Exeter Airport Airspace Change Proposal

Design Principles Questionnaire

Responses of Devon & Somerset Gliding Club

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1 Stakeholder Questionnaire

1.1 Your Responses

The questions below are designed to help us understand the constraints that should be considered during the CAA CAP 1616 Design Principles step of the Define Stage (1). Please insert your responses below to each of the following questions; the size of the response box will expand as you type your response. Use as much space as you need, or alternatively attach additional sheets or documents making it clear which questions you are responding to. Save this and any other documents and return as described at paragraph **Error! Reference source not found.** above. If any of the questions are not applicable or relevant, please say so against the appropriate question.

It should be noted that wherever possible, within the constraints that procedure designers are obliged to work to, designs will be developed to avoid built-up areas.

Please complete the following:

Representative Organisation:
Devon and Somerset Gliding Club (DSGC) flying from North Hill Airfield (NH).

Question
Q1 - Please list any altitude constraints, together with your reasons, that you feel Exeter Airport could consider when designing its new airspace structure?

Question 1, Altitude Constraints. DSGC Response:

Preliminary Note

DSGC gliders have, since the club was formed in 1967 enjoyed almost unlimited access to Class G airspace overhead and around the club.

North Hill airfield is located 9 nm north-east of Exeter Airport in Class G airspace, and 6 nm north of the ILS feathers for Runway 26. It is on the edge of the Blackdown Hills at approximately 900 ft amsl, with a spur of the Blackdowns running southwards for 2 nm from a point just east of the airfield, at approximately the same height.

The club's current constraints are:

- **The Dunkeswell airfield ATZ,** where limited access is available within the terms of a Letter of Agreement [LOA] between DSGC and Dunkeswell. On a reciprocal basis, Dunkeswell's approach and departure traffic is required to avoid NH.
- **The requirements of Skydive Buzz Ltd, the parachuting club based at Dunkeswell Airfield.** There are arrangements between DSGC and Skydive Buzz.
- **Exeter Airport Letter of Agreement.** Given the close proximity of NH to Exeter, DSGC has a LOA with Exeter ATC which (subject to agreed procedures and rules) permits NH gliders to fly without making radio contact to Exeter ATC, south as far as the clearly visible topographic boundaries of the A30 trunk road and the Honiton–Exeter railway line. If NH gliders wish to fly to south of this topographic boundary, they are required to make contact with Exeter ATC.
- **The north-south airway Berry Head CTA FL65+ (N864)** which lies overhead and adjacent to the western end of North Hill Airfield.

"Altitude constraints, together with your reasons".

1. ***Any* future altitude constraints overhead and within gliding range of NH make gliding less attractive to members. Firstly, local soaring.** Gliding range from a home airfield such as NH is determined by soaring conditions on the day. On a good soaring day with favourable thermal lift conditions, this can be up to 20 nautical miles from NH. **Reasons for adverse impact of altitude constraints:** put simply, the pleasure and satisfaction in gliding arises - firstly, from successfully using the skill of gaining and sustaining altitude to prolong the duration of the flight; and secondly - from using the height gained to fly away from and then return to the home base. Many club members prefer to remain within gliding range of the club. However, any constraint on altitude also imposes consequent limitations on gliding range from the airfield and more widely, on the satisfaction of flying. **Constraints arising from CAS therefore have significant implications for member satisfaction and thus on the viability of the club.**
2. **Future altitude constraints – adverse implications for cross-country flying.** Flying longer distances cross-country is what most glider pilots aspire to. When weather conditions permit, DSGC pilots fly to-and-from distant turnpoints, for example, Chard, Crewkerne, Dorchester, Crediton, Wimbleball Reservoir and Okehampton; and in strongest conditions, to Salisbury Cathedral and beyond to the east, and Launceston to the west. **Reasons for adverse impact of altitude constraints:** before setting off on a cross-country flight, pilots will wish to gain sufficient height to satisfy themselves that the soaring conditions are indeed as interpreted from meteorological data before the flight, and to gain sufficient height to fly away from NH. Secondly, when gliding home from a distant turnpoint, the pilot needs to have sufficient altitude to get home (stopping if necessary to gain more height by circling in a thermal and by routing via most likely sources of lift). Any limitation in altitude places a barrier to the route of the flight and/or increases the risk of a forced landing, particularly as thermals are weaker in the lower half of the convective layer. For these reasons, controlled airspace (CAS) is a virtual no-go area for glider pilots, as - unlike powered aircraft - gliders do not fly in straight lines at fixed altitudes.
3. **Future altitude constraints – detrimental effects on DSGC operations.** DSGC's normal operations include aerotows to 5000ft amsl for both spin recovery training for pilots, and trial lessons flights for members of the public. Regarding the latter, a useful part of the club's income

