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EXETER AIRSPACE CHANGE PROPOSAL

DEVON AND SOMERSET GLIDING CLUB

RESPONSE TO REVISED PLAN OF CLASS D AIRSPACE FROM MEETING ON 14 AUGUST 2017

As requested, this is the response of Devon and Somerset Gliding Club (DSGC) to the revised plan that was emailed prior to the meeting at North Hill Airfield on 14 August. It should be read in conjunction with the DSGC initial response of 8 June 2017 to the ACP. This response also refers to the Aviation Stakeholder Consultation Report ('Consultation Report'/ASCR) placed within the Airport website on 26 July. As the club was only made aware of the ASCR by the BGA on 11 August, there was limited time to assimilate it for a sufficiently considered response at the meeting. Nevertheless, it provides much of the information required of a feedback document under CAP 725 Section 4.15

The revised plan remains unacceptable to DSGC. It is badly flawed in design with important safety and practical consequences, as well as unreasonable limitations. DSGC therefore objects very strongly to this revised plan.

1.0 LACK OF JUSTIFICATION

1.1 **ACP - restatement of DSGC position.** It is noted in the Consultation Report that the underlying justification for the ACP [Section 2.1], previously *increasing ATMs causing potential overload* appears to have been dropped. The stated aim is now *'augmenting safety, and advancing the airspace efficiency and Exeter Airport flight operations'*, [ASCR Section 2.2] the latter including a claim for the need for full procedure containment, i.e. containment of Exeter Airport published Flight Procedures [IFPs] of the current RNAV [GNSS] Approaches. **DSGC remains adamant that, as "Exeter ATC handles the current operational issues safely and effectively", then the case for Class D airspace or any changes to existing Airspace arrangements has not been justified, principally in light of (i) the low number of ATMs at the Airport – refer to BGA analysis; and (ii) the impact upon DSGC and other GA stakeholders. All other options referred to in this response apply only if this position is not accepted.**

- 1.2 **Revised Plan.** It is noted that no written justification for the amended airspace design has been provided although it is clearly intended to lessen the impact of the original Consultation plan. The remaining reasoning for the Club's response is set out below. This being said we welcome the token gesture of raising the bases of the northern CTAs.

2.0 SAFETY CONCERNS

- 2.1 **Southerly and south-westerly winds.** Most gliding (except cross-country) takes place upwind of the airfield – this is the normal and safest 'centre' for local soaring. The base of CTA-3 (1700ft amsl) is down to normal circuit height and is thus an impenetrable barrier only 4 Km south of North Hill airfield. The CTR is only 5 Km to the south-west. On good soaring days, there can be numerous gliders airborne at the same time. The restriction on distance upwind means a restricted search area, and thus limited cloud choice, for soaring. If gliders are trapped in a small area, sources of lift become more crowded, consequently with greater risk of midair collisions between gliders.
- 2.2 **Funnelling west of Dunkeswell.** Regardless of wind direction, it is highly likely that much GA traffic transiting east or west would wish to avoid the Class D airspace by flying below CAS to the north of CTA-3 and the CTR. This would place such traffic within or alongside the southerly circuit of North Hill airfield, used on approximately 50% of DSGC flying days. On days with south-westerly and southerly winds, with a greater congregation of gliders in this area (as in 2.1 above) this further increases the risk of midair collisions between gliders and GA transiting traffic.
- 2.3 **Radio difficulties for GA traffic departing Dunkeswell.** DSGC is aware that GA pilots departing Dunkeswell and wishing to enter or transit CTA-3 or the CTR would need to change frequency immediately upon leaving Dunkeswell. If Exeter ATC is unable to respond or to give clearance immediately, this traffic would be forced to go around within the limited area of Class G airspace/below CAS until contact is established or clearance given. On gliding days, this would put this traffic in potential conflict with North Hill gliders until the situation was resolved, increasing the safety risk.
- 2.4 **Complexity of airspace design.** The comments of NATS in the Consultation Report are striking: *"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"*. In spite of this criticism of the original plan, the revised plan introduces even greater complexity. Because Airspace boundaries do not follow natural features, there is a higher risk of accidental airspace infringements. DSGC aircraft flying in the area would need to carry moving maps with airspace proximity warnings which would need to be closely monitored by pilots. Expecting pilots to constantly monitor a moving map to identify an unclear airspace boundary, particularly during training flights, is unreasonable and increases mid-air collision risk. In addition, many DSGC based gliders that rarely fly cross-country are not equipped with moving maps.
- 2.5 **Height limits and the distraction factor for glider pilots.** Approaching the height limits imposed by all of the CTAs overhead and adjacent to North Hill, while soaring, would cause a distraction to glider pilots in what can be critical situations, especially while thermalling in close proximity to other gliders. *Additionally, making radio calls whilst thermalling in close proximity to other gliders increases workload and provides further unsafe distractions.*
- 2.6 **CTA-6 to CTA-5.** The need to reduce altitude when flying west from CTA-6 to remain clear of the lower base CTA-5, is another factor that increases the risk of a forced landing 'off airfield' as has been mentioned many times before.

