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17 December 2021

EXETER AIRPORT ACP DESIGN OPTIONS – RESPONSE OF DEVON AND SOMERSET GLIDING CLUB (DSGC)

This letter is in response to the 'Design Options – Comprehensive List' document dated 19th November 2021, and the Focus Group meeting for aviation stakeholders on 8th December.

Section 5.1 of the document invites stakeholders' views or comments on the options presented, including: preferences; suggested amendments to the designs shown; alternative ideas; and any options that should not be taken forward. These points are set out as follows, together with brief background information necessary to understand the context of DSGC operations:

1. **Evaluation criteria adopted in this DSGC response and relevant background.**
2. **Significant points arising from the Focus Group meeting.**
3. **Overview of DSGC gliding operations & safety issues arising from changes in airspace classification.**
4. **Evaluation of the options.**
5. **Alternative ideas - (1) modernisation of IAPs with switch to southerly orbits.**
6. **Alternative ideas – (2) time-switched flexible use of airspace.**
7. **Summary and Conclusions.**

1. EVALUATION CRITERIA AND RELEVANT BACKGROUND

1.1. **Design Principles.** Whilst Stage 1 of CAP 1616 requires that change sponsors agree design principles with stakeholders as the basis for the development of options, this was not done: this has been highlighted in letters and emails from DSGC to both EDAL and the CAA. Nevertheless for the evaluation of the Options document, DSGC looks below at the options presented in the light of the principles agreed between the change sponsor and the CAA. Additionally - and particularly in these circumstances - it is also appropriate to consider the options in light of the relevant industry guidance on airspace design.

1.2. **Additional criteria – 1. Minimum volume of airspace.** EDAL has advised stakeholders on 9 September 2021 that the resumption of the ACP process is *"in support of the UK Airspace Modernisation Strategy [CAP 1711, AMS] which has committed to modernising the UK airspace – both low level around airports and the wider network at a higher level".* CAP 1711 sets out the parameters for meeting the objective of airspace modernisation, one of which is to *"use the minimum volume of controlled airspace consistent with safe and efficient air traffic operations".* (AMS page 23). This stipulation of minimum volume to meet the objective of airspace modernisation thus clearly gives guidance for the continuation of this ACP process.

1.3. **Additional criteria – 2. Minimum classification of airspace.** SARG's Policy Statement dated 14 August 2015 for RMZs and TMZs sets out in paragraph 1.2 *"The principle that the least restrictive categorisation of airspace should be the norm in UK airspace design, with more restrictive classifications only being established where necessary when the safety need is clearly demonstrated".*

1.4. **Use of historic Waypoints.** The continued use for IAPs of the historic Waypoints of LETSI, NEXAN, BATSU, SISRI, EBOBA and OTBOT for Initial Approach Fixes - with TE26I and TE08I for Intermediate Fixes - give rise to approach tracks to the Final Approach Fixes TE26F and TE08F which are inefficient and now, militate against minimising the volume of controlled airspace. These Waypoints were created in Class G airspace when there was no requirement to minimise volume and impact. With the proposal for reclassification of airspace to create a known environment beyond the current ATZ and the commitment to the modernisation of the low-level airspace, there is now a requirement to minimise volume and impact, so these Waypoints and IAPs should be revised. This will be referred to below.

2. SIGNIFICANT POINTS FROM THE FOCUS GROUP MEETING

2.1. **Main driver for a 6 nm radius for the proposed CTR rather than a 5nm radius.** It was stated that the 5 nm radius being classed unviable whilst the 6 nm radius was classed as viable was *"more to do with approaches than departures."* Post-meeting note: This statement gives added weight to the need to revise the historic Waypoints and IAPs.

2.2. **Altitude of bases and tops of proposed reclassified airspace.** The point was raised by JS of DSGC as to why the bases of the stubs were at 1500 feet rather than 1700 feet in Option 19/the previous ACP. In response it was stated that all heights, such as 1500, 1700 and 3000 feet can be considered further, with an indication that 1700 feet base would probably be satisfactory. Additionally, it was stated that some of the bases to the north were lower in the majority of options document than in the Option 19, and these could be raised to Option 19 levels. Post-meeting note: In view of the points raised in paragraphs 3.1 on local terrain heights and 3.7 and 3.8 on funnelling of traffic, below, DSGC considers that the base of re-categorised airspace in the Dunkeswell area should be at least 1700 feet.

2.3. **Re-design of IAPs.** JS of DSGC raised the point that the historic Waypoints were widely drawn, particularly the northerly ones and could be revised to bring them in closer to reduce the requirement. In response it was stated by SK that there was no requirement to contain the T bars shown in the document. Both DB and SK said this could be looked at to see what effect it could have, but stated that cost was a factor. PS of the BGA said *"We would encourage you to look at the approach designs to see where those can reduce the overall airspace footprint, I know that's something you've just committed to doing, but that's something we'd definitely like to see".* Post-meeting note: it is not accepted that cost should be a factor in limiting the related commitment to modernising the lower airspace, which should be undertaken on the basis of the Design Principles and industry guidance. Cost was not an agreed principle.

2.4. **Tighter radius turns for proposed PBN SIDs.** JS of DSGC suggested that tighter radius turns, for example by the use of NADP 1 departure procedure, could assist in minimising the volume of any reclassified airspace. It was indicated that this can be considered.

2.5. **Time-Switched Flexible Use of Airspace (FUA).** PH of DSGC commented that FUA was not included in the options document, and explained the DSGC proposal of Class G during for example 10 am to 6 pm, and a higher classification outside those set times. SK responded by stating that *"It's something that can be taken forward to look at"*, a point subsequently confirmed by DB. SK indicated that the CAA has no policy on FUA.