is derived from the marketing and sale of these 'mile-high aerotows' (to a mile above sea-level). (As noted above, NH is approximately 900 ft amsl).
Q2 - Please inform us of the latest proposed timescales for any neighbouring airspace/procedure re-design projects?
Q.2 Your Response: N/A [not applicable] to DSGC.
Q3 - Please advise us of any future requirements for improved coordination (particularly adjacent/contiguous routes) between Exeter Airport and adjacent ATC units that should be considered during the development of the new Exeter Airport airspace structure?
Your Response: N/A to DSGC.
Q4 - Are there any current Air Transport Movement coordination arrangements with Exeter Airport that you would like to see remain or change as a result of Exeter Airport's new airspace design? Please provide a brief description.
Your Response: <u>Recommended change.</u> Relocate the EX NDB Hold to a right-hand pattern to the south of the runway, which would move it from the currently heavily used Class G area.
Q5 - Are there any aspects of the Future Airspace Strategy (FAS) (e.g. airway entry/exit points, existing planned or new handover points) that Exeter Airport should take into account in the design of the new airspace? Please provide details.
Your Response: It is the understanding of DSGC that with effect from December 2018 the FAS is superseded and replaced by the Airspace Modernisation Strategy (AMS) [see AMS/CAP 1711 Executive Summary paragraph 3] with the possible exception of the redesign of the terminal network [AMS page 112]. *(DSGC would welcome correction on this point as appropriate).*
Q6 - Are you aware of anything in the CAA Airspace Modernisation Strategy that presents a risk or opportunity to Exeter Airport airspace development? Please provide details.

[Question 6 – AMS, risk or opportunity?] Your Response:

It is the view of DSGC that the AMS - in conjunction with this Airspace Change Proposal – can provide the opportunity and impetus to rationalise and integrate Exeter traffic and GA traffic. However, this is dependent upon the extent of any CAS envisaged by the change sponsor.

1. The AMS requires the modernisation of airspace at lower altitudes (up to 7000 ft) by 2024. [AMS see Table 1 page 10; and Paragraph 4.1, page 62].
2. It is understood that the majority of CAT approaches at Exeter utilise the ILS system for instrument flight procedures, rather than the available RNAV LPV approaches (or NDB hold).
3. The AMS refers to the modernisation of airspace at lower altitudes by implementing more precise and flexible satellite-based arrival and departure routes [AMS Paragraph 4.24]. This modernisation is understood by DSGC to be a top priority [AMS Paragraph 4.30].
4. Two alternative initiatives are identified in AMS Paragraph 4.26 to achieve this modernisation: either the replication of existing arrival and departure routes with satellite navigation upgrades, or the deployment of new arrival and departure routes designed to satellite navigation standards.
5. Notwithstanding these stated "ends" [objectives] of the AMS, EDAL has stated in paragraph 3.3 of this Questionnaire that *"Exeter Airport does not have, and is not intending to introduce SID or STAR procedures for aircraft operating from the airport. Routing to and from the airways structure will be facilitated by tactical instructions from ATC, which currently leads to the natural dispersion of aircraft around the local area…."*
6. The airspace modernisation proposed in the AMS, coupled with this ACP, would seem to present an appropriate opportunity to introduce SIDs and STARs which would have the effect of reducing the volume of any CAS that is proved to be necessary.
7. **Thus, if the case for CAS beyond the critical stages of flight is clearly demonstrated, DSGC is requesting in Question 29 below that Exeter revises its routings of CAT to minimise the potential confliction of Exeter traffic with GA traffic in areas to the north of the ILS feathers. It is the view of DSGC that this aim can be achieved during the modernisation of Exeter's approach and departure methodology referred to in replies above to Questions 6.1 to 6.6, which is understood to be required in any event by 2024 under the objectives of the AMS.**

