

Devon Strut of the LAA's Response to Exeter Airport's ACP following Post Consultation Local Engagement Meeting, 4th October 2017, 10.00 at Exeter Airport

In attendance: Dave Burrows (Exeter ATC Services Manager), David Millin (Devon Strut Chairman), Mike Mold (Devon Strut committee member).

1. Introduction.

1.1 The Devon Strut of the Light Aircraft Association has the largest membership base of airspace users in the South West, including those who fly at airfields in the area local to Exeter Airport (Dunkeswell, North Hill, Upottery, Watchford Farm, Farway Common, Branscombe etc) with diverse interests (GA, M/L, gliders, hang gliders, etc) as well as those of its members based further afield but who transit the East Devon area and who are all potentially affected by the proposed airspace changes.

1.2. The Devon Strut's concerns about Exeter's airspace proposals are based on:

- (i) non-Exeter Airport user organisations being negatively impacted, both operationally and financially, and specific impacts on several aviation organisations based at Dunkeswell Aerodrome and on Devon and Somerset Gliding Club at North Hill (documented separately by those clubs),
- (ii) Increased complexity of the airspace design will lead to a) reduced safety to GA by funnelling and b) increased risk of airspace infringements,
- (iii) protection of CAT should be based on safety. Any associated costs should be borne by Exeter Airport and CAT. Such costs and any deleterious operational consequences should not be imposed on other airspace users, particularly those in the sectors to the north of Exeter.
- (iv) this consultation exercise has missed the opportunity to adapt ATC procedures and incorporate innovation.

1.3 The Devon Strut maintains its suggestion, as described in its response to the consultation, that a design of controlled airspace solely to the south would be most beneficial to all users.

2 Notes from the local engagement meeting.

2.1 Exeter's new airspace design, with revisions made following consideration of responses after the consultation carried out between March and June (*Fig. 1 below*), had not yet been finalised nor submitted to CAA. This submission was now expected by the end of October 2017. If accepted by CAA, implementation would be unlikely before summer 2018.

2.2 The MOD has objected to the proposed area CTA-10 in D012 in the SE corner of the plan. Consequently, the plan is to be revised as Danger Areas take precedence over Controlled Airspace.

2.3 Exeter was to meet with NATS to discuss integration of Cardiff, Bristol and airway sector 6 into Exeter's proposed airspace. Other than the current meeting and having previously met with DSGC & DSFT on 14th August, no other discussions were anticipated.

2.4 The current Exeter radar controllers for north & south areas are likely to be replaced by a LARS controller and an inner zone controller.