2.6. **Minimum size and avoidance of choke points.** David Millin of the Devon Strut emphasised the need to keep the airspace design simple and to avoid pinch-points/choke points and to keep it as small as possible.

2.7. **Flexibility of design.** Both SK and DB reiterated two points. Firstly that (with the exception of the need for a first turn not before 1000 feet) all indicative departure routes in the document are only that – indicative – and are capable of some flexibility. Secondly, that EDAL is open to all suggestions for amendment of options and new ideas towards meeting the overall ACP objectives.

3. OVERVIEW OF DSGC GLIDING OPERATIONS & SAFETY ISSUES FROM CHANGES IN AIRSPACE CLASSIFICATION

3.1. **North Hill Airfield.** The airfield lies on a south-west promontory of the Blackdown Hills at 920 feet amsl. The airfield is roughly on a west-east alignment. From the airfield's SW corner a ridge runs northwards (providing limited ridge soaring in a WNW wind); and eastwards past the clubhouse (providing limited soaring in a south wind) before turning south at about 850 feet amsl to Hembury Fort and Hembury Hill. It should be noted that the distance from the centre point of Exeter RWY 08/26 to the SW corner of North Hill airfield (closest point of the airfield) is only 8.5nm.

3.2. **Launches and circuits.** Winch launches are generally 1200 – 1800 feet aal (approximately 2120 to 2720 amsl). Aerotows are most frequently to 2000 feet aal, however with many for training, introductory flights for members of the public and for aerobatics to 4000 feet aal (2920 and 4920 amsl). A landing circuit requires positioning at the upwind end of the airfield at around 800 feet aal.

3.3. **Local soaring.** For training and early solo flights, local soaring is generally within 5 – 8 nm of the airfield if lift (thermals) is reasonable. On good soaring days there can be 4 training gliders and maybe 20 other club and private gliders all soaring in the North Hill local area. Local flying is generally upwind of the airfield which can result in a number of gliders in a relatively limited area. For this reason, good lookout is essential and any distractions from lookout are to be avoided as far as possible. A choke point would add an extra pressure and potential hazard if any more restrictive airspace is in close proximity to the airfield and there are additional non-DSGC aircraft flying through a limited corridor.

3.4. **Thermalling.** Particularly important to any flight - especially from a winch launch - is finding the first thermal to 'get away' and thus avoid a short flight due to the need to get into position for a circuit and landing. Once a glider has 'got away' then subject to finding further lift, the pilot hopes to have the opportunity for an extended flight: on good soaring days, this is likely to be between 3000 and 5000 feet aal (3920 to 5920 amsl). Thermalling (circling, sometimes with other gliders in the same thermal) whilst vitally maintaining a good lookout, requires a high degree of concentration. It would therefore be unsafe to change radio channel in a thermal, only when setting course after a thermal and clear of other traffic.

3.5. **Cross-country (XC) flying.** For XC pilots, 100 km tasks (usually triangles) are frequently possible around turnpoints such as Dorchester, Crewkerne, Crediton, Okehampton and Wimbleball to name a few. On strong thermic days, 300km tasks are possible either as triangles or out-and-return to, for example, Salisbury Cathedral or Launceston. In summer, sea-breeze-fronts (a line of lift just inland of the coast) are frequently flown outwards or returning along the coast.

3.6. **North Hill local airspace - existing constraints**.

3.6.1. **Dunkeswell ATZ and the Parachute DZ**. The existing airspace around DSGC airfield at North Hill is very busy, within a mile there is the widely used GA airfield at Dunkeswell and a co-located, freefall skydiving DZ. North Hill airfield is located entirely within the Dunkeswell ATZ. To ensure separation and co-operation between the three organisations a Letter of Agreement (LoA) is in place allowing DSGC to fly in the western third (approx) of the ATZ and Dunkeswell traffic stays out, similarly DSGC gliders keeps out of the eastern two-thirds (approx) of the ATZ used by Dunkeswell traffic, see Appendix 1. In addition, Skydive Buzz operate from FL150 freefalling and under canopies. DSGC pilots have to be aware of the parachuting operations and dependent on the prevailing wind, keep clear of the area being used for dropping by listening out on a common radio frequency.

All gliders and powered aircraft based at North Hill are fitted with Flarm electronic conspicuity, a system which is designed to warn of possible collision between Flarm-equipped aircraft. Later development has produced an internet-based map with all Flarm-equipped aircraft positions plotted in real time. Skydive Buzz monitor the Flarm display to ensure the drop zone is clear before dropping.

3.6.2. **Exeter Airport.** DSGC has an LoA with Exeter Air Traffic, if a DSGC glider wishes to fly south of a line of ground features, it has to make radio contact with Exeter ATC. This line is approximately two miles north of the 26/08 runway extended centreline.

3.7. **Practical and safety implications of more restrictive airspace classification.** Paragraph 3.6.1 and Appendix 1 illustrate that North Hill gliders are already considerably constrained with regard to access to airspace to the east, as they are obliged to circumnavigate the majority of the ATZ. Therefore additional constraints from a nearby more restrictive airspace classification could make unrealistic - or even prevent - some of the options currently available to pilots wishing to fly to or from the east.

