Farway Common Airfield

Exeter Airport ACP Team
Exeter Airport
Devon

By Email

Ref: Response from Aviation Stakeholder Farway Common Airfield

15th December 2021

Dear Team,

We write in response to your Exeter Airspace Change Proposal – Design Options Document and in reference to the ACP Stakeholder Meeting held on Wednesday 8th December. We are the new owners of Farway Common Airfield which sits below the ILS for Runway 26.

While we broadly support the enhancement of safety for CAT using Exeter, we believe that careful consideration must be given to other airspace users. As airfield owners, aircraft owners, instrument pilots, residents of Exeter Airport and users of private aircraft for extensive business travel, we do see the arguments from all perspectives. The main points that we put forward for consideration are:

1) Part of the argument for the ACP given are based on various statistics for incidents that have happened over a reasonably long period of time. This argument leads to support a potentially large swathe of airspace that could become Class D. However, what has not been made clear is where/when/height that these incidents actually occurred. Are they limited to a single geographic area or specific pinch point? With this information, Stakeholders would be better placed to agree or disagree with each airspace design – currently there are too many unknowns and not enough detailed evidence to properly support any given design.

   With respect to the above, please can the airport provide a chart with the incidents plotted with a specific height?

2) In our combined experience of over 50 years of flying in the UK, many GA pilots avoid Class D airspace wherever possible. Furthermore, "walls of Class D" do preclude, or make transits difficult. For example, Bristol became notorious for not allowing transits and recently Cardiff refused transits without a flight plan being submitted (on one occasion we were told (on a clear VFR day) that we'd would only receive clearance after upgrading our VFR flight to an IFR flight (while in the air) – this option is not available for many pilots). Just last week we were refused a transit of the Edinburgh CTA (Class D) without a flight plan. Regardless of NATS guidance, reports being made to NATS and protests of pilots, once the airspace is in place, the 'owners' of such airspace run it as they see fit. Without written rules about the use and proper recourse in place to counter such abuse, the airspace becomes locked.

   For this reason, we would oppose any form of expansive Class D airspace.

3) Our plans for Farway Common Airfield are to base resident aircraft there, create a small maintenance base, allow training and hold various fly-ins. Indeed one Farway event attracted 120 aircraft. With a ceiling of just 700' above the field, the safety procedures at Farway become too compromised for us to operate safely.

   Firstly, it is the CAA's recommendation to encourage a Standard Circuit (in our case, we believe 800' to be a reasonable, safe height that also doesn't upset our neighbours) and an overhead join. While some compromise may be necessary (and we would welcome discussion about changing our procedures), Airspace that is too expansive or low over the field makes coming up with safe procedures very much more difficult.

   Secondly, the airspace in the vicinity of Farway already very busy at low level. We see many transiting aircraft running north/south over the field, microlights and a significant number of paragliders. Further compressing this traffic to a maximum of 700' AGL seriously increases the risk of air-to-air collision and is, in our opinion, creating the perfect conditions for an accident.

   With overhead airspace at 700' AGL we cannot operate a proper circuit, ensure safe joining instructions or realistically allow our circuit to be used for any kind of training.

   VFR safe flying practices also require us to fly at over 500' from any structure or person (so essentially means no flying below 500' period). So if 1500' Class D airspace were to be granted, **this would further compresses the available airspace to fly in to just 200'.** This significantly increases the possibility of an air-to-air accident.

4) The hills to the east of Exeter Airport extend to 870' AMSL along with various aerials up to 1536' AMSL. The terrain is hilly with deep valleys and large areas of forest. Navigating below a 1500' AMSL (or 1700' AMSL ceiling dependent on the ACP design) gives a letterbox of just 630' above ground level to navigate inside of (bear in mind the 500' rule too).

   Firstly, the turbulence at below 2000' AMSL in the area is significant. We invite any non-pilot to fly with us and experience just how significant and uncomfortable this is; Furthermore how pilot workload increases as a result while navigation becomes more difficult – compromising safety.

