surrounding the airport to assist Air Traffic Control (ATC) in providing enhanced levels of information to aircraft operating in and out of Exeter Airport and to aircraft operating in the local area. As a major contributor to the local economy, EDAL fully appreciates the impact its decisions may have on local communities. Consequently, the airport is eager to listen to the views of its stakeholders, acknowledge any concerns and work with you when changes to the way we operate are planned.

This project is following Civil Aviation Authority (CAA) guidance described in CAA Publication (CAP) 1616. This document describes the process airports follow to ensure an appropriate level of engagement with those who may be affected. The introduction of an alternative airspace arrangement would create a known air traffic environment that would allow Exeter ATC to provide a greater level of protection to local and transiting aircraft; additional benefits would be the provision of a greater level of integrity and efficiency to all local airspace users. We are currently at Stage 2A which requires the development of options that seek to meet the original Statement of Need. The options are required to align, where practicable, with the Design Principles that were generated in Stage 1 with the assistance of our stakeholders.

EDAL wishes to fully engage with its stakeholders by offering the opportunity to influence the outcome of this project within the constraints of what is technically possible. We are seeking your feedback on the design options contained in the attached document to ensure that we have correctly understood and accounted for stakeholder concerns specifically related to the design options.

In addition, EDAL would also like to take this opportunity to invite you to a Focus Group about the design options for the Airspace Change where you will have the opportunity to ask questions about the designs and provide your feedback. The Focus Group is intended to be a small group to maximise the opportunity for face to face discussion and explanation, so we request that no more than two people from each organisation attend. The sessions will be held in person at Exeter Airport, although for those individuals who cannot or do not want to attend in person in the current climate, we will be providing an online link for people to join virtually. Dates and times for the Focus Groups will be as follows:

Aviation Stakeholders	Wednesday 8th December 2021 10am – 12pm
Non-aviation Stakeholders	Wednesday 8th December 2021 2pm – 4pm

Please could you let us know if you or a colleague are planning to attend by Wednesday 1st December 2021. Details regarding the location and parking instructions will be forwarded nearer the time, once numbers have been confirmed and a suitable location decided on. If you are planning on driving, we will provide complimentary exit passes for the car park. We would ask that those individuals who wish to attend in person conduct a lateral flow test for Covid-19 prior to attendance. For those who wish to attend online, we will send a link to the meeting shortly before the event.

We look forward to receiving your response and involving you in our design process. Thank you in advance for taking the time to help us with this project.

Yours Sincerely

[redacted]

[redacted]

Exeter and Devon Airport Limited

[redacted]

From: [redacted]
Sent: 17 December 2021 23:36
To: ACP Exeter Enquiries
Cc: ACP Exeter Enquiries
Subject: Exeter ACP
Attachments: Exeter ACP.docx

Dear ACP Team,

season's Greeting to you.

Please see attached the respond from the Devon Strut of the Light Aircraft Association the the Exeter ACP.

Thanks & best regards,

[redacted]
Chairman
Devon Strut

Devon Strut of the Light Aircraft Association

[redacted]

Exeter Airport ACP Team
Exeter Airport
Exeter
Devon
EX5 2BD

Re: Response: Exeter Airspace Change Proposal

Further to the Focus group Meeting of Stakeholders held on December 8th at Exeter Airport. Thank you for your invitation to attend which was informative and gave the opportunity to explore some of the views and opinions of interested parties.

The Devon Strut is a member club of the Light Aircraft Association (LAA) and as such represents the largest body of sports and recreational pilots in Devon.

At the Focus Group Meeting at Exeter Airport it was sighted that Airproxes, incidents and incursions were the primary cause for the ACP but it was not made clear as to exactly where and when such incidents took place. It would be useful to understand that information and view it in context and in relation to the Government's Airspace Modernisation Strategy.

General:

Whilst, in relation to some of the airspace options described, the document mentions protection of Dunkeswell Aerodrome and North Hill, the ACP fails to make any reference to Watchford Farm Airfield, Farway Common Airfield or Branscombe Airfield which also require protection as stated in the design principle 1.4.

Exeter Departures:

None of the described SIDS tracks have a negative impact on local airfields other than Farway Common but that is mitigated by the anticipated altitude to be flown in the procedure.

Exeter Approaches:

The described Transitional approach routes from airways to RW 08 have no impact on local GA airfields but the Transition to RW26 overflies Watchford Farm and Branscombe Airfield. The profiles of these transitional descents need clarifying for us to understand our required "headspace" above the circuit heights of these airfields. 3.1 states that the GNSS are not

going to be changed however, the Initial Approach Fixes (IAF) (which was not included in the glossary) are historic and not commensurate with modern aircraft performance or practice. The position of the IAFs should be revised accordingly and brought closer to Exeter thus reducing the size of the CAS.

Suggestions of Class D for the CTR and RMZs for the stubs and/or outer areas are possible although the rules for access to RMZs need re-stating.

Options to consider:

The "Do Nothing" option is agreed to be unacceptable as not providing the required protection to commercial traffic.

Options 1-2, 6-9 and 11-19 are considered unacceptable as not protecting local airfields. Option 19, EDAL's previously presented option is unsafe as it too complicated and would result in AS incursions. For this reason it should be rejected again.

Options 3 & 10 are worth further consideration: However, the suggested base of the eastern stub at 1500' leaves headspace of only 729' at Farway Common and 1050' at Branscombe. This is unacceptable. The suggested 1500ft base of the Western stub would leave approximately 330ft above ground between Exeter and the Haldon Hills. The base of the CA would need to be at least 200 feet above the circuit height of 800 feet for Farway Common Airfield. With the design of any controlled AS the CAA's "Take 2" principle must be applied to provide sufficient headroom to fly the circuit safely.

Option 10 is acceptable - This is similar to the South-side lozenge design we advocated in the previous round of consultation. In the case of both our preferences, the Eastern stub needs to be raised to at least 1700' to provide headroom for Farfay Common's 800' circuit and the Western stub needs to be raised to 2000' in order to provide safety clearance over the Westerly high ground.

Conclusion:

The Devon Strut is not opposed to air space change but any such development must provide a safe environment for all air space users. Safety has to be the overarching factor above all else. The volume of change in the controlled airspace must be kept as small as possible and to the minimum classification possible in order to minimise the impact on other AS users. Any new CAS must be to the lowest specification possible such as RMZ which would create a mutually suitable know environment. RMZ classification would be preferable to Class D.

The Devon Strut expects its members to be able to continue to use the AS when safe to do so and is prepared to work in harmony with Exeter Radar.

The Devon Strut is concerned for the safety of its members and other AS users. Pilots departing from Dunkeswell Aerodrome, Farway Common, Watchford Farm and Branscombe airfields should be afforded space to leave the circuit, carry out checks and procedures and establish a safe cockpit environment before changing frequency to Exeter. Likewise, VFR traffic departing Exeter should be able to change frequency to Dunkeswell or SafetyCom with sufficient time and space to make contact before joining the circuit.

The CAA's "Take 2" principle must be applied to avoid pinch and choke points as well as to provide headroom below CAS. Pinch points will also affect transiting traffic which will be routing around the new CAS and between any chokes created by inadequate design.

The South Coast corridor should be maintained with sufficient size to as to aid the safe flow of East/West VFR traffic. Consideration must also be given to the ACP's relationship with D012 and the requirements of the MOD.

By the very nature of the gliders, The Devon & Somerset Gliding Club will have specific needs and requirement in order for them to continue to operate in a safe and efficient manner. The ACP must take into consideration their needs and work toward a harmonious and equitable solution.

Harmonized operations between commercial and GA aircraft will increase overall efficiency and reduce the environmental impact as well as making savings by the reduction of operational cost through minimisation of time spent in the Exeter circuit and therefore time spent holding on the ground.

I understand that previously a Listening Squawk was not considered appropriate but this system seems to be functioning perfectly well in the rest of the UK. If on reflection, a Listening Squawk was deemed to be suitable we would be happy to support its use.

I hope my comments are taken in a positive manner and I look forward to further discussions as we move toward a harmonized and safe air space. In the meantime should you require any clarification or further information, please do not hesitate to contact me.

Yours Sincerely,

[redacted]

Chairman

Devon Strut

(A member club of the Light Aircraft association)

[redacted]

From: secretary@dsgc.co.uk
Sent: 18 December 2021 17:00
To: ACP Exeter Enquiries
Cc: [redacted]
Subject: Exeter Airport ACP Design Options - response from Devon and Somerset Gliding Club

Dear [redacted]

Please find attached the Devon and Somerset Gliding Club Ltd response to the Exeter Airport ACP Design Options Comprehensive List document dated 19th November 2021.

Please acknowledge receipt.

Kind Regards

[redacted]
DSGC Secretary
secretary@dsgc.co.uk

on behalf of DSGC Management Committee

cc: [redacted] DSGC, Airspace liaison

Devon and Somerset Gliding Club Ltd
North Hill Airfield
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17 December 2021

EXETER AIRPORT ACP DESIGN OPTIONS – RESPONSE OF DEVON AND SOMERSET GLIDING CLUB (DSGC)

This letter is in response to the 'Design Options – Comprehensive List' document dated 19th November 2021, and the Focus Group meeting for aviation stakeholders on 8th December.

Section 5.1 of the document invites stakeholders' views or comments on the options presented, including: preferences; suggested amendments to the designs shown; alternative ideas; and any options that should not be taken forward. These points are set out as follows, together with brief background information necessary to understand the context of DSGC operations:

1. **Evaluation criteria adopted in this DSGC response and relevant background.**
2. **Significant points arising from the Focus Group meeting.**
3. **Overview of DSGC gliding operations & safety issues arising from changes in airspace classification.**
4. **Evaluation of the options.**
5. **Alternative ideas - (1) modernisation of IAPs with switch to southerly orbits.**
6. **Alternative ideas – (2) time-switched flexible use of airspace.**
7. **Summary and Conclusions.**

1. EVALUATION CRITERIA AND RELEVANT BACKGROUND

1.1. **Design Principles.** Whilst Stage 1 of CAP 1616 requires that change sponsors agree design principles with stakeholders as the basis for the development of options, this was not done: this has been highlighted in letters and emails from DSGC to both EDAL and the CAA. Nevertheless for the evaluation of the Options document, DSGC looks below at the options presented in the light of the principles agreed between the change sponsor and the CAA. Additionally - and particularly in these circumstances - it is also appropriate to consider the options in light of the relevant industry guidance on airspace design.

1.2. **Additional criteria – 1. Minimum volume of airspace.** EDAL has advised stakeholders on 9 September 2021 that the resumption of the ACP process is *"in support of the UK Airspace Modernisation Strategy [CAP 1711, AMS] which has committed to modernising the UK airspace – both low level around airports and the wider network at a higher level".* CAP 1711 sets out the parameters for meeting the objective of airspace modernisation, one of which is to *"use the minimum volume of controlled airspace consistent with safe and efficient air traffic operations".* (AMS page 23). This stipulation of minimum volume to meet the objective of airspace modernisation thus clearly gives guidance for the continuation of this ACP process.

1.3. **Additional criteria – 2. Minimum classification of airspace.** SARG's Policy Statement dated 14 August 2015 for RMZs and TMZs sets out in paragraph 1.2 *"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".*

1.4. **Use of historic Waypoints.** The continued use for IAPs of the historic Waypoints of LETSI, NEXAN, BATSU, SISRI, EBOBA and OTBOT for Initial Approach Fixes - with TE26I and TE08I for Intermediate Fixes - give rise to approach tracks to the Final Approach Fixes TE26F and TE08F which are inefficient and now, militate against minimising the volume of controlled airspace. These Waypoints were created in Class G airspace when there was no requirement to minimise volume and impact. With the proposal for reclassification of airspace to create a known environment beyond the current ATZ and the commitment to the modernisation of the low-level airspace, there is now a requirement to minimise volume and impact, so these Waypoints and IAPs should be revised. This will be referred to below.