Q7 - Do you have an existing Letter of Agreement or Memorandum of Understanding or other agreement with Exeter Airport? If so, do you see this as:

(a) An agreement you would like to see remain, preferably in its current form.
(b) An opportunity to alter or extend this agreement – and how?
(c) An agreement that is unfit for purpose (or may come to be as a result of the change).

Your Response:

Following a long period of unwritten rules, DSGC has a LOA with Exeter ATC jointly signed in June 2017 and reviewed annually. It is beneficial to both parties: it facilitates NH pilots to fly southwards (towards the ILS feathers and the easterly final approach track, to a readily identifiable topographic boundary) without the need to make radio contact with ATC; the LOA thus also reduces ATC workload.

The future retention of this LOA depends upon the extent of any CAS that may be introduced as a result of this ACP. This is dealt with in response to Q.29.

Q8 - Please let us know if there are any day time or night time constraints that you consider Exeter Airport could take into account when updating its airspace structure? Please provide details and reasons.

Your Response:

1. DSGC's normal soaring-flight hours are 10.00am to 6.00pm (dependent upon time of year) although training and limited local flying can take place outside these hours.
2. Additionally, it is the contention of DSGC that 10.00am to 6.00pm is also the core time for most GA flights.
3. Any additional controlled airspace at Exeter will negatively impact DSGC's existing rights under Class G airspace.
4. DSGC therefore strongly believes that any proposal for a revised airspace structure which goes beyond the critical stages of flight should and can be adapted to minimise the impact upon NH and the other airfields north of the Exeter airport during these hours. Further details are given in Q.29 below.

Q9 - Please tell us if there are there any other operational constraints that Exeter Airport will need to consider when planning its new airspace?

Your Response:

See response to Q.15 below.

Q10 - Please inform us of who you consider to be the other key local aviation stakeholders that you believe Exeter Airport should engage with during the process of designing its new airspace? Please provide details and reasons.

Your Response:

- Devon and Somerset Flight Training Ltd, Dunkeswell, EX14 4LG. Its operations will be directly affected.
- The Devon Strut of the Light Aircraft Association. It is the largest aviation membership body in the south west, including members who fly out of Exeter, Dunkeswell and Watchford Farm. It is an established fact that many GA pilots prefer to avoid CAS, and this may cause funnelling and pinch points around the margins of re-classified airspace.
- Skydive Buzz Ltd at Dunkeswell Airfield. On flying days, the parachuting club operates numerous flights to 15,000 ft before dropping within the Dunkeswell DZ.
- Somerset Microlights, Dunkeswell Airfield, Culme Way, Honiton EX14 4LJ
- Farway and Branscombe Airfields.

Q11 - Please provide details of any constraints imposed by restricted operations in the area encompassed by Exeter Airport flight operations (e.g. military operations, danger areas, restricted areas, route crossings, transit corridors, training areas etc.)?

Your Response:

N/A to DSGC.

Q12 - Please indicate if you feel there is a requirement for improved coordination between Exeter Airport and adjacent Air Navigation Service Providers (ATC) units that should be considered during the development of the Design Principles, Design Options and when implementing the new Exeter Airport airspace structure?

Your Response:

DSGC has no response to make on this point.