Secondly and importantly, if any form of restricted airspace is close to North Hill's normal area for local flying when pilots need to seek a transit from ATC, or pass information on intentions to ATC, this would necessitate changing frequencies and making radio calls shortly after launch when focus should be on gaining and/or maintaining height. This is simply not possible when thermalling, and is a major distraction from lookout at any time and restricts listening out on common frequency for paradropping. For this reason, there is a serious safety issue in more restrictive airspace classifications being in close proximity to North Hill's normal airspace.

3.8. **Increased risk of collision due to funnelling through choke points.** Paragraph 3.6 above indicates the constraints already existing for DSGC pilots. However, in future it is likely that much GA traffic transiting east-west or west-east through the wider area may choose to avoid any airspace that carries a more restrictive classification ("brick wall effect"). Such transiting traffic is likely to choose to remain north of Exeter, and therefore may choose to fly between any newly-restricted airspace and the Dunkeswell ATZ. Throughout the Options document, this likely corridor is very narrow.

3.9. **Avoiding Airspace infringements "Take2".** The CAA guidance in document CAP 1840 suggest that GA aircraft flying close to controlled airspace (CAS) should "Take 2". This is to stay 200 feet vertically and 2 nautical miles horizontally from CAS boundaries. This guidance effectively creates a 2 nm artificial buffer around all airspace and 200ft vertical buffer which can be critical over higher terrain. The reduction in Class G airspace due to the artificial buffer is therefore exacerbating choke points and funnelling due to restrictions near Controlled airspace.

The implications of paragraphs 3.6 to 3.9 are that it is unviable for any restricted airspace to be positioned north of Honiton: that is, further north than the northerly edge of the easterly stub in Option 3.

4. EVALUATION OF THE OPTIONS

4.1. **Approved Design Principles.** Section 1.4 of the Options document sets out the priority order of design principles based broadly on consultation with aviation stakeholders, although selected and worded by EDAL and approved by the CAA without the required reference back to stakeholders. The Options document will be looked at below in the light of these prioritised principles, so it's worth briefly re-stating them:

DP1. Safety - maintain and ideally enhance safety.

DP2. Harmonisation. Airspace design must accord with AMS requirements.

DP3. Protection - new airspace should create a known traffic environment to protect the final approach and climb-out paths.

DP4. Access – new airspace should facilitate fair access to all airspace users.

DP5. Minimise impact. Airspace designs should minimise impact on non-Exeter Airport aviation locally.

DP6. Dimensions. The size and categorisation of any new CAS should be proportionate to the requirement.

DP7. Connectivity. Airspace should connect to the airways structure to ensure CAT remain inside CAS when arriving and departing Exeter Airport.

DP8. Environment. Airspace should minimise adverse environmental impacts including consequential impacts from displaced air traffic outside CAS.

4.2. **Industry guidance on airspace design.** This has been mentioned in 1.2 and 1.3 above, with reasons for its inclusion which make it relevant to the consideration of all options.

4.3. **Requirements for the stubs and the sub-options.** All options from 1 to 18 contain sub-options i.e. a. TMZ, b. RMZ, c. Class E, d. Class E+, and e. Class D CTA. It has been stated throughout the options that a TMZ alone is not sufficient to create the known environment, and indeed these statements were illustrated at the Focus Group by reference to the incident on 18 November 2021 depicted on radar display of an aircraft squawking 7000 but not talking to ATC.

Note: DSGC would strongly oppose any requirement for the use of transponders as a pre-condition for entry into any regulated airspace, due to the high cost, the logistical problems of retro-fitting them as additional equipment into the already-cramped space of many glider instrument panels and cockpits; and problems of increased battery power requirements.

As the majority of options (including those with an RMZ) have not been categorised as 'unviable', the RMZ options have therefore clearly been considered viable.

DSGC general statement on classification of the stubs. *On the SARG principle that the least restrictive categorisation of airspace should be the norm, DSGC is therefore of the view that in all options the stubs should be RMZs, unless a case is subsequently made for a higher categorisation. DSGC is strongly against the stubs becoming Class D airspace particularly when Exeter Airport considers an RMZ viable.*

In view of this general statement as preamble to comments on individual options, this assumption of an RMZ for the stubs applies to all individual options now considered below.

4.4. DSGC Detailed comments on the Options (with DPs highlighted that have not been met).

Option 0 – do nothing. Whilst this is preferable from a strictly DSGC perspective, it is acknowledged that this does not meet the most basic objective of the ACP - protection of the final approach and climb-out paths **(DP 1,3,7)**

Option 1. This is accepted as not viable, as it does not meet the most basic objective of the ACP - protection of the final approach and climb-out paths **(DP 1,3,7)**

Option 2. This is accepted as not viable, it also creates a significant choke point to the southwest of North Hill **(DP1,2,4,5,6,8)**

Option 3. Although EDAL has classed this as unviable, DSGC considers this **could** be viable and acceptable if the 5nm Circle and Stubs are RMZ, and provided amendments are made:

- the IF prior to the FAF is brought closer to the FAF, or the stub extended;
- adjustment of IAPs with the positioning of Transitions to the south;
- adjustment of SID parameters as required (see paragraph 2.4 above)
- see also paragraph 6.4 on time-switched Flexible Use of Airspace

Option 4. This is not viable for DSGC due to the choke point to the southwest of North Hill **(DP1,5,8)**

All further Options 5-19 containing Class D CTR within 2nm of North Hill are not viable or acceptable to DSGC due to Safety, Access and Impact (DP1,4,5); additional points are listed below.

