



# ExeterAirport

Part of **Regional & City Airports**



**O S P R E Y**

CONSULTING SERVICES

# Exeter Airport Airspace Change Proposal

Aviation Stakeholder Consultation Report

## Document Details

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	Aviation Stakeholder Consultation Report
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# Executive Summary

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Exeter and Devon Airports Limited (EDAL) extends our thanks to all organisations and individuals who took the time to participate and provide feedback to our public consultation that took place 10<sup>th</sup> March 2017 and 9<sup>th</sup> June 2017.

EDAL is the Sponsor of a proposed change to the current arrangements and procedures in the immediate airspace surrounding Exeter Airport. The proposed change will provide enhanced protection to aircraft on the critical stages of flight in departure and final approach.

As part of the Civil Aviation Authority's (CAA) Guidance on the Application of the Airspace Change Process (Civil Aviation Publication (CAP) 725) [Reference 1], EDAL is required to submit a case to the CAA to justify its proposed Airspace Change, and to undertake consultation with all relevant aviation stakeholders. This ensures that all stakeholders who may be directly or indirectly affected by the proposed change have an opportunity to provide comment on the proposal.

The Exeter Airport Airspace Change is hereafter referred to as 'the proposal'.

This document is a Report on the consultation carried out by EDAL between 10<sup>th</sup> March 2017 and 9<sup>th</sup> June 2017 in accordance with the requirements of CAA CAP 725 [Reference 1]. It includes an analysis of all submissions received throughout the consultation period, provides a summary of consultees that supported the development of a Controlled Airspace (CAS) construct and identifies the main issues raised by consultees that had concerns. It also provides EDAL's views in relation to those issues and outlines post-consultation action taken, or planned to be undertaken, by EDAL.

This document will form part of the Airspace Change Proposal (ACP) submission to the CAA. The ACP will detail the case for the proposed change to the current arrangements and procedures in the immediate airspace surrounding Exeter Airport.

## Subject of the Consultation

The purpose of this consultation was to gather and analyse the views of the various aviation stakeholders concerning a proposal to change the current airspace arrangements in the immediate airspace surrounding Exeter Airport. Fundamentally, the consultation enabled EDAL to obtain or confirm views and opinions about the potential impact of the proposed airspace change.

## Conclusions

The Consultation Document was circulated to a total of 53 organisations and individuals. Of these, three consultation emails were returned as undelivered; however, two of these consultees were still able to participate in the consultation, making the total number of consultees 52. The aviation consultees included the Ministry of Defence (MOD), airlines, aircraft operators, adjacent aerodromes, local airspace users and the national bodies representing all UK aviation interests who may be affected by the proposed changes. National bodies such as the Light Aircraft Association (LAA), the British Airline Pilots' Association (BALPA), and the Airport Operators Association (AOA) were represented through the auspices of the National Air Traffic

Management Advisory Committee (NATMAC), sponsored by the CAA. A number of military organisations are also members of the NATMAC.

## Consultation Statistics

A total of 18 responses (34 %) were received from the 53 consultees contacted.

In addition, EDAL received a total of 414 responses from other individual members of the General Aviation (GA) community and other parties.

Of the total of 432 responses received; 15 consultees supported the proposal; 406 consultees objected to the proposal; and 9 consultees provided a neutral response, whereby the consultee did not object or provided no specific comments on the proposal. Two responses included clarification questions, but the stakeholder did not formally provide a response.

## EDAL Conclusions

The Consultation has produced significant opposition from the GA community supported by the BGA and the GAA. The main emphasis of the concerns are as follows:

- The dimensions of the suggested CAS construct are disproportionate to density of commercial activity at Exeter Airport;
- Consideration from the Devon and Somerset Gliding Club (DSGC) that the club would be forced to close or re-position elsewhere to continue flight operations;
- CAS design producing a funnelling effect as aircraft avoid and go around the CAS rather than transit through;
- Access arrangements for local and transitory airspace users.

The Consultation raised concerns from the MOD relating to the effects that implementation of CAS may have on MOD flight operations in the area and the development of a Flexible Use of Airspace (FUA) concept relating to the primacy usage of Danger Area 012/3 complex.

NATS raised concerns relating to the airspace design which was assessed as potentially complicating Air Traffic Management (ATM) arrangements in the area.

## Next Stages

EDAL will carry out a further stage of engagement with aviation stakeholders, and analysis of responses before submitting a formal ACP to the Safety and Airspace Regulation Group (SARG) of the CAA.

Following receipt of the formal ACP, the CAA will assess the documentation to determine if there is sufficient information presented on which to base a decision. Thereafter, a 16-week period follows during which the CAA conducts its own internal analysis of the final proposal and consultation results, before arriving at a Regulatory Decision.

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# 1 Glossary

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Acronym	Meaning
ACC	Airport Consultative Committee
ACP	Airspace Change Proposal
agl	Above ground level
AIP	Aeronautical Information Publication
AIRAC	Aeronautical Information Regulation and Control
amsl	Above mean sea level
AOA	Airport Operators Association
AOPA	Aircraft Owners and Pilots Association
APS	Approach Control Surveillance
AR	Airspace Regulation
ARPAS	Association for Remotely Piloted Aircraft Systems
ATC	Air Traffic Control
ATM	Air Traffic Management
ATS	Air Traffic Service
AWY	Airway
BAA	British Airports Association
BABO	British Association of Balloon Operators
BALPA	British Airline Pilots' Association
BATA	British Air Transport Association
BBAC	British Balloon and Airship Club
BBGA	British Business and General Aviation Association

Acronym	Meaning
BGA	British Gliding Association
BHA	British Helicopter Association
BHPA	British Hand Gliding and Paragliding Association
BMAA	British Microlight Aircraft Association
BMFA	British Model Flying Association
BPA	British Parachute Association
CAA	Civil Aviation Authority
CAP	Civil Aviation Publication
CAS	Controlled Airspace
CAT	Commercial Air Traffic
CCD	Continuous Climb Departure
CDA	Continuous Descent Approach
CFIT	Controlled Flight Into Terrain
CNS	Communication, Navigation & Surveillance
CTA	Control Area
CTR	Control Zone
DAATM	Defence Airspace and Air Traffic Management
DAP	Directorate of Airspace Policy (part of the CAA – now SARG)
DfT	Department for Transport
DSGC	Devon and Somerset Gliding Club
ELFAA	European Low Fares Airline Association
FIR	Flight Information Region
FMS	Flight Management System
ft	Feet



Acronym	Meaning
GA	General Aviation
GASCo	General Aviation Safety Council
GAT	General Air Traffic
GAPAN	Guild of Air Pilots and Air Navigators
GATCO	Guild of Air Traffic Control Officers
GPS	Global Positioning System
HCGB	Helicopter Club of Great Britain
HQ DAAvn	Headquarters Director Army Aviation
HTZ	Helicopter Traffic Zone
IAIP	Integrated Aeronautical Information Package
IFP	Instrument Flight Procedure
IFR	Instrument Flight Rules
IMC	Instrument Meteorological Conditions
LAA	Light Aircraft Association
LoA	Letter of Agreement
MAA	Military Aviation Authority
MATZ	Military Air Traffic Zone
MSA	Minimum Safe Altitude
MOD	Ministry of Defence
NAP	Noise Abatement Procedure
NATMAC	National Air Traffic Management Advisory Committee
NATS	The National Air Traffic Service Provider
NERL	NATS En-Route Ltd
NCHQ	Navy Command Head Quarters

Acronym	Meaning
NM	Nautical Miles
NPR	Noise Preferential Route
OS	Ordnance Survey
PSR	Primary Surveillance Radar
RAF	Royal Air Force
RMZ	Radio Mandatory Zone
RPAS	Remotely Piloted Aircraft Systems
RTF	Radiotelephony
SARG	CAA Safety and Airspace Regulation Group
SERA	Standard European Rules of the Air
SVFR	Special Visual Flight Rules
TMA	Terminal Control Area
TMZ	Transponder (SSR) Mandatory Zone
UAV	Unmanned Air Vehicles
UKAB	UK Airprox Board
UKFSC	UK Flight Safety Committee
VFR	Visual Flight Rules
VMC	Visual Meteorological Conditions
VOR	VHF Omni Directional Radio Range; a type of short-range radio navigation system for aircraft

## 2 Introduction

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*This document is a Report of the consultation carried out by Exeter and Devon Airports Ltd (EDAL) between 10<sup>th</sup> March 2017 and 9<sup>th</sup> June 2017, on the proposed change to the current airspace arrangement in the immediate surroundings of Exeter Airport. The aim of this report is to present details on the statistical data arising from the responses to the consultation, together with an analysis of the feedback received.*

### 2.1 Exeter Airport Airspace Change Proposal

EDAL is the sponsor for a proposed change to the current airspace arrangement in the immediate surroundings of Exeter Airport, to provide enhanced protection to aircraft on the critical stages of flight in departure and final approach. As part of the Civil Aviation Authority's (CAA) Guidance on the Application of the Airspace Change Process (Civil Aviation Publication (CAP) 725) [Reference 1], EDAL is required to submit a case to the CAA to justify its proposed airspace change and to undertake consultation with aviation stakeholders. This ensures that aviation stakeholders who may be directly or indirectly affected by the proposed change have an opportunity to provide comment on the proposal. EDAL has engaged Osprey Consulting Services Ltd (Osprey) to project manage the Airspace Change Process on their behalf.

