

From: [REDACTED]
Sent: 10 May 2019 22:26
To: [REDACTED]
Subject: DSA ACP RESPONSE/[REDACTED]/Microflight Aviation

1. Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively? **(Yes or No)**

NO

2. Do you or the organisation you represent routinely use the volume of airspace in question (i.e. CTA13 between FL85-FL105)? **(Yes or No. If No move to question 4)**

NO

3. If you or the organisation you represent use the volume of airspace cited in question 2, how often is it used on average in a calendar month and for what purpose? **(Please indicate frequency and purpose)**
4. If you had to choose one of the five options presented in the brief provided, which would be your preferred option? **(Choose one)**

- Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;
- Option 2. Change classification to Class E;
- Option 3. Change classification to Class E but add RMZ;
- Option 4. Change classification to Class E but add TMZ; or
- Option 5. Change classification to Class E but add RMZ/TMZ.

OPTION 3

5. Do you believe that all available options have been explored? **(Yes or No. If no, please expand upon your answer)**
6. If you had to put the options presented in the brief provided in order of preference (1 most desirable and 5 least desirable), how would you score them? **(Score each 1-5)**

- Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace; **3**
- Option 2. Change classification to Class E; **2**
- Option 3. Change classification to Class E but add RMZ; **1**
- Option 4. Change classification to Class E but add TMZ; or **5**
- Option 5. Change classification to Class E but add RMZ/TMZ. **5**

7. Within the scope of this supplementary consultation, DSA welcomes all feedback on the airspace classification of the additional CTA to the south of DSA intended to contain the ROGAG SIDs (i.e. CTA-13). Please feel free to express your views on the subject of this supplementary consultation. Whilst further comments on the matters outside the scope of this supplementary consultation (such as the introduction of the Standard Instrument

Departures) will be noted, any comment received will be discounted from the analysis as these matters may have been consulted upon previously. **(Free-text response)**

WE FLY FROM HEADON AIRFIELD (TO THE SOUTH OF CTA13) AND ALTHOUGH WE OPERATE MICROLIGHT AIRCRAFT AND DO NOT BY ANY MEANS FLY ABOVE FL85 REGULARLY THERE ARE OCCASIONS WHEN SOME OF OUR AIRCRAFT DO GO ABOVE THIS LEVEL. TRANSPONDERS ARE NOT FITTED TO ANY OF OUR MICROLIGHT AIRCRAFT AND ONLY ONE LIGHT SPORT AIRCRAFT. ON THE OTHER HAND WE ALL CARRY RADIOS AND IT WOULD BE NO PROBLEM TO COMMUNICATE WITH DONCASTER IF IT WAS BROUGHT IN AS A RMZ. FOR THIS REASON I HAVE ANSWERED THE ABOVE AS LISTED. HOPE THAT HELPS.

██████████ – Humberside Airport ATS Manager – 13 May 2019

1. Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively? **(Yes or No)**

Yes

2. Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively? **(Yes or No)**

Yes

3. Do you or the organisation you represent routinely use the volume of airspace in question (i.e. CTA13 between FL85-FL105)? **(Yes or No. If No move to question 4)**

No (Humberside ANSP currently provides an Air Traffic Service to any pilot who request it within this area; this happens occasionally but is not routine).

4. If you or the organisation you represent use the volume of airspace cited in question 2, how often is it used on average in a calendar month and for what purpose? **(Please indicate frequency and purpose)**

N/A

5. If you had to choose one of the five options presented in the brief provided, which would be your preferred option? **(Choose one)**

Option 1

- Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;
- Option 2. Change classification to Class E;
- Option 3. Change classification to Class E but add RMZ;
- Option 4. Change classification to Class E but add TMZ; or
- Option 5. Change classification to Class E but add RMZ/TMZ.