Option 5. This is not viable for DSGC due to the large extent of Class D CTR within 2 miles of North Hill. It would create significant choke points and safety issues with other GA traffic **(DP1,4,5,6,8)**

Option 6. Agreed, as not viable for DSGC, due to adverse impact on local airfields including North Hill. **(DP 1,4, 5,6).**

Option 7. This is not viable for DSGC. Due to its size and position, it would have considerable impact on the normal flying area and would create 2 unacceptable choke points. **(DP1,4,5,6,8)**

Option 8. Agreed as not viable due to adverse impact on local airfields including North Hill **(DP1,4,5,6)**

Option 9. This is not viable for DSGC. Due to its size and position, it would have considerable impact on the normal flying area also causing unacceptable safety liabilities, due to unacceptable choke points. **(DP1,4,5,6,8)**

Option 10. This is not viable for DSGC. It would create significant choke points and safety issues with other GA traffic **(DP1,4,5,6,8)**

Option 11. Agreed as not viable due to adverse impact on local airfields including North Hill **(DP1,4,5,6)**

Option 12 This is not viable for DSGC. Due to its size and position, it would have considerable impact on the normal flying area and would create 2 unacceptable choke points. **(DP1,4,5,6,8)**

Option 13. This is not viable for DSGC. Due to its size and position, it would have considerable impact on the normal flying area and would create 2 unacceptable choke points. **(DP1,4,5,6,8)**

Option 14. Agreed as not viable due to adverse impact on local airfields including North Hill. Upper area and outer zone are totally unacceptable. **(DP1,4,5,6)**

Option 15. This is not viable for DSGC. Due to its size and position, it would have considerable impact on the normal flying area, and create unacceptable choke points, and the overhead airspace is totally unacceptable. **(DP1,4,5,6,8)**.

Option 16. This is not viable for DSGC. Due to its size and position, it would have considerable impact on the normal flying area also causing unacceptable safety liabilities due to choke points. **(DP1,4,5,6,8)**.

Option 17. This is not viable for DSGC. Due to its size and position, it would have considerable impact on the normal flying area, also causing unacceptable safety liabilities due to choke points and the overhead airspace is totally unacceptable. **(DP1,4,5,6,8)**.

Option 18. This is not viable for DSGC. Due to its size and position, it would have considerable impact on the normal flying area also causing unacceptable safety liabilities due to choke points and the upper airspace to the west of North Hill is totally unacceptable. **(DP1,4,5,6,8)**.

Option 19. This is not viable for DSGC. Due to its size and position, it would have considerable impact on the normal flying area, also causing unacceptable safety liabilities. It is excessively complex and has of course already been turned down by the CAA. **(DP1,4,5,6,8)**.

4.5. **Summary and conclusion.** There are clearly major safety issues with the options presented in the document. In view of those of the Design Principles which have been given the highest priority, and in view of the relevant industry guidance in paragraphs 1.2 and 1.3, DSGC has concluded that the Option 3 footprint consisting entirely of an RMZ (with the amendments listed above), could meet the primary objective of the ACP, whilst minimising the impact upon DSGC, and GA more generally in the North Hill / Dunkeswell area.

5. ALTERNATIVE IDEAS – (1) MODERNISATION OF IAPs WITH SWITCH TO SOUTHERLY ORBITS

5.1. **Background: comparable airports - implications.** The retention of the historic Initial Approach Fixes results in inefficient approach tracks for inbound aircraft which need to fly longer approaches than necessary. These are inconsistent with modernisation of low-level airspace and do not minimise the volume of CAS as now required. Looking at two comparable airports with RNP IAPs, both of Birmingham's approaches and Southampton's southerly approach successfully function with only one Intermediate Fix prior to Final Approach Fix, and no IAFs. In both cases, the IFs on each approach are closer to the FAF than is the case at Exeter Airport, see Appendices 2 & 3. This indicates that Exeter's IFs before the FAFs should be reviewed and IAPs completely updated, dropping the use of unnecessary Waypoints.

5.2. **A pragmatic and workable solution.** In view of the relatively close proximity of Dunkeswell and North Hill airfields to Exeter's principal final approach, a pragmatic modernisation of the airspace is to move Exeter traffic away from this area as far as possible for the safety of all. This has three elements:

5.2.1. Revise Waypoints and IAPs.

5.2.2. For RWY 26, design STARs and Transitions routing from EXMOR to TIVER to EX NDB, then routing 115 degrees to circa 9 DME before turning left to the IF. This track follows the current procedural ILS for runway 26 and is more efficient than the route via the RNP IAP fixes. Effectively the position 115 degrees from the EX NDB and 9 DME from EGTE would act as the only IAF for runway 26, this would work well for aircraft approaching from the south via BHD

with the added advantage of avoiding D112 which is likely to be encroached routing via BATSU; aircraft approaching from GIBSO could route direct to the IF.

5.2.3. Alteration of the EX hold. It is proposed that while the EX NDB and inbound track remained unchanged, the hold becomes a righthand pattern rather than the current lefthand pattern. This will move the footprint of the hold to the south, thereby reducing the volume of airspace required to become a Known Environment to the north.

5.3. The *northern boundary* of any required Known Environment achieved through an RMZ can realistically be based on the footprint of Option 3. This has a circular area based on a 5nm radius; it is noted that other airports operate using this measurement, for example Bristol. With further reference to the 5 nm radius, as previously noted, NADP 1 departures can be utilised if required, or use Radius-to-Fix departure procedures referred to in paragraph 2.6 of the Options document, requiring the immediate completion of the Fleet Equippage Survey.