This document is a Report on the consultation carried out by EDAL between 10<sup>th</sup> March 2017 and 9<sup>th</sup> June 2017. The background to this consultation and the methodology used are detailed in Annex A1 to this document. The aim of this report is to present details on the statistical data arising from the responses to the consultation, together with an analysis of the feedback received.

EDAL would like to thank all consultees and other individuals who took the time to participate in this consultation and for their very useful feedback.

### 2.2 Subject of the Consultation

The subject of the consultation was EDAL's proposal to establish Class D Controlled Airspace (CAS) surrounding Exeter Airport.

The overall aim of the EDAL Airspace Change Proposal (ACP) is to augment safety and advance the airspace efficiency and Exeter Airport flight operations. This will be achieved through:

- The design of CAS to adequately contain current Exeter Airport published Instrument Flight Procedures (IFPs); and
- The provision of lateral separation of arrival and departure routes and increase the opportunity for the use of Continuous Descent Approaches (CDAs) and Continuous Climb Departures (CCDs).

EDAL, as the sponsor of the proposed airspace change, is required to submit a case to the CAA to justify the change in airspace surrounding Exeter Airport. In addition, as

part of the CAA's Airspace Change Process, it is EDAL's responsibility to consult with all relevant aviation stakeholders who may be directly or indirectly affected by the proposal.

The purpose of the consultation was to gather and analyse the views of the various aviation stakeholders and local authorities concerning regarding the effects of the proposed airspace change.

## 2.3 Consultation Design Concept

*It was noted that many of the responses indicated that they thought that the CAS design concept, contained in the Consultation Document, was the final version intended to be forwarded to the CAA for deliberation; however, the design concept is preliminary and subject to review and potential amendments prior to delivery of the formal ACP to the CAA.*

## 2.4 Development of the Consultee List

A full list of consultees was developed with the advice of the CAA and is given at Annex A2.

At the start of the consultation, EDAL sent out notification to 53 consultees, comprising:

- 41 Aviation "National Organisations" (CAA National Air Traffic Advisory Committee (NATMAC list);
- 4 Airport Users;
- 6 Local Aerodromes/Aviation Consultees; and
- 2 Local Authorities.

Of these, three emails were returned as undelivered. Therefore, the total number of consultees that received the consultation email was 50. It should be noted however, that two of the aviation stakeholders that were initially returned as undelivered, provided a response from a separate e-mail source.

Further detail on the categories of consultee organisations is provided in Annex A2 of this report.

## 2.5 Consultation Confidentiality

The CAA Safety and Airspace Regulation Group (SARG) requires that all consultation material, including copies of responses from consultees and others, is included in any formal submission to the CAA of an ACP.

EDAL undertakes that, apart from the necessary submission of material to the CAA and essential use by Osprey for analytical purposes in developing this Report and subsequent ACP material, EDAL will not disclose personal details or content of responses or submissions to any third parties. EDAL and Osprey are signatories to confidentiality agreements in this respect.

## 2.6 Document Structure

This document contains six main Sections and four Annexes, outlined below for convenience:

- Section 1 provides a glossary;
- Section 2, this section, introduces the document;
- Section 3 details the consultation statistics;
- Section 4 provides an overview of the responses, support ratio and objections raised;
- Section 5 outlines the next stages with respect to the EDAL ACP; and
- Section 6 provides a list of references.

Annexes:

- Annex A1 details the background to this consultation and the consultation methodology;
- Annex A2 lists the consultees;
- Annex A3 details the key issues and areas of concern arising from this consultation; and
- Annex A4 illustrates the consulted airspace design.

## 3 Consultation Statistics

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*EDAL circulated the Consultation Document via email to a total of 53 aviation stakeholder consultee organisations or individuals, of which three were returned as undelivered. The Consultation Document was also posted on the Exeter Airport website. Eighteen of the 53 organisations responded, and a further 414 responses were received by other individuals and organisations.*

### 3.1 Overview

This section describes the categories of consultee organisations and individuals that were contacted and gives a breakdown of the responses received.

### 3.2 Consultee Organisations

The EDAL Consultation Document was circulated via email to a total of 53 stakeholder consultee organisations, including 40 NATMAC organisations, and other individuals detailed in Annex A2.

As stated in Section 2.4, three consultation emails were returned as undelivered, with two of the undelivered consultees still returning a response; therefore, the total number of consultees reached via email is 52.

The Consultation Document was made available for general distribution online through a dedicated link on the EDAL website.

Aviation stakeholder consultees included the MOD, airlines, aircraft operators, adjacent aerodromes, all local airspace users and the national bodies representing all UK aviation interests who may be affected by the proposed changes. National bodies such as the Light Aircraft Association (LAA), British Airline Pilots Association (BALPA), and Airport Operators Association (AOA) etc. are represented through the auspices of the NATMAC, sponsored by the CAA. A number of military organisations are also members of the NATMAC.

In addition, the following Local Authorities were consulted:

- Devon County Council; and
- Exeter City Council.

The consultee groups are detailed in Figure 1 below.

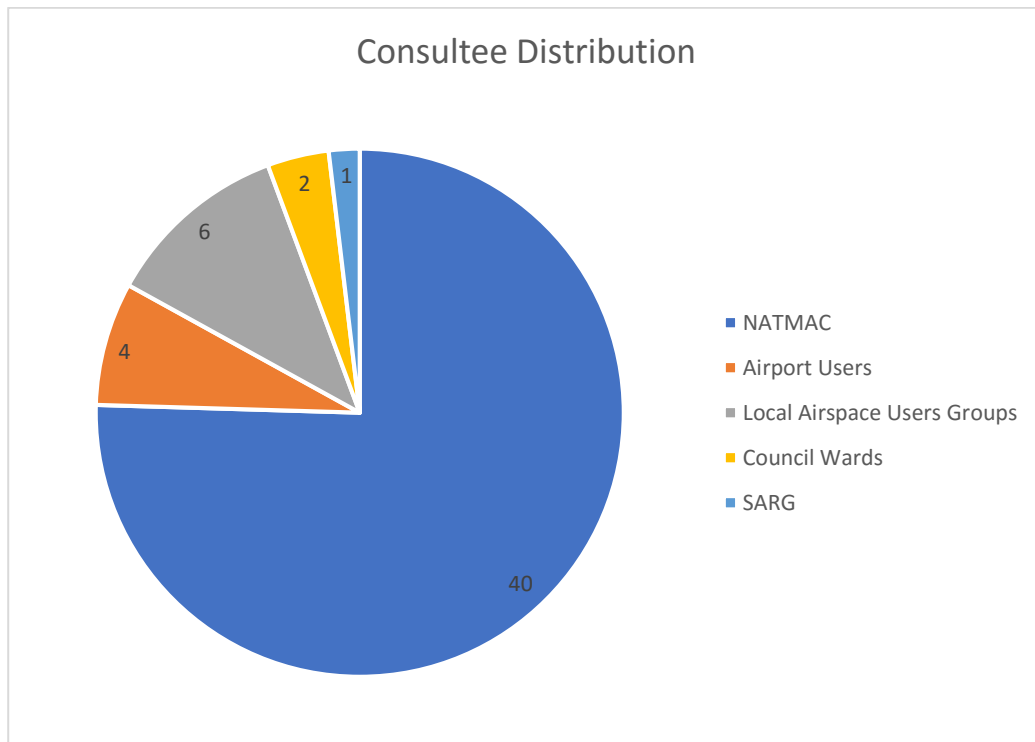


Figure 1 Consultee Distribution

### 3.3 Consultation Responses

A total of 18 responses (34 %) to this consultation were received from the direct consultees. A breakdown of these is provided in Table 1 and Figure 2 below.

	Consultee Group	Number Consulted	Responses	% <sup>1</sup>
1	NATMAC	40	12	30%
3	Airport Users	4	2	50%
4	Local Aerodromes/Aviation Consultees	6	4	66%
5	Local Authorities (For Information)	2	0	0%
6	SARG	1	0	0%
	<b>Totals</b>	<b>53</b>	<b>18</b>	<b>34%</b>

Table 1 Consultee Responses

<sup>1</sup> Percentage of those originally consulted.