3.0 EFFECTS ON DSGC OPERATIONS

3.1 In addition to the important safety concerns outlined, the revised design is likely to have the same results as the previous Consultation proposal. The needs of the DSGC's members are not met and as such the Club, which is currently very successful, will definitely lose members and fail to attract new members resulting in financial loss and decline – i.e. the closure of the Club. The reasons are stated briefly as follows:

- It limits flying to the training and early-solo end of the spectrum.
- It prevents the 'really good soaring flights' that incentivise and enthuse all pilots who take up the sport, and are what everyone practises for. It stops the good days from being really good days.
- It prevents 'achievement' flying such as gaining Silver Height.
- It imposes a significant loss to DSGC: for DSGC cross-country gliders wishing to depart to or return from the east, the placement of CTA-3 up to the south side of the Dunkeswell ATZ prevents use of the historic and natural route to the south-east of North Hill airfield. The only alternative route is around the north of the Dunkeswell ATZ which can be unsuitable and/or much less desirable, dependent on wind and conditions; and for returning gliders, significantly increase the risk of a forced landing.
- It makes attempting cross-country flying more risky for all but the most experienced pilots.
- It considerably limits the gliding distance from (and back to) the airfield available to local flyers and to pre-cross-country pilots needing to gain experience; that is, those pilots who are anxious to avoid a forced landing away from the airfield. *It is worth re-stating that all forced landings carry risk to aircraft and pilot. Fields which are selected under pressure for landing - if soaring conditions deteriorate or the natural route is unavailable due to Airspace - may be considerably less than optimum as landing areas, and may contain hazards not visible when selected from altitude. Field landings are amongst the highest cause of accidents and injury to glider pilots.*
- It restricts the club from offering 'mile high' [5280ft amsl] aerotow flights (upwind of the airfield) to members of the public, which provide a significant part of the club's income.
- It severely infringes the historic freedom of the air enjoyed by North Hill members, which is a major part of why so many glider pilots enjoy gliding.
- **Important note on offer made in the Consultation Report on 'transitory GA aircraft and gliders'**. In the ASCR, 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"*.

DSGC is very grateful for the positive and helpful approach by EDAL in making this statement. However, DSGC in turn needs to reiterate that gliders are rarely 'transitory aircraft' in the way that powered aircraft can be, that is, by flying in straight lines at fixed altitudes. Gliders have the constant need to maintain height by **(a)** selecting a route marked by the positions of clouds judged most likely to indicate good lift; **(b)** the need to thermal upwards (flying in circles in a column of rising air, the centre of which is itself drifting with the wind); **(c)** the need to turn away from an area of sink – and thereby avoid the possibility of a forced landing. *Thus the concept of 'crossing' CAS is misleading when applied to gliders, which may often need to remain for varying time periods where the best lift happens to be before moving on in the overall chosen direction.* 'Direct' flights can sometimes be possible if a returning cross-country glider has a sufficient height margin and is on 'final glide' back to the home circuit, but in planning his/her

route home from a distant turnpoint, the glider pilot needs to know that the route is available, particularly if conditions are likely to be weakening at the end of the day.

Supplementary Note: UK-wide experience has shown that access to Class D Airspace has not been made readily available to GA traffic despite well-meaning promises beforehand.

