

Devon & Somerset Flight Training Ltd

Dunkeswell Aerodrome

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Dear Sir/Madam,

**Re: EXETER AIRSPACE CHANGE PROPOSAL – RESPONSE TO AMENDMENTS
PROPOSED 14/08/17**

In response to the airspace changes proposed by Exeter Airport during the meeting held between Exeter ATC, Osprey and Devon & Somerset Flight Training (DSFT) on the 14th August at Dunkeswell Aerodrome, Devon & Somerset Flight Training makes the following reply.

For operations at Dunkeswell, the proposed increase to the base of controlled airspace above Dunkeswell, CTA4, from 3000ft amsl to 3900ft amsl is positive but comes with an associated negative impact on the airspace design at the eastern edge of CTA4 in that a stub now exists with a lower base of 3000ft. It is understood that this irregular and non-standard airspace design is required in order to accommodate the LETSI RNAV waypoint that forms part of the Exeter RWY26 GNSS Approach procedure. It is notable that a response to the initial consultation from NATS included an observation that NATS had concerns with the complexity of airspace given in the first draft and that this proposed amendment to CTA4 would further compound that complexity.

The proposal to raise the base of CTA3 from 1500ft to 1700ft is positive but the fact remains that Controlled Airspace is located adjacent to the Dunkeswell ATZ and with a base that is only 61ft above the Dunkeswell circuit altitude. Such a small buffer is not conducive to minimising potential airspace infringements and it therefore remains a fact that aircraft will choose to fly at lower altitudes and as a consequence increase the noise levels on an already sensitive local population.

Despite the raised base level of CTA3, the close proximity of CTA3 to the Dunkeswell ATZ remains, as do concerns over the operational arrangements for obtaining a clearance to enter that airspace. It is a common observation, (by those consulted within our organisation), that GA pilots departing Dunkeswell will require a prompt response if their flight to the south or south-west is to continue unhindered. While Exeter ATC has given verbal confirmation that appropriate procedures and adequate staffing levels will mean that they have every intention of providing the prompt response, there is no guarantee as to how future developments may impact the level of ATC service.

Such a scenario, is already happening with other Airports in the south west; an increase in the number of NOTAMs issued restricting airspace transits has been observed. Reasons have been cited as due to inadequate staffing levels. It is also understood that recruitment of Air Traffic Controllers is proving difficult for a number of airfields.

It is also recognised that if Exeter Airport were to be successful in implementing its proposed airspace design, an increase in commercial air traffic movements is likely to occur which in turn will increase controller workload to such an extent that services to aircraft outside of Exeter Controlled Airspace are reduced or removed altogether.

Pilots departing Dunkeswell faced with a situation of controlled airspace transit refusal will have limited options; a decision to descend and fly lower or to change direction to the north-west and cross an intense area of gliding activity. If the southerly circuit is in use at North Hill it is likely that gliders joining the downwind leg will be at a similar altitude to an aircraft departing to the north-west.

We also note that CTA3, with a revised base of 1700ft now extends to Honiton Mast, an obstacle that extends to 1527ft. This airspace design is therefore creating an increased risk to flight safety for aircraft choosing to remain below the proposed Exeter Control Area. For such aircraft the maximum practical altitude would be 1600ft but it is worth noting that recommended good practice for preventing airspace infringements would be to increase the buffer between flight altitude and the airspace above. It would, therefore, not be unrealistic for pilots to select an altitude of 1500ft or less, creating a flight with increased risk.

Therefore, concerns still remain with regards to the potential for airspace infringements, a negative impact on general aviation activity to the south and south-east of Dunkeswell Aerodrome and increased noise levels for the local population.

Airspace to the west of Exeter remains with a base of 2000ft. It has been confirmed by Exeter ATC & Osprey that this altitude is required to accommodate the 3-degree Instrument Approach Procedure (IAP) for Runway 08. No evidence has been

presented by Exeter ATC/OSPNEY as to why the IAP could not be modified to a 3.5-degree approach, (matching the IAP to Runway 26), other than cost.

Devon & Somerset Flight Training has always conducted its operations such that any of its aircraft are required to obtain a clearance via VHF RTF before entering Controlled Airspace. It is noted that a Letter of Agreement has been signed between Devon & Somerset Gliding Club and Exeter Air Traffic that allows gliders to fly to a predefined southern boundary without being required to contact Exeter ATC. It has also been stated and recorded in meeting notes that such an arrangement for non-radio activity will remain in place if Class D airspace were to be implemented.

Such an arrangement indicates that separation distances between aircraft on final approach and other aircraft in the area can be reduced to a level that is less than that stipulated by the dimensions of controlled airspace.