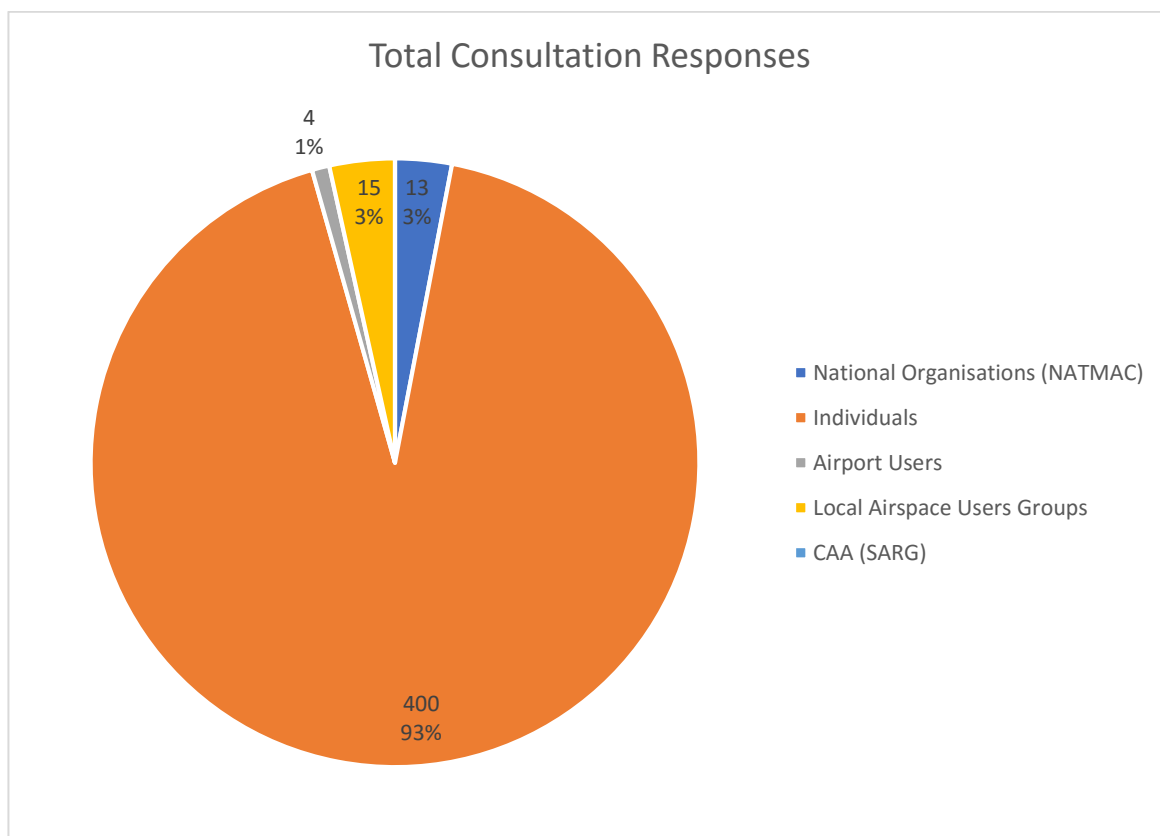


Figure 2 Breakdown of Consultee Responses Received

In addition to the 18 responses received from direct consultees (distribution shown in Figure 1), a further 414 submissions were received from other individuals or organisations making the total number of responses equal to 432.

It should be noted that “NATMAC” comprises those organisations who are members of the CAA’s NATMAC. The NATMAC consultee list includes some CAA Departments who, for reasons of CAA impartiality, do not respond to consultations.

MOD provided a consolidated response, through Defence Airspace and Air Traffic Management (DAATM), on behalf of all military consultees. This is standard MOD practice. Thus, all military consultees are deemed to have responded.

The majority of the responses received were from pilots and individuals associated with general aviation groups and organisations.

### 3.4 Meetings with Aviation Stakeholders

Prior to the commencement of the consultation period, a number of meetings were held with some of the local aviation stakeholders. The purpose of these meetings was to present the detail that would be incorporated into the Consultation Document to ensure there were no surprises for stakeholders when it came to formal comment.

Details of the consultation meetings that were organised with the aviation stakeholders are given in Table 2 below.



Stakeholder	Meeting Date	Notes
DSGC	8 <sup>th</sup> July 2016	ACP Briefing.
DSFT and SkyDive Buzz Ltd at Dunkeswell Aerodrome	8 <sup>th</sup> July 2016	ACP Briefing.
DAATM/Flag Officer Sea Training (FOST)	25 <sup>th</sup> July 2016	Discussion regarding the effects and mitigating options of the proposed EIA Class D CAS on Royal Navy operations in the Lyme Bay Danger Areas (D012 complex) along the neighbouring Channel Coast.
DSGC	21 <sup>st</sup> September 2016	Further discussions relating to the development of a Glider Box concept of operations.
DSFT and SkyDive Buzz Ltd at Dunkeswell Aerodrome	22 <sup>nd</sup> September 2016	Discussions regarding a CAS design concept relating to Dunkeswell Flight Operations.
DSGC	10 <sup>th</sup> January 2017	Further discussions relating to the development of complementary mitigation (glider box concept) to enable DSGC flight operations in proposed Class D CAS.
NATS	9 <sup>th</sup> May 2017	Discussions regarding the development of agreement between EDAL and LACC Sector 6/Cardiff Airport regarding the provision of ATS in CAS structure. Additional discussion included the review and amendment of the LOA regarding Dunkeswell Parachuting flight operations.

Table 2 Pre-Consultation Stakeholder Meetings

### 3.4.1 Additional Meetings

During the consultation period, additional meetings with aviation stakeholders continued. Details of the consultation meetings that were organised with the aviation stakeholders are given in Table 3.

Stakeholder	Meeting Date	Notes
DSGC	25 <sup>th</sup> April 2017	Update on DSGC management change and further thoughts on mitigation concept.

BGA	25 <sup>th</sup> April 2017	Discussions relating to proposed CAS design model, concept of gliding flight operations and incompatibility in CAS. Discussion of alternative airspace constructs considered by BGA as more compatible with gliding flight operations.
Bath Wilts and North Dorset Gliding Club (BNWDGC) (DSGC representative also present)	25 <sup>th</sup> May 2017	Discussions relating to BNWDGC flight operations in the south-west peninsula and the incompatibility of Exeter CAS development on BNWDC and generic flight operations. BNWDGC support for BGA alternative CAS construct.

Table 3 Additional Consultation Meetings

## 4 Analysis of Responses

*Of the 432 responses received in total, fifteen supported the proposal, 406 consultees objected to the proposal and nine provided a neutral response, or had no comments on the proposal. Two consultees did not register a formal response.*

### 4.1 Overview

This section provides details on the number of responses received from the various organisations and individuals that were consulted. It also studies the ratio of aviation stakeholder consultees that raised concerns about the proposal and explores the support ratio of consultee responses received to give a general indication on the aviation stakeholder acceptance of this proposal.

### 4.2 Response Support Ratio

Of the 432 responses received during the consultation period:

- 15 consultees (3.5 %) supported the proposal;
- 406 consultees (94 %) objected to the proposal;
- 9 consultees (2 %) provided a neutral response or provided no comments on the proposal; and
- 2 consultees (0.5 %) provided questions for clarification purposes but did not formally provide a response.