4.0 FAILURE OF REVISED PLAN TO MEET DESIGN OBJECTIVES

4.1 Design objectives were laid out by EDAL's consultants in the Consultation Document:

1. **As a minimum, to maintain the current level of safety; and**
2. **To make the airspace more efficient for all users;**

Regarding Objectives 1 & 2: NATS in its Consultation Response assessed the initial design as "potentially complicating ATM arrangements in the area, and as having a consequent negative impact on safety and airspace efficiency". **This revised design introduces even greater complexity, with safety issues already covered.** It is also the view of DSGC that it is not efficient use of airspace to effectively discourage or prevent the use of large volumes of airspace by all classes of non-commercial traffic, for the sole benefit of small numbers of ATMs, thus using the restricted airspace for only a short amount of time on a daily basis. The status quo is more efficient.

3. **Provide protection to public transport passenger aircraft in the critical stages of flight prior to landing and after departure;**

This is achieved/maintained. The status quo is that "Exeter ATC handles current operational issues safely and effectively".

4. **Be of the minimum practicable dimensions, commensurate with the regulatory and environmental requirements and the safe and efficient use of airspace;**

EDAL's proposed airspace has been designed to encompass historic procedures that were drawn up without geographic constraints. If - *notwithstanding the submissions of the BGA and DSGC that airspace changes have not been justified* - the need for CAS is upheld, then Approach procedures should be redesigned to meet modern airliners' Performance Based Navigation requirements and CDAs, and the Class D airspace redrawn around these new procedures. The proposal should then be proportionate to the requirement, with a likely halving of the area required to encompass all historic routes. This would also involve review of the need for current/historic waypoints, with the likely need for only the southern waypoints.

5. **Provide for access to the maximum extent practicable by all classes of aircraft.**

The revised plan fails significantly to meet this objective.

5.0 LETTER OF AGREEMENT BETWEEN EXETER ATC & DSGC

5.1 DSGC believes that the **Letter of Agreement (LoA)** signed by Exeter's ATSM on 28 June and by DSGC's CFI on 4 July, to be mutually beneficial to both parties, as stated in the document. [Annex 1]. The LoA formalises the longstanding informal agreement between the parties. This includes the requirement, inter alia, that any gliders within the 'jurisdiction' of DSGC wishing to fly to the south of an agreed line marked by clear topographical features [*the A30 road from Monkton westwards to Feniton; & the railway line westward from Feniton to the Exeter ATZ*] must first contact Exeter ATC to advise of their location and intentions.

5.2 DSGC further believes that in appropriate future circumstances, this LoA may be beneficial as the basis for further agreement – see Section 6.4 below.

6.0 DSGC – PROPOSAL FOR REVISED OPTION

6.1 **BGA Option for RMZ/RMA.** The clear and detailed analysis of the ACP undertaken by the BGA led to its proposal for an RMZ/RMA to support a known environment for Exeter ATC [as described in ASCR 4.6.2]. This is proposed by the BGA to be within an area planned around modern flight profiles, rather than the [more expansive] containment of Exeter Airport published Flight Procedures [IFPs] of the current RNAV [GNSS] Approaches.

6.2 **Previous DSGC position.** While DSGC could see considerable advantage in the BGA proposal in relation to the massive areas of Class D proposed, the drawback for both DSGC pilots and Exeter ATC would have been the need for numerous radio contacts whenever DSGC gliders entered the RMZ/RMA. Given the Club's proximity to the proposed RMZ/RMA, this was felt to be impractical from the Club's viewpoint, and that of Exeter ATC.

6.3 **DSGC previously proposed options.** DSGC is dismayed that the proposed alternative options suggested in its Consultation Response of 8 June have been ignored by EDAL. The options proposed received no mention in the Consultation Report and we do not believe that they have been given appropriate consideration. DSGC urges EDAL to reconsider its proposals and the rationale for them.

6.4 **DSGC revised option.** In light of the recent LoA mentioned in 5.0 above, 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.

7.0 MAJOR FAILURE OF REVISED PLAN TO REMOVE ALL NORTHERN CTAs.

7.1 **Failure to respond to the weight of consultation objections.** CAP 725 Section 4.7 places an obligation [use of the word 'must'] to respond with major changes to 'key themes': "*The Change Sponsor must be prepared to respond to what it learns and to make changes, even if this requires major modifications, if it is appropriate. The analysis of the responses to the consultation should identify the issues and key themes*". Within the Consultation Report, striking across a wide range of non-commercial consultees, is (a) the very high level of objection to the size of the Class D construct; and (b) the near unanimity amongst these consultees that this is primarily because of the inclusion of the northerly CTA blocks. However, major modifications have not been made, and DSGC wishes to record that EDAL has indicated that there is no need to re-consult on the revised plan because it is not a 'major change', since the 'footprint' of the Class D construct is unchanged from the initial consultation proposal.

