

GENERAL AVIATION ALLIANCE

Partnership in Aviation

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5th June 2017

EXETER AIRPORT AIRSPACE CHANGE PROPOSAL CONSULTATION 9TH MARCH 2017 - RESPONSE BY THE GENERAL AVIATION ALLIANCE (GAA)

1. The General Aviation Alliance

The General Aviation Alliance (GAA) is a group of organisations representing the interests of many in the UK General Aviation (GA) industry. It was formed in 2004 to address the need for co-ordinated response to UK regulatory issues.

Members of the GAA include; British Balloon and Airship Club (BBAC); British Gliding Association (BGA); British Hang Gliding and Paragliding Association (BHPA); British Microlight Aircraft Association (BMAA); British Parachute Association (BPA); Helicopter Club of Great Britain (HCGB); Light Aircraft Association (LAA); PPL/IR Europe – European Association of Instrument Rated Private Pilots; Royal Aero Club of the United Kingdom (RAeC). The GAA coordinates about 72,000 subscription paying members of these bodies.

2. Our Comments

The GAA is aware that during April and May 2017, at the request of the BGA, dialogue took place between the BGA and Exeter airport with the aim of informing Exeter airport about the impact of their proposed airspace design on gliding and other GA traffic. The GAA authorised the BGA to speak on its behalf at those meetings.

The GA Alliance fully endorses and agrees with the BGA response to the consultation as submitted to Exeter airport and the CAA. In opposing the proposed airspace design, we additionally note the following points;

- a. The proposed airspace design has significantly negative safety and freedom of movement implications for all VFR Class G traffic, as detailed in the BGA response.
- b. It is disappointing that Exeter airport or its consultants, Osprey, have not sought any dialogue or advice from GAA member organisations at an earlier stage in the

*British Gliding Association
British Hang Gliding and Para gliding Association
British Microlight Aircraft Association
British Parachute Association*

*Royal Aero Club of the United Kingdom
Helicopter Club of Great Britain
Light Aircraft Association
PPL IR Europe*

preparation of the airspace design. We are always available to offer input to help to get the airspace design right first time.

- c. Safe, expeditious flow of traffic is important to all airspace users. However, there appears to be an incorrect assumption that airspace safety is all about controlling aircraft. It is UK policy that the default airspace is class G and that restricted airspace must be fully justified. We believe that the airspace design is not justified.
- d. We note Exeter airports view that their proposed airspace design is, to quote, "a starter for ten" and look forward to seeing a redesign that takes into consideration the needs of local and transiting GA traffic including gliding.
- e. It is misleading to quote passenger numbers rather than movements to illustrate activity. It is misleading to include non-commercial air transport movements when discussing increased public transport activity. The BGA response clarifies the detail.
- f. Exeter airport have in discussions made clear that their goal is simply to have a "known environment" for commercial air transport movements. For a busy commercial air transport operation such as Gatwick or Heathrow we understand that a proportionate solution is for to every aircraft to be controlled and for controllers to have rights of refusal to other traffic; quite appropriately both Gatwick and Heathrow therefore have Class D. Where a small number of movements take place each day, it is disproportionate to expect all aircraft in an extensive area around the airport to be controlled by ATC; here co-ordination is more appropriate than control and that RMZ\RMA or a variant of Class E as is used throughout Europe would be more appropriate. The volume of such airspace should also be carefully minimised. Specifically it should cover only that volume required for aircraft flying CDAs and CCDs and not be a loose overlay encompassing current inefficient flight patterns as is the current proposal. Designing airspace in a formulaic manner around outdated and inefficient (with level flight sections!) RNAV procedures would be environmentally and operationally unacceptable.

The airspace design should be retracted and redesigned in light of discussion with GA stakeholders and as detailed in the BGA's response.



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