6. Do you believe that all available options have been explored? **(Yes or No. If no, please expand upon your answer)**

Yes (as far as I am aware)

7. If you had to put the options presented in the brief provided in order of preference (1 most desirable and 5 least desirable), how would you score them? **(Score each 1-5)**

- Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;
1
- Option 2. Change classification to Class E;
5
- Option 3. Change classification to Class E but add RMZ;
3
- Option 4. Change classification to Class E but add TMZ; or
4
- Option 5. Change classification to Class E but add RMZ/TMZ.
2

8. Within the scope of this supplementary consultation, DSA welcomes all feedback on the airspace classification of the additional CTA to the south of DSA intended to contain the ROGAG SIDs (i.e. CTA-13). Please feel free to express your views on the subject of this supplementary consultation. Whilst further comments on the matters outside the scope of this supplementary consultation (such as the introduction of the Standard Instrument Departures) will be noted, any comment received will be discounted from the analysis as these matters may have been consulted upon previously. **(Free-text response)**

ICAO requires that whenever possible Commercial Air Transport (CAT) should be provided with the protection of controlled airspace (CAS) (ICAO Standards and Recommend Practices, Annex II and Annex 11). As part of EU 2017/373, it will become a requirement, when Part ATS is implemented, to establish CAS with connectivity for such CAT flights. For the level of traffic expected within CTA-13, Class D is an appropriate airspace classification as it provides CAT operators and ATC a known traffic environment, with minimal inconvenience for other users (where Class D rules are appropriately applied). Whilst the Class E requirements for a controller are clearly stated within the regulations, the suggestions above of Class E (with options) bring with it uncertainty and a higher workload for CAT pilots owing to the requirement when they are VMC to look out to avoid other aircraft (although this is not explicitly stated within ICAO, we are aware of pilots (and controllers) who believe that when they are flying within Classes D and E under IFR, that ATC will separate from other IFR and that VFR will avoid IFR aircraft (also note the UK Military statement within Military Aviation Authority Regulatory Publication: RA 3228 Issue 3 AMC 3228(2) paragraph 10 "Own Traffic" Class D or E IFR, Conflicting Traffic Class D or E VFR "VFR will avoid IFR. TI provided on VFR traffic, separation only provided when requested by the pilot.").

As a consequence, Class E is less safe than Class D as even when with a RMZ and TMZ, the VFR pilot does not have to follow requests; a controller would have to take this into account for his IFR aircraft and also consider other aircraft operating within 2NM of the edge of CAS that might elect to enter Class E where no clearance is required and an aircraft could enter the Class E CAS simultaneously contacting the controlling ANSP and eroding separation.

██████████ – Chief Executive British Helicopter Association – 17 May 2019

1. Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively? **(Yes or No) No but apologies sent and recorded.**
 2. Do you or the organisation you represent routinely use the volume of airspace in question (i.e. CTA13 between FL85-FL105)? **(Yes or No. If No move to question 4) No**
 3. If you or the organisation you represent use the volume of airspace cited in question 2, how often is it used on average in a calendar month and for what purpose? **(Please indicate frequency and purpose)**
 4. If you had to choose one of the five options presented in the brief provided, which would be your preferred option? **(Choose one)**
 - Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;
 - Option 2. Change classification to Class E;
 - Option 3. Change classification to Class E but add RMZ;
 - Option 4. Change classification to Class E but add TMZ; or
 - Option 5. Change classification to Class E but add RMZ/TMZ. **Preferred option**
 5. Do you believe that all available options have been explored? **(Yes or No. If no, please expand upon your answer) Yes**
 6. If you had to put the options presented in the brief provided in order of preference (1 most desirable and 5 least desirable), how would you score them? **(Score each 1-5)**
 - Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace; **5**
 - Option 2. Change classification to Class E; **4**
 - Option 3. Change classification to Class E but add RMZ; **2**
 - Option 4. Change classification to Class E but add TMZ; or **3**
 - Option 5. Change classification to Class E but add RMZ/TMZ. **1**
 7. Within the scope of this supplementary consultation, DSA welcomes all feedback on the airspace classification of the additional CTA to the south of DSA intended to contain the ROGAG SIDs (i.e. CTA-13). Please feel free to express your views on the subject of this supplementary consultation. Whilst further comments on the matters outside the scope of this supplementary consultation (such as the introduction of the Standard Instrument Departures) will be noted, any comment received will be discounted from the analysis as these matters may have been consulted upon previously. **(Free-text response) Your presentation contained many abbreviations which were not spelt out on first usage which would make it time consuming for a layperson to understand. Your presentation does not make reference to the proposed changes to Class D Airspace VFR under the removal of the UK's SERA 5001 exemption; details given by googling CAP1779. There are slides which show the VFR with the Exemption in place.**
-

[REDACTED] – FBO Manager Leeds East Airport

1. Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively? **Yes**

2. Do you or the organisation you represent routinely use the volume of airspace in question (i.e. CTA13 between FL85-FL105)? **Yes**

3. If you or the organisation you represent use the volume of airspace cited in question 2, how often is it used on average in a calendar month and for what purpose? **Three times a month – Private flying**

4. If you had to choose one of the five options presented in the brief provided, which would be your preferred option? **Option 1**
 - Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;
 - Option 2. Change classification to Class E;
 - Option 3. Change classification to Class E but add RMZ;
 - Option 4. Change classification to Class E but add TMZ; or
 - Option 5. Change classification to Class E but add RMZ/TMZ.