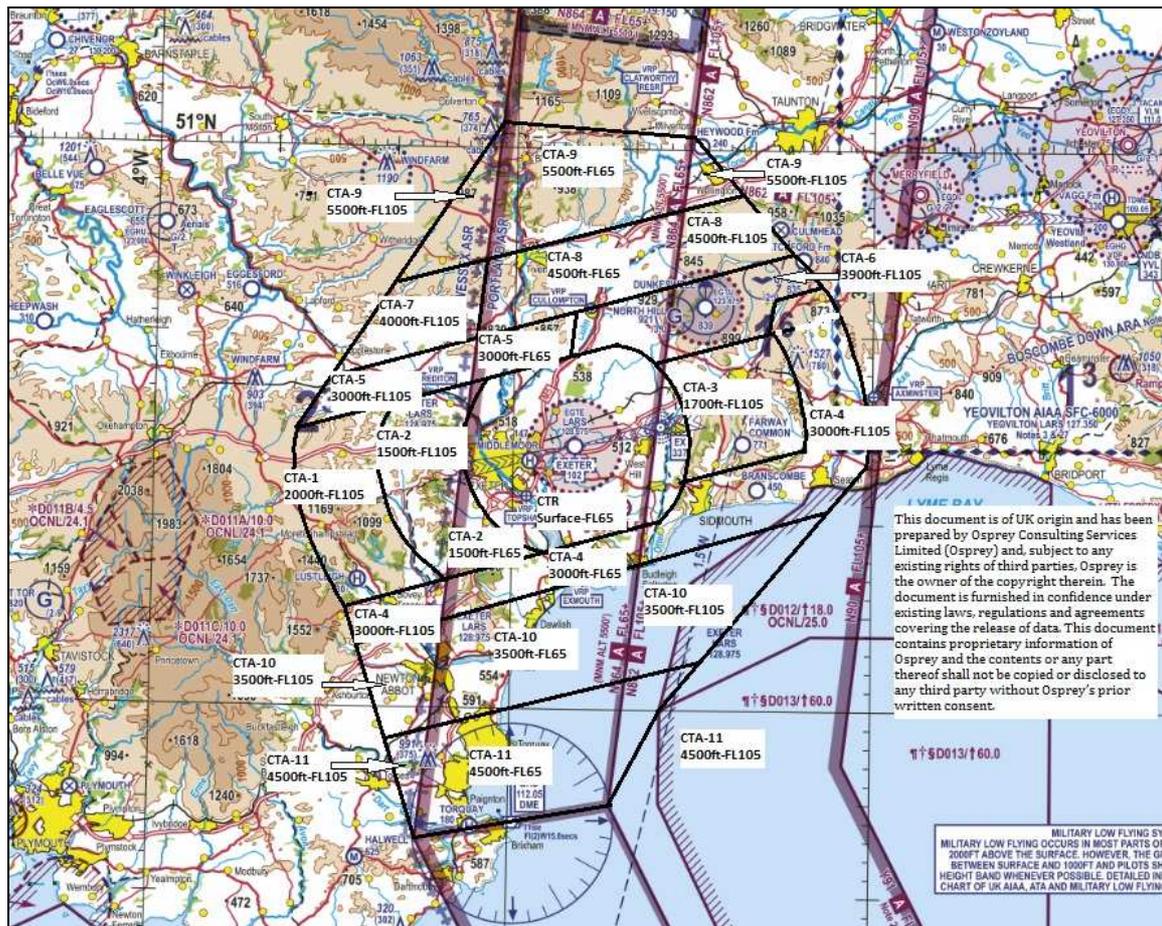


Fig. 1 Post consultation airspace design with revisions

- 2.5 Exeter ATC intends to introduce a listening squawk (referred in pre-consultation discussions with the Devon Strut) but this was not mentioned in the ACP. *(DB to raise with Osprey).*
- 2.6 The Strut was sceptical of DB's assertions that Exeter would ensure that it would be sufficiently manned and capable of providing transit services to GA traffic requesting such a service. The Strut quoted GA pilots' experiences of Bristol airport where, following several years of good rapport with GA, more recently requests to transit their airspace were now frequently refused due to controller workload.
- 2.7 Exeter proposes to include a North/South VFR corridor, to follow River Exe and through the Exeter A/P overhead. Although this had also been mentioned by DB in pre-consultation discussions, it had not been included in ACP. *(DB to raise with Osprey.)*
- 2.8 Dave Burrows was dismissive of the concerns raised for the future of the DSGC at North Hill, feeling that the likely negative impact on the club due to the airspace proposals had been significantly overstated. He quoted the London GC at Dunstable as operating successfully under class D airspace adjacent to Luton Airport with a Letter of Agreement system and with glider boxes agreed with Luton.
- 2.9 The Strut queried whether there had been any progress on airspace flexibility, which would allow temporary changes between class D and class G to accommodate gliding. DB had asked the CAA about their attitude to this but he had not received a reply from them. *(DB to chase response from CAA).*
- 2.10 DB will look again with Osprey at issues raised by Brendan Procter of DSFT regarding the proximity of the northern edge of proposed CTA-3 to the Dunkeswell

ATZ. As most of the reported cases of deconfliction over recent years had occurred on or adjacent to the ILS centrelines, the Strut suggested that these were the areas where CAT protection should be focussed and that CTA-3 should be narrower with its northern edge moved further south to avoid the Dunkeswell ATZ & parachute drop zone.