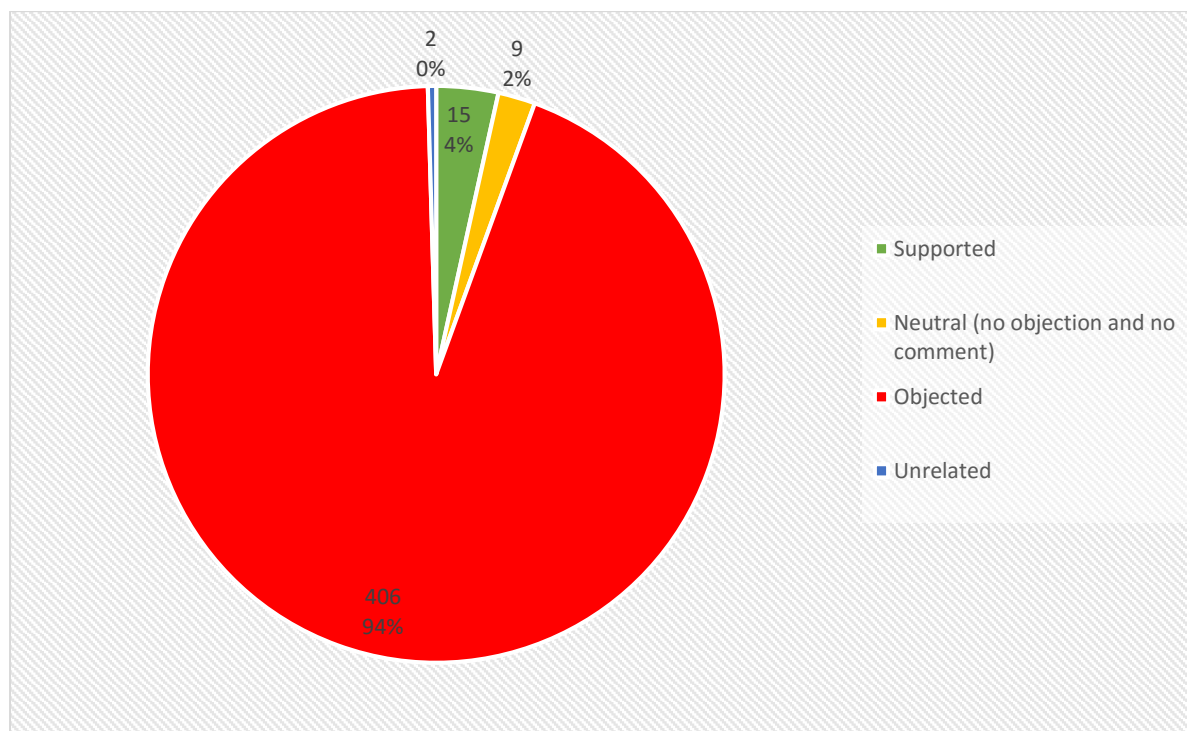


Figure 3 Support Ratio from All Responses Received

## 4.3 Aviation Stakeholder Support Responses

A number of aviation stakeholders both based at Exeter Airport and other agencies have stated support for the development of CAS in support of flight operation at and in the area of the Airport. The following sub-sections outline the nature of the support received from local aviation consultees and NATMAC members (listed in alphabetical order).

### 4.3.1 Capital Air Ambulance

Capital Air Ambulance is based at Exeter Airport, operating a variety of aircraft in support of the Air Ambulance task.

The company is committed to safety and one of the greatest identified risks is the operation of aircraft outside of CAS; therefore, the proposed implementation of CAS at their home airport (Exeter Airport) is welcomed. However, due consideration must be made during the consultation process, to ensure local airfields will be able to continue to operate in an uncomplicated and straight forward manner.

### 4.3.2 Flybe

Flybe, launched in 1979, is the largest independent regional airline in Europe, based in Exeter, operating more UK domestic flights than any other airline. It flies 7 million passengers a year on 149 routes, from 62 destinations in 9 countries.

Flybe have reviewed the Exeter Airport ACP in relation to establishing Class D CAS. Flybe believes that the propose change will benefit the Airport in the form of increased safety by providing a much more predictable and protected traffic environment for both operators of aircraft within the airspace. In addition, aircraft will be able to transition from the airway system into CAS with continuity of service provision. This will enhance pilots and controllers situational awareness, which in turn, will improve safety and reduce the need for air traffic intervention. Flybe notes that there have been a number of reported safety events within the present Class G airspace, which have caused concern, and would not have occurred in a Class D CAS environment.

Improved predictability will also allow the facilitation of more efficient departures and arrivals. Departures can be planned as continuous climb so aircraft can climb away quickly and efficiently and aircraft arriving should be able to obtain a reduction of and a better estimate of track miles to landing. This will allow all operators to fly more efficient flight profiles which will reduce noise pollution, emissions and the overflight of local communities. Flybe also notes that the CTA 5 fillets to the east and west of Airway N864 need to be in place to facilitate these approaches.

In conclusion, Flybe supports this proposal as it feels that the change will improve the operating environment around Exeter Airport in terms of both safety and give benefit to the local communities situated in the vicinity of the Airport.

### 4.3.3 The Guild of Air Traffic Control Officers (GATCO)

The GATCO is a UK-wide professional organisation which promotes the highest standards in all aspects of air traffic management and is dedicated to the safety of all who travel or gain their livelihood in the air, with membership drawn from both civilian and military ATC. The Guild is heavily involved in the work of the International Federation of Air Traffic Controllers' Associations (IFATCA), which

includes representations to UK and international ATM associations and organisations.

The GATCO response states that with safety being the main priority of the organisation and having observed the number of safety incidents relating to Exeter Airport discussed at the UK Airprox Board (UKAB) meetings, it welcomes the proposal to introduce CAS around Exeter Airport.

In addition, GATCO specifies that instrument approaches at the Airport should be afforded the protection CAS provides as flying an instrument approach and potentially having to acquire visually conflicting traffic negatively affects the safety of all airspace users. The response also notes that the approach to an airport is one of the most workload-intensive phases of flight and the provision of a known environment to both pilots and air traffic controllers can help reduce the workload for both and, at the same time, increase the level of safety for all airspace users. However, GATCO stresses that the regulator must ensure that the proper training and adequate staffing are provided whenever such changes are introduced.

#### **4.3.4 Isles of Scilly Skybus Ltd**

Skybus operates a scheduled commercial operation with five flights a day, six days a week between March and October to and from Exeter Airport to the Scilly Isles.

The Skybus response offers support for the proposed change of Exeter Airport airspace, understanding that such a change will assist the Airport in providing enhanced levels of information to aircraft operating at the Airport.

Skybus stated that they would be delighted with the introduction of this proposal as it would be beneficial to their flight operation by providing a safer more efficient environment for their aircraft, pilots and passengers.

#### **4.3.5 Thomson Airways**

Thomson Airways Limited, is the world's largest charter airline, offering scheduled and charter flights from the United Kingdom and the Republic of Ireland to destinations in Europe, Africa, Asia and North America. The airline carried 10.6 million passengers in 2015, then making it the third-largest UK airline by total passengers.

The Thomson Airways response stated that they support the proposal for the introduction of Class D CAS at Exeter in line with the Company policy to operate within CAS as much as possible. It is hoped that the introduction of CAS will increase the probability of achieving continuous descent into and unhindered climb out from Exeter thus, in the long term, reducing fuel burn and both noise and carbon footprint.

However, Thomson states that they are fully aware that they share this airspace with many users and whole heartedly encourage the development of Letters of Agreement or Memorandum of Understanding with other user groups to minimise the disruption to the local GA community.

Thomson Airways also support the potential development of a Flexible Use of Airspace arrangement regarding the Lyme Bay Danger Area complex which will hopefully lead to more direct routings for arrivals from the south for approach onto runway 26, which will again reduce fuel burn and carbon footprint.

Finally, Thomson wish to understand whether alternative holding altitudes (EX hold) are being considered to fit within the proposed CAS therefore ensuring appropriate vertical separation from aircraft operating beneath CTA 4.

#### 4.4 Submissions from Individuals and Other Aviation Organisations

Of the 414 responses to the consultation received from those not in the formal consultee list, the majority were from GA and private pilots, some of whom are members of local flying or gliding clubs.

Notwithstanding that their representative organisations may have submitted detailed responses to the consultation on behalf of their membership, all of the additional individual submissions have been documented and analysed by EDAL and will form part of the ACP to be made to the CAA in due course. Any new issues identified in the individual submissions which had not already been raised by the formal consultees are embraced within the key issues (Table 4) and areas of concern listed in Annex A3 to this report.

Responses were also received from the following flying and gliding clubs:

- Bath Wilts and North Dorset Gliding Club;
- Light Aircraft Association – Devon Strut; and
- University of Surrey Gliding Club.

#### 4.5 Key Issues Arising

The response analysis process identified a number of key themes in those responses that objected to the proposal. There are outlined in Table 4 below together with the number of consultees who expressed that view in their response.

Nature of objection	Number of consultees
Disproportionate/unrealistic/unjustified size of proposed airspace	239
Loss of Devon and Somerset Gliding Club as an amenity	77
Loss of airspace amenity for transitory GA aircraft and gliders	219
Funnelling effect potentially increasing risk to aircraft avoiding proposed CAS	24
GA access issues to an Exeter Airport CAS construct	54

Table 4 Nature of Objections Raised by Consultees

Table 5 highlights the specific issues raised regarding the CAS design and presents some solutions proposed by some consultees.