7.2 **EDAL's formal response to 'south side only Class D'.** This is given in the Consultation Report, Annex A3-2, as follows: "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 just to the south of the airport does not meet the requirement in that *aircraft will continue to be routed on less expeditious flight patterns to reach their destination point*". [DSGC italics].

7.3 **EDAL's informal response during consultations.** Given the desire for CAT to remain within CAS on routes compatible with this aim, 'south side only' CAS would require flights arriving from or departing to the Airway N864 northwards to over-fly the Airport. In consultation meetings, EDAL has ruled this out,

stating that such routing-changes would require public consultation and/or environmental survey, which they wish to avoid, citing the possible 'impact' on coastal settlements.

- 7.4 **ATMs affected.** Flights leaving and joining the north-south Airway N864 to or from Manchester, Newcastle, Edinburgh and Glasgow currently average approximately 12 - 14 ATMs per day. Flights approaching from/departing to Belfast and Dublin - most often directly to/from the north west, but sometimes routed to the north - currently total only 4 ATMs per day. *Given these very low numbers, and given that half are arrivals which have minimal impact, the effect of 'switching' some flights to southerly orbits is extremely low.*
- 7.5 **Anecdotal evidence.** Anecdotal evidence from Exmouth, Budleigh Salterton and Sidmouth (the larger settlements to the south of the Airport) is that Exeter's ATMs are very little noticed, with little or no impact. This is due to (a) the relative distance from the Airport; (b) the altitude of ATMs in proximity to them; (c) the number of relatively quiet aircraft, in particular, the many turboprops used by Flybe; and (d) to a lesser extent, the infrequent overall number of flights.
- 7.6 **CAA discretion.** It is understood that in the event of an environmental assessment being required, that the CAA has some discretion on the extent of the assessment – for example, CAP 725 Section B.13. DSGC urges EDAL to explore this with the CAA.
- 7.7 **The importance of a correct basis for the decision.** *DSGC, as a major aviation stakeholder whose future is at stake, is strongly of the view that the decision on the retention of the northern CTAs should be based on a balanced assessment of the needs of and the effects upon the parties affected. It should not be based on the desire of the change sponsor to avoid a longer process for convenience or commercial reasons.*
- 8.0 FLEXIBLE USE OF AIRSPACE (FUA)**
- 8.1 **Flexible use of airspace in principle.** At the meeting on 14 August, DSGC and BWNDGC ("the consultees") proposed that - as EDAL had stated the outline/footprint of the Class D plan could not be changed - then EDAL should consider flexible use of airspace. EDAL had not considered this as an Option, but has agreed to consult with the CAA on the use of the arrangement.
- 8.2 **Outline of proposal.** The consultees cited the example of Innsbruck Airport, and have provided examples and reference material of FUA currently in use in Austria. It is understood that appropriate areas of airspace can be 'switchable' from Class D to Class G, on request, under an agreed procedure.
- 8.3 **The need for a collaborative approach.** As consideration of this proposal is at an early stage, DSGC wishes to state the need for a collaborative approach, as required by the Framework Briefing at the start of the ACP process. (*"The CAA emphasised the need for a collaborative approach with aviation stakeholders in particular"*). DSGC would welcome further discussions on this point, if an approved option with less impact is not forthcoming.

SUMMARY AND CLOSING REMARKS

1. The revised plan tabled immediately prior to the meeting of 14 August is unacceptable to DSGC. It is badly flawed in design with important adverse safety and practical consequences, as well as unreasonable and unnecessary limitations.

