



Airspace Regulator (Coordination)
Airspace, ATM and Aerodromes
Safety and Airspace Regulation Group
CAA House
45-59 Kingsway
London WC2B 6TE

Devon and Somerset Gliding Club Ltd
North Hill Airfield
Sheldon
Honiton
Devon
EX14 4QW

19 February 2020

Dear Sir

**EXETER AIRPORT AIRSPACE CHANGE PROPOSAL
FAILURE OF CHANGE SPONSOR TO ADHERE TO CAP 1616 STAGE 1 PROCESS**

Devon and Somerset Gliding Club (DSGC) wishes to place on record that the process for promoting an airspace change around Exeter Airport is not compliant with the provisions of the regulatory framework, as set out in CAP 1616, Stage 1, Step 1b. Furthermore, within the design principles approved by the CAA on 6 November 2019, CAA airspace design policy has been ignored by the change sponsor to the detriment of non-Exeter Airport aviation stakeholders.

DSGC is writing (copy enclosed) to EDAL, the change sponsor at Exeter Airport to advise

1. that DSGC objects to the effects of non-compliance with CAP 1616;
2. to state that in its view the design principles taken forward from the Define Gateway lack legitimacy as a basis for the development of options for the proposed airspace design;
3. to state that in its view the finalisation of the design principles should be revisited, including with stakeholders, so as to be compliant with CAP 1616 and with the CAA's own airspace design requirements;
4. and to state that in the event that the step in 3 is not taken, the factors set out in the objection remain open as the basis for challenge to the future steps in the ACP process.

The letter to the change sponsor also covers the total lack of transparency in the process from the end of August 2019. This applies particularly to the change sponsor, whose primary responsibility it is to keep stakeholders informed of progress. However, the letter also covers the failure of the CAA Airspace Change portal to those who have subscribed to it for updates.

The complete breakdown in engagement with stakeholders in the critical process of finalising the design principles is deplorable. That this has occurred in only first stage of seven in the CAP 1616 ACP process gives very little confidence about the continuation of this revised process. It seems all the more surprising that the CAA Airspace Portal states:

"The CAA has completed the Define Gateway Assessment and is satisfied that the change sponsor has met the requirements of the Process up to this point. The CAA approves progress to the next Step".

Can you please respond to this and all relevant points in the enclosed letter to EDAL.

Jill Harmer
DSGC Secretary
for DSGC Management Committee