Nature of Concerns	Number of Consultees who Raised the Concern	Proposed Solution or Redesign
Disproportionate/unrealistic/unjustified size of proposed airspace	239	Airspace to remain as Class G uncontrolled airspace
Loss of airspace amenity for transitory GA aircraft and gliders	219	Removal of all Class D CAS to the north of the proposed CTR, with Class D established to the south  Removal of all Class D CAS and redesign either an RMZ airspace or Class E CAS construct
Loss of Devon and Somerset Gliding Club as an amenity	77	Suggested Glider Box concept concluded as unacceptable; therefore, airspace to remain as Class G uncontrolled airspace
Funnelling effect potentially increasing risk to aircraft avoiding proposed CAS	24	Airspace to remain as Class G uncontrolled airspace  Raise the base altitudes of CTA sectors
GA access to an Exeter Airport CAS construct	54	Airspace to remain as Class G uncontrolled airspace  Removal of all Class D CAS to the north of the proposed CTR, with Class D established to the south  Removal of all Class D CAS and redesign either an RMZ airspace or Class E CAS construct

Table 5 Issues Raised Regarding the Proposed CAS at Exeter Airport

It was noted that some consultees who objected to the proposal, considered that some form of Class D CAS of a smaller scale was appropriate in support of Exeter Airport scheduled Commercial Air Transport (CAT) flight operations.

It was also noted that 23 consultees who objected to the proposal, supported the establishment of a Radio Mandatory Zone (RMZ) as an alternate airspace construct. However, at present this is not a recognised permanent airspace construct for regional airports and EDAL considers that the RMZ concept would provide insufficient protection to scheduled CAT movements.

The key concerns and EDAL's consideration of them, are detailed at Annex A3 to this report.

## 4.6 Aviation Stakeholder Objection Responses

A total of 406 objections to the proposal were received throughout the consultation period. The consultee types and respective numbers are given below:

- 10 objections from NATMAC consultees;
- 388 objections from individuals within the aviation community;
- 0 objections from Airport users; and
- 8 objections from local aerodromes/aviation consultees.

The responses received are presented in more detail in Annex A3 of this report. The following sub-sections outline the nature of the objections received from local aviation consultees and NATMAC members (listed in alphabetical order).

### 4.6.1 Bath Wilts and North Dorset Gliding Club (BWNDGC)

BWNDGC (or The Park Gliding Club) operates from its own gliding-only airfield at Kingston Deverill, Warminster, Wiltshire. It has 125 members and has operated in the southwest region for over 50 years.

The BWNDGC response states that they are in agreement with the content contained within the British Gliding Association response and fully endorse its conclusions. In addition, the club further objects to the CAS design based on equal and historical rights to operate in the airspace, concerns regarding existing flight profiles utilised by commercial aircraft operating at Exeter and a lack of formal consultation with the club prior to the formal release of a CAS design construct in the formal ACP Consultation Document.

In conclusion, the BWNDGC proposes that a new design be established that would take into consideration modern efficient flight profiles and be developed with existing airspace users to include an additional consultation period.

### 4.6.2 British Gliding Association

The British Gliding association (BGA) is the national governing body of sport gliding and represents all UK gliding clubs, with approximately 7,000 active glider pilots, utilising approximately 2,300 aircraft and formed into 80 clubs.

The BGA has stated that it has no objection in principle to the application of CAS in situations where a rational assessment of public risk leads to the requirement for CAS as a logical and proportionate conclusion. However, it concludes that in this case, the airspace design proposed by Exeter does not meet that criteria. The BGA contends that the proposed airspace design is larger than necessary, and disproportionate to the needs of the Airport, particularly when taking into account the number of Air Transport movements. Therefore, the BGA emphasised that the proposed design should be revised in order to comply with the UK CAA requirement to be of the minimum practical dimensions and to cause minimum disruption to aviation stakeholders.

The BGA noted that Radio Mandatory Zones (RMZ)/Radio Mandatory Areas (RMA) are utilised in most European countries and are being deployed in the UK as a mitigation that supports a known environment where required. The BGA stated that level of CAT air traffic at Exeter indicates that an RMZ/RMA would be a proportionate response to the Airports concerns.



The BGA suggested a design concept that utilises RMZ/RMA and suggested that it should satisfy Exeter Airport and other stakeholders who could retain most of their existing rights of use. Their design proposal removed all proposed Class D Control Areas (CTA) annotated as CTA 4 and CTA 5 to the north of the proposed Control Zone (CTR) and designated the remaining CTR and CTA's as an RMZ/RMA.

#### **4.6.3 British Hang Gliding and Paragliding Association**

The British Hang Gliding and Paragliding Association (BHPA) supports the UK network of recreational clubs and registered schools, and provides the infrastructure in support of UK hang gliding and paragliding operations. The BHPA oversees pilot and instructor training standards, and provides technical support such as airworthiness standards, and coaching courses for qualified hang gliding and paragliding pilots.

The BHPA stated that it welcomed the opportunity to respond to the consultation; however, the BHPA considered the EDAL approach to the ACP process was flawed and therefore has made a formal complaint to the CAA. The BHPA made a number of data requests, some of which were considered to be answered satisfactorily, but some requests remained unanswered. Consequently, the BHPA raised an objection to the Class D proposals due to insufficient justification.

#### **4.6.4 Dartmoor Gliding Society**

The DGS operates from a single-use base on the western edge of Dartmoor, approximately 3 miles north of Tavistock, Devon.

Their response states that the northern CTA sectors would severely restrict gliding flight operations to and from the southwest peninsula. However, the response indicated that an increase in the base altitudes of these CTA sectors to 4,500 ft would enable safe access to the airspace by VFR glider aircraft.

The response also states that an RMZ option would not be acceptable as there is no statutory requirement for gliders to carry radio; therefore, the creation of a RMZ would be an infringement of this freedom by effectively blocking the use of this airspace by non-equipped aircraft.

#### **4.6.5 Devon and Somerset Flight Training Ltd**

Devon and Somerset Flight Training Ltd (DSFT), also known as Air Westward Ltd, is based at Dunkeswell Aerodrome and is considered a busy hub for one of the largest GA communities in South West England.

DSFT stated in their response that CTA 4 is located in close proximity to the lateral extent of their Air Traffic Zone (ATZ). This would restrict aircraft that join the aerodrome circuit via downwind or base-leg. Aircraft are expected to join the circuit at a height of 800 ft above airfield level which would mean that aircraft would be at 1,639 ft amsl – i.e. above the base altitude of CTA 3 (1,500 ft amsl). Due to busy circuit operations and a requirement to avoid a village to the south-east of the Aerodrome, aircraft already use the full extent of the ATZ and therefore a significant risk of inadvertent CAS infringement might occur.

DSFT indicate that circuit traffic operate predominantly to the south and south-east of the Aerodrome due to the proximity of DSGC flight operations at North Hill Aerodrome and the regular parachuting operations that also take place at

Dunkeswell. In addition, due to the proximity of the proposed CAS, departures to the south and south-west from the Aerodrome might not have enough time to ensure appropriate CAS entry clearances are obtained once airborne.

DSFT note that VHF communication with Exeter Airport is limited, which is likely due to terrain; therefore, aircraft must achieve an adequate altitude to achieve satisfactory reception. This could lead to aircraft not have appropriate time to gain CAS access clearance.

#### **4.6.6 Devon and Somerset Gliding Club (DSGC)**

The DSGC is the largest gliding club in the south-west of the UK and has been operating at North Hill Aerodrome, Sheldon near Honiton, Devon for approaching 60 years. The club is open on Wednesdays, Thursdays, weekends, public holidays and does routinely open 7 days a week during the summer period.

The DSGC states that it objects, in the strongest possible terms, to Exeter Airport proposals for the establishment of Class D CAS as the proposals are an unreasonable and disproportionate solution to a problem that has not been justified. The DSGC discussed that it considers that a proposed CAS construct is based entirely on what it considers as exaggerated future ATM. They also discuss that the ACP contains numerous misrepresentations of the effects of its proposal, and that the Airport, as change sponsor, clearly failed to meet its responsibilities to other aviation stakeholders under CAP 725. In addition, they highlight that the proposals are likely to lead to the closure of DSGC and that the ACP clearly shows that the Airport does not understand gliding flight operations and what is required for a gliding club to operate.

The DSGC discussed the 'Glider Box' concept as an unsatisfactory mitigation for the effects of the establishment of CAS, and they considered that the change sponsor dispensed with expected further discussions regarding the development of this mitigation concept.

The DSGC considers that any alternative proposal that involved a form of CAS design would have similar consequences for DSGC, i.e. no-go areas for gliders. In addition, it would increase the risk of 'forced landing', with associated risks to pilot and aircraft.

The DSGC response stated that the establishment of the proposed Class D CAS would be a disaster for DSGC, and would be likely to cause its closure. However, DSGC note that for many years they have had a good and amicable working relationship with Exeter ATC and regardless of the outcome of this process, it is hoped and anticipated that this will continue to be the case.