5. Do you believe that all available options have been explored? **Yes**

6. If you had to put the options presented in the brief provided in order of preference (1 most desirable and 5 least desirable), how would you score them? **(Score each 1-5)**
 - Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace; **1**
 - Option 2. Change classification to Class E; **5**
 - Option 3. Change classification to Class E but add RMZ; **3**
 - Option 4. Change classification to Class E but add TMZ; or **4**
 - Option 5. Change classification to Class E but add RMZ/TMZ. **2**

[REDACTED]

[REDACTED]

██████████ – Sherburn Aero Club

1. Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively? **(Yes)**

2. Do you or the organisation you represent routinely use the volume of airspace in question (i.e. CTA13 between FL85-FL105)? **(No. If No move to question 4)**

3. If you or the organisation you represent use the volume of airspace cited in question 2, how often is it used on average in a calendar month and for what purpose? **(Please indicate frequency and purpose)**

4. If you had to choose one of the five options presented in the brief provided, which would be your preferred option? **(Choose one)**
 - Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;
 - Option 2. Change classification to Class E;
 - Option 3. Change classification to Class E but add RMZ;
 - Option 4. Change classification to Class E but add TMZ; or
 - Option 5. Change classification to Class E but add RMZ/TMZ.

5. Do you believe that all available options have been explored? **(Yes. If no, please expand upon your answer)**

6. If you had to put the options presented in the brief provided in order of preference (1 most desirable and 5 least desirable), how would you score them? **(Score each 1-5)**
 - 1 Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;
 - 5 Option 2. Change classification to Class E;
 - 3 Option 3. Change classification to Class E but add RMZ;
 - 4 Option 4. Change classification to Class E but add TMZ; or
 - 2 Option 5. Change classification to Class E but add RMZ/TMZ.

7. Within the scope of this supplementary consultation, DSA welcomes all feedback on the airspace classification of the additional CTA to the south of DSA intended to contain the

ROGAG SIDs (i.e. CTA-13). Please feel free to express your views on the subject of this supplementary consultation. Whilst further comments on the matters outside the scope of this supplementary consultation (such as the introduction of the Standard Instrument Departures) will be noted, any comment received will be discounted from the analysis as these matters may have been consulted upon previously. **(Free-text response)**

██████████ – TUI Airways Fleet Support Pilot (Base Captain)

Responses to the email dated 10 May related to the DSA ACP, are as follows highlighted in red:

1. Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively? (Yes or No) YES
 2. Do you or the organisation you represent routinely use the volume of airspace in question (i.e. CTA13 between FL85-FL105)? (Yes or No. If No move to question 4) YES
 3. If you or the organisation you represent use the volume of airspace cited in question 2, how often is it used on average in a calendar month and for what purpose? (Please indicate frequency and purpose) up to 80/month depending on prevailing runway in use, scheduled commercial flights departing DSA, each with up to 200 passengers and crew.
 4. If you had to choose one of the five options presented in the brief provided, which would be your preferred option? (Choose one)
 - Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;
 - Option 2. Change classification to Class E;
 - Option 3. Change classification to Class E but add RMZ;
 - Option 4. Change classification to Class E but add TMZ; or
 - Option 5. Change classification to Class E but add RMZ/TMZ.
- Option 1 is clearly the ideal due to reduced complexity of DSA airspace
5. Do you believe that all available options have been explored? (Yes or No. If no, please expand upon your answer) YES
 6. If you had to put the options presented in the brief provided in order of preference (1 most desirable and 5 least desirable), how would you score them? (Score each 1-5)
 - Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace; 1
 - Option 2. Change classification to Class E; 5
 - Option 3. Change classification to Class E but add RMZ; 4
 - Option 4. Change classification to Class E but add TMZ; 3 or
 - Option 5. Change classification to Class E but add RMZ/TMZ. 2
 7. Within the scope of this supplementary consultation, DSA welcomes all feedback on the airspace classification of the additional CTA to the south of DSA intended to contain the ROGAG SIDs (i.e. CTA-13). Please feel free to express your views on the subject of this supplementary consultation. Whilst further comments on the matters outside the scope of this supplementary consultation (such as the introduction of the Standard Instrument Departures) will be noted, any comment received will be discounted from the analysis as these matters may have been consulted upon previously. (Free-text response)

