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By email

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FORMAL RESPONSE NUMBER TWO FROM THE BRITISH GLIDING ASSOCIATION (BGA) TO THE EXETER AIRSPACE CHANGE PROPOSAL CONSULTATION OF 6TH MARCH 2017.

1 Background

The BGA responded to this ACP on 2nd June 2017. It is aware that many other responses were submitted by the GA and Gliding communities.

EDAL published its Aviation Stakeholder Consultation Report (ASCR) on 26th July and placed a copy on its website, unfortunately without notifying the BGA or other respondents. Its availability became apparent during a conference phone call between the BGA and EDAL on 11th August.

Meetings were held in early August 2017 to discuss a revised airspace plan contained on a one-page map issued by EDAL. During the BGA conference call on 11th August and the face to face meeting at DSGC premises on 14th August, the EDAL rationale for the changes was explained. Discussions on these and wider issues then took place at DSGC, which are the subject of minutes then agreed between the parties.

2 The consultation Report

The BGA responded to the initial consultation voicing strong objections. Some of those objections were noted and discussed in the ASCR but others were not, and appear to have been ignored. We refer particularly to the traffic growth projections and to the RMZ/RMA concept that we proposed. *We believe that these points are critical and should therefore have been specifically considered and responded to by EDAL. Even at this late stage we wish to understand EDAL's stance on these issues.*

3 The Modified Proposal

3.1 Design Principles

EDAL have repeatedly made it clear that the design formally proposed in the ACP was “a starter for ten” and would evolve further. Any increases to CAS base levels are of course directionally helpful but must be assessed within the overall concept of the design.

Discussions during August led us to conclude that the airspace being proposed merely encapsulates all existing class G flight profiles.

Any Class G operator who seeks to gain authority and control over airspace for its own purposes has a moral, legal, and CAA-imposed duty to arrange its operations so that the controlled volume is minimised. It is our opinion that this can only be done by generating a new design using modern flight profiles and that this should result in a much more efficient design with an associated smaller footprint.

EDAL's reluctance to redesign in this way undoubtedly saves it cost and effort now but the consequence of that would be to set in stone inherent inefficiencies based on outdated flight profiles with the price being paid by GA in general and Gliding in particular.

3.2 Impact on Gliding Operations

We are aware of the DSGC further response submitted to EDAL on 7th Sept 2017 and fully endorse its contents. DSGC's operations would become unworkable both under the originally-published and the revised airspace proposals. Implementation of the ACP without very substantial modification would cause irreparable damage to this long established BGA member club and to its fellow clubs and members in the southern part of the UK.

4 Conclusions

4.1 The original (“starter for ten”) ACP proposed design fails to meet the CAA's stated guiding principle of proposing a solution which is fair to all, and to generate solutions that deal adequately with adverse effects created by its plans. *While the most recently tabled proposals represent a directional improvement they remain disproportionate and damaging to the interests of Gliding.*

4.2 We continue to believe that the comments and proposals made in our June response to the ACP are valid and would express our support to the regulator should EDAL choose to adopt them.

4.3 In the absence of such a (4.2) solution our position remains that *a complete rethink of the proposals is needed*, taking into account best practice and the requirement to minimise the airspace.

4.4 The non-preferred suggestion of switchable class G airspace, under Eurocontrol FUA provisions, could be a workable option if the legality, operation and terms could be agreed. We supplied details, in conjunction with DSGC, of such a solution implemented at Innsbruck. Such an arrangement would fail to create what we believe to be an appropriate

and efficient airspace structure but would mitigate the impact on gliding in the event that EDAL were to put forward their current proposal and that, despite fundamental flaws, it were to be approved by the CAA.

Yours sincerely

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Pete Stratten
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