#### **4.6.7 GA Alliance (GAA)**

The GAA is a group of organisations representing the interests of many in the UK General Aviation (GA) industry and was formed in 2004 to address the need for a coordinated response to UK regulatory issues.

The GAA represents the British Balloon and Airship Club (BBAC), British Gliding Association (BGA), British Hang Gliding and Paragliding Association (BHPA), British Microlight Aircraft Association (BMAA), British Parachute Association (BPA), Helicopter Club of Great Britain (HCGB), Light Aircraft Association (LAA), PPL/IR Europe – European Association of Instrument Rated Private Pilots, and Royal Aero Club of the United Kingdom (RAeC).

The GAA response states that they fully endorse and agree with the BGA response to the Airport's consultation document in opposing the proposed airspace design (Section 4.6.2).

In summary, the GAA notes that safe, efficient airspace is important for all airspace users, and that the proposed size of the Class D CAS construct is unjustified. In addition, the volume of such airspace should also be carefully minimised, specifically covering only that volume of airspace required for aircraft flying CDAs and CCDs and not be a loose overlay encompassing existing inefficient and outdated flight patterns as this process would be environmentally and operationally unacceptable. The GAA response states that the airspace design should be retracted and redesigned in light of discussion with GA stakeholders and as detailed in the BGA's response and that consideration be given to the development of either an RMZ option or a variant of a Class E CAS construct would be more appropriate.

#### **4.6.8 Light Aircraft Association (LAA)**

The LAA represents over 7,600 members and acts as a delegated authority on behalf of the CAA, overseeing around 2,600 aircraft operating on active LAA Permits.

The LAA response states that the proposed scale of Class D CAS is considered excessive and is based on an unsubstantiated future traffic forecast at the Airport. The LAA response concluded that [the proposal] will have significant implications for VFR Class G flight operations in and across the area.

The LAA response stated that a design construct that removed all the CTA blocks to the north, northwest and north east of the proposed CTR, would be preferable, allowing a clear route for transiting VFR traffic and gliders outside CAS. Additionally, dialogue with all relevant local stakeholders should be sought.

#### **4.6.9 LAA – Devon Strut**

The Devon Strut of the LAA has a membership of over 180 and is the largest member organisation of general aviation participants in the south west of England.

The Devon Strut believes the proposed Class D airspace design published in the ACP is excessive for the objectives of protecting Exeter traffic and the provision of a known environment and would impact on the flight operations of a number of local airfields to the north of the Airport.

The response suggests that the airspace design should be modified to remove all CTA blocks to the north-west, north and north-east of the proposed Exeter CTR; therefore creating a one-sided CTA to the south of the Airport.

#### **4.6.10 Ministry of Defence (MOD) – Defence Airspace and Air Traffic Management (DAATM)**

The MOD DAATM organisation represents the UK Defence within the Domestic and International Airspace and ATM environment. This ensures that the MOD, as a self-regulating operator of aircraft and Air Navigation Service Provider, is suitably represented in airspace and regulatory change matters.

The MOD DAATM response stated that they are broadly in support of the need for CAS to be established at Exeter Airport and are grateful to have had prior opportunity to discuss some observations relating to developing a collaborative

airspace structure that would support MOD flight operations and implement of CAS at Exeter Airport.

The MOD perception is that the proposed design dimensions appear excessive when considering the current and forecast traffic levels at the Airport. In addition, the MOD looks forward to agreement on the resolution of a number of issues relating to the effects that implementation of CAS may have on MOD flight operations in the area and the development of a Flexible Use of Airspace (FUA) concept relating to the primacy usage of Danger Area 012/3 complex.

#### **4.6.11 National Air Traffic Services**

NATS are responsible for the provision of ATS at some airports in the UK and to traffic en-route within UK airspace.

NATS welcomed Exeter Airport's engagement with NATS Cardiff and Swanwick to discuss the ACP design concept and stated that in principle that they have no objection to the establishment of CAS at Exeter Airport. However, during those discussions it was clear that NATS had some fundamental concerns with the airspace design as presented, which was assessed as potentially complicating ATM arrangements in the area, and as having a consequent negative impact on safety and airspace efficiency. NATS concluded that the airspace design is not at a stage where NATS could fully support its implementation.

NATS are more than happy to continue to engage with Exeter Airport to develop a design that is mutually acceptable before any planned ACP submission, but request that Exeter now include NATS Bristol in any further engagement as any revised Airspace/ATM arrangements will need to consider that airport's ATC requirements.

## 5 Post Consultation Actions

*EDAL will complete a further period of engagement with aviation stakeholders to inform any changes to the proposal and then submit a formal ACP to the CAA.*

### 5.1 Post-Consultation Review

Following the 10<sup>th</sup> March 2017 and 9<sup>th</sup> June 2017 consultation period, all comments received have been thoroughly reviewed by EDAL in order to identify the key issues of concern. EDAL remains committed to mitigate, as far as is practicable, the principle concerns of those consultees who objected to this proposal.

The approach taken by EDAL was to review the airspace design in the light of the significant points of objection raised by consultees and to continue a dialogue with the principle objectors to assuage, as far as is practicable, the concerns raised.

### 5.2 Post-Consultation Airspace Development

#### 5.2.1 Key issues under consideration

Figure 4 in Annex A4 shows the design for the Exeter Airport CAS as defined for the 10<sup>th</sup> March 2017 and 9<sup>th</sup> June 2017 consultation.

Following closure of the Consultation, and in the light of the responses received, EDAL are undertaking a detailed review of the following particular aspects of the proposed airspace design:

- Size of the CAS construct;
- Alternative classification of airspace;
- Funnelling of Aircraft; and
- BGA, GAA transiting aircraft.

#### 5.2.2 Size of the Proposed CAS

EDAL are considering options to reduce the size of a CAS design. The option consulted on was considered by the majority that responded as being too large, and would affect many of the local and transitory flight operations in the region of the Airport. The aim of the first design was to contain the existing IFPs within an area of CAS that was as simple as practicable. EDAL will consider reducing the volume of CAS in the proposal whilst adhering to the safe principle of wholly enclosing existing procedures although this may lead to a more complicated overall design.

#### 5.2.3 Alternative Classifications of Airspace

Suggestions were made in responses relating to alternative types of airspace construct. Suggestions included the following variants:

- Airspace to remain as Class G uncontrolled airspace;
- Removal of the CTA sectors to the north of a CTR, leaving Class D CAS to the south of a CTR;
- Replacing Class D CAS with other classes of airspace:

- Class D CAS + RMZ; or
- Some form of RMZ-only construct.

EDAL will study the practicalities of the various suggested options with respect to improved safety and efficiency of the provision of ATS to aircraft operating at the Airport, and of the requirements of other airspace users operating at local aerodromes and transiting the area.

#### **5.2.4 Funnelling of Aircraft**

Some responses indicated that the implementation of a CAS construct surrounding Exeter Airport would have the effect of pushing aircraft not wanting to cross the CAS into narrow channels to the north and south of the Airport. Many considered that CAS would in effect be a 'brick wall' to which other airspace users would not want to make a crossing of the CAS and therefore would route further north – between the proposed Exeter Airport CAS and the Cardiff Airport CAS. In addition, aircraft would also be forced to route beneath the proposed CTA sectors to the south of the Airport and the south coast. The perception was that 'it is traditionally difficult' in some cases for GA aircraft to gain CAS crossing clearances from an Airport and that would increase the risks to those aircraft avoiding CAS by funnelling them in smaller pockets of Class G uncontrolled airspace.

EDAL will consider options for the reduction the lateral and vertical dimensions of the proposed CAS.

#### **5.2.5 BGA/GAA Aircraft Transit**

Many BGA/GAA aircraft transit cross-country from their aerodromes through the airspace adjacent to Exeter Airport along the south-west peninsula. Many responses indicated that the establishment of CAS, specifically to the north of the Airport will close this airspace for those wishing to transit past the Airport. Additionally, pilots of other types of aircraft supported by the GAA consider that the proposal will also close off the airspace to them.

EDAL are considering options to establish a means of making access to the airspace available for GA aircraft transit purposes.

### **5.3 Supplementary Meetings**

In conjunction with the post-consultation airspace design review detailed above, EDAL will hold post-consultation engagement meetings with appropriate aviation stakeholders to discuss their particular concerns and whether potential modifications to the airspace configuration would allay their concerns.

### **5.4 EDAL Conclusions**

The Consultation has produced a significant opposition from the GA community supported by the BGA and the GAA. The main emphasis of the concerns are as follows:

- The dimensions of the suggested CAS construct is disproportionate to density of commercial activity at Exeter Airport;
- Consideration from DSGC that the club would be forced to close or re-position elsewhere to continue flight operations;

- CAS design producing a funnelling effect as transitory aircraft avoid CAS transit option; and
- Access arrangements for local and transitory airspace users.