We understand from the focus group discussions, that the Class D proposal was likely to be viewed as unacceptable by the authorities. This is a regrettable position, not only by the virtue of reduced protection for IFR traffic within the airspace, but also by the addition of an unjustifiable degree of complexity to the DSA airspace, which will adversely impact all airspace users and ATC. If not for the complexity introduced by the addition of this a miniscule portion of Class E airspace contiguous with the DSA Class D, Option 5 would seem an acceptable compromise. Option 4 is vastly preferable to Option 3 and 2, as it provides visibility for the aircraft collision avoidance systems, as well as allowing ATC to provide traffic advisories. However compared with Option 5, it introduces the significant risk that an aircraft may be operating in the airspace believing the transponder is operating, when it is in fact either unserviceable or (more likely) not switched on. Without any obligation (or ability) to confirm with ATC that their transponder is working correctly, Option 4 seems an entirely avoidable and unjustifiable compromise to the safety of all concerned.

██████████ – Darlton Gliding Club

1. Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively?

Ans: **NO (notice was too short to change previous commitments)**

2. Do you or the organisation you represent routinely use the volume of airspace in question (i.e. CTA13 between FI 85-FI105)?

Ans: **NO**

3. If you or the organisation you represent use the volume of airspace in question 2, how often is it used on average in a calendar month and for what purpose?

Ans. **Although not used regularly it is right above our gliding site so when there is wave around it is used to take advantage of the wave.**

4. If you had to chose one of the five options presented in the brief provided, which would be your preferred option?

Ans: **Option 2. Change classification to Class E;**

5. Do you believe that all available options have been explored?

Ans: **No.**

There has been no consideration of my suggestion when these departures were initially thought of. That is that the departures could initially start with an orbit climbing turn) to the west to gain height therefore keeping the climb within the current class D airspace and leave the base of the airway (CTA13) at FL105. If you look at departures at various airports in Europe this is quite common.

6. If you had to put the options presented in the briefing in order of preference (1 most desirable and 5 least desirable), how would you score them?

Option 1. Do nothing, i.e. do not change the existing proposal of class D airspace **(5)**

Option 2. Change classification to Class E, **(1)**

Option 3. Change classification to Class E but add RMZ. **(2)**

Option 4. Change classification to Class E but add TMZ. (3)

Option 5. Change classification to Class E but add RMZ/TMZ. (4)

But see my answer to question 5

██████████ – BBAC

1. Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively? **No**

2. Do you or the organisation you represent routinely use the volume of airspace in question (i.e. CTA13 between FL85-FL105)? **No**. If No move to question 4)

3. If you or the organisation you represent use the volume of airspace cited in question 2, how often is it used on average in a calendar month and for what purpose? (Please indicate frequency and purpose)

4. If you had to choose one of the five options presented in the brief provided, which would be your preferred option? (Choose one)

- **Option 3. Change classification to Class E but add RMZ;**

5. Do you believe that all available options have been explored? **Yes**

6. If you had to put the options presented in the brief provided in order of preference (1 most desirable and 5 least desirable), how would you score them? (Score each 1-5)

- Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace; **3**
- Option 2. Change classification to Class E; **2**
- Option 3. Change classification to Class E but add RMZ; **1**
- Option 4. Change classification to Class E but add TMZ; or **4**
- Option 5. Change classification to Class E but add RMZ/TMZ. **5**

7. Within the scope of this supplementary consultation, DSA welcomes all feedback on the airspace classification of the additional CTA to the south of DSA intended to contain the ROGAG SIDs (i.e. CTA-13). Please feel free to express your views on the subject of this supplementary consultation. Whilst further comments on the matters outside the scope of this supplementary consultation (such as the introduction of the Standard Instrument Departures) will be noted, any comment received will be discounted from the analysis as these matters may have been consulted upon previously. (Free-text response) **Hot air balloons generally fly at or below 3000' so this new CAS will only affect a small amount of users**