   Secondly, in the event of engine failure at just 600' AGL, the opportunities for a safe forced landing are seriously reduced (and is in fact very dangerous). With the deep valleys, trees etc, this makes the safety implications of an enforced 1500' AMSL ceiling an unacceptable compromise of GA safety.

5) As mentioned during the meeting, it is extremely difficult to obtain reliable two way radio contact when to the East with Exeter Radar at below 1500' AMSL. This problem exists right up until in the vicinity of Branscombe and Farway. By introducing low level airspace, we will be creating an unknown environment with pilots not being able to talk to the local LARS service.

   Without investment and changing the radio system at Exeter, low level airspace becomes unworkable and compromises safety.

6) With terrain at 800' and a low airspace ceiling height, marginal VFR weather or where there is low broken cloud would make navigation impossible to execute safely. Without the airspace in place, pilots are able to climb above broken (or unbroken if Instrument Rated) to safely navigate over terrain and obstacles. With a maximum of 1500/1700' before airspace is encountered, pilots have this valuable safety option removed from them – again significantly impacting safety and encouraging "scud running".

   With the implications of these points, we are certain that introducing airspace could create more safety issues than it could solve. To date there have been no mid-air or Controlled Flight Into Terrain incidents in the area – by introducing the airspace, we believe that avoidable accidents could be created.

7) The opportunity to review any granted airspace was discussed during the meeting. What undertakings does the airport make to continue collecting (and plotting data as per point 1) so that any such airspace can be reviewed objectively and with a genuine intention to change airspace if necessary?

8) In any event, we agree with the widely supported view that any granted airspace should be as small and non-complex as possible. With too many varying heights and complex shapes, flight planning for VFR GA becomes difficult. Innocent and well-prepared pilots can accidentally become infringers and face the full force of the CAA with possible licence and legal implications if they get things wrong. It would be a great shame and contrary to the desire of NATS/CAA to make airspace less complex if an overly large, complex shape, lots of levels style of airspace was granted.

9) Some discussion at the meeting was made around implementing a combined TMZ/RMZ. The airport agreed that in most cases (at least 95%), a GA pilot would do as told to take avoiding action of any aircraft approaching/departing Exeter. Given the low number of incidents (I recall 8 being cited), this would reduce the number to less than 0.4 incidents over the period of recording them. Given this drastic reduction in incidents and the creation of a "known environment" by implementing a TMZ/RMZ, is anything greater than this actually really needed for Exeter airport given the relatively low number of movements?

10) In the event of any controlled airspace being granted to Exeter, we would strongly lobby for such airspace to be reduced to Class E outside of airport published operating hours. In the last 2 years the airport has been open at significantly reduced hours – why impose the airspace when there is no one in the tower? This allows summer evening flying when the airport is closed without restriction.

11) Discussion was made around changing certain procedures and descent profiles which would reduce the airspace requirements by over a mile in size. We would support the change in the approach procedures to accommodate this.

Within the consultation, we have been asked to submit our views on the proposed designs. The objective of Exeter is to enhance safety and create a known environment for CAT. With this in mind our belief that the design of Option 5 (with the following caveats) would be least impactful on Stakeholders:

- Taking into account the reduced airspace requirement (Point 9) by adjusting procedures to provide:
    - Class D CTR, surface to FL65 Circular zone 5 NM radius (smaller due to changed procedures)
    - Stubs – TMZ/RMZ extending from 2000' to FL65 – see point 9.
    - With TMZ/RMZ stubs at 2000' (not 1500 or 1700' due to the reduced requirement for airspace), Farway Common would still be able to continue to operate a 800' AGL circuit with compromise on overhead joins.
    - The airspace used for North/South transits would then give a ceiling of ~1200' to enhance glide clear and reduce the effect of compacting everyone into a tight letterbox of airspace.
    - The smaller amount of airspace needed would allow safe transit of obstacles and weather in marginal conditions.
    - All airspace reverting to Class E outside of Exeter Operating Hours.

We hope that the enclosed views and suggestions are constructive and useful for you and look forward to receiving the plot of incidents on a chart.

Yours sincerely,

Farway Common Airfield