6. ALTERNATIVE IDEAS – (2) TIME-SWITCHED FLEXIBLE USE OF AIRSPACE

6.1. **The FUA model proposed by DSGC: time-switched FUA.** DSGC proposes that a northerly sector of any area which is required to become part of a Known Traffic Environment should - during prescribed daytime hours - become fully open Class G airspace, and reverting to the Known Traffic Environment designation outside those hours. Possible times and area to be designated are considered below and would be annotated on the ½mil chart.

6.2. **Time-switched FUA – background.** The CAA's own Airspace Classification Review - Cotswold Report 2021 is currently considering time-switched FUA for specific CTAs in the Cotswold area – see Appendix 4. In addition, the adoption of FUA would be aligned with the parameters of the Airspace Modernisation Strategy for meeting its objectives, which state *"in aiming for a shared and integrated airspace, facilitate safe and ready access to airspace for all legitimate classes of airspace users, including commercial traffic, General Aviation and the military."* (AMS page 23).

6.3. **Rationale for use of time-switched FUA north-east of Exeter Airport.** The creation of a Known Traffic Environment north of Exeter Airport will naturally necessitate more aircraft needing to speak to ATC. From the viewpoint of DSGC, even the 'least worst' Option 3 footprint has a radial sector of 5nm, which is within 3.5nm of the edge of the airfield; additionally, if the CAA's Take 2 guideline referred to in paragraph 3.9 is to be followed, this leaves only 1.5 nm of airspace. This close proximity would clearly give rise to the need for DSGC gliders to make frequent radio calls to ATC. This has several potentially serious consequences

6.3.1. As noted earlier, this is a severe safety issue for the glider pilot.

6.3.2. Frequent calls could hinder the routine work of ATC.

6.3.3. It would reduce part of the sense of freedom which to many is the essence of gliding, and it's realistic to say that some of the membership may decide that given the new constraints, this causes them to quit. This is clearly a serious issue risking the viability of the club.

6.4. **Area proposed for time-switched FUA.** As a provisional proposal, DSGC considers that the most likely area to be to the benefit of both parties is – with reference to the Option 3 footprint – the area to the north of a straight line joining the northerly edges of westerly and easterly stubs (ie 2 nm North of 26/07 extended centreline).

6.5. **Time for switching similar to the Cotswold model.** DSGC proposes a daily timing of 09:00 - 17:00 UTC (10.00am to 6.00pm BST).

6.6. **Important Note.** DSGC urges EDAL to give serious consideration to this concept, as promised in the Focus Group. It is felt that the concept can be of benefit to both parties in maximising the utilisation of the limited resource that is airspace, in line with the aims of the Airspace Modernisation Strategy. The CAA is clearly moving towards a more flexible approach to airspace use, as demonstrated in Airspace Modernisation – Progress Report 2021, CAP 2281, paragraph 3.7 (see Appendix 5).

7. SUMMARY AND CONCLUSIONS

7.1. **Safety issues for DSGC.** There are major safety issues for Devon and Somerset Gliding Club from all options presented in the Options document. Whilst these may arise primarily because of the geographical facts of close proximity of the two airfields and are thus almost unavoidable, they nevertheless require a pragmatic solution to mitigate the possible effects and optimise the outcome for both parties jointly, and including the wider GA community.

7.2. **Design Principles - the key objective and its safeguarding provision.** The key objective of the ACP is set out in Design Principle 3, which states *"Protection – New airspace should create a known traffic environment to protect the final approach and climb-out paths at Exeter Airport".* This is subject to the proviso in Design Principle 1 that the *"Airspace design must at least maintain, and ideally enhance, aviation safety for all airspace users in the local area."*

7.3. **Industry guidance on airspace design.** The SARG airspace design principle states "…*the least restrictive categorisation of airspace should be the norm in UK airspace design, with more restrictive classifications only being established where necessary when the safety need is clearly demonstrated".*

7.4. **Minimum requirements on the approach.** Option 2 contains the general statement that *"Exeter Airport considers that the minimum requirement for aircraft on the final approach would be for protection of aircraft from the Intermediate Fix (IF), where they are lined up in the direction of the runway, prior to commencing descent".*

7.5. **RMZ.** An RMZ has the following benefits:

7.5.1. It creates a known traffic environment and thus meets the key objective of the ACP set out in Design Principle 3.

7.5.2. It satisfies the SARG design principle set out in its Policy Statement for RMZs and TMZs referred to in paragraphs 1.3 and 7.3 above.

7.5.3. It satisfies EDAL's declared minimum requirement for aircraft on approach referred to in paragraph 7.4.

7.5.4. Utilisation of the Option 3 footprint for an RMZ would provide the simplicity and relatively modest volume of airspace that a number of aviation stakeholders stated as being important.

7.6. **More restrictive classifications.** DSGC feels that to comply with the SARG principle, a safety need for a higher classification than an RMZ would need to be clearly demonstrated, particularly when the Options document repeatedly implies that RMZs are viable. (It is noted that two other aviation stakeholders, Farway Common Airfield and the Hangar 52 Group have requested additional information on Airproxes and incidents. This information would doubtless need to form part of any such demonstration of need).