– Flybe

1. Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively? **Yes**
2. Do you or the organisation you represent routinely use the volume of airspace in question (i.e. CTA13 between FL85-FL105)? **Yes**
3. If you or the organisation you represent use the volume of airspace cited in question 2, how often is it used on average in a calendar month and for what purpose? **Once a day every day. ROGAG departure**
4. If you had to choose one of the five options presented in the brief provided, which would be your preferred option? (Choose one)
 - **Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;**
 - Option 2. Change classification to Class E;
 - Option 3. Change classification to Class E but add RMZ;
 - Option 4. Change classification to Class E but add TMZ; or
 - Option 5. Change classification to Class E but add RMZ/TMZ
5. Do you believe that all available options have been explored? **Yes**
6. If you had to put the options presented in the brief provided in order of preference (1 most desirable and 5 least desirable), how would you score them? (Score each 1-5)
 - Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace; **1**
 - Option 2. Change classification to Class E; **5**
 - Option 3. Change classification to Class E but add RMZ **4**
 - Option 4. Change classification to Class E but add TMZ; or **3**
 - Option 5. Change classification to Class E but add RMZ/TMZ. **2**
7. Within the scope of this supplementary consultation, DSA welcomes all feedback on the airspace classification of the additional CTA to the south of DSA intended to contain the ROGAG SIDs (i.e. CTA-13). Please feel free to express your views on the subject of this supplementary consultation. Whilst further comments on the matters outside the scope of this supplementary consultation (such as the introduction of the Standard Instrument Departures) will be noted, any comment received will be discounted from the analysis as these matters may have been consulted upon previously. **At this time, to remain in controlled airspace on the ROGAG departure, a high power setting and lower groundspeed is necessary to achieve the required gradient. This affects the ability to fully comply with any noise abatement procedure as we would wish to do and is environmentally/operationally uneconomical.**

– NERL

1. Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively? (Yes or No)
Yes 1st May

2. Do you or the organisation you represent routinely use the volume of airspace in question (i.e. CTA13 between FL85-FL105)? (Yes or No. If No move to question 4)

Yes

3. If you or the organisation you represent use the volume of airspace cited in question 2, how often is it used on average in a calendar month and for what purpose? (Please indicate frequency and purpose)

CTA 13 is regularly used by aircraft on the ROGAG PDR (standard outbound clearance) from Doncaster. Based on current procedures Doncaster approach will retain control of the aircraft whilst it transits current Class G airspace and transfer approaching or within Class A.

If no observed traffic or the aircraft is climbing rapidly, Doncaster Approach often transfer the aircraft to East sector outside of CAS .

This area PDR is used by approximately 200 aircraft / month based on 2018 data

4. If you had to choose one of the five options presented in the brief provided, which would be your preferred option? (Choose one)

- Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace

Preferred option

- Option 2. Change classification to Class E;
- Option 3. Change classification to Class E but add RMZ;
- Option 4. Change classification to Class E but add TMZ; or
- Option 5. Change classification to Class E but add RMZ/TMZ.

5. Do you believe that all available options have been explored? (Yes or No. If no, please expand upon your answer) **Yes**

6. If you had to put the options presented in the brief provided in order of preference (1 most desirable and 5 least desirable), how would you score them? (Score each 1-5)

- Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace; **1**
- Option 2. Change classification to Class E **5**
- Option 3. Change classification to Class E but add RMZ; **4**
- Option 4. Change classification to Class E but add TMZ; or **3**
- Option 5. Change classification to Class E but add RMZ/TMZ. **2**

7. Within the scope of this supplementary consultation, DSA welcomes all feedback on the airspace classification of the additional CTA to the south of DSA intended to contain the ROGAG SIDs (i.e. CTA-13). Please feel free to express your views on the subject of this supplementary consultation. Whilst further comments on the matters outside the scope of this supplementary consultation (such as the introduction of the Standard Instrument Departures) will be noted, any comment received will be discounted from the analysis as these matters may have been consulted upon previously. (Free-text response)

The potential issue of crews not fully understanding the classification and the separation responsibilities within this airspace cannot be underestimated. The perception that they remain separated and receive a control service in the airspace yet VFR aircraft could transit without a clearance could lead to confusion.

Airlines would need to undertake additional briefings with their crews to articulate Class E requirements. Could this be tracked?

The views from GA would seem to echo the above and there is doubt whether this is better than Class G.