- 2.11 DB confirmed that a previous suggestion, that the Dunkeswell based parachute aeroplanes should maintain their climb-out to within the DZ footprint (and which would have potentially raised additional noise concerns from residents local to Dunkeswell), was **not** a proposal within the new airspace design. An LoA was under discussion between the parachute club and both Exeter and Cardiff airport ATC units.
- 2.12 Devon Strut's concerns were reiterated re the base of CTA-1 to the west of the area and queried whether the ILS approach to RW08 could be amended from 3 degrees to match the 3.5 degrees used on RW 26 and hence allow the base of CTA-1 to be raised to 3,000ft. This would provide more headspace for GA traffic transiting the area where the ground level was ca 1,100ft amsl. DB dismissed this ILS procedure change as being too expensive.
- 2.13 The Strut acknowledged that the raising of the bases of CTA-3 to 1,700ft and that of CTA-6 to 3,900ft were helpful to GA but those benefits were countered by the added complexity that they introduced, an area of concern already raised by NATS. This would increase the workload of pilots transiting the area or arriving/departing Dunkeswell and increase the risk of traffic conflict and airspace infringements.
- 2.13 **The Devon Strut reiterated its stance on preferring a CAS design to the south of the CTR such that no limitations would be placed on the airfields to the north of the Exeter area.** This southern design would require the few daily CAT movements arriving and departing from/to the north (Manchester, Newcastle, Glasgow & Edinburgh) to overfly the Exeter CTR and make climbs/descents in the southern quadrants. DB suggested that this would lead to increased noise concerns from the coastal residents and increased congestion requiring more airspace to the south, with a lower base to CTA-4 than the proposed 3,000ft along the south coast. Coincidentally, he also advised that in the near future, to accord with the implementation of the new airspace, Exeter's radar would be updated to provide 3nm separation compared with the current 5nm capability. The Strut pointed out that this would reduce any necessary increase in airspace volume required for CAT protection for the whole of the proposed airspace and negate any need for a lower base to CTA-4 if a southern design was adopted. The Strut's view, supported by anecdotal evidence from residents of East Devon, was that the few additional arrivals and departures required to overfly the CTR would be unlikely to generate any significant increase in noise complaints, given the characteristics and capabilities of modern public transport aircraft.

3 Conclusion.

- 3.1 **The Devon Strut strongly objects to the proposed airspace design.** If the ACP in its current form is implemented, the changes will severely affect stakeholders to the north of Exeter. However, these changes are unnecessary as alternative options, incorporating a south-side airspace design with less impact, are available. In particular, the approach procedures should be re-drawn to meet updated Performance Based Navigation requirements and should also take into account the impending radar upgrade which might safely reduce the historically greater separation requirements on which the current proposals are based.
- 3.2 Exeter's proposals are founded on speculative values for future air traffic movements that are not corroborated by independent transport and economic forecasts.

- 3.3 The Devon Strut is extremely concerned, both by the implications for non-CAT airspace users (outlined above and in its formal response to the consultation) and by the way the consultation process and post consultation discussions have failed to meet the required criteria laid down in the consultation framework. In both phases of the process, not all stakeholders were included. Despite this failing, the vast majority of responders were opposed to the proposals.
- 3.4 In particular, no consultees were notified when the Aviation Stakeholder Consultation Report of 14th July 2017 <https://www.exeter-airport.co.uk/content/uploads/ACP-Consultation-Report-Issue-1.pdf> was made public on the Exeter Airport website. The document was not linked via the airport's homepage as had the original announcement of the consultation, but was only visible via a keyword search of the website. The conclusion drawn by consultees was that the report was being hidden from public view, again contrary to the framework guidelines and also contrary to the guidance in the Code of Practice on Consultation (Cabinet Office, July 2008). The Code of Practice, Section 6.4 states "*Those who have participated in a consultation exercise should normally be alerted to the publication of this information*". https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/100807/file47158.pdf
- 3.5 The revised airspace design (Fig.1 above), drawn up following comments from the consultation, was not shared with all consultees but its circulation was limited to a phase of local engagement with DSGC, DSFT and latterly with the Devon Strut who learnt of it from DSGC and then took the initiative in engaging with Exeter. Whilst acknowledging that this version was not likely to be the final design, as changes would be made following objections from the MOD, the failure to more widely share the revised design, which added even greater complexity to a proposal that NATS had criticised as being too complex, again illustrates a concerning element of subterfuge in the process.
- 3.6 The proposals fail to:
- make the airspace more efficient for *all* users;
 - be of the *minimum* practicable dimensions, commensurate with the regulatory and environmental requirements and the safe and efficient use of airspace;
 - provide for access to the maximum extent practicable by *all* classes of aircraft.
- 3.7 In failing to follow the above principles, Exeter's consultation process was flawed and its proposals should be radically re-designed to minimise the impact on other airspace users.

M Mold / D Millin
Devon Strut of the LAA
19/10/2017