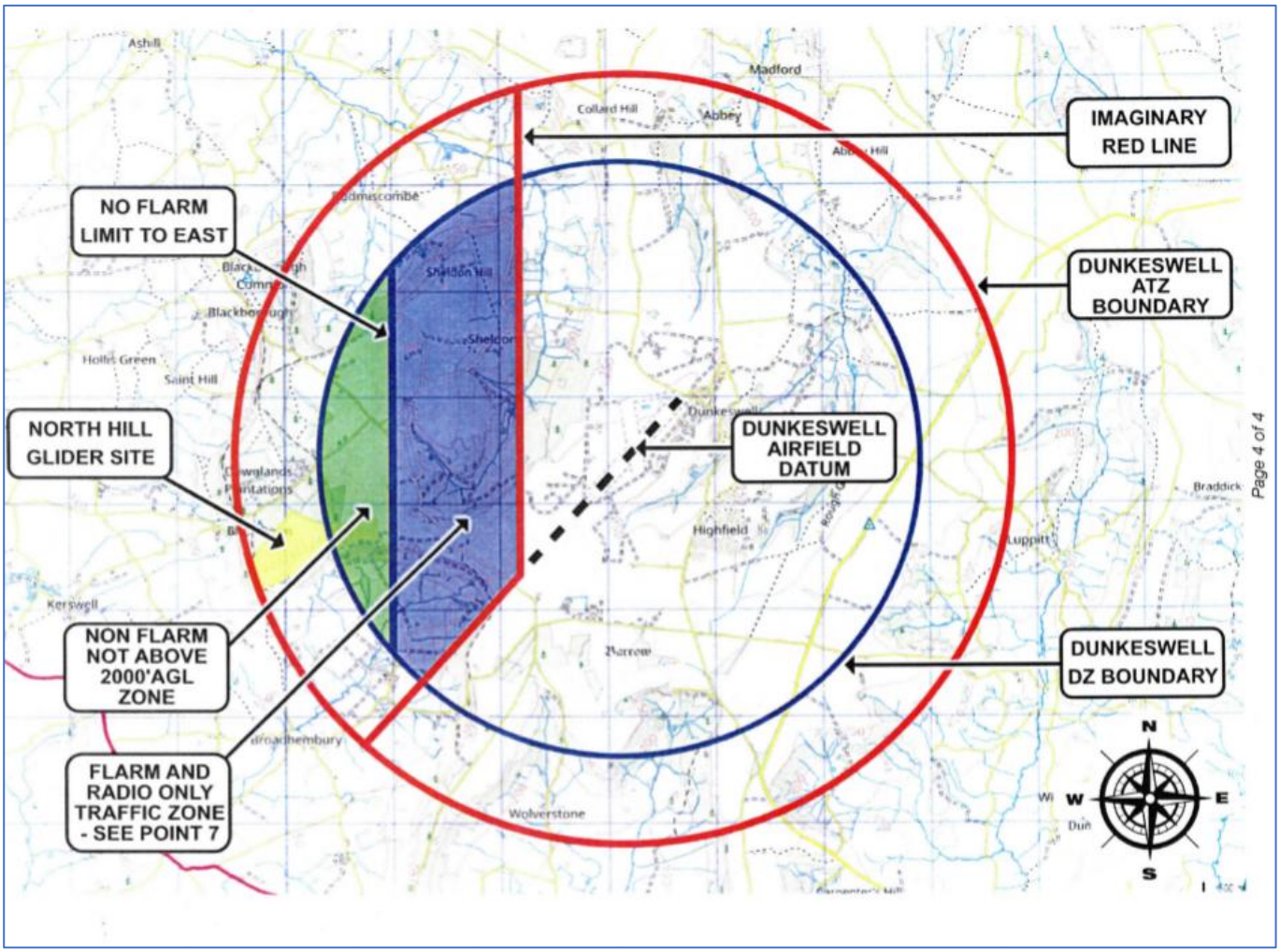
7.7. **A balanced solution.** DSGC accepts the need for protection referred to in Design Principle 3. DSGC believes that an RMZ within the footprint area of the Option 3 diagram balances the safety and commercial needs of EDAL with the safety requirements of all users. However, the safety issues described in this submission would be substantially mitigated by the adoption of a time-switched area which would essentially also reproduce the arrangements currently in place.

In conclusion, DSGC would like to thank EDAL for the opportunity to respond to this Design Document and would welcome further engagement, once you have considered all the Stakeholders responses, prior to the formal Consultation Stage.

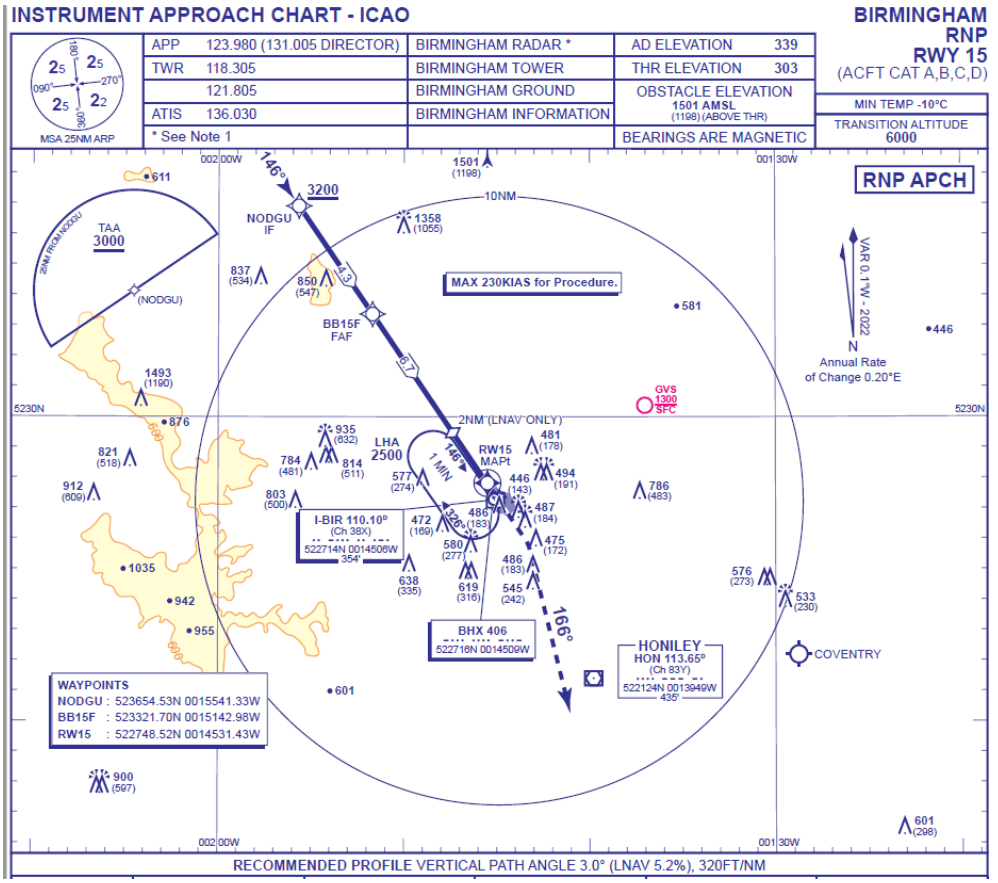
Jill Harmer, Secretary
Devon and Somerset Gliding Club Ltd
on behalf of the DSGC Management Committee