PC would require procedures /LOA which requires that Doncaster approach 'work' the aircraft until clear of Class E (if approved) prior to transfer to PC East sector. However, as indicated PC controllers will still need to understand their overall responsibilities in the event of failure to comply with the procedure. The introduction of Class E albeit a small portion of airspace would result in a disproportionate amount of training required for both PC and Doncaster Approach controllers. This additional training burden is also likely to cost PC between £50- 250k to implement.

MOD RESPONSE TO DONCASTER SHEFFIELD AIRPORT AIRSPACE CHANGE PROPOSAL SUPPLEMENTARY CONSULTATION ON THE PROPOSED CLASSIFICATION OF A PORTION OF CONTROLLED AIRSPACE

1. Thank you for the opportunity to comment on your supplementary consultation on the proposed classification of CTA-13 (previously CTA-X) as part of your ACP. As requested, the MOD response to the questions posed are as follows:

Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively? No

Do you or the organisation you represent routinely use the volume of airspace in question (i.e. CTA13 between FL85-FL105)? Yes

If you or the organisation you represent use the volume of airspace cited in question 2, how often is it used on average in a calendar month and for what purpose? The airspace is used by military aircraft however the usage is not scheduled, nor is it recorded, therefore it is difficult to quantify how often this airspace is used.

If you had to choose one of the five options presented in the brief provided, which would be your preferred option?

Option 4. Change classification to Class E but add TMZ;

Do you believe that all available options have been explored? MOD has no comment.

If you had to put the options presented in the brief provided in order of preference (1 most desirable and 5 least desirable), how would you score them?

Option 1. Do Nothing i.e. do not change the existing proposal of Class D airspace; 3

Option 2. Change classification to Class E; 5

Option 3. Change classification to Class E but add RMZ; 4

Option 4. Change classification to Class E but add TMZ; or 1

Option 5. Change classification to Class E but add RMZ/TMZ. 2 2

Within the scope of this supplementary consultation, DSA welcomes all feedback on the airspace classification of the additional CTA to the south of DSA intended to contain the ROGAG SIDs (i.e. CTA-13). Please feel free to express your views on the subject of this supplementary consultation. Whilst further comments on the matters outside the scope of this supplementary consultation (such as the introduction of the Standard Instrument Departures) will be noted, any comment received will be discounted from the analysis as these matters may have been consulted upon previously. It should be noted that the MOD aircraft that would routinely transit or use this airspace are equipped with transponders and would routinely request an ATS. The MOD would expect that, irrespective of the final classification of this airspace, access to the airspace should be maintained and facilitated by DSA as required in line with the airspace classification and to allow for MOD aircraft in both VFR and IFR flight.

2. As per previous responses, the MOD would expect an open dialogue to continue between the airport and adjacent military units, namely RAF Waddington and RAF Scampton, to ensure that any local procedures are developed and accepted within a Letter of Agreement (LoA) prior to implementation of new procedures. Within the LoA we would expect that the CAA Special Use Airspace Safety Buffer Policy be considered, with any policy dispensations granted by the CAA articulated. 3. The only additional point of interest (for general awareness, not specific to this consultation) I may raise is that relating to EGR313. As you are aware, RAF Scampton is due for closure in 2022 with the Red Arrows being relocated. Three sites have currently been identified as potentially suitable future locations for the Red Arrows: RAF Wittering in Cambridgeshire, RAF Leeming in North Yorkshire and RAF Waddington in Lincolnshire. Any basing decision for the Red Arrows will depend on securing suitable airspace in which they can conduct their aerobatic training; as such ACP-2018-72 is currently in progress. Wrt the existing construct of EGR313, this will remain until a suitable alternative has been established through the CAP1616 process however it should be noted that, if the basing location choice is RAF Waddington, there may be changes to EGR313 in its current location or indeed even no change to EGR313 at all.

4. The MOD would wish to be included in the ongoing development of the ACP and any further discussions required. Please contact the undersigned should you require any additional information.