2. SIGNIFICANT POINTS FROM THE FOCUS GROUP MEETING

2.1. **Main driver for a 6 nm radius for the proposed CTR rather than a 5nm radius.** It was stated that the 5 nm radius being classed unviable whilst the 6 nm radius was classed as viable was *"more to do with approaches than departures."* Post-meeting note: This statement gives added weight to the need to revise the historic Waypoints and IAPs.

2.2. **Altitude of bases and tops of proposed reclassified airspace.** The point was raised by [redacted] of DSGC as to why the bases of the stubs were at 1500 feet rather than 1700 feet in Option 19/the previous ACP. In response it was stated that all heights, such as 1500, 1700 and 3000 feet can be considered further, with an indication that 1700 feet base would probably be satisfactory. Additionally, it was stated that some of the bases to the north were lower in the majority of options document than in the Option 19, and these could be raised to Option 19 levels. Post-meeting note: In view of the points raised in paragraphs 3.1 on local terrain heights and 3.7 and 3.8 on funnelling of traffic, below, DSGC considers that the base of re-categorised airspace in the Dunkeswell area should be at least 1700 feet.

2.3. **Re-design of IAPs.** [redacted] of DSGC raised the point that the historic Waypoints were widely drawn, particularly the northerly ones and could be revised to bring them in closer to reduce the requirement. In response it was stated by [redacted] that there was no requirement to contain the T bars shown in the document. Both [redacted] and [redacted] said this could be looked at to see what effect it could have, but stated that cost was a factor. [redacted] of the BGA said *"We would encourage you to look at the approach designs to see where those can reduce the overall airspace footprint, I know that's something you've just committed to doing, but that's something we'd definitely like to see".* Post-meeting note: it is not accepted that cost should be a factor in limiting the related commitment to modernising the lower airspace, which should be undertaken on the basis of the Design Principles and industry guidance. Cost was not an agreed principle.

2.4. **Tighter radius turns for proposed PBN SIDs.** [redacted] of DSGC suggested that tighter radius turns, for example by the use of NADP 1 departure procedure, could assist in minimising the volume of any reclassified airspace. It was indicated that this can be considered.

2.5. **Time-Switched Flexible Use of Airspace (FUA).** [redacted] of DSGC commented that FUA was not included in the options document, and explained the DSGC proposal of Class G during for example 10 am to 6 pm, and a higher classification outside those set times. [redacted] responded by stating that *"It's something that can be taken forward to look at"*, a point subsequently confirmed by [redacted] [redacted] indicated that the CAA has no policy on FUA.

2.6. **Minimum size and avoidance of choke points.** [redacted] of the Devon Strut emphasised the need to keep the airspace design simple and to avoid pinch-points/choke points and to keep it as small as possible.

2.7. **Flexibility of design.** Both [redacted] and [redacted] reiterated two points. Firstly that (with the exception of the need for a first turn not before 1000 feet) all indicative departure routes in the document are only that – indicative – and are capable of some flexibility. Secondly, that EDAL is open to all suggestions for amendment of options and new ideas towards meeting the overall ACP objectives.

3. OVERVIEW OF DSGC GLIDING OPERATIONS & SAFETY ISSUES FROM CHANGES IN AIRSPACE CLASSIFICATION

3.1. **North Hill Airfield.** The airfield lies on a south-west promontory of the Blackdown Hills at 920 feet amsl. The airfield is roughly on a west-east alignment. From the airfield's SW corner a ridge runs northwards (providing limited ridge soaring in a WNW wind); and eastwards past the clubhouse (providing limited soaring in a south wind) before turning south at about 850 feet amsl to Hembury Fort and Hembury Hill. It should be noted that the distance from the centre point of Exeter RWY 08/26 to the SW corner of North Hill airfield (closest point of the airfield) is only 8.5nm.

3.2. **Launches and circuits.** Winch launches are generally 1200 – 1800 feet aal (approximately 2120 to 2720 amsl). Aerotows are most frequently to 2000 feet aal, however with many for training, introductory flights for members of the public and for aerobatics to 4000 feet aal (2920 and 4920 amsl). A landing circuit requires positioning at the upwind end of the airfield at around 800 feet aal.

3.3. **Local soaring.** For training and early solo flights, local soaring is generally within 5 – 8 nm of the airfield if lift (thermals) is reasonable. On good soaring days there can be 4 training gliders and maybe 20 other club and private gliders all soaring in the North Hill local area. Local flying is generally upwind of the airfield which can result in a number of gliders in a relatively limited area. For this reason, good lookout is essential and any distractions from lookout are to be avoided as far as possible. A choke point would add an extra pressure and potential hazard if any more restrictive airspace is in close proximity to the airfield and there are additional non-DSGC aircraft flying through a limited corridor.

3.4. **Thermalling.** Particularly important to any flight - especially from a winch launch - is finding the first thermal to 'get away' and thus avoid a short flight due to the need to get into position for a circuit and landing. Once a glider has 'got away' then subject to finding further lift, the pilot hopes to have the opportunity for an extended flight: on good soaring days, this is likely to be between 3000 and 5000 feet aal (3920 to 5920 amsl). Thermalling (circling, sometimes with other gliders in the same thermal) whilst vitally maintaining a good lookout, requires a high degree of concentration. It would therefore be unsafe to change radio channel in a thermal, only when setting course after a thermal and clear of other traffic.

3.5. **Cross-country (XC) flying.** For XC pilots, 100 km tasks (usually triangles) are frequently possible around turnpoints such as Dorchester, Crewkerne, Crediton, Okehampton and Wimbleball to name a few. On strong thermic days, 300km tasks are possible either as triangles or out-and-return to, for example, Salisbury Cathedral or Launceston. In summer, sea-breeze-fronts (a line of lift just inland of the coast) are frequently flown outwards or returning along the coast.

3.6. **North Hill local airspace - existing constraints**.

3.6.1. **Dunkeswell ATZ and the Parachute DZ**. The existing airspace around DSGC airfield at North Hill is very busy, within a mile there is the widely used GA airfield at Dunkeswell and a co-located, freefall skydiving DZ. North Hill airfield is located entirely within the Dunkeswell ATZ. To ensure separation and co-operation between the three organisations a Letter of Agreement (LoA) is in place allowing DSGC to fly in the western third (approx) of the ATZ and Dunkeswell traffic stays out, similarly DSGC gliders keeps out of the eastern two-thirds (approx) of the ATZ used by Dunkeswell traffic, see Appendix 1. In addition, Skydive Buzz operate from FL150 freefalling and under canopies. DSGC pilots have to be aware of the parachuting operations and dependent on the prevailing wind, keep clear of the area being used for dropping by listening out on a common radio frequency.

All gliders and powered aircraft based at North Hill are fitted with Flarm electronic conspicuity, a system which is designed to warn of possible collision between Flarm-equipped aircraft. Later development has produced an internet-based map with all Flarm-equipped aircraft positions plotted in real time. Skydive Buzz monitor the Flarm display to ensure the drop zone is clear before dropping.

3.6.2. **Exeter Airport.** DSGC has an LoA with Exeter Air Traffic, if a DSGC glider wishes to fly south of a line of ground features, it has to make radio contact with Exeter ATC. This line is approximately two miles north of the 26/08 runway extended centreline.

3.7. **Practical and safety implications of more restrictive airspace classification.** Paragraph 3.6.1 and Appendix 1 illustrate that North Hill gliders are already considerably constrained with regard to access to airspace to the east, as they are obliged to circumnavigate the majority of the ATZ. Therefore additional constraints from a nearby more restrictive airspace classification could make unrealistic - or even prevent - some of the options currently available to pilots wishing to fly to or from the east.

Secondly and importantly, if any form of restricted airspace is close to North Hill's normal area for local flying when pilots need to seek a transit from ATC, or pass information on intentions to ATC, this would necessitate changing frequencies and making radio calls shortly after launch when focus should be on gaining and/or maintaining height. This is simply not possible when thermalling, and is a major distraction from lookout at any time and restricts listening out on common frequency for paradropping. For this reason, there is a serious safety issue in more restrictive airspace classifications being in close proximity to North Hill's normal airspace.

3.8. **Increased risk of collision due to funnelling through choke points.** Paragraph 3.6 above indicates the constraints already existing for DSGC pilots. However, in future it is likely that much GA traffic transiting east-west or west-east through the wider area may choose to avoid any airspace that carries a more restrictive classification ("brick wall effect"). Such transiting traffic is likely to choose to remain north of Exeter, and therefore may choose to fly between any newly-restricted airspace and the Dunkeswell ATZ. Throughout the Options document, this likely corridor is very narrow.

3.9. **Avoiding Airspace infringements "Take2".** The CAA guidance in document CAP 1840 suggest that GA aircraft flying close to controlled airspace (CAS) should "Take 2". This is to stay 200 feet vertically and 2 nautical miles horizontally from CAS boundaries. This guidance effectively creates a 2 nm artificial buffer around all airspace and 200ft vertical buffer which can be critical over higher terrain. The reduction in Class G airspace due to the artificial buffer is therefore exacerbating choke points and funnelling due to restrictions near Controlled airspace.

The implications of paragraphs 3.6 to 3.9 are that it is unviable for any restricted airspace to be positioned north of Honiton: that is, further north than the northerly edge of the easterly stub in Option 3.

4. EVALUATION OF THE OPTIONS

4.1. **Approved Design Principles.** Section 1.4 of the Options document sets out the priority order of design principles based broadly on consultation with aviation stakeholders, although selected and worded by EDAL and approved by the CAA without the required reference back to stakeholders. The Options document will be looked at below in the light of these prioritised principles, so it's worth briefly re-stating them:

DP1. Safety - maintain and ideally enhance safety.

DP2. Harmonisation. Airspace design must accord with AMS requirements.

DP3. Protection - new airspace should create a known traffic environment to protect the final approach and climb-out paths.

DP4. Access – new airspace should facilitate fair access to all airspace users.

DP5. Minimise impact. Airspace designs should minimise impact on non-Exeter Airport aviation locally.

DP6. Dimensions. The size and categorisation of any new CAS should be proportionate to the requirement.

DP7. Connectivity. Airspace should connect to the airways structure to ensure CAT remain inside CAS when arriving and departing Exeter Airport.

DP8. Environment. Airspace should minimise adverse environmental impacts including consequential impacts from displaced air traffic outside CAS.

4.2. **Industry guidance on airspace design.** This has been mentioned in 1.2 and 1.3 above, with reasons for its inclusion which make it relevant to the consideration of all options.

4.3. **Requirements for the stubs and the sub-options.** All options from 1 to 18 contain sub-options i.e. a. TMZ, b. RMZ, c. Class E, d. Class E+, and e. Class D CTA. It has been stated throughout the options that a TMZ alone is not sufficient to create the known environment, and indeed these statements were illustrated at the Focus Group by reference to the incident on 18 November 2021 depicted on radar display of an aircraft squawking 7000 but not talking to ATC.

Note: DSGC would strongly oppose any requirement for the use of transponders as a pre-condition for entry into any regulated airspace, due to the high cost, the logistical problems of retro-fitting them as additional equipment into the already-cramped space of many glider instrument panels and cockpits; and problems of increased battery power requirements.

As the majority of options (including those with an RMZ) have not been categorised as 'unviable', the RMZ options have therefore clearly been considered viable.

DSGC general statement on classification of the stubs. *On the SARG principle that the least restrictive categorisation of airspace should be the norm, DSGC is therefore of the view that in all options the stubs should be RMZs, unless a case is subsequently made for a higher categorisation. DSGC is strongly against the stubs becoming Class D airspace particularly when Exeter Airport considers an RMZ viable.*

In view of this general statement as preamble to comments on individual options, this assumption of an RMZ for the stubs applies to all individual options now considered below.