2. ***DSGC reaffirms its view that, on the evidence put forward by the BGA - both in its own right and on behalf of the GAA - the ACP has failed to substantiate the need for any change to the existing Airspace arrangements.***
3. In the event that the conclusion in the preceding paragraph is not accepted, then DSGC supports the BGA proposal for an RMZ/RMA around the airport which will provide a known environment for Exeter ATC, provided the dispensation referred to in 6.4 above is a part of the arrangement.
4. Failing this, *and if Class D airspace is deemed essential, the design of the Class D construct requires a completely fresh approach to ensure compliance with SARG Controlled Airspace Containment Policy, Section 2.2. Additionally, it would be useful to refer back to Paragraph 4.1.4 at this point.* The current approach should not be acceptable and could be open to challenge.
5. If - *after complete review of the size of the Class D construct and all matters highlighted in this response regarding the implications of overflying the CTR – the northerly CTAs are deemed essential, then Flexible Use of Airspace would be required north of the proposed CTR to enable the club to remain viable.*
6. Further, if Class D is deemed necessary, the decision on the extent of a Class D construct should not be influenced by any need that might exist for the change sponsor to produce further substantiation for its proposals. The ‘need’ for the northern CTAs appears to be based on expediency.
7. It is the view of DSGC that the needs and views of non-commercial aviation stakeholders have not been taken seriously.
8. More generally, DSGC is very dissatisfied with many aspects of the consultation process, which has contained numerous flaws. These have been noted, but will not be set out in this document where the focus is on the issues arising from the revised plan.
9. Both DSGC and Exeter Airport have operated for over 50 years, with a good working relationship, and it is again hoped that this can continue, regardless of the outcome of this process.

Jill Harmer

Secretary

Devon and Somerset Gliding Club Ltd

on behalf of the DSGC Management Committee

ANNEX 1; copy of Letter of Agreement dated July 2017.



LETTER OF AGREEMENT (LOA)
between
EXETER ATC
and
DEVON AND SOMERSET GLIDING CLUB

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A LETTER OF AGREEMENT (LoA) BETWEEN **EXETER ATC and** **DEVON and SOMERSET GLIDING CLUB**

1. Introduction

Exeter International Airport is the busiest regional airport in the southwest of the UK. It operates within a 2.5nm radius ATZ with an overlying airway, base FL65 and is marked on aeronautical charts as an aerodrome having one or more instrument approach procedures (IAPs) outside controlled airspace. The chart recommends that "pilots intending to fly within 10nm of any part of the IAP symbol are strongly advised to contact the aerodrome ATSU."

Devon & Somerset Gliding Club (DSGC) has operated from North Hill airfield since 1967. The airfield is 9nm north east of Exeter Airport and 5.5nm from the final approach track to Runway 26 at its closest point. More than fifty gliders, two motor gliders and one towing aircraft are based at North Hill and DSGC routinely operates four days per week and often seven days a week throughout the summer, with up to 100 movements per day. The airspace within 5nm of North Hill is therefore very busy, particularly throughout the soaring season of March to September, with training flights, local soaring and pilots preparing to fly cross country.

For many years there has been an informal, and unwritten, agreement that DSGC makes a telephone call to Exeter ATC to declare its intentions for the flying day.

This LoA is to formalise and put into writing the long held understanding between DSGC and Exeter ATC that gliders from North Hill will not fly close to the final approach track to Runway 26 at Exeter, nor within the same airspace as the published NDB 'EX' hold.

This LoA defines the southernmost limit where DSGC gliders do not need to make radio contact with Exeter ATC, whilst operating within the existing class G airspace, and the procedures for radio equipped gliders to operate south of this limit. Although it is suggested that whenever possible radio contact should be made with Exeter ATC when operating within a mile of this limit.

2. Procedures

1. The responsibilities and procedures to be employed by Exeter ATC, the DSGC and the pilots of aircraft operating in accordance with the LoA are detailed in this Agreement as follows:

- Part One: Lateral limits
Vertical limits
Times of activation

- Part Two: Notification and activation procedures
Activity status display
Procedures for gliders
Separation and Traffic information
De-activation

- Part Three: Airspace Maps

3. Application and Review of the Letter of Agreement

1. Permanent amendment to, or withdrawal of, this Letter of Agreement is to be effected only with the written consent of the signatories or their successors.
2. This Letter of Agreement becomes effective at 0001 on 1st July 2017.
3. This LoA shall be reviewed during November 2017 and March 2018 and thereafter annually from the date of signing. The method of review shall be acceptable to both parties.
4. This LoA shall be re-signed on 1st October 2017 and every 5 years thereafter.
5. Exeter International Airport has identified a requirement to change the existing airspace to assist ATC in providing enhanced levels of information to aircraft in and out of the airport and has proposed the establishment of controlled airspace (CAS).
As the proposal develops it is agreed that it may be necessary to amend the procedures in this LoA (e.g. airspace limits, introduction of frequency monitoring SSR codes).