The Consultation has also raised objection from the MOD based predominantly upon access arrangements to the suggested CAS, MOD flight operations in the area and the development of a FUA concept relating to the primacy usage of Danger Area 012/3 complex. Furthermore, NATS raised concerns relating to the airspace design which was assessed as potentially complicating ATM arrangements in the area with particular reference to Bristol Airport.

## 5.5 ACP - Next Stages

The consultation process constitutes the third stage of the CAA's overall process detailed in CAP 725 [Reference 1] leading to an ACP.

EDAL will undertake a further period of aviation stakeholder engagement and design analysis prior to submitting a formal ACP to the CAA, presenting the case for the proposal. It is a requirement of the consultation process that EDAL provide the CAA with full details of the consultation (including copies of responses and correspondence) together with all documentation necessary for the promulgation of the proposed airspace change.

Following receipt of the formal ACP, the CAA then requires a 16-week period to conduct its own internal analysis of the final proposal and consultation results, before arriving at a Regulatory Decision.

In the event that the CAA, without the need for further design optimisation or analysis, accepts the ACP, then it is proposed that implementation takes place on a single date. All new Instrument Flight Procedures (IFP) and new airspace would be activated simultaneously, on a double AIRAC (Aeronautical Information Regulation and Control) cycle. This approach would not typically create an overly large training burden for Exeter ATC and NATS Swanwick Area Control Centre (ACC) personnel or for airline operator Flight Management System (FMS) updates.

## 6 References

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Reference	Name	Origin
1	CAP 725 CAA Guidance on the Application of the Airspace Change Process Third Edition (corrected) April 2007	CAA ISBN 978 0 11790 739 3
2	Code of Practice on Consultation July 2008	Cabinet Office URN 08/1097

Table 6 Table of References



# A1 Consultation Background and Methodology

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## A1.1 Background to the Consultation

EDAL has identified the need for a change to the arrangements and procedures in the immediate airspace surrounding Exeter Airport to provide requisite protection to aircraft on the critical stages of flight in departure and final approach.

Exeter Airport operations are currently considered to be restricted by departure and arrival procedures that are not afforded the protection of CAS, require persistent ATC intervention, some at very short notice, and are subject to protracted rerouting. Hence, EDAL believes that CAS is necessary to improve the levels of protection for CAT and other aircraft operating to and from Exeter Airport in the critical stages of flight on approach and immediately after departure.

In order to enhance safety and improve the efficiency of Exeter Airport operations, EDAL are proposing to achieve this through:

- The design of Class D CAS airspace to adequately contain current Exeter Airport published IFPs; and
- The provision of lateral separation of arrival and departure routes.

CAS will provide additional protection for CAT during arrival and departure (both vulnerable phases of flight for airliners) on current IFPs, to optimise the airspace with efficiency and environmental benefit for all Airport users. Currently, deviation of airliners operating to and from the Airport is a regular occurrence due to the unknown, and unpredictable, nature of the Class G uncontrolled airspace surrounding the Airport. The introduction of CAS will reduce the likely occurrence of aircraft deviations, particularly airliners on approach and departure. The reduction in deviations will not only have a safety benefit, but will reduce the total track miles for a given aircraft and lead to a general reduction in aircraft emissions in the local environment.

The proposal and associated consultation are not related to the future development of Exeter Airport or aspects of Government Aviation Policy. It is not about the Noise Abatement Procedures (NAP) for departing aircraft or Noise Preferential Routes.

EDAL, as the Sponsor of the proposed airspace change, is required to submit a case to the CAA to justify the change in the airspace surrounding Exeter Airport. In addition, as part of the CAA's ACP, it is EDAL's responsibility to consult with relevant aviation stakeholders who may be directly or indirectly affected by the proposal.

## A1.2 Methodology

The EDAL ACP consultation was conducted in accordance with the principles set out in the Cabinet Office Code of Practice on Consultation [Reference 2], as required by the CAA.

A comprehensive Consultation Document was prepared by EDAL, presenting the proposal, rationale for the change, the perceived effects, and mitigation measures considered by EDAL.

A link to the Consultation Document was made available on the EDAL website. Consultees were notified by email alerting them to the consultation and how to access the Consultation Document.

Local aviation stakeholders were engaged at an early stage during the design process. Prior to the preparation of the Consultation Document, meetings were conducted with the following major stakeholders:

- Devon and Somerset Flight Training (based at Dunkeswell Aerodrome);
- Devon and Somerset Gliding Club;
- MOD DAATM; and
- NATS.

The primary purpose of these meetings was to expose the stakeholders to the proposed airspace designs to ensure there are no surprises for stakeholders when it comes to formal comment.

Full consultation commenced with wide circulation of the electronic Consultation Document and conceptual airspace designs to all identified stakeholders on 10<sup>th</sup> March 2017. The required minimum period for formal consultation is twelve weeks but the process should recognise the number of Public Holidays during the period. The duration of the consultation was extended to 9<sup>th</sup> June 2017, allowing an extra week for the Public Holidays associated with the Easter holiday period.

Consultees were asked to consider the proposal and submit a response to EDAL using an online response form on the EDAL consultation website or through a dedicated email address (acpconsultation@exeter-airport.co.uk).

In order to promote maximum response, the following reminders were sent to encourage a maximum response from local aviation stakeholders:

- 29<sup>th</sup> May – Thomson Airways
- 27<sup>th</sup> June – Farway Common Airstrip
- 27<sup>th</sup> June – Skydive Buzz Ltd.

## A2 Aviation Stakeholder Consultee List

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### A2.1 Airport User Group

FlyBe  
Airways Flight Training  
Aviation Southwest  
Robin Flying Group

### A2.2 Local Airspace User Group

Dunkeswell Aerodrome: Devon and Somerset Flight Training  
Dunkeswell Aerodrome: SkyDive Buzz Ltd  
North Hill Airfield: Devon and Somerset Gliding Club  
Farway Common Airstrip  
Branscombe Airfield  
Watchford Farm Airstrip

### A2.3 National Organisations (NATMAC)

3 AF-UK/A3  
AEF  
Airport Operators Association  
AOA  
AOPA UK  
Aviation Division NCHQ  
Aviation Environment Federation  
BA  
BAE Systems  
BALPA  
BATA  
BBAC  
BBGA  
BGA  
BHPA  
BMAA  
BMFA  
BPA  
British Helicopter Association  
CAA  
CAA SRG  
DAATM  
GASCo  
GATCO  
HCGB  
Heathrow Airport  
Heavy Airlines

HQ DAAvn  
LAA  
Light Airlines  
Low Fares Airlines  
Military Aviation Authority (MAA)  
Ministry of Defence  
MoD Flight Test Regulator  
NATS  
PPL/IR Europe  
SARG  
UAVS Association  
UKAB  
UKFSC/GAPAN

**A2.4 Civil Aviation Authority (CAA)**

SARG

**A2.5 Local Authorities**

Devon County Council  
Exeter City Council

## A3 Key Issues and Areas of Concern arising from the Consultation

No	Issue	EDAL Comment
1	<p>No need for such a disproportionate amount of CAS as Exeter Airport is a small regional airport with low air traffic volumes. Much busier airports in the UK (e.g. London Gatwick) manage with less associated CAS.</p>	<p>The proposed CAS design is intended to provide a volume of airspace to contain the existing IFP into the Airport. In addition, the CAS design is planned to incorporate connectivity with the existing CAS structure above the Airport.</p> <p>Unlike other airports such as London Gatwick, Stansted or Luton, Exeter's controlled airspace design requirements are not comparable. Exeter has an east-west orientated runway which is located under a north-south orientated airway (Airway N864) and the requirement is therefore markedly different. The specific suggestion that Gatwick has a smaller CAS volume surrounding in comparison to what was consulted at Exeter, although factually correct, is very misleading. Gatwick's location underneath the London Terminal Manoeuvring Area allows it to have a smaller CAS construct surrounding it specifically for its own use as it benefits from connectivity with the national controlled airspace infrastructure.</p>
2	<p>A re-designed airspace structure would be more suited to flight operations in the region, Suggested airspace concepts suggested as follows:</p>	<p>EDAL notes that some suggestions include a CAS design just to the south of the Airport that would include the design principles of CDA and CCD. EDAL considers that Class D CAS established just to the south of the Airport does not meet the requirement in that aircraft</p>