Verbal conversations with Exeter ATC & Osprey have indicated that a Letter of Agreement will be in place for operations at Dunkeswell Aerodrome. Devon & Somerset Flight Training, to date, has not seen the contents of any Letter of Agreement and it also remains unclear as to whether the Agreement will be between Devon & Somerset Flight Training or with the Airfield Operator, Air Westward.

Considering the Airspace Change Proposal as a whole, the implementation of Controlled Airspace is being proposed to augment safety and advance the airspace efficiency and Exeter Airport Flight Operations. It is also stated that there is a need for full Instrument Procedure containment.

To satisfy these intentions, it has been proposed that a large area of airspace is implemented, that if approved, will give benefits that are reaped by Exeter Airport but with a significant negative impact on stakeholders and populations in the surrounding area.

The overall proposed design of airspace covers a significant area in both horizontal and vertical dimensions. The quantity of airspace required appears necessary in order to meet the stated intention of accommodating the Instrument Approaches within Controlled Airspace and is also based on an extension of existing airspace that makes up the 'airways' route structure, in particular, a fixed route, N864, that lies between Brecon and Berry Head VORs.

However, in the proposal there is little evidence that alternative designs of controlled airspace have been considered. Exeter Airport's Airspace Change Proposal offers an ideal opportunity to demonstrate innovation and use of modern airspace design practices. Several areas present themselves:

1. The base of controlled airspace to the west of Exeter could be raised if the Instrument Approach for RWY08 was amended to incorporate a 3.5 degree

slope. Such a design is already in use on RWY26 and is used by existing traffic using Exeter Airport. There appears to be no technical or aircraft performance issues why such a change cannot be made. Amending the procedure would have the benefits of increasing the base of proposed controlled airspace, reducing the 'funnel' effect of aircraft transiting along the western edge who did not wish to enter Controlled Airspace and also reducing the noise impact on populations that lie within the vicinity of the Instrument Approach.

2. The instrument approach to RWY26, particularly the RNAV (GNSS) approach could also be adjusted by moving the IAF LETSI further East. This would allow a higher base of proposed controlled airspace to the East of Dunkeswell. The present proposal is for a non-standard and irregular piece of airspace to be lower than the surrounding area.
3. The Instrument Holding Pattern axis established on the EX is not aligned with the Runway centreline. It remains unclear as to why the holding pattern is out of alignment with the runway. Likewise, the TOMPO hold associated with RWY08 Instrument Approach procedures is located at a separate location. A redesign of procedures offers an opportunity to co-locate the holds to an south of Exeter

In verbal discussions with Exeter ATC and Osprey suggestions concerning the redesign of Instrument Approach Procedures have been dismissed on the grounds of cost. However, it is acknowledged that there is a proposal to introduce a "two-tier" system of Instrument Approach that will enable some aircraft to complete an Instrument Approach at lower levels but outside of controlled airspace. Such a proposal is positive but does further compound the complexity of airspace and associated procedures.

With regards to Control Areas to the north and west of Dunkeswell an increase in the base level is positive but little evidence remains for their requirement. Evidence presented by EDAL in support of the airspace change proposal focuses on conflicts that have occurred on the final approach track threatening the safety of aircraft conducting Instrument Approach Procedures. We would suggest it more appropriate for these areas to be removed and only instigated in the event that traffic numbers are seen to increase to such a level that controlled airspace in these areas is proven to be necessary.

It is notable that an airspace change proposal for Norwich Airport was implemented but following a post-implementation review found an area of the airspace to be not sufficiently utilised and it was removed.

We see it is as unreasonable that, overall, the proposed airspace change will give EDAL commercial benefits but that significant impact will be made on stakeholders at nearby airfields and gliding sites to such an extent that the restrictions to operational activities will have an effect on the viability of continued operation.

All options for the design of airspace do not appear to have been exhausted with some options dismissed purely on the grounds of cost. The calculation of those costs would appear to only take into account those that would affect Exeter Airport and do not take account of costs inflicted on stakeholders in the surrounding area.

There is no evidence of attempts to design the airspace with regard to Future Aviation Strategy, modern PBN procedures or with the intention of fully minimising the impact on other stakeholders

In conclusion, the proposed Exeter airspace change proposal will inflict significant operational difficulties for flights operating to/from Dunkeswell Aerodrome. The airspace design is not conducive to flight safety for aircraft who are not using Exeter Airport and will also lead to an increased environmental impact on our surrounding populations.

Yours faithfully,

Brendan Procter

Director
Devon & Somerset Flight Training