4.4. DSGC Detailed comments on the Options (with DPs highlighted that have not been met).

Option 0 – do nothing. Whilst this is preferable from a strictly DSGC perspective, it is acknowledged that this does not meet the most basic objective of the ACP - protection of the final approach and climb-out paths **(DP 1,3,7)**

Option 1. This is accepted as not viable, as it does not meet the most basic objective of the ACP - protection of the final approach and climb-out paths **(DP 1,3,7)**

Option 2. This is accepted as not viable, it also creates a significant choke point to the southwest of North Hill **(DP1,2,4,5,6,8)**

Option 3. Although EDAL has classed this as unviable, DSGC considers this **could** be viable and acceptable if the 5nm Circle and Stubs are RMZ, and provided amendments are made:

- the IF prior to the FAF is brought closer to the FAF, or the stub extended;
- adjustment of IAPs with the positioning of Transitions to the south;
- adjustment of SID parameters as required (see paragraph 2.4 above)
- see also paragraph 6.4 on time-switched Flexible Use of Airspace

Option 4. This is not viable for DSGC due to the choke point to the southwest of North Hill **(DP1,5,8)**

All further Options 5-19 containing Class D CTR within 2nm of North Hill are not viable or acceptable to DSGC due to Safety, Access and Impact (DP1,4,5); additional points are listed below.

Option 5. This is not viable for DSGC due to the large extent of Class D CTR within 2 miles of North Hill. It would create significant choke points and safety issues with other GA traffic **(DP1,4,5,6,8)**

Option 6. Agreed, as not viable for DSGC, due to adverse impact on local airfields including North Hill. **(DP 1,4, 5,6).**

Option 7. This is not viable for DSGC. Due to its size and position, it would have considerable impact on the normal flying area and would create 2 unacceptable choke points. **(DP1,4,5,6,8)**

Option 8. Agreed as not viable due to adverse impact on local airfields including North Hill **(DP1,4,5,6)**

Option 9. This is not viable for DSGC. Due to its size and position, it would have considerable impact on the normal flying area also causing unacceptable safety liabilities, due to unacceptable choke points. **(DP1,4,5,6,8)**

Option 10. This is not viable for DSGC. It would create significant choke points and safety issues with other GA traffic **(DP1,4,5,6,8)**

Option 11. Agreed as not viable due to adverse impact on local airfields including North Hill **(DP1,4,5,6)**

Option 12 This is not viable for DSGC. Due to its size and position, it would have considerable impact on the normal flying area and would create 2 unacceptable choke points. **(DP1,4,5,6,8)**

Option 13. This is not viable for DSGC. Due to its size and position, it would have considerable impact on the normal flying area and would create 2 unacceptable choke points. **(DP1,4,5,6,8)**

Option 14. Agreed as not viable due to adverse impact on local airfields including North Hill. Upper area and outer zone are totally unacceptable. **(DP1,4,5,6)**

Option 15. This is not viable for DSGC. Due to its size and position, it would have considerable impact on the normal flying area, and create unacceptable choke points, and the overhead airspace is totally unacceptable. **(DP1,4,5,6,8)**.

Option 16. This is not viable for DSGC. Due to its size and position, it would have considerable impact on the normal flying area also causing unacceptable safety liabilities due to choke points. **(DP1,4,5,6,8)**.

Option 17. This is not viable for DSGC. Due to its size and position, it would have considerable impact on the normal flying area, also causing unacceptable safety liabilities due to choke points and the overhead airspace is totally unacceptable. **(DP1,4,5,6,8)**.

Option 18. This is not viable for DSGC. Due to its size and position, it would have considerable impact on the normal flying area also causing unacceptable safety liabilities due to choke points and the upper airspace to the west of North Hill is totally unacceptable. **(DP1,4,5,6,8)**.

Option 19. This is not viable for DSGC. Due to its size and position, it would have considerable impact on the normal flying area, also causing unacceptable safety liabilities. It is excessively complex and has of course already been turned down by the CAA. **(DP1,4,5,6,8)**.

4.5. **Summary and conclusion.** There are clearly major safety issues with the options presented in the document. In view of those of the Design Principles which have been given the highest priority, and in view of the relevant industry guidance in paragraphs 1.2 and 1.3, DSGC has concluded that the Option 3 footprint consisting entirely of an RMZ (with the amendments listed above), could meet the primary objective of the ACP, whilst minimising the impact upon DSGC, and GA more generally in the North Hill / Dunkeswell area.

5. ALTERNATIVE IDEAS – (1) MODERNISATION OF IAPs WITH SWITCH TO SOUTHERLY ORBITS

5.1. **Background: comparable airports - implications.** The retention of the historic Initial Approach Fixes results in inefficient approach tracks for inbound aircraft which need to fly longer approaches than necessary. These are inconsistent with modernisation of low-level airspace and do not minimise the volume of CAS as now required. Looking at two comparable airports with RNP IAPs, both of Birmingham's approaches and Southampton's southerly approach successfully function with only one Intermediate Fix prior to Final Approach Fix, and no IAFs. In both cases, the IFs on each approach are closer to the FAF than is the case at Exeter Airport, see Appendices 2 & 3. This indicates that Exeter's IFs before the FAFs should be reviewed and IAPs completely updated, dropping the use of unnecessary Waypoints.

5.2. **A pragmatic and workable solution.** In view of the relatively close proximity of Dunkeswell and North Hill airfields to Exeter's principal final approach, a pragmatic modernisation of the airspace is to move Exeter traffic away from this area as far as possible for the safety of all. This has three elements:

5.2.1. Revise Waypoints and IAPs.

5.2.2. For RWY 26, design STARs and Transitions routing from EXMOR to TIVER to EX NDB, then routing 115 degrees to circa 9 DME before turning left to the IF. This track follows the current procedural ILS for runway 26 and is more efficient than the route via the RNP IAP fixes. Effectively the position 115 degrees from the EX NDB and 9 DME from EGTE would act as the only IAF for runway 26, this would work well for aircraft approaching from the south via BHD

with the added advantage of avoiding D112 which is likely to be encroached routing via BATSU; aircraft approaching from GIBSO could route direct to the IF.

5.2.3. Alteration of the EX hold. It is proposed that while the EX NDB and inbound track remained unchanged, the hold becomes a righthand pattern rather than the current lefthand pattern. This will move the footprint of the hold to the south, thereby reducing the volume of airspace required to become a Known Environment to the north.

5.3. The *northern boundary* of any required Known Environment achieved through an RMZ can realistically be based on the footprint of Option 3. This has a circular area based on a 5nm radius; it is noted that other airports operate using this measurement, for example Bristol. With further reference to the 5 nm radius, as previously noted, NADP 1 departures can be utilised if required, or use Radius-to-Fix departure procedures referred to in paragraph 2.6 of the Options document, requiring the immediate completion of the Fleet Equippage Survey.

6. ALTERNATIVE IDEAS – (2) TIME-SWITCHED FLEXIBLE USE OF AIRSPACE

6.1. **The FUA model proposed by DSGC: time-switched FUA.** DSGC proposes that a northerly sector of any area which is required to become part of a Known Traffic Environment should - during prescribed daytime hours - become fully open Class G airspace, and reverting to the Known Traffic Environment designation outside those hours. Possible times and area to be designated are considered below and would be annotated on the ½mil chart.

6.2. **Time-switched FUA – background.** The CAA's own Airspace Classification Review - Cotswold Report 2021 is currently considering time-switched FUA for specific CTAs in the Cotswold area – see Appendix 4. In addition, the adoption of FUA would be aligned with the parameters of the Airspace Modernisation Strategy for meeting its objectives, which state *"in aiming for a shared and integrated airspace, facilitate safe and ready access to airspace for all legitimate classes of airspace users, including commercial traffic, General Aviation and the military."* (AMS page 23).

6.3. **Rationale for use of time-switched FUA north-east of Exeter Airport.** The creation of a Known Traffic Environment north of Exeter Airport will naturally necessitate more aircraft needing to speak to ATC. From the viewpoint of DSGC, even the 'least worst' Option 3 footprint has a radial sector of 5nm, which is within 3.5nm of the edge of the airfield; additionally, if the CAA's Take 2 guideline referred to in paragraph 3.9 is to be followed, this leaves only 1.5 nm of airspace. This close proximity would clearly give rise to the need for DSGC gliders to make frequent radio calls to ATC. This has several potentially serious consequences

6.3.1. As noted earlier, this is a severe safety issue for the glider pilot.

6.3.2. Frequent calls could hinder the routine work of ATC.

6.3.3. It would reduce part of the sense of freedom which to many is the essence of gliding, and it's realistic to say that some of the membership may decide that given the new constraints, this causes them to quit. This is clearly a serious issue risking the viability of the club.

6.4. **Area proposed for time-switched FUA.** As a provisional proposal, DSGC considers that the most likely area to be to the benefit of both parties is – with reference to the Option 3 footprint – the area to the north of a straight line joining the northerly edges of westerly and easterly stubs (ie 2 nm North of 26/07 extended centreline).

6.5. **Time for switching similar to the Cotswold model.** DSGC proposes a daily timing of 09:00 - 17:00 UTC (10.00am to 6.00pm BST).

6.6. **Important Note.** DSGC urges EDAL to give serious consideration to this concept, as promised in the Focus Group. It is felt that the concept can be of benefit to both parties in maximising the utilisation of the limited resource that is airspace, in line with the aims of the Airspace Modernisation Strategy. The CAA is clearly moving towards a more flexible approach to airspace use, as demonstrated in Airspace Modernisation – Progress Report 2021, CAP 2281, paragraph 3.7 (see Appendix 5).

7. SUMMARY AND CONCLUSIONS

7.1. **Safety issues for DSGC.** There are major safety issues for Devon and Somerset Gliding Club from all options presented in the Options document. Whilst these may arise primarily because of the geographical facts of close proximity of the two airfields and are thus almost unavoidable, they nevertheless require a pragmatic solution to mitigate the possible effects and optimise the outcome for both parties jointly, and including the wider GA community.

7.2. **Design Principles - the key objective and its safeguarding provision.** The key objective of the ACP is set out in Design Principle 3, which states *"Protection – New airspace should create a known traffic environment to protect the final approach and climb-out paths at Exeter Airport".* This is subject to the proviso in Design Principle 1 that the *"Airspace design must at least maintain, and ideally enhance, aviation safety for all airspace users in the local area."*

7.3. **Industry guidance on airspace design.** The SARG airspace design principle states "…*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".*

7.4. **Minimum requirements on the approach.** Option 2 contains the general statement that *"Exeter Airport considers that the minimum requirement for aircraft on the final approach would be for protection of aircraft from the Intermediate Fix (IF), where they are lined up in the direction of the runway, prior to commencing descent".*

7.5. **RMZ.** An RMZ has the following benefits:

7.5.1. It creates a known traffic environment and thus meets the key objective of the ACP set out in Design Principle 3.

7.5.2. It satisfies the SARG design principle set out in its Policy Statement for RMZs and TMZs referred to in paragraphs 1.3 and 7.3 above.

7.5.3. It satisfies EDAL's declared minimum requirement for aircraft on approach referred to in paragraph 7.4.

7.5.4. Utilisation of the Option 3 footprint for an RMZ would provide the simplicity and relatively modest volume of airspace that a number of aviation stakeholders stated as being important.

7.6. **More restrictive classifications.** DSGC feels that to comply with the SARG principle, a safety need for a higher classification than an RMZ would need to be clearly demonstrated, particularly when the Options document repeatedly implies that RMZs are viable. (It is noted that two other aviation stakeholders, Farway Common Airfield and the Hangar 52 Group have requested additional information on Airproxes and incidents. This information would doubtless need to form part of any such demonstration of need).

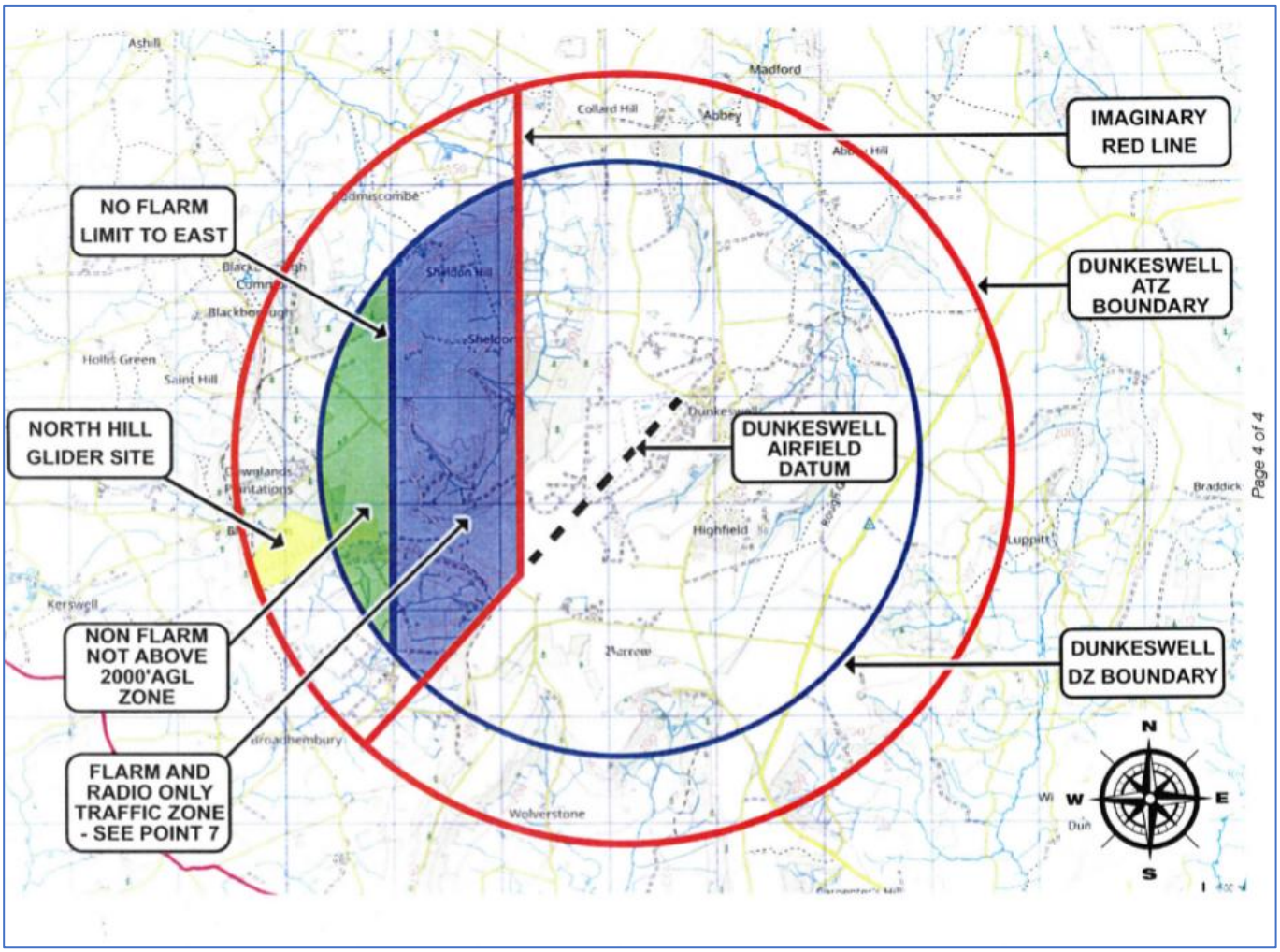
7.7. **A balanced solution.** DSGC accepts the need for protection referred to in Design Principle 3. DSGC believes that an RMZ within the footprint area of the Option 3 diagram balances the safety and commercial needs of EDAL with the safety requirements of all users. However, the safety issues described in this submission would be substantially mitigated by the adoption of a time-switched area which would essentially also reproduce the arrangements currently in place.

In conclusion, DSGC would like to thank EDAL for the opportunity to respond to this Design Document and would welcome further engagement, once you have considered all the Stakeholders responses, prior to the formal Consultation Stage.

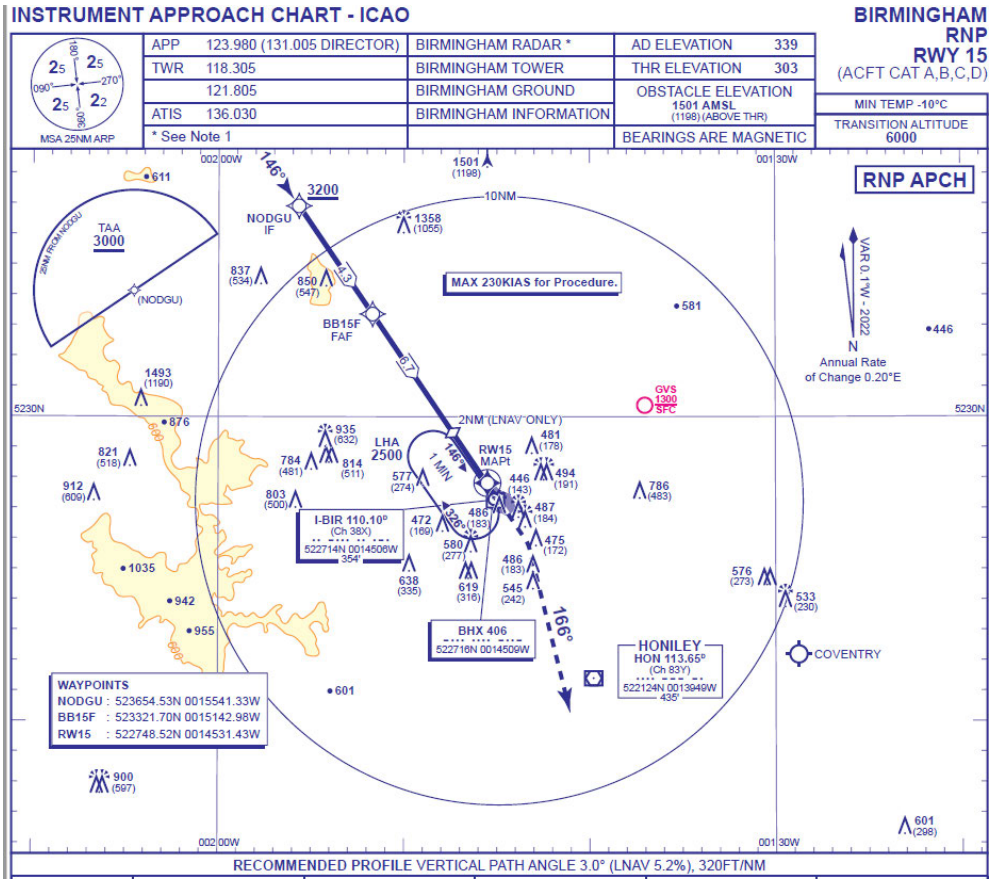
[redacted] Secretary
Devon and Somerset Gliding Club Ltd
on behalf of the DSGC Management Committee

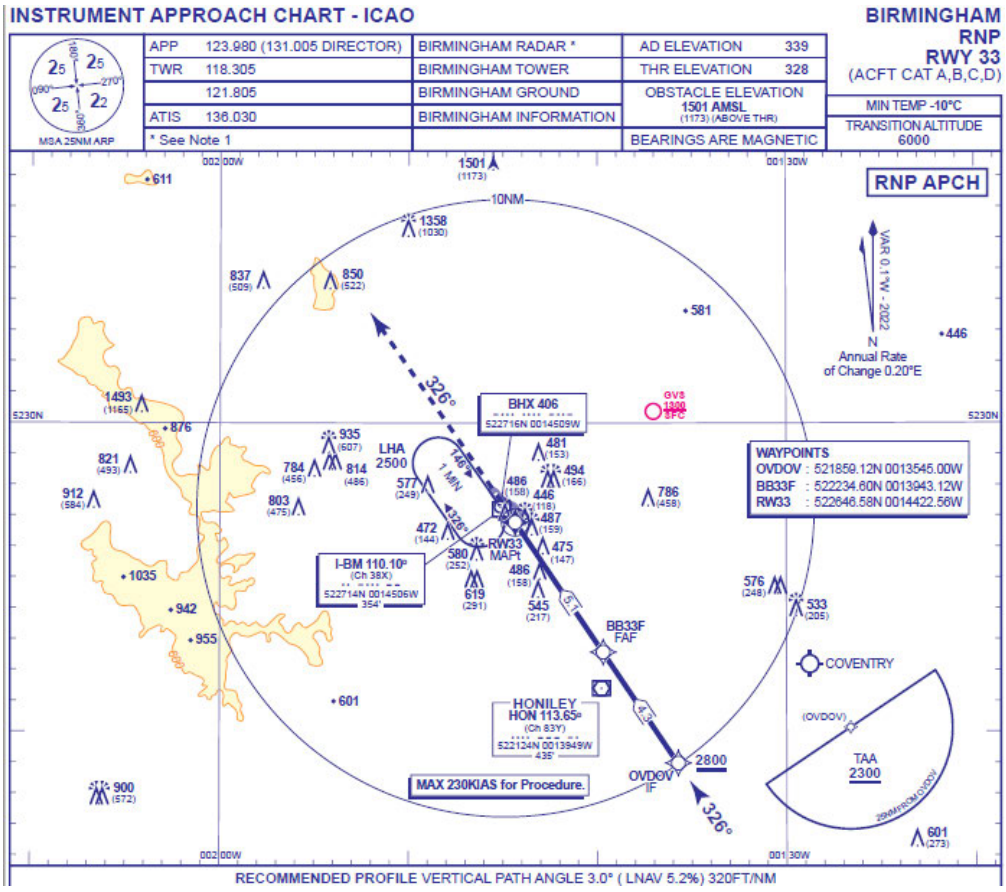
APPENDIX 1 – map of North Hill local airspace, from Letter of Agreement with Dunkeswell.

https://www.dsgc.co.uk/pdf/documents/dunkeswell_dz_map_may2021.pdf

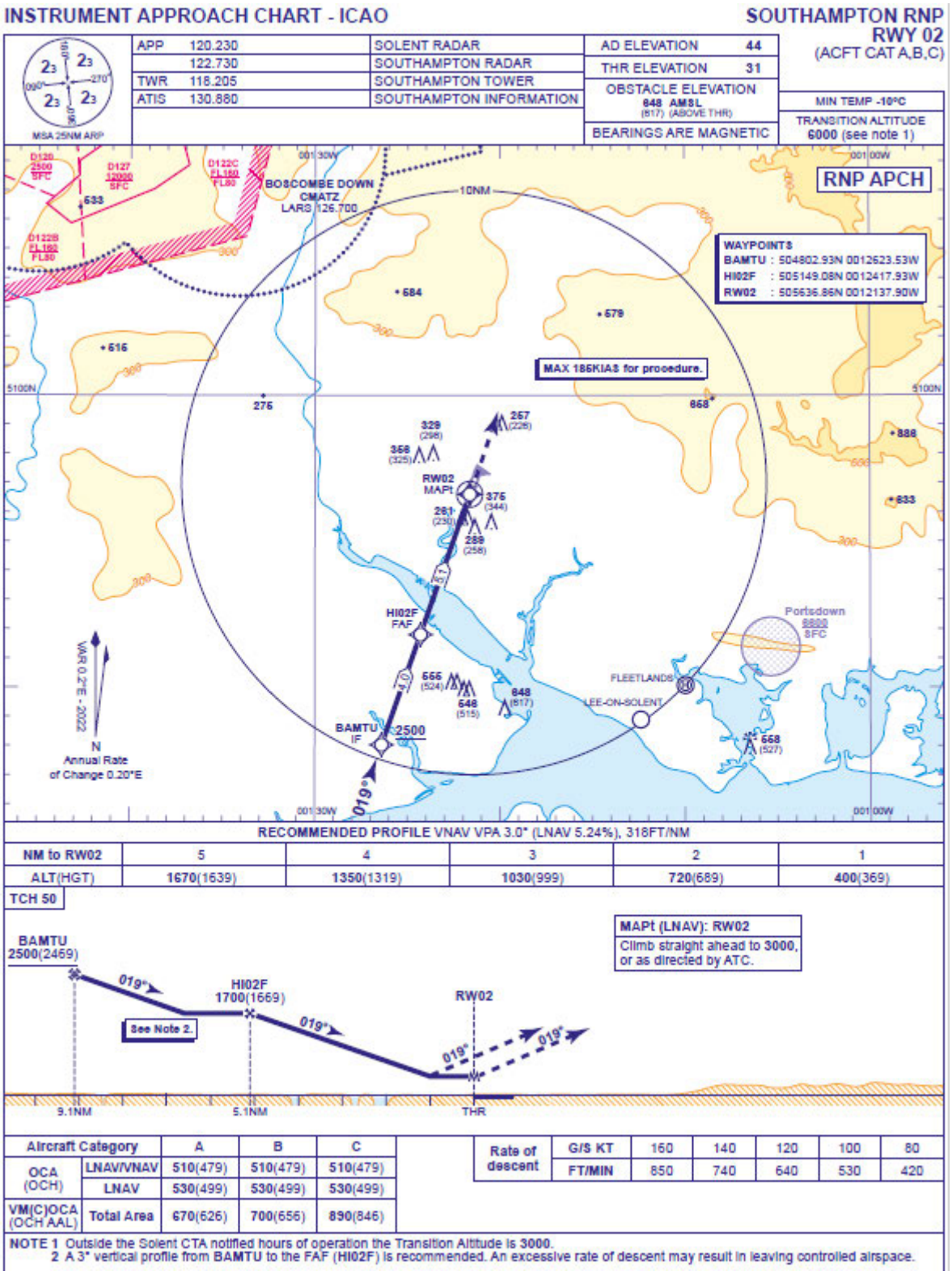


APPENDIX 2 – Birmingham RNP Approach Charts illustrating single IFs prior to FAF.





APPENDIX 3 – Southampton RNP Approach Chart to RWY 02 illustrating single IF prior to FAF.



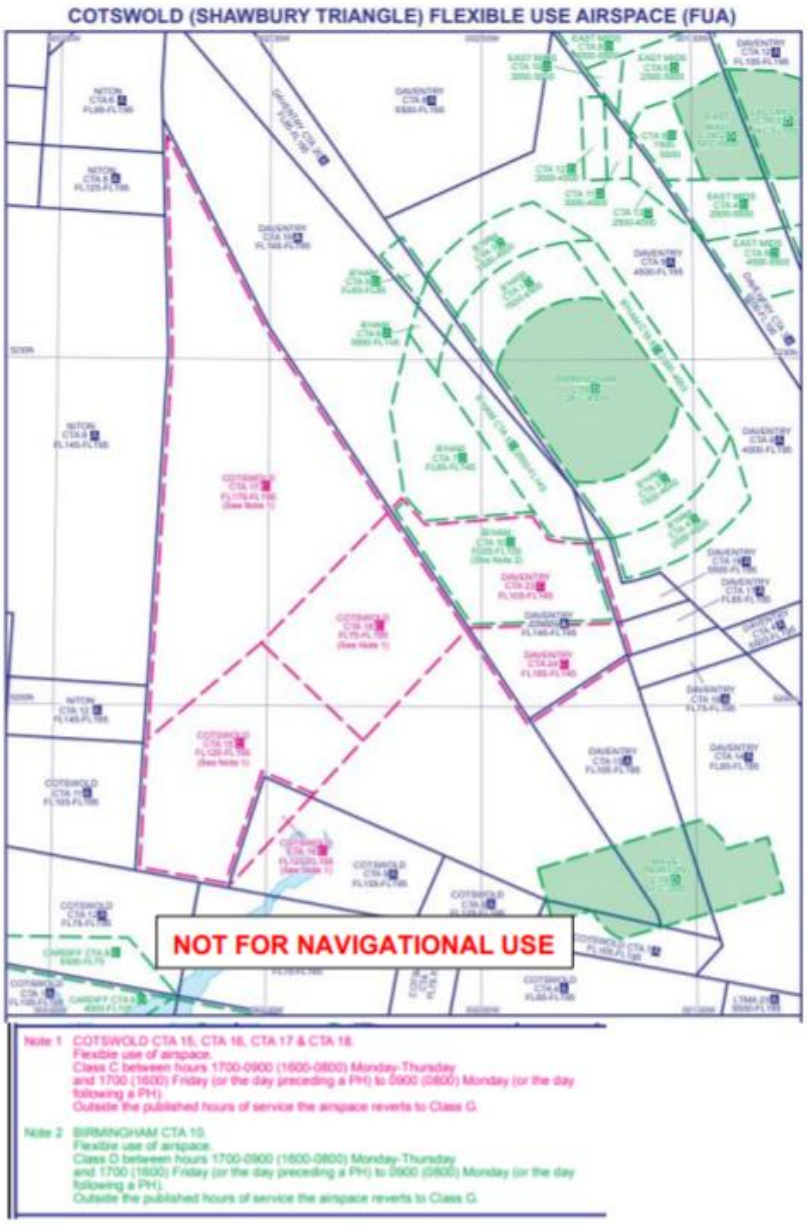
APPENDIX 4 – Airspace Classification Review - Cotswold Report 2021; CAP 2235

https://publicapps.caa.co.uk/docs/33/Cotswold%20Report%20V2.0%20-%20CAP%202235.pdf

Flexible Use Airspace - COTSWOLD CTA 15, CTA 16, CTA 17 & CTA 18

The Flexible Use Airspace, as shown in Figure 7, becomes Class C between hours 1700-0900 (1600-0800) Monday-Thursday and 1700 (1600) Friday (or the day preceding a PH) to 0900 (0800) Monday (or the day following a PH). Outside the published hours of service, the airspace reverts to Class G.

Figure 7: UK AIP Chart (ENR 6-82) Reproduced with permission from the CAA and NATS



August 2021 Page 21

APPENDIX 5 –Airspace Modernisation – Progress Report 2021, CAP 2281

information that allows for as much freedom to operate as possible for the end users whilst ensuring safe separation from other users.

3.5 We have started to deliver this through our work on Electronic Conspicuity and the initial developments for ground use of this information source through the Flight Information Display capability.

3.6 We will look to aid deployment of new user requirements through the use of existing regulatory frameworks to help manage the burden on existing and new users whilst developing operational integration further through the Lower Airspace Service concept.

Access to Controlled Airspace | Size and Regulation of Controlled Airspace | Flexible Use of Airspace ***(at low level and in addition to the existing Airspace Modernisation Strategy Initiative 3 scope)***

3.7 The Airspace Modernisation Strategy refresh is driven by the intent of improving the overall access to airspace for all users in the spirit of '*integration over segregation'*. It will focus on better use of airspace, especially with the principle of *'only using what is required and when'*. Access to controlled airspace is already available to those that ask, but there will be more emphasis on the type of airspace classification used, along with the types of service provided, for better flexibility for the Visual Flight Rules pilot. Flexible access airspace will be an aim such that it becomes controlled when an Air Traffic Control Service is required for Instrument Fligh Rules flights, and the in-use airspace will be structured around the specific procedures in use at that time. The CAA's Airspace Classification Team will continue to review the classification of airspace and to amend volumes where appropriate.

3.8 We are also required to seek to ensure that the amount of controlled airspace is the minimum required to maintain a high standard of air safety and, subject to overriding national security or defence requirements, that the needs of all airspace users are reflected on an equitable basis.

3.9 Furthermore, whilst segregation will remain for specific activities, where safety is a concern i.e. military firings, space launch etc., more flexibility will be sought for Danger Areas only being active for the minimum safety required and time required.

3.10 The long-term objective is that this airspace will better facilitate autonomous, self-managed use by suitably equipped aircraft.

Exeter Airport Consultative Committee

Secretary: [redacted]
EDDC, Blackdown House, Border Road, Heathpark Ind Estate, Honiton EX14 1EJ
Tel: 01404 515616 Email: [redacted]

15 December 2021

The Managing Director
Exeter and Devon Airport Limited
Exeter
EX5 2BD

Exeter Airport Consultative Committee's Response to the current Airspace Change Proposals

Reference: Design Options Stage 2 Document 71581 005
Dated 19 November 2021

Dear Sir,

Although not strictly within its remit, the Exeter Airport Consultative Committee considers that the Airspace Change Proposals (ACP) being developed by Exeter Airport, with two exceptions, are both sensible and proportionate for the safe operation of commercial traffic. Whilst the current use of Class G Airspace for transit between airway structures and the existing Aerodrome Traffic Zone (ATZ) has to date been reasonably safe, the creation of defined Class D Airspace will finally provide the enhanced level of control expected of a modern ATC system.

Exceptions:

1) With regard to the proposed Standard Instrument Departures (SIDs) for both runways we would wish to make the following comments:

Runway 26. Departures – UK AIP AD 2. EGTE-11 20 Jun 2019

AD 2.21 Noise Abatement Procedures:

a) Every operator of aircraft using the aerodrome shall ensure at all times that aircraft are operated in a manner calculated to cause the least disturbance practicable in areas surrounding the airport, particularly the City of Exeter.

c) Unless otherwise instructed by ATC, all jet aircraft and propeller aircraft whose MTWA exceeds 5700kg shall after take-off from:

i) Runway 26 climb on runway heading at maximum rate compatible with safety to 1000 ft aal and turn as soon as possible to avoid the City of Exeter.

The upwind end of this runway lies approximately 1.85nm from the densely populated eastern limits of the City of Exeter. The published Noise Abatement Procedure is adequate for maintaining a noise footprint that does not unduly impact the lives of residents. This assumption is supported by the fact that the airport has historically received very few noise complaints from residents beneath the current departure tracks that pass close to the City boundary.

The necessity to design a SID to conform to ICAO PANS-OPS 8168 Volume 2 – Construction of Visual and Instrument Flight Procedures precludes any possibility of avoiding overflying large swaths of the City. This is especially pertinent as the airfield has no current night restrictions on its operations. The alternative of creating a Radius-to-Fix initial departure procedures could solve the environmental problem so long as the current track distances to GIBSO and Berry Head are not unduly increased.

A viable alternative is not to publish a SID for this runway as the existing departure tracks after passing 1000 ft aal are calculated by the aircraft Flight Management Systems (FMS) and vary only slightly according to the actual radius of turn. From an ATC point of view this remains a predictable situation and would be further enhanced by the proposed creation of local CTRs and CTAs.
Runway 08.

2) The proposed departure track to GIBSO should be routed between West Hill and the town of Ottery St Mary. The arrival approach path to runway 26 passes directly over Ottery St Mary and we consider it unwise to route an easterly departure SID over the same town.

The Committee request that this submission be forwarded to the Civil Aviation Authority as part of Exeter Airport's ACP application.

Yours faithfully,

[redacted](Chair)

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ACP-2018-47 EXETER AIRPORT ACP DESIGN OPTIONS – BGA RESPONSE

The British Gliding Association (BGA) is the governing body of sport gliding in the UK and represents the interests of some 6500 members of the UK's 78 gliding clubs including the operators of some 2200 sailplanes.

Gliding

The sport of gliding includes a significant amount of cross-country flying. Gliders use rising air in thermals to climb and use the gliders very flat gliding angle to cover distance before again stopping to climb. Flying in rising air is fundamental to staying airborne.

Almost all cross-country flights are planned and flown to result in a return to base. Details of how gliders operate are available in AIC Y 036/2020. Most gliders flying cross-country are equipped with FLARM electronic conspicuity devices that have a recording function. As a result, the BGA can collect and analyse flight traces.

'Local' gliding occurs in daylight hours. Cross-country gliding occurs from 10am through to 6pm.

Comments

<u>The Problem EDAL is seeking to resolve</u>

The BGA responded to the 2016/17 Exeter ACP under CAP 725 provisions. In doing so, we recognised that Exeter had a safety concern with operating commercial flights in Class G airspace. We proposed several solutions reliant upon TMZs and RMZs with the aim of minimising the size of controlled airspace. We are encouraged to see that these airspace tools are being considered in this latest ACP.

The BGA continues to recognise that EDAL has safety issues with its existing operation and recognises that there is a risk to GA aircraft from commercial traffic. W acknowledge that FASI(S) places additional requirements on EDAL and understands that public funding is being made available to EDAL to support its ACP.

The BGA is aware that EDAL flight movements have reduced significantly since 2017. Whilst EDAL hopes that previous forecasts will be met, of course this is far from guaranteed. Commercial flight movements may remain low for many years to come, reducing the need for significant change.

[redacted]

Plans to solve EDAL's problem should be proportionate and take full and informed account of airspace stakeholders needs

EDAL will receive detailed responses from the Devon and Somerset Gliding Club (DSGC) and the Bath, Wilts and North Dorset Gliding Club (BWND). Both of these gliding clubs would be significantly affected by EDALs plans, as would a number of other gliding clubs and operators of aircraft that transit through the area.

DSGC could be severely damaged by the introduction of new airspace. Its operations rely on unfettered access to airspace located between its own airfield at North Hill and the Exeter ATZ.

BWND's position is representative of that of many gliding clubs in the south of England. All could be adversely affected by having long-standing cross-country routes curtailed or damaged by the introduction of new controlled airspace.

Dartmoor Gliding Club (DGC) is located to the west of Exeter at Brentor and has access to high-level wave soaring areas over Dartmoor which could be adversely impacted by any new airspace to the west of Exeter. DGC's cross-country gliding routes to the east of Dartmoor and into Devon would also be impacted by new airspace.

The BGA expect EDAL to take very careful account of the needs of these clubs and operators as the airspace designs evolve.

Design Principles

The BGA notes that the Design Principles appear to recognise the need for the maintenance of safety margins for all airspace users. We understand this to include all non-EDAL traffic, whether in the immediate local area or that potentially pushed further afield to avoid new airspace. Specifically, we expect any solutions proposed to protect GA and gliding users from being funneled into narrower corridors and over higher or dangerous ground.

A Design Principle requires any airspace design to be proportional to the requirement. The BGA is surprised that one of the proposed designs that EDAL favour in the document is the one that the CAA rejected as disproportionate in 2017. We note, however, that many of the designs described in the engagement letter are for smaller airspace volumes than previously seen during 2017.

Design work should be carried out in good faith taking into account gliding stakeholder needs

The 2017 ACP work was time consuming and frustrating for the BGA, which is fundamentally volunteer resourced. We welcome being invited to comment on EDAL's thinking at this stage and looks forward to a transparent and open engagement. We believe that mutually acceptable solutions can be found if the sponsor and stakeholders understand each other's needs early in the process and develop innovative ideas that work for all parties. Clearly some compromises are needed in any such discussions.

Relevant material is supposed to be published in a timely manner on the CAA Airspace Change Portal. In general, we find that publications are added to the portal late in the process and sometimes too late for adequate consideration. It is requested that all relevant documents are published for all potential consultees to see in good time.

Previously designed approaches should be modernised

The EDAL GNSS procedures were introduced without any consultation during 2006. In 2006 there was little focus on environmental issues. The current 3-degree procedures will use more fuel, inflict noise on a larger area and require more airspace than would be the case with 3.5-degree procedures. There are example 3.5-degree procedures in use today (eg Prestwick). 3.5-degree procedures directly support the '5.Minimise Impact' and '8.Environment' Design Principles.

Summary

1. Any controlled airspace north of Exeter Airport presents a significant threat to DSGC's ongoing viability. Any new airspace should be designed to minimise the impact on DSGC aligned with DSGC's response.

2. Any controlled airspace that causes GA funneling north of Exeter Airport is unwelcome to GA and specifically to glider traffic. It should be avoided to the greatest extent possible in EDAL's designs.

3. Any controlled airspace that causes GA to fly over high ground is unwelcome to GA and specifically to glider traffic. It should be avoided to the greatest extent possible in EDAL's designs.

4. Any controlled airspace south of Exeter Airport should be at the highest level possible to enable GA and glider flights to continue below CAS.

5. Any procedures and associated airspace design that is taken forward must minimise amount of controlled airspace supported where necessary by use of other airspace tools including TMZ, RMZ and flexible use airspace.

Yours sincerely

[redacted]
Chief Executive Officer
[redacted]

BATH, WILTS AND NORTH DORSET GLIDING CLUB

The Park, Kingston Deverill, Warminster, Wilts, BA12 7HF
Tel: 01985 844095 Web: www.bwnd.co.uk

15 December 2021

Airspace Change Manager
acpexeterenquiries@exeter-airport.co.uk

Exeter Airport ACP Design Options document 19th Nov 2021. Issue 1. Design Options. Comprehensive List.

Comments and views submitted by The Bath Wilts and North Dorset Gliding Club (BWNDGC) Dec 2021

Thank you for the opportunity to review and comment on your document and to attend the focus group on Weds 8th Dec at Exeter. We understand that the interaction at this stage is preliminary to the production of formal Design Options and that such options will be exposed to a larger audience in a full consultation in accordance with CAP1616. Our response at this stage is designed to assist with your work in proposing workable airspace designs.

In positioning our comments we wish to state the following.

Our comments represent the views of the members of BWNDGC, an active gliding club based at The Park, between Mere and Warminster.

BWNDGC is an affiliated Club of the British Gliding Association (BGA), with a membership of over 100. Many of our members are active cross-country glider pilots and have flown sorties westwards from our airfield into the West Country over many years. As Exeter Airport has grown into a commercial operation over time we have done our best to co-operate with its growing commercial activities and to fly past safely whilst pursuing our legitimate activities.

We fully support the activities and rights of other gliding clubs to exercise similar freedoms and not to be unduly constrained. This especially applies to the Devon and Somerset Gliding Club (DSGC) at North Hill and to the Dartmoor Gliding Club (DGC) at Brentor. We wish to remind EDAL that other glider pilots from much further afield also fly sorties regularly into the West Country from as far away as Cambridge, Dunstable, Lasham, Bristol and the Cotswolds.

We fully support the comments submitted by The BGA as our parent body.

We were a respondent to the previous ACP consultation which the CAA rejected in 2018. We believe that the reasons for rejection at that time remain correct and valid. We believe that those reasons and rationales need to be fully considered in the current ACP design work as it progresses.

We submit comments on:

1 The potential impact on our operations of new CAS in the Exeter area

2 The application of the Design Principles in your document

3 The minimization of negative impacts on our operation

4 The application of CAP1616 principles in this ACP

1 The potential impact on our operations of CAS in the Exeter area.

Glider pilots have a strong preference for flying in class G airspace. Cross Country gliding requires frequent changes of height, speed and direction, and this fits very poorly with the orderly flow of a controlled environment. Glider pilots are permanently busy with the tasks of navigating around airspace, finding the next available source of rising air, of exploiting it when found, and adjusting navigation decisions to take account of other aircraft, varying weather conditions and the land-ability of the terrain below and on route. Using the radio and acting under the control of others is a huge impediment to progress and potentially to flight safety.

It should be evident from the above that new controlled airspace would not be a first choice for the gliding community. However, BWND recognises that operating a commercial airport as EDAL has to date, in Class G airspace, is not without risk. No glider pilot wishes to fly in close proximity with large commercial aircraft, as the risks to both parties are real and significant. We made this position clear in the 2017 ACP and repeat it for the record now.

Our main concern, however, is that the multiple options proposed in the current document work to the benefit of the sponsor and are wholly inadequate in taking into account the needs of other non-EDAL airspace users. It is disappointing that they represent only the very limited range of desired outcomes for EDAL at the expense of others. It is our intention to consider and comment.

Any CAS that would cause significant funnelling of GA traffic outside of CAS would be unacceptable. The safety of GA traffic would be radically reduced to the benefit the commercial traffic in CAS. This applies in terms of heights to be flown as well as geographical locations. Complex and large airspace designs can cause traps and cul-de sacs for uncontrolled aircraft. These must be avoided at the design stage. The alternative would be to create a barrier across all major routes to the South West for Class G traffic, resulting in a significant part of the country being cut off for the safety conscious GA pilot.

2 The application of the Design Principles in your document

The Design Principles as published allow for a great deal of flexibility in interpretation. We welcome the ability to state what would be acceptable to us and would allow us to continue to enjoy the safe use of the airspace surrounding Exeter Airport.

DP1 notes the need for the maintenance and enhancement of safety for all airspace users. We wish to state that funnelling if GA aircraft over higher ground and into narrower corridors has the potential for worsening the safety for those pilots, and should not be a consequence of any changes to airspace design under this ACP.

DP5 notes that new airspace designs should "where possible" minimise the impact on non-Exeter Airport traffic in the "local" area. Both of these qualifiers leave considerable room for confusion. We seek clarity on your definitions for these terms in your design work. In our terms local to Exeter airport begins at the edges of the ATZ and extends for at least 10 miles in a N/S direction, and 20 E/W.

DP6 requires that and new controlled airspace should be "proportionate" to the requirement. A definition is required in this case also, and some view on to whom it might be deemed proportionate. In the end it will be the CAA's view that prevails, but what will guide EDAL in the drafting of designs? Better clarity is required in this area.

3 The minimization of negative impacts on our operation

In this section we deal with the potential impacts on cross country gliders from clubs other than DSGC, specifically our own, but this will also apply to other clubs as mentioned in the positioning statements above, para 3. DSGC has its own specific needs for airspace close to Exeter, which it covers in detail in its own response.

We choose not to comment in detail on the multiple options in the document. The options are a compendium of possible solutions, many of which you already discount as unworkable. We are, however, surprised to see option 19 proposed again as it was roundly rejected by the CAA in 2017 as disproportionate. In suggesting it again at this stage EDAL must clarify what has changed between 2017 and now which makes it in any way a viable option. We are encouraged to see that some of the options proposed bias new airspace designs towards the south of Exeter Airport in an attempt not to disturb current Class G excessively to the north.

Cross country glider pilots frequently use the class G airspace across the SW peninsula in the Exeter area, avoiding the ATZ and the approach feathers as shown on the half mil charts. They generally fly at heights between 1000ft and 6000ft agl on a good day, choosing to remain at the higher end of these extremes whenever possible. Generally gliders do not choose to fly over the sea, or to have their routes very close to the coast, although there are times when this is a good option, as stated below.

Any airspace below 6000ft amsl that extends to the north of the current Exeter ATZ and of a line from Honiton to Crediton would significantly reduce access and options for glider pilots. Specifically the gap between it and the Dunkeswell DZ would cause dangerous funnelling and a reduction in safety to pilots denied the choice of routing to good gliding conditions. Any airspace restriction that forces gliders over higher ground causes a reduction in safety margins and an increase in the likelihood of an outlanding.

The presence of commercial aircraft at lower levels at a distance from Exeter is a cause for safety concerns under present arrangements. For example, GA aircraft in the Axminster Class G area do not expect to meet commercial traffic below cloudbase but this does sometimes happen. Commercial aircraft should be kept at much greater heights in class G. Speed and lookout considerations are very different for these classes of traffic, posing a danger to both.

Crediton is a frequently visited turnpoint for XC gliders, and access from the east towards Dartmoor is important to us. Any CAS that extends beyond Crediton to the west at below 6000ft amsl reduces options for us and would be unwelcome.

The southern side of Exeter airport towards Exmouth and Sidmouth is less-used by cross country gliders but on occasions is by far the preferred routing under specific conditions. Were this area to be in low level CAS below 4000ft amsl we would lose significant options currently available to us. There are occasions when access below 2000ft to the cliffs between Exmouth and Lyme Regis is important to us.

4 The application of CAP1616 principles in this ACP

We welcome the opportunity to comment at this stage in the process, and acknowledge that EDAL is going beyond the basic letter of the requirements of CAP1616 in that regard.

We seriously question the proposal to retain the existing GNSS Instrument Approach Procedures as stated in Section 3.1. This limits your thinking and options. The current hold patterns for runway 26 inevitably push your aircraft movements northwards of the runway, to the detriment of local GA traffic. When raising this point at the 8th Dec focus group meeting the main reason given was the cost of redesigning the procedures. We suggest that this should not be seen as a valid reason for failing to consider change under the CAP1616 process. We ask that due consideration should be given to such changes in the search for a viable solution that meets the Design Principles in all respects.

The detailed list of consultees has not been made available to us but a generic one has. Clearly there is a list of obvious candidates that derives from CAP1616 requirements. Sponsors are required to consult widely on their proposals. To us that means not just the immediate neighbours but also those further afield who may be impacted by any new proposal. To that end we would request that any aviation users with operations within a 10 mile radius of the boundary of any proposal under consideration should be contacted and given the opportunity to comment. They could be affected by displaced air traffic. This requires good diligence from proposers but we consider it to encourage satisfactory compliance with the CAP1616 requirement to consult fully and transparently.

We note that the document on which we are invited to comment has yet to be published in the CAA airspace portal. We question why it has not. Relevant documents should be published in a timely manner in order to allow maximum transparency. We can see no reason for delaying publication of this document which is dated 19th Nov and could have been published immediately after release. Delay undermines the apparent transparency of the exercise.

Conclusions.

We trust that our comments will be viewed as constructive and to have been given in good faith. EDAL will recognise that this process generates unwelcome work for an organisation such as ours, run by volunteers.

We further hope that lessons have been learned from the 2016/17 ACP, and remind EDAL that the responses submitted by the BGA, our own club and DSGC all contain valid information and views. Recreating those responses is time consuming and tedious. We understand that EDAL would prefer to see this ACP as a green field activity, but we request that you review those previous responses in good faith when generating detailed options for this ACP. We think they have value in your deliberations.

We look forward to seeing our views and comments reflected in your documents and proposals as they come forward.

[redacted]
For BWNDGC 15h Dec 2021

[redacted]

[redacted]
Managing Director
Exeter Airport

14 December 2021

Dear [redacted]

Re: Response to the Exeter Airspace Change Proposal from the Residents of Hangar 52

Thank you for the invitation to attend the Focus Group meeting on Wednesday 8 December, which was very informative and helpful to us.

This letter is being sent on behalf of the GA residents from Hangar 52 and the points below follow up on the questions that were raised during the focus group meeting and also a review of the ACP document Design Option document dated 19 November 2021.

The comments and observations below fall into two categories: a) General Considerations and b) specific issues relating to the design of any new proposed controlled airspace.

General Considerations

a) As GA pilots, we totally support the concept of improving safety for all airspace users (both professional and amateur) and will back any reasonable proposals providing they are seen to be proportionate, calculated to significantly reduce the risk of future airproxs, avoiding actions and incursions etc, and do not adversely impact other airspace users around the local area.
b) It would be helpful to understand and have documented in a tabular type format, comparisons of total air traffic movements (Commercial, GA, Military etc) with other similar sized airfields in both Class G airspace and also those within Class D airspace.
c) We were presented with the number of airproxs, avoiding actions and incursions into the ILS fans for Exeter for a control period, but again, it would be helpful to understand how these numbers relate to airproxs, avoiding actions and incursions for other similar sized airfields in both Class G and Class D.
d) When designing any new proposed additional controlled airspace, it would be helpful if the proposal can state the expected impact on future airproxs, avoiding actions and incursions etc.
e) It would be helpful to have all the airproxs and incursions from the control period plotted on a chart where avoiding action was required so that we can better understand where the geographical areas of main concern really are.

Specific Issues in relation to design of any new proposed controlled airspace.

a) The over-riding principles when designing any new controlled airspace should be:
    i) keep it as simple as possible,
    ii) keep the space and volume as minimum as possible,

iii) avoid any "pinch points" for traffic not wishing or able to enter controlled airspace, and
iv) ensure that non controlled air traffic is not forced to fly through the overheads of other small airfields such as Farway Common and Branscombe.

b) It was noted that having any controlled airspace down to 1500ft particularly to the East of the airfield will be potentially dangerous due to the undulating terrain with hills up to 700ft, the proximity of the Honiton radio mast together and difficult 2-way radio communication at anything under 3000ft.
c) Flying at low altitude is generally more turbulent and uncomfortable for light aircraft than at higher altitudes, and any forced landing from a low level is inherently more dangerous with little gliding height to manage the situation.

So finally, in order for us to be able to provide an informed response to the various ideas and options, we need to also further understand the impact of each of these in terms of the stated safety objectives as detailed in para 1.2 of the ACP document, namely:

- Safeguard routinely utilised flights operating under Instrument Flight Rules (IFR) at Exeter Airport.
- Ensure safe separation between the IFR traffic and promote proactive coordination of traffic operating under Visual Flight Rules (VFR) near the Airport.
- Protect aircraft operating within the Visual Circuit at Exeter Airport that routinely need to extend beyond the boundary of the ATZ.
- Enhance efficiency by providing airspace that will reduce the instances of avoiding action.
- Reduce traffic delays on the ground and in the air.

At the present time, we only have some of these facts available to us and making or approving options / decisions based upon incomplete information could seriously undermine this consultative process and may even impact the safety of airspace users in the future.

Our recommendation would now be to re-publish the ACP document with further detailed information as outlined above and then to represent it to the Focus Groups in due course. Of course, this will necessitate a delay to the next Gateway, but if the options are thoroughly considered and well thought out, there is significantly more likelihood that the process will gain support from local users and will be successful in the long term.

I hope that the above comments etc are seen as being constructive and if you or the Osprey consultants would like to discuss them in more detail, please do not hesitate to call or email me.

G-RONS Group Administrator
On behalf of Hangar 52 residents, Exeter Airport

Farway Common Airfield
[redacted]

Exeter Airport ACP Team
Exeter Airport
Devon

By Email

Ref: Response from Aviation Stakeholder Farway Common Airfield

15th December 2021

Dear Team,

We write in response to your Exeter Airspace Change Proposal – Design Options Document and in reference to the ACP Stakeholder Meeting held on Wednesday 8th December. We are the new owners of Farway Common Airfield which sits below the ILS for Runway 26.

While we broadly support the enhancement of safety for CAT using Exeter, we believe that careful consideration must be given to other airspace users. As airfield owners, aircraft owners, instrument pilots, residents of Exeter Airport and users of private aircraft for extensive business travel, we do see the arguments from all perspectives. The main points that we put forward for consideration are:

1) Part of the argument for the ACP given are based on various statistics for incidents that have happened over a reasonably long period of time. This argument leads to support a potentially large swathe of airspace that could become Class D. However, what has not been made clear is where/when/height that these incidents actually occurred. Are they limited to a single geographic area or specific pinch point? With this information, Stakeholders would be better placed to agree or disagree with each airspace design – currently there are too many unknowns and not enough detailed evidence to properly support any given design.

   With respect to the above, please can the airport provide a chart with the incidents plotted with a specific height?

2) In our combined experience of over 50 years of flying in the UK, many GA pilots avoid Class D airspace wherever possible. Furthermore, "walls of Class D" do preclude, or make transits difficult. For example, Bristol became notorious for not allowing transits and recently Cardiff refused transits without a flight plan being submitted (on one occasion we were told (on a clear VFR day) that we'd would only receive clearance after upgrading our VFR flight to an IFR flight (while in the air) – this option is not available for many pilots). Just last week we were refused a transit of the Edinburgh CTA (Class D) without a flight plan. Regardless of NATS guidance, reports being made to NATS and protests of pilots, once the airspace is in place, the 'owners' of such airspace run it as they see fit. Without written rules about the use and proper recourse in place to counter such abuse, the airspace becomes locked.

   For this reason, we would oppose any form of expansive Class D airspace.

3) Our plans for Farway Common Airfield are to base resident aircraft there, create a small maintenance base, allow training and hold various fly-ins. Indeed one Farway event attracted 120 aircraft. With a ceiling of just 700' above the field, the safety procedures at Farway become too compromised for us to operate safely.

   Firstly, it is the CAA's recommendation to encourage a Standard Circuit (in our case, we believe 800' to be a reasonable, safe height that also doesn't upset our neighbours) and an overhead join. While some compromise may be necessary (and we would welcome discussion about changing our procedures), Airspace that is too expansive or low over the field makes coming up with safe procedures very much more difficult.

   Secondly, the airspace in the vicinity of Farway already very busy at low level. We see many transiting aircraft running north/south over the field, microlights and a significant number of paragliders. Further compressing this traffic to a maximum of 700' AGL seriously increases the risk of air-to-air collision and is, in our opinion, creating the perfect conditions for an accident.

   With overhead airspace at 700' AGL we cannot operate a proper circuit, ensure safe joining instructions or realistically allow our circuit to be used for any kind of training.

   VFR safe flying practices also require us to fly at over 500' from any structure or person (so essentially means no flying below 500' period). So if 1500' Class D airspace were to be granted, **this would further compresses the available airspace to fly in to just 200'.** This significantly increases the possibility of an air-to-air accident.

4) The hills to the east of Exeter Airport extend to 870' AMSL along with various aerials up to 1536' AMSL. The terrain is hilly with deep valleys and large areas of forest. Navigating below a 1500' AMSL (or 1700' AMSL ceiling dependent on the ACP design) gives a letterbox of just 630' above ground level to navigate inside of (bear in mind the 500' rule too).

   Firstly, the turbulence at below 2000' AMSL in the area is significant. We invite any non-pilot to fly with us and experience just how significant and uncomfortable this is; Furthermore how pilot workload increases as a result while navigation becomes more difficult – compromising safety.

   Secondly, in the event of engine failure at just 600' AGL, the opportunities for a safe forced landing are seriously reduced (and is in fact very dangerous). With the deep valleys, trees etc, this makes the safety implications of an enforced 1500' AMSL ceiling an unacceptable compromise of GA safety.

5) As mentioned during the meeting, it is extremely difficult to obtain reliable two way radio contact when to the East with Exeter Radar at below 1500' AMSL. This problem exists right up until in the vicinity of Branscombe and Farway. By introducing low level airspace, we will be creating an unknown environment with pilots not being able to talk to the local LARS service.

   Without investment and changing the radio system at Exeter, low level airspace becomes unworkable and compromises safety.

6) With terrain at 800' and a low airspace ceiling height, marginal VFR weather or where there is low broken cloud would make navigation impossible to execute safely. Without the airspace in place, pilots are able to climb above broken (or unbroken if Instrument Rated) to safely navigate over terrain and obstacles. With a maximum of 1500/1700' before airspace is encountered, pilots have this valuable safety option removed from them – again significantly impacting safety and encouraging "scud running".

   With the implications of these points, we are certain that introducing airspace could create more safety issues than it could solve. To date there have been no mid-air or Controlled Flight Into Terrain incidents in the area – by introducing the airspace, we believe that avoidable accidents could be created.

7) The opportunity to review any granted airspace was discussed during the meeting. What undertakings does the airport make to continue collecting (and plotting data as per point 1) so that any such airspace can be reviewed objectively and with a genuine intention to change airspace if necessary?

8) In any event, we agree with the widely supported view that any granted airspace should be as small and non-complex as possible. With too many varying heights and complex shapes, flight planning for VFR GA becomes difficult. Innocent and well-prepared pilots can accidentally become infringers and face the full force of the CAA with possible licence and legal implications if they get things wrong. It would be a great shame and contrary to the desire of NATS/CAA to make airspace less complex if an overly large, complex shape, lots of levels style of airspace was granted.

9) Some discussion at the meeting was made around implementing a combined TMZ/RMZ. The airport agreed that in most cases (at least 95%), a GA pilot would do as told to take avoiding action of any aircraft approaching/departing Exeter. Given the low number of incidents (I recall 8 being cited), this would reduce the number to less than 0.4 incidents over the period of recording them. Given this drastic reduction in incidents and the creation of a "known environment" by implementing a TMZ/RMZ, is anything greater than this actually really needed for Exeter airport given the relatively low number of movements?

10) In the event of any controlled airspace being granted to Exeter, we would strongly lobby for such airspace to be reduced to Class E outside of airport published operating hours. In the last 2 years the airport has been open at significantly reduced hours – why impose the airspace when there is no one in the tower? This allows summer evening flying when the airport is closed without restriction.

11) Discussion was made around changing certain procedures and descent profiles which would reduce the airspace requirements by over a mile in size. We would support the change in the approach procedures to accommodate this.

Within the consultation, we have been asked to submit our views on the proposed designs. The objective of Exeter is to enhance safety and create a known environment for CAT. With this in mind our belief that the design of Option 5 (with the following caveats) would be least impactful on Stakeholders:

- Taking into account the reduced airspace requirement (Point 9) by adjusting procedures to provide:
    - Class D CTR, surface to FL65 Circular zone 5 NM radius (smaller due to changed procedures)
    - Stubs – TMZ/RMZ extending from 2000' to FL65 – see point 9.
    - With TMZ/RMZ stubs at 2000' (not 1500 or 1700' due to the reduced requirement for airspace), Farway Common would still be able to continue to operate a 800' AGL circuit with compromise on overhead joins.
    - The airspace used for North/South transits would then give a ceiling of ~1200' to enhance glide clear and reduce the effect of compacting everyone into a tight letterbox of airspace.
    - The smaller amount of airspace needed would allow safe transit of obstacles and weather in marginal conditions.
    - All airspace reverting to Class E outside of Exeter Operating Hours.

We hope that the enclosed views and suggestions are constructive and useful for you and look forward to receiving the plot of incidents on a chart.

Yours sincerely,

[redacted]

[redacted]
Farway Common Airfield

[redacted]

From: [redacted]
Sent: 07 December 2021 14:45
To: ACP Exeter Enquiries
Subject: Exeter Airport ACP design options

Good afternoon,

Having had the opportunity to read the design options and rational behind the options I am concerned on the impact on the cross-country flights from Dartmoor gliding club on an easterly route, destination North hill or the Park or even further afield. I fly out of Dartmoor Gliding club at Brentor and have concerns about the proposals for changes and the impact on my flying.

Having reviewed all the design options the only design option that has been considered viable by Exter airport is option 19. This does not look like a workable option for glider pilots with varying CTA's next to each other which would impact on any cross-country flights north of Exeter.

My concern is that to have a change in CTA's from 3000 to 5500 so close to each other would seem impractical as a glider in the 4,000 CTA would need to remain in the area and descend to 3,000 before moving into the 3,000 CTA. How do they then move from a CTA of 3,000 to 4,000 as they would need to climb to make the move ? and all movements requiring ATC permission. This would limit the glider pilot and could impact on safety when flying cross country or to other airfields due to the weather conditions they require whilst climbing and descending.

There has been no indication of the expected growth in the use of Exeter airport and number of movements. Has a review been taken of the number of flights at the various times of the day when VFR flying is taking place from other airfields ? What about departures and arrivals are they increasing the movements mainly from Northerly arrivals or Southernly arrivals ? the same applies to departures.

I would like to see little change to the class G airspace north of Exeter to maintain the safety for current VFR users travelling North of Exeter and on an East West and West East route.

Regards

[redacted]

[redacted]

From: [redacted]
Sent: 13 December 2021 14:35
To: ACP Exeter Enquiries
Subject: Proposed Airspace

Hello

I am emailing in response to the proposed airspace changes to the airways for Exeter airport.

I believe this was refused in 2018, I don't believe any issues from the last proposal have been resolved by any of these proposals. I also don't believe Exeter airport has had any growth since 2018 to warrant this proposal. Some of the proposals are as big as Gatwick.

As a glider pilot we do fly cross country from the east to west and reverse to get back to our home airfield. These proposals are going to filter more VFR flights into a smaller area which cannot be safe.

I do note a number of points that your proposal does say.

Protect aircraft operating within the Visual Circuit at Exeter Airport that routinely need to extend beyond the boundary of the ATZ.

Due to the South West having 2 coasts that are close together this means a tighter corridor for other users. The chances of a collision increases.

Reduce traffic delays on the ground and in the air.

How can this help Exeter airports delays on the ground? This has to be down to staff and the infrastructure within the airport and nothing to do with other aircraft. A lot of airports within the country have less airspace than most of the proposals that Exeter has put forward and they cope well.

Enhance efficiency by providing airspace that will reduce the instances of avoiding action.

I would think the safest way to reduce instances or taking avoiding action would be to turn towards the South and climb to a safe altitude to then turn back to the course to the north if needed.

It seems to me that the Proposals for Exeter are aimed at totally at the airport with no consideration to local airfields or other aviators.

I must finish by picking up on the statement that all the proposals except one are not safe. This leads me to ask a question? If none of these go through, Will Exeter airport cease all operation? If your answer to this question is as I suspect NO, you will have to admit that all operations are in fact safe.

[redacted]
Glider Pilot

[redacted]

[redacted]

From: [redacted]
Sent: 14 December 2021 15:32
To: ACP Exeter Enquiries
Cc: [redacted]
Subject: Exeter Airport ACP Design Options

Dear [redacted]

Thank you for allowing Exeter City Council to comment on the Exeter Airport Airspace Change Proposal.

The Exeter Airport Airspace Change Proposal (ACP) concerns adapting existing airspace structure surrounding Exeter Airport to assist Air Traffic Control (ATC) in providing enhanced levels of safety and information to aircraft. The City Council is supportive of implementing an ACP, as this will make airspace over and surrounding Exeter, safer for all. The City Council are supportive of introducing Option 19, as shown within the consultation document.

As part of this process you are introducing new departure routes, which are known as Standard Instrument Departures. These routes are designed to provide safe, predictable and efficient navigation routes for aircraft taking off and ascending to join the en-route airway structure. Without understanding the environmental impact (noise and air quality) on the city, for the different departures for Runway 08 and Runway 26, we are unable to provide a final comment at present. From the information that has been provided in the consultation document and from attending the consultation event on 8 December 2022, we would like to provide some initial thoughts.

Runway 08 Departures
From reviewing Figure 1 and Figure 2 within the consultation document, this would be the preferred option for the City Council, as this would reduce the level of air traffic movements over the city. It is anticipated that this would reduce noise and air pollution over a large populated area, as well as improving safety. The City Council would need to see modelled data provided by the airport, to confirm our recommendation.

Runway 26 Departures
From reviewing Figure 3 and Figure 4 within the consultation document, this would be our least favourable option being implemented. We have come to this conclusion as aircraft would be banking and turning over the city, which could cause additional noise and air pollution over the city. This needs to be confirmed by the airport. From discussions at the consultation event, Airport representatives indicated they receive more complaints when an aircraft is turning.

Runway 26 Departures
From reviewing Figure 5 and Figure 6 within the consultation document, this would be the City Council's second option for being implemented. The reason for this, is that aircraft would continue to climb over the city and would have less environmental impact on Exeter.

When modelled data is provided on each Standard Instrument Departures, we will be able to provide additional comments. Could you please confirm, when this data will be provided and the timeframe for implementation for the Airspace Change Proposal and the Standard Instrument Departures?

We look forward to hearing back from you.
Yours sincerely

[redacted]
Portfolio Holder for City Management

[redacted]

Service Lead – Net Zero, Commercialisation, Skills, Business and City Centre
Net Zero & Business, Environment & City Management
Exeter City Council

[redacted]

See our privacy notice for details on how we manage personal information.

[redacted]

From: [redacted]
Sent: 17 December 2021 10:44
To: ACP Exeter Enquiries
Subject: Exeter proposed Airspace Stage 2 proposals

Dear CAA,
Exeter Airport's intention to enclose airspace to the North of their existing airspace will squeeze East / West transiting aircraft of all types more closely together. This will reduce overall safety.

Fast jets and slow gliders, helicopters etc use this corridor, and squeezing them into a narrower corridor is not sensible nor safe.
Yours faithfully,
[redacted]

[redacted]

From: [redacted]
Sent: 17 December 2021 16:54
To: ACP Exeter Enquiries
Cc: [redacted]

Subject: RE: EXETER AIRPORT – AIRSPACE CHANGE PROJECT

Dear [redacted]

Thank you for providing NATS the opportunity to respond to your consultation.

In principle, NATS is supportive of the design principles and the majority of the design options presented. NATS will, of course, continue to work with you during the LD1.1 and LD1.2 projects

With regard to Option 19 we have the following comments to make:

The design option carried over from your previous Airspace Change Proposal does not appear to have considered some of the previous conversations between Exeter and both NATS Cardiff and Bristol.

Where the proposed increase to the vertical limit is FL105, consideration needs to be given to how traffic would be managed between Bristol, Cardiff and Exeter.

However, with LD1.2 aligned, we can work to consider the airspace becoming part of the LD1.2 airspace to still achieve the Exeter concept albeit with a slightly amended design.

Rgds

[redacted]

Manager NATS Operational Policy

[redacted]

NATS Internal

From: ACP Exeter Enquiries <ACPExeterEnquiries@Exeter-airport.co.uk>
Sent: 18 November 2021 12:10
Subject: EXETER AIRPORT – AIRSPACE CHANGE PROJECT

Dear Exeter Airport Stakeholder,

EXETER AIRPORT – AIRSPACE CHANGE PROJECT

Exeter and Devon Airport Ltd (EDAL) is seeking to adapt the airspace structure surrounding the airport to assist Air Traffic Control (ATC) in providing enhanced levels of information to aircraft operating in and out of Exeter Airport and to aircraft operating in the local area. As a major contributor to the local economy, EDAL fully appreciates the impact its decisions may have on local communities. Consequently, the airport is eager to listen to the views of its stakeholders, acknowledge any concerns and work with you when changes to the way we operate are planned.

This project is following Civil Aviation Authority (CAA) guidance described in CAA Publication (CAP) 1616. This document describes the process airports follow to ensure an appropriate level of engagement with those who may be affected. The introduction of an alternative airspace arrangement would create a known air traffic environment that would allow Exeter ATC to provide a greater level of protection to local and transiting aircraft; additional benefits would be the provision of a greater level of integrity and efficiency to all local airspace users. We are currently at Stage 2A which requires the development of options that seek to meet the original Statement of Need. The options are required to align, where practicable, with the Design Principles that were generated in Stage 1 with the assistance of our stakeholders.

EDAL wishes to fully engage with its stakeholders by offering the opportunity to influence the outcome of this project within the constraints of what is technically possible. We are seeking your feedback on the design options contained in the attached document to ensure that we have correctly understood and accounted for stakeholder concerns specifically related to the design options.

In addition, EDAL would also like to take this opportunity to invite you to a Focus Group about the design options for the Airspace Change where you will have the opportunity to ask questions about the designs and provide your feedback. The Focus Group is intended to be a small group to maximise the opportunity for face to face discussion and explanation, so we request that no more than two people from each organisation attend. The sessions will be held in person at Exeter Airport, although for those individuals who cannot or do not want to attend in person in the current climate, we will be providing an online link for people to join virtually. Dates and times for the Focus Groups will be as follows:

Aviation Stakeholders	Wednesday 8th December 2021 10am – 12pm
Non-aviation Stakeholders	Wednesday 8th December 2021 2pm – 4pm

Please could you let us know if you or a colleague are planning to attend by Wednesday 1st December 2021. Details regarding the location and parking instructions will be forwarded nearer the time, once numbers have been confirmed and a suitable location decided on. If you are planning on driving, we will provide complimentary exit passes for the car park. We would ask that those individuals who wish to attend in person conduct a lateral flow test for Covid-19 prior to attendance. For those who wish to attend online, we will send a link to the meeting shortly before the event.

We look forward to receiving your response and involving you in our design process. Thank you in advance for taking the time to help us with this project.

Yours Sincerely

[redacted]

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Part of Regional & City Airports

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www.exeter-airport.co.uk

[redacted]

From: [redacted]
Sent: 19 December 2021 09:25
To: ACP Exeter Enquiries
Subject: Paragliding and Hang gliding club absence from focus group

Hi,

I'm wondering how we go about being added to your list of stakeholders and those included in focus groups being consulted for your airspace change proposal? I'm the site office for the South Devon Hang Gliding and Paragliding Club, our members fly almost daily over the summer months and sometimes in large numbers in the airspace you're looking to change. We often fly close to the current airspace on our way east from sites on Dartmoor so you'll understand our concern that your proposed changes might put an end to 60 years for Dartmoor flying tradition.

I'm absolutely sure the North Devon, Somerset and Avon clubs would all also like to be included in this consultation.

Thanks in advance,
[redacted]