4. Parties to the Agreement

1. It is hereby declared that the parties to the said Agreement are Exeter ATC and Devon and Somerset Gliding Club.

Original signed

Mr D Burrows

Air Traffic Services Manager
Exeter Airport

Dated: 28 June 2017

Original signed

Mr S Procter

Chief Flying Instructor
Devon and Somerset Gliding Club

Dated: 4 July 2017

[LOA page 4]

PART ONE

1.0 This Letter of Agreement (LoA) is to be mutually beneficial to both parties involved. Gliders launching from North Hill, participating in competitions or otherwise complying with this LoA shall adhere to the airspace limits as follows:

1.1 Lateral Limits

The southernmost limit where DSGC gliders do not need to make radio contact with Exeter ATC, whilst operating within the existing class G airspace is:

- a) From Monkton (east of Honiton) following the A30 westward until Feniton
- b) From Feniton following the railway line westward to the Exeter ATZ

1.2 Vertical Limits

DSGC gliders operate in the existing Class G airspace and the vertical limits are the bases of the existing controlled airspace

1.3 Times Of Activation

Notice of DSGC flying operations taking place shall be given to Exeter ATC (01392 369646) before flying commences and will cease at official night or at any other pre-notified time contained within activation phone call.

PART TWO

1.0 Notification and Activation

1.1 Notice of DSGC flying operations taking place may only be activated by one of the following authorised persons:

- a) Director of a regional or national gliding competition;
- b) The Duty Instructor or authorised deputy of Devon and Somerset Gliding Club
- c) Exeter Air Traffic Control (see 4.0 below)

1.2 The authorised person will advise Exeter ATC of activation by telephone (01392 369646) and pass details of the planned activity. The authorized person will advise Exeter ATC of subsequent changes to the planned activity (e.g. change of maximum operating level).

1.3. Exeter ATC shall note the details on the appropriate "Glider Activity Notification Strip."

1.4 Exeter ATC shall ensure that aircraft on frequency in the vicinity of North Hill are issued with appropriate traffic information on the glider operations.

1.5 Exeter ATC, the nominated clubs and competition directors shall retain records of each occasion that DSGC flying operations have been notified. This shall form an official record of compliance with this agreement.

2.0 Activity Status Display

2.1 The activity status of the DSGC flying operations shall be clearly displayed at appropriate radar consoles by displaying the appropriate "Glider Activity Notification Strip."

3.0 Glider Procedures

3.1 All pilots flying out of North Hill will be briefed on the details of the agreement and will be expected to comply with its requirements. This LoA will be posted on the Club website, in DSGC pilots' notes and on the Clubhouse noticeboard. Pilots are encouraged to contact Exeter ATC to advise of their presence.

3.2 Glider pilots should not cross the southern limiting line without first calling Exeter Approach on 128.975MHz to advise of their location and intentions.

3.3 Glider pilots flying within 1nm, to the north, of the southern limiting line should, whenever possible, contact Exeter Approach on 128.975MHz to advise of their location and intentions.

3.4 Glider pilots will not enter the Exeter ATZ without first calling Exeter Approach on 128.975 MHz to advise of their location and intentions, and then only with a specific clearance.

3.5 Glider pilots intending to fly in the area of the published 'EX' NDB holding pattern are strongly advised to call Exeter Approach on 128.975 MHz to advise of their location and intentions.

3.6 Pilots of non-radio equipped gliders should familiarise themselves with this agreement to ensure they do not operate in areas where they may come into conflict with Exeter traffic.

3.7 Nothing in this Letter of Agreement shall preclude individual glider pilots from requesting an air traffic control service as per normal aviation practice.

3.8 The contents of this LoA shall apply to all gliders, motor gliders and powered aircraft operating under the procedures of DSGC.

4.0 Separation and Traffic Information

4.1 Once DSGC flying operations have been notified, Exeter ATC should issue traffic information to aircraft operating within five miles of North Hill airfield.

4.2 DSGC pilots operating out of North Hill airfield are flying in Class G airspace and are continually aware that this airspace is used for many other aviation activities, and a good lookout is very high priority.

5.0 De-activation

5.1 Following activation, Exeter ATC shall assume that DSGC flying operations will continue until official night or the pre-notified time (whichever is earlier).

PART THREE

Airspace Maps