[REDACTED] – ATCSL (Liverpool)

1. Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively? **Yes**
2. Do you or the organisation you represent routinely use the volume of airspace in question (i.e. CTA13 between FL85-FL105)? **Yes**
3. If you or the organisation you represent use the volume of airspace cited in question 2, how often is it used on average in a calendar month and for what purpose? **My organisation uses that volume of airspace 300 – 400 times a month for aircraft departing towards the East Coast of England**

4. If you had to choose one of the five options presented in the brief provided, which would be your preferred option? **(Choose one)**
- Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;
5. Do you believe that all available options have been explored? **Yes I believe all options were explored at the recent HAZID I attended.**
6. If you had to put the options presented in the brief provided in order of preference (1 most desirable and 5 least desirable), how would you score them? **(Score each 1-5)**
- Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;**1**
 - Option 2. Change classification to Class E; **5**
 - Option 3. Change classification to Class E but add RMZ; **4**
 - Option 4. Change classification to Class E but add TMZ; or **2**
 - Option 5. Change classification to Class E but add RMZ/TMZ. **3**
7. Within the scope of this supplementary consultation, DSA welcomes all feedback on the airspace classification of the additional CTA to the south of DSA intended to contain the ROGAG SIDs (i.e. CTA-13). Please feel free to express your views on the subject of this supplementary consultation. Whilst further comments on the matters outside the scope of this supplementary consultation (such as the introduction of the Standard Instrument Departures) will be noted, any comment received will be discounted from the analysis as these matters may have been consulted upon previously. **I have no further comment to make**
-

██████████ – Flybe

1. Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively? **Yes**
4. Do you or the organisation you represent routinely use the volume of airspace in question (i.e. CTA13 between FL85-FL105)? **Yes**
5. If you or the organisation you represent use the volume of airspace cited in question 2, how often is it used on average in a calendar month and for what purpose? **Once a day every day. ROGAG departure**
6. If you had to choose one of the five options presented in the brief provided, which would be your preferred option? **(Choose one)**
- **Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;**
 - Option 2. Change classification to Class E;
 - Option 3. Change classification to Class E but add RMZ;
 - Option 4. Change classification to Class E but add TMZ; or

- Option 5. Change classification to Class E but add RMZ/TMZ
7. Do you believe that all available options have been explored? **Yes**
8. If you had to put the options presented in the brief provided in order of preference (1 most desirable and 5 least desirable), how would you score them? **(Score each 1-5)**
- Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace; **1**
 - Option 2. Change classification to Class E; **5**
 - Option 3. Change classification to Class E but add RMZ **4**
 - Option 4. Change classification to Class E but add TMZ; or **3**
 - Option 5. Change classification to Class E but add RMZ/TMZ. **2**
9. Within the scope of this supplementary consultation, DSA welcomes all feedback on the airspace classification of the additional CTA to the south of DSA intended to contain the ROGAG SIDs (i.e. CTA-13). Please feel free to express your views on the subject of this supplementary consultation. Whilst further comments on the matters outside the scope of this supplementary consultation (such as the introduction of the Standard Instrument Departures) will be noted, any comment received will be discounted from the analysis as these matters may have been consulted upon previously. **At this time, to remain in controlled airspace on the ROGAG departure, a high power setting and lower groundspeed is necessary to achieve the required gradient. This affects the ability to fully comply with any noise abatement procedure as we would wish to do and is environmentally/operationally uneconomical from both a fuel burn and carbon emissions point of view.**
-

██████████ – York Gliding Club

1. Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively? **(Yes or No)**

No. York Gliding Centre has no record of being notified of these events.

2. Do you or the organisation you represent routinely use the volume of airspace in question (i.e. CTA13 between FL85-FL105)? **(Yes or No. If No move to question 4)**

No.

4. If you or the organisation you represent use the volume of airspace cited in question 2, how often is it used on average in a calendar month and for what purpose? **(Please indicate frequency and purpose)**

N/A

4. If you had to choose one of the five options presented in the brief provided, which would be your preferred option? **(Choose one)**

- Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;
5. Do you believe that all available options have been explored? **(Yes or No. If no, please expand upon your answer)**

We are unable to comment on what has been explored as we have not been privy to all discussions. What has been presented for consultation does not appear to represent all possible options. Specifically it excludes those that would involve additional fuel use by commercial airlines (climbing to altitude within the existing Class D airspace). While it is recognised that this may not be popular with airline operators, in the interests of transparency, it should have been presented.