Q13 - Please provide details of any issues or constraints due to local helicopter operations that you believe may have an impact on Exeter Airport's new airspace design project?

Your Response:

DSGC has no response to make on this point.

Q14 - Please provide details of any issues or constraints due to local General Aviation operations, that you believe may have an impact on Exeter Airport's new airspace structure.

Your Response:

See response to Q.8 above.

Q15 - Please provide details of any constraints that may be occasioned by local gliding activities on the Exeter Airport's new airspace structure?

Your Response:

Refer again to response to Q.1. In addition:

1. It is worth emphasising that gliders do not fly in straight lines or at fixed altitudes because they are reliant on atmospheric conditions (particularly thermal lift) to remain airborne. Thermals are weaker in the lower half of the convective layer. Before flying, glider pilots choose a route dependent upon conditions on the day, and then en route, by reading the sky for likely best sources of lift on and adjacent to the intended route. There is a constant chance of encountering sink (down-going air) which causes varying amounts of height loss, from minor to dramatic.
2. Constraints on altitude mean reduced distance capability and a greater risk of a forced landing. Forced landings are the highest cause of injury to glider pilots and of damage to aircraft in gliding.
3. For these reasons, CAS is effectively a no-go area for gliding, especially if the current exemption to the SERA 5001 rules when flying in Class D airspace is withdrawn. See https://members.gliding.co.uk/2019/04/24/caa-consultation-on-proposed-changes-to-vmc-minima-in-class-d-airspace-2/.

Q16 - Please provide details of any impacts on General Aviation flying that you feel may be occasioned by any new airspace proposed by Exeter Airport.

Your Response:

- Risk to the viability of DSGC dependent upon the extent of CAS introduced.
- Insofar as gliding is a part of General Aviation, see responses to questions 1, 8 and 15.
- Doubtless this question will be dealt with by other aviation stakeholders.

Q17 - When Exeter Airport designs new airspace, please list the facilities in your local area that you believe could be prioritised when considering aircraft noise (eg hospitals, schools, parks, hospices etc)?
Your Response: Blackdown Hills AONB.
Q18 - Please tell us if multiple routes that disperse noise across a greater number of households are more of a priority for you than a single route that concentrates noise along a track above a smaller number of households.
Your Response: DSGC is not a householder and of course cannot speak for any individuals on this point. However, in general terms it would seem desirable that aircraft noise is dispersed. If controlled airspace is proved necessary beyond the critical stages of flight, then PBN enables the use of alternative routes which can 'share' the noise arising from larger aircraft.
Q19 - Please identify any other areas, in adjacent council/borough areas, that in your opinion may be sensitive to either direct overflight or exposure to aircraft noise, including during the night-time period?
Your Response: DSGC has no response to make on this point.
Q20 - Do you believe aircraft conducting continuous climbs or descents to/from altitude (where this is safe to do so) may improve (lessen) exposure to noise in your local area?
Your Response: 1. In general terms it is understood that Continuous Descent Approaches (CDAs) and Continuous Climb Departures (CCDs) can lessen overall noise levels around an airport from CAT. This would therefore apply to the Exeter Airport locality. 2. It is also understood that CDAs require CAS from Airway to Airport. DSGC has commented on the implications of this in Question 29 below.
Q21 - Please tell us the locations of any particularly sensitive wildlife habitats, not already notified (linked to Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI) etc), that you feel aircraft could avoid?
Your Response: Blackdown Hills AONB.
Q22 - Please state what principles you believe Exeter Airport may adopt to mitigate (in full or in part) any concerns you may have regarding the impact of airliner exhaust fumes or pollution?

Your Response: DSGC has no response to make on this point.
Q23 - Please bring to our attention any recent or ongoing local environmental studies, you feel should be considered by Exeter Airport when designing the new airspace structure?
Your Response: DSGC has no response to make on this point.
Q24 - Are there any other local development projects, perhaps currently at the planning stage, that Exeter Airport should be aware of and consider when planning its new airspace structure?
Your Response: DSGC has no response to make on this point.
Q25 - Please list any other relevant local or national organisations that you believe Exeter Airport should ensure are involved in its formal consultation.
Your Response: • The Devon Strut of the Light Aircraft Association. • British Gliding Association. • The General Aviation Alliance. • The Light Aircraft Association. • British Hang Gliding and Paragliding Association.
Q26 - Please provide the location of any future planned facilities you are aware of in your local area that could be considered sensitive to the impact of aircraft noise; please state why you feel this is necessary?
Your Response: DSGC has no response to make on this point.
Q27 - Are there any areas that you feel will suffer more due to the impact of aircraft noise if the displacement of other aviation traffic were to occur due to the Exeter Airport airspace design project?

Your Response: CAS is avoided by much GA traffic, therefore funnelling of GA traffic, both horizontally and vertically, into potential pinch-points on the periphery of proposed CAS needs to be considered carefully before introducing CAS, from both a safety and noise viewpoint.
Q28 - If you were flying as a passenger from Exeter Airport, we would be grateful for any views you may wish to express about how Exeter Airport should consider the needs of the local community?
Your Response: The needs of the local community include other aviation users.
Q29 - Please advise us of any other issues or constraints you feel Exeter Airport could consider when designing its new airspace structure? Please provide details.

[**Q29 – "other issues or constraints"].** Your Response:

1. **Design Principles for the ACP process.**
    1) It is understood that these Responses will contribute to Step 1B of CAP 1616, the development of "design principles" which will act as guidance for the development of design options. It is noted that this is to be part of a *"two-way conversation with relevant stakeholders"*. [Appendix D, paragraph D4].
    2) Although this part of the process has not yet started, DSGC wishes to take this opportunity to put forward what it sees as fair and reasonable design principles from the viewpoint of an aviation stakeholder. These design principles are set out in "Annex 1 – Design Principles" with this Response.
    3) It is also noted that paragraph 108 of CAP 1616 (page 33) states *"The design principles form a framework against which airspace change design options can be evaluated."* The DSGC Annex 1 - proposed Design Principles - incorporate a simple 'test' for evaluating design options, again from the viewpoint of aviation stakeholders.
    4) *DSGC would therefore welcome the agreement of the change sponsor to the adoption of these **Annex 1 Design Principles** for use in guiding the design process.*
2. **Recap on CAA's decision not to approve Exeter's 2017 ACP.**
    1) **Disproportionate size of proposed CAS.** Regarding "the efficient use of airspace", the CAA in its Decision found that *"…there is a significant impact on other airspace operators. The size and classification of the proposed airspace is disproportionate when considering the potential efficiency benefits of CAT operating at Exeter. The proposal falls short on facilitating access for as many other types of aircraft movements. The size of the final design is not predicated on a safety argument, (unlike the protection afforded to CAT in the critical stages of flight element of the proposal,) but on the containment of existing instrument flight procedures, which is not required. The misapplication of the Containment Policy has led to a design which is disproportionate and therefore fails to secure the most efficient use of airspace."* [Decision in CAP 1654, para 15].
    2) **Protection for the critical stages of flight.** In its Decision, the CAA appears to have accepted the need for enhancement "in respect of providing protection to Commercial Air Transport (CAT) in the critical stages of flight." [ACP Operational Assessment, OA, para 1.2; OA 1.4, first line; OA 2.9 first two lines]. The justification for this acceptance by the CAA was illustrated during the 2017 ACP process: analysis showed that 97% of recorded 'controller interventions' arose from traffic which crossed the extended centreline, or flew within 3nm of it without contacting ATC. [**see Appendix 2,** comprising DSGC's ACP Consultation Response of 8 June 2017 **paras 5.3 & 5.4,** based on information from SATCO].