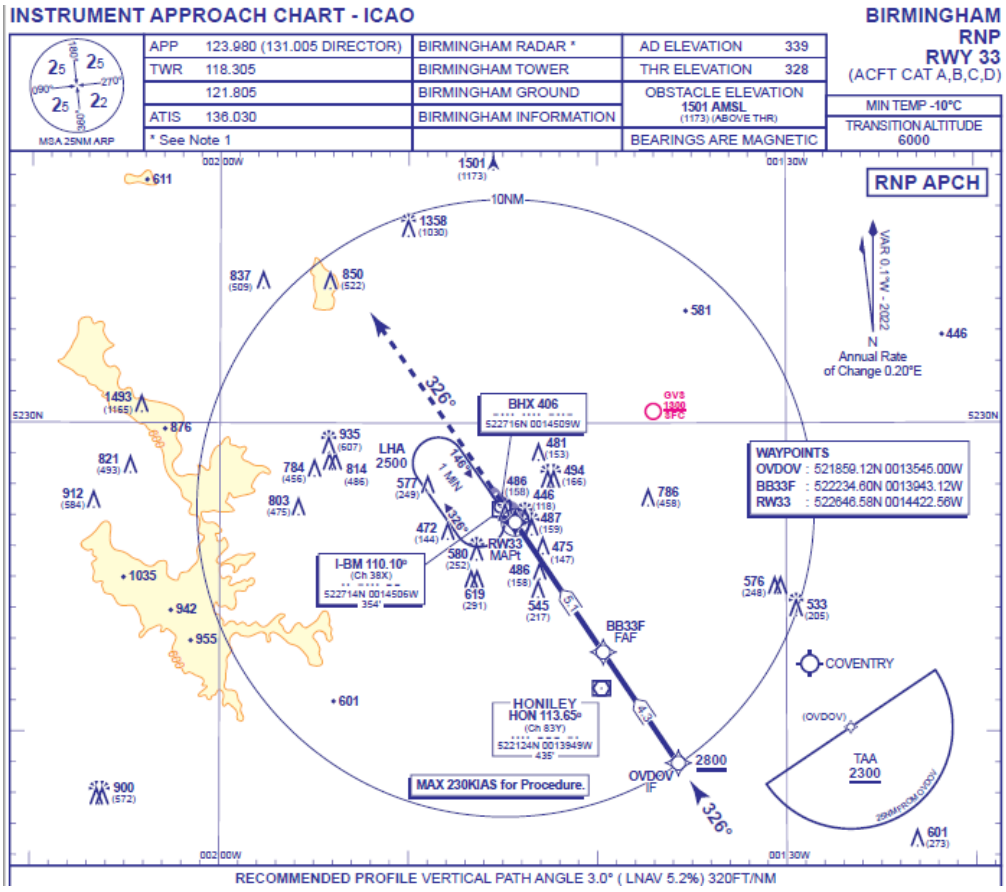
APPENDIX 1 – map of North Hill local airspace, from Letter of Agreement with Dunkeswell.