	<ul style="list-style-type: none"> <li>• Class D CAS only on the south side of the Airport;</li> <li>• Class D CAS + RMZ; or</li> <li>• A form of RMZ only construct.</li> </ul>	<p>will continue to be routed on less expeditious flight patterns to reach their destination point.</p> <p>EDAL notes that an RMZ is not at present a recognised permanent airspace construct for airports but also considers that the RMZ concept would provide insufficient protection to scheduled CAT flight operations. In essence, the aircraft would not be formally identified unless a coordinated agreement between the controller and a pilot is affected. Therefore, this option remains as the current situation.</p>
<p><b>3</b></p>	<p>The establishment of CAS would have a very significant effect on the DSGC as a regional asset and as an amenity.</p> <p>The DSGC considers that the Airport failed to meet its responsibilities to other aviation stakeholders under CAP 725, and that the ACP clearly showed that the Airport does not understand gliding flight operations and what is required for a gliding club to operate. The Club also considers that any form of Class D CAS construct would similarly have a catastrophic effect on its flight operations.</p> <p>The DSGC discussed the 'Glider Box' concept as an unsatisfactory mitigation for the effects of the establishment of CAS, and they considered that the change sponsor dispensed with expected further discussions regarding the development of this mitigation concept.</p>	<p>EDAL understands the concerns raised by the DSGC and individual members that the effects of the establishment of a CAS design would have DSGC flight operations.</p> <p>EDAL have had discussions with the Club to facilitate DSGC flight operations to continue within CAS. The initial Glider Box concept was seen initially by both parties as a means to facilitate flight operations from the club in the proposed CAS. EDAL are extremely keen to continue these discussions toward a consensual agreement.</p>

<p>4</p>	<ol style="list-style-type: none"> <li>1. Loss of airspace amenity for transitory GA aircraft and gliders.</li> <li>2. GA access issues to an Exeter Airport CAS construct.</li> <li>3. Funnelling effect potentially increasing risk to aircraft avoiding proposed CAS.             <ul style="list-style-type: none"> <li>• Many GA flights take place across the region that utilise the airspace to the north and south, along the coast from the Airport.</li> <li>• Although, some respondents suggested that they agreed that the Airport would benefit from the establishment of CAS in some form, most indicated that the airspace to the north should remain as Class G uncontrolled airspace in support of such operations.</li> </ul> </li> </ol>	<p>EDAL reiterates that access to CAS by transitory aircraft will be facilitated. Access will only not be granted for reasons of aircraft safety. EDAL will have appropriate resources to enable all requests for CAS crossing/entry to be dealt with as quickly as possible.</p> <p>EDAL have discussed with the BGA an option to facilitate use of the airspace to the north of the Airport by Gliding Club operators. EDAL contends that a block of airspace can be utilised, subject to an agreed protocol that would allow numbers/groups of aircraft to cross for specific time periods.</p> <p>EDAL understands that some within the GA community would not want to entertain crossing of CAS; however, EDAL reiterates that that it will facilitate the crossing of CAS as much as practicably possible subject to aircraft safety being maintained.</p>
<p>5</p>	<p>Suggestions from Dunkeswell Aerodrome regarding adaptations to the CTA sectors affecting circuit operations and flight operations to the west of Exeter Airport:</p> <ul style="list-style-type: none"> <li>• Adaptation to CTA 3 adjacent to the Dunkeswell Air Traffic Zone (ATZ);</li> <li>• Cognisant of the fact that the Instrument Landing System (ILS) Glidepath angle for approaches to Runway 08 is set at 3 degrees, consideration to provision of a higher base altitude for CTA 1 due to high ground beneath the sector.</li> </ul>	<p>Due to the proximity of the Dunkeswell ATZ to the consulted CTA 3 sector EDAL will look further at this sector to establish a minimum requirement and also discuss means to establish communication protocols (e.g. pre-notification of flights) to ensure efficient identification of aircraft departing from the Aerodrome to the south to ensure appropriate separation standards are maintained.</p> <p>EDAL will give consideration to adaptations to the lateral and vertical extents of the CAS design construct commensurate with the requirement to support existing IFP's.</p> <p>EDAL confirms that the ILS Glidepath angle for approaches to Runway 08 is set at 3 degrees; consequently there is a requirement for a lower base of CTA to support this procedure. This is alternative to the higher CTA 4 base which supports an ILS Glidepath angle for approaches to Runway 26 set at 3.5 degrees.</p>

<b>6</b>	Operators at Watchford Farm Aerodrome (elevation 840 ft amsl) consider that the positioning of CTA 4, adjacent to their location, is proposed a base altitude of 3,000 ft amsl. This would affect some flight profiles at the aerodrome such as practice forced landing and aerobatics.	EDAL will consider adaptation to the CTA 4 sector relating to its effect on Watchford Farm Aerodrome. The development of an agreement between both parties relating to CAS access in support of these flight profiles.
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# A4 The Consulted Exeter Airport CAS Design Proposal

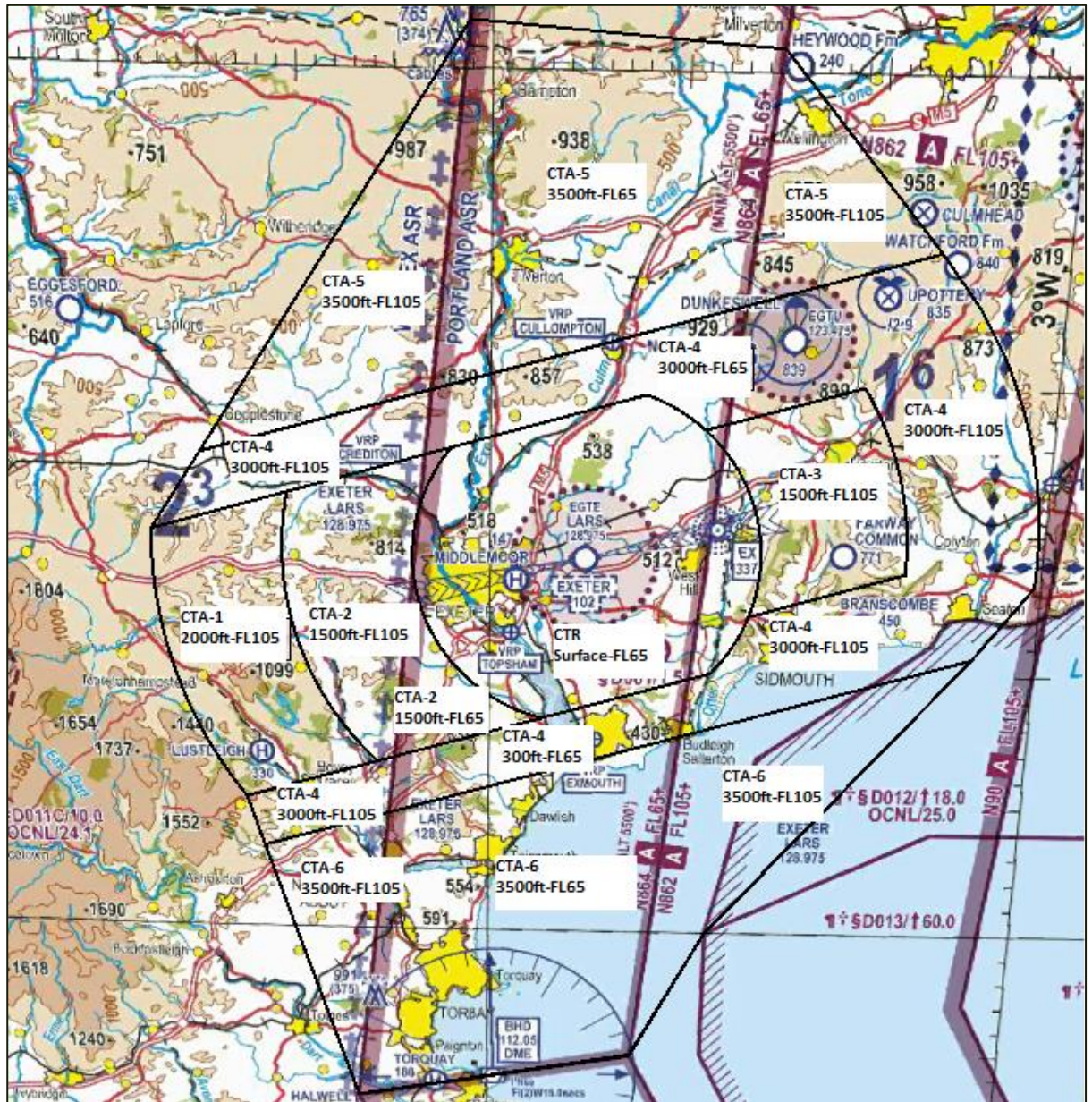


Figure 4 Consulted CAS Design Concept