3. **Options for the enhancement of safety in the critical stages of flight/beyond the critical stages of flight.** As indicated, the CAA has accepted the case for the enhancement of safety to CAT in the critical stages of flight. It is apparent that the issues giving rise to this current ACP are substantially identical to those during EDAL's 2017 ACP, notwithstanding the incremental increase in passenger numbers since that date. This being the case, DSGC believes that - in accordance with the Design Principles set out in Annex 1 - EDAL should consider the least restrictive categorisation of airspace necessary to achieve this safety enhancement, over the smallest possible volume. *Towards meeting this objective, DSGC requests that the options set out in sub-paragraphs 4-7 below are fully evaluated during the CAP 1616 Stage 2 process:*

    Option 1 - Controlled airspace focussed on the critical stages of flight (two possible designs).

    Option 2 - Flexible use of airspace (2 possible types of FUA).

    Option 3 - Implementation of an RMZ/RMA.

    Option 4 - Controlled airspace based around modern PBN flight profiles.

4. ***Option 1*** **- Controlled airspace focussed on the critical stages of flight.** As indicated above, the issues presented in EDAL's Sections 1-3 of this Design Principles Questionnaire are identical to those presented during the 2017 ACP process. Following the 2017 ACP Consultations, **DSGC's response letter of 8 June 2017** ***[now re-submitted as Appendix 2 to this Response]*** put forward 2 designs which would provide Exeter with enhanced safety in the critical stages of flight, without the massive disruption to local aviation stakeholders from the 2017 proposals. These two designs are:

    1) **'MATZ-shaped' area of Class D airspace.** Analysis in 2017 showed that it is the area close to the extended runway centre-line that is of concern. Under this proposal, this area could be protected by the MATZ-shaped design of a 5nm radius around the airport and together with a 5nm long and 4nm wide stub centred on the extended centreline in each direction. **(Refer to paragraphs 5.3 – 5.7 of Appendix 2, and appended plan, for the rationale for this proposal).**

       Note: DSGC has noted that additional reporting on 'controller interventions' is now available to the change sponsor, but this is not yet available in analysed form to aviation stakeholders.

       Additional note for information: In its Submission to the proposed All Party Parliamentary Group (APPG) Inquiry into Lower Airspace, DSGC has put forward the request that the principle of a MATZ-shaped area of CAS be considered at the Inquiry, as a suitable compromise in the case of smaller airports such as Exeter seeking to enhance safety beyond the ATZ.

    2) **Class D Airspace (as in preceding proposal) with the addition of Class D to the south.** If controlled airspace is required from Airport to Airway, a 6nm block of Class D to the south of the stubs would be sufficient to permit this, with traffic to and from the north remaining in the Airway and overflying Exeter Airport. **(Again, refer to Appendix 2 to this Questionnaire response, paragraph 5.9 and its appended plan).**

5. ***Option 2*** **- Flexible Use of Airspace (FUA).** Congested airspace and competing airspace users indicate the need for a flexibility of approach to help find solutions, with innovation where appropriate. DSGC believes FUA can be a means of adapting the lower airspace at Exeter to meet the differing airspace needs of a number of aviation stakeholders.

    1) **FUA - Time-based CAS.** As noted in the response to Question 8 earlier, most DSGC flying and the majority of GA traffic flies during daylight hours, and in particular, between 10.00am and 6.00pm. PBN enables the concept of flexibility of/between defined routings, in and out of airports. In Exeter's case, designated areas could be classified as Class G from 10.00am to 6.00pm, and Class D from 6.00pm to 10.00am, with arrival and departure routes for commercial traffic varied dependent upon time of day.

       The AMS states in paragraph 1.32 *"Airspace modernisation is also expected to improve access to airspace for General Aviation, by enabling greater integration (rather than segregation) of different airspace user groups."* DSGC contends that this proposal for FUA could integrate the primary time-based needs of GA into the area surrounding Exeter Airport, in a way that provides an overall optimum outcome for the competing needs of the stakeholders concerned.

       Examples of time-based CAS: DSGC understands that a number of airports in France have a time-based airspace classification, although the basis for the switch is not as proposed by DSGC at Exeter. Airports such as La Rochelle, Bergerac and Brive have Class D airspace during operating hours but revert to Class G out of hours. Thus the principle of a time-based airspace classification is well established.

    2) **FUA – switchable airspace classification.** During the 2017 ACP process, the consultees cited the example of Innsbruck Airport where this operates, and provided reference material. It is understood that appropriate areas of airspace can be 'switchable' from Class D to Class G, on request, under an agreed procedure. This form of FUA is

understood to be ICAO and European ATM Regulation compliant. It should therefore be investigated and considered as an option.

Additional note for information: In its Submission to the proposed All Party Parliamentary Group (APPG) Inquiry into Lower Airspace, DSGC has put forward the request that both of these forms of FUA be considered at the Inquiry, as a suitable compromise in the case of smaller airports such as Exeter, and in particular where there are multiple stakeholder interests involved.

6. ***Option 3*** **- Implementation of an RMZ/RMA.**

1) **BGA Submission during 2017 ACP.** EDAL will be aware of, and have access to, the BGA Submission dated 2 June 2017 in response to the Consultation on EDAL's 2017 ACP. Following thorough analysis in this document at that time, the BGA proposed an RMZ/RMA in paragraph 8.

2) **DSGC support for BGA's RMZ proposal.** During the 2017 ACP process and after the raising of the bases of some CTAs, DSGC made the following points in its letter to EDAL dated 8 September 2017; this paragraph also sets out DSGC's current position regarding an RMZ:

3) *"DSGC supports the BGA proposal for an RMZ/RMA, in conjunction with a supplementary LOA. As with the current LOA, this would require a daily phone call to Exeter ATC on flying days for activation, to permit pilots to fly southwards as far as the same clear topographical boundary without making individual calls to ATC. Note: At the Meeting on 14 August, EDAL indicated that under Class D, it would remain OK for DSGC to fly non-radio south to the A30, as in the recent LOA. [Meeting Note 16 refers]. It is therefore assumed that under an RMZ/RMA, the same agreement for a dispensation could be reached ".*

7. ***Option 4*** **- CAS based around modern PBN flight profiles.**

1) The Air Navigation Guidance 2017 states that PBN introduces a number of key benefits, including: *"a safer and more efficient ATC system requiring less controller intervention".* [Annex B paragraph B.2] Controller interventions have been cited as a significant factor behind this new ACP.

2) *If the need for CAS beyond the critical stages of flight is clearly demonstrated,* then in accordance with the aims of the AMS Paragraph 4.26 referred to earlier, approach and departure procedures should be updated by "the deployment of new arrival and departure routes designed to satellite navigation standards".

3) If Airway-to-Aerodrome CAS is proposed, satisfactory design of these routes is unlikely to be achieved by the replication of existing routes. The reason for this is that containment of existing routes would conflict with widely-used and long-established Class G rights of numerous local aviation stakeholders north of the A30, including DSGC, and would result in inefficient use of airspace. It is the view of DSGC that replication of existing routes would not comply with guidance within the AMS: paragraph 3.5 states that airspace modernisation should deliver *"**integration**: airspace modernisation should satisfy the requirements of operators and owners of all classes of aircraft across the commercial, General Aviation and military sectors"*; and paragraph 4.24 states *"…Airspace developments at lower altitudes must also consider the need to safely integrate other airspace users within the airport vicinity, including General Aviation…".*

4) It therefore seems apparent that a 'south-side-only' area of CAS would be the obvious solution, particularly as the proportion of Exeter's CAT that connects northwards to the Airway is small, and overflying the airport to achieve southerly orbits has relatively small impact. This was proposed in 2017 by both DSGC and the Devon Strut of the LAA.

Table 1 – Stakeholder Questionnaire

Thank you for your cooperation in completing this questionnaire. Your comments will provide a valuable input to aid development of the Design Principles against which the options for the Exeter Airport airspace design can be developed.