https://www.dsgc.co.uk/pdf/documents/dunkeswell_dz_map_may2021.pdf

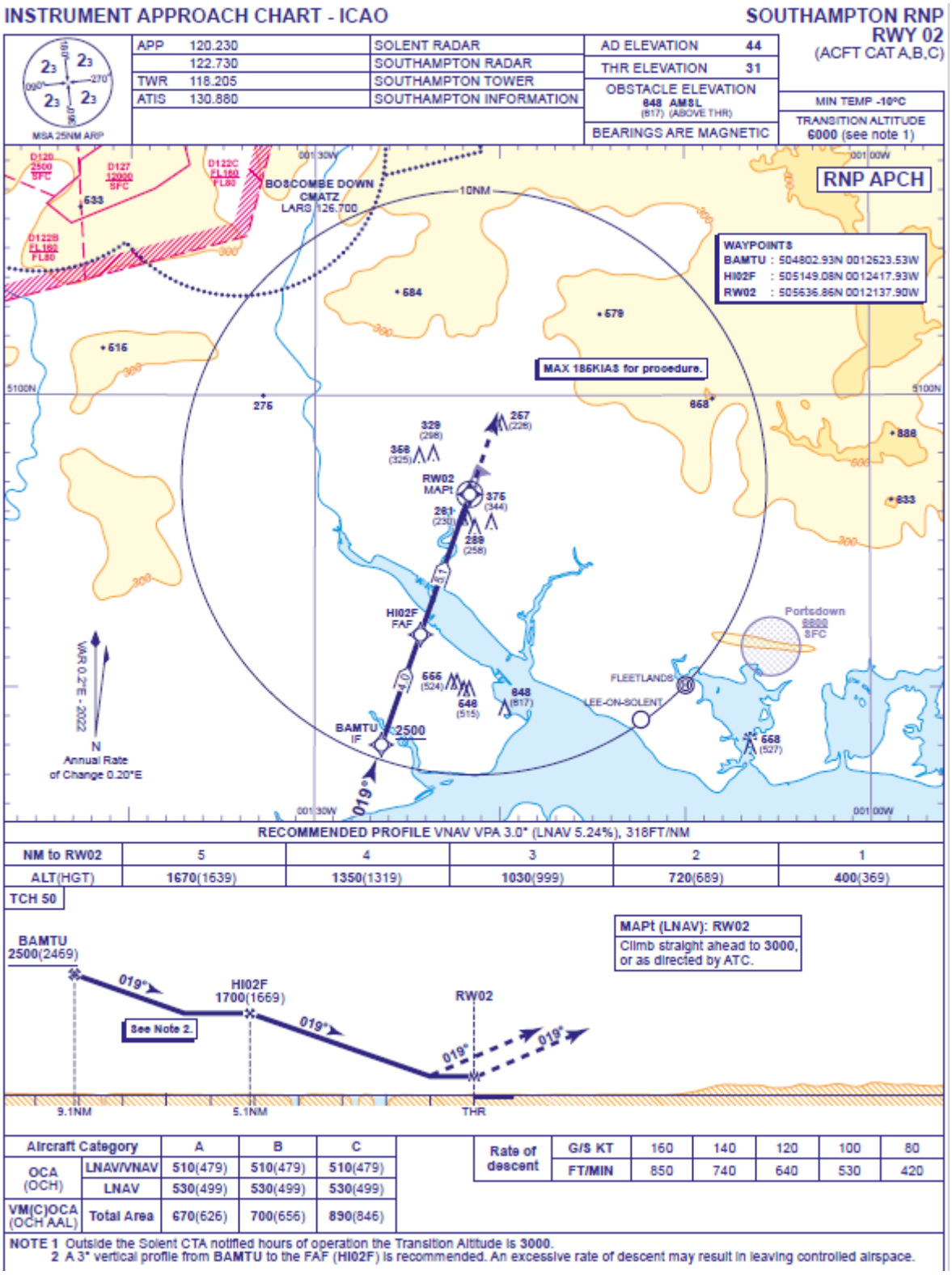


APPENDIX 2 – Birmingham RNP Approach Charts illustrating single IFs prior to FAF.





APPENDIX 3 – Southampton RNP Approach Chart to RWY 02 illustrating single IF prior to FAF.



APPENDIX 4 – Airspace Classification Review - Cotswold Report 2021; CAP 2235

https://publicapps.caa.co.uk/docs/33/Cotswold%20Report%20V2.0%20-%20CAP%202235.pdf

Flexible Use Airspace - COTSWOLD CTA 15, CTA 16, CTA 17 & CTA 18

The Flexible Use Airspace, as shown in Figure 7, becomes Class C between hours 1700-0900 (1600-0800) Monday-Thursday and 1700 (1600) Friday (or the day preceding a PH) to 0900 (0800) Monday (or the day following a PH). Outside the published hours of service, the airspace reverts to Class G.

Figure 7: UK AIP Chart (ENR 6-82) Reproduced with permission from the CAA and NATS

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information that allows for as much freedom to operate as possible for the end users whilst ensuring safe separation from other users.

3.5 We have started to deliver this through our work on Electronic Conspicuity and the initial developments for ground use of this information source through the Flight Information Display capability.

3.6 We will look to aid deployment of new user requirements through the use of existing regulatory frameworks to help manage the burden on existing and new users whilst developing operational integration further through the Lower Airspace Service concept.

Access to Controlled Airspace | Size and Regulation of Controlled Airspace | Flexible Use of Airspace ***(at low level and in addition to the existing Airspace Modernisation Strategy Initiative 3 scope)***

3.7 The Airspace Modernisation Strategy refresh is driven by the intent of improving the overall access to airspace for all users in the spirit of '*integration over segregation'*. It will focus on better use of airspace, especially with the principle of *'only using what is required and when'*. Access to controlled airspace is already available to those that ask, but there will be more emphasis on the type of airspace classification used, along with the types of service provided, for better flexibility for the Visual Flight Rules pilot. Flexible access airspace will be an aim such that it becomes controlled when an Air Traffic Control Service is required for Instrument Fligh Rules flights, and the in-use airspace will be structured around the specific procedures in use at that time. The CAA's Airspace Classification Team will continue to review the classification of airspace and to amend volumes where appropriate.

3.8 We are also required to seek to ensure that the amount of controlled airspace is the minimum required to maintain a high standard of air safety and, subject to overriding national security or defence requirements, that the needs of all airspace users are reflected on an equitable basis.

3.9 Furthermore, whilst segregation will remain for specific activities, where safety is a concern i.e. military firings, space launch etc., more flexibility will be sought for Danger Areas only being active for the minimum safety required and time required.

3.10 The long-term objective is that this airspace will better facilitate autonomous, self-managed use by suitably equipped aircraft.