6. If you had to put the options presented in the brief provided in order of preference (1 most desirable and 5 least desirable), how would you score them? **(Score each 1-5)**

- Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace; **1**
- Option 2. Change classification to Class E; **2**
- Option 3. Change classification to Class E but add RMZ; **3**
- Option 4. Change classification to Class E but add TMZ; or **4**
- Option 5. Change classification to Class E but add RMZ/TMZ. **5**

7. Within the scope of this supplementary consultation, DSA welcomes all feedback on the airspace classification of the additional CTA to the south of DSA intended to contain the ROGAG SIDs (i.e. CTA-13). Please feel free to express your views on the subject of this supplementary consultation. Whilst further comments on the matters outside the scope of this supplementary consultation (such as the introduction of the Standard Instrument Departures) will be noted, any comment received will be discounted from the analysis as these matters may have been consulted upon previously. **(Free-text response)**

We are anxious not to set any precedent through this submission, but we do wish to be pragmatic in our contribution to joint decision-making. In general, we are concerned about proposals that endeavour to classify airspace as 'controlled' that transpire to be unjustified. However, we are also concerned that when airspace change is justified, the solution becomes unreasonably complex in an effort to satisfy a wide range of demands. This makes navigating the airspace, especially by recreational users, more challenging than it needs to be. With this in mind, we have chosen to support Option 1 as the most parsimonious solution in as much as it does not involve the creation of two separate classes of airspace serving the same airport and it makes it very clear that, like the rest of the CTA, ATC permission is required for VFR users as well as IFR users. We anticipate that few users from the gliding community will require access given the location of the proposed CTA13.

██████████ - Yorkshire Gliding Club

1. Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively? **(Yes or No)**

YES

2. Do you or the organisation you represent routinely use the volume of airspace in question (i.e. CTA13 between FL85-FL105)? **(Yes or No. If No move to question 4)**

YES

3. If you or the organisation you represent use the volume of airspace cited in question 2, how often is it used on average in a calendar month and for what purpose? **(Please indicate frequency and purpose)**

Difficult to quantify exactly because gliders don't file flight plans and not all flights are analysed afterwards but during the soaring season (March to October) when the weather conditions allow tasking of cross-country flights to the south (our preferred routing as controlled airspace already restricts access to the north) there are likely to be gliders in this area on a daily basis. Numbers will vary from one or two to upwards of twenty during weeks when competitions are held (DSA is always advised of competition tasking direction and numbers on a daily basis during competitions).

On these occasions gliders use wave in the area of the proposed CTA to gain sufficient height (often well over 8000' amsl) to pass along the narrow corridor along the Trent Valley between DSA Class D and the Lincolnshire MATZ cluster as the area is damp and not conducive to thermal production. Pilots use this route as the only viable alternative to the already congested Upton Corridor to the west of DSA Class D.

4. If you had to choose one of the five options presented in the brief provided, which would be your preferred option? **(Choose one)**

- Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;
- Option 2. Change classification to Class E;
- Option 3. Change classification to Class E but add RMZ;
- Option 4. Change classification to Class E but add TMZ; or
- Option 5. Change classification to Class E but add RMZ/TMZ.

Clearly our preference would be for the area of the proposed CTA-13 to remain as Class G and to date we have seen no response as yet to our comments (based on input from our own CAT pilots and ATC controllers) that with only a minor adjustment to routing the airway could be accessed without leaving the existing Class D.

Given the limited options specified our choice would be Option 2. Change to Class E.

5. Do you believe that all available options have been explored? **(Yes or No. If no, please expand upon your answer)**

No – see our answer to question 4. Class G should still be an option.

6. If you had to put the options presented in the brief provided in order of preference (1 most desirable and 5 least desirable), how would you score them? **(Score each 1-5)**

- Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;
- Option 2. Change classification to Class E;
- Option 3. Change classification to Class E but add RMZ;
- Option 4. Change classification to Class E but add TMZ; or
- Option 5. Change classification to Class E but add RMZ/TMZ.

YGC Preference	1:	DSA Proposed Option	2.
	2:		3.
	3:		1.
	4:		5.
	5:		4.

It should be noted that this prioritisation results from the fact that any option which mandates the use of transponders (4, 5) will prevent a significant proportion of our cross-country pilots who currently use this route on the grounds of safety from doing so. For reasons of technical fit, appropriate power source weight and availability, and cost, a proportion of gliders are not fitted with transponders and it is not mandated that they should be.

Provided that as is the current practice at DSA, i.e. when conditions allow, clearances to enter/transit Class D are given to all gliders able to maintain two-way radio dialogue including those not fitted with transponders, Option 1 would be preferable to Options 4 and 5. However, the following caveat applies to the proposed Class D.

We asserted in our responses to the original consultation for the establishment of Class D airspace at DSA that in the view of our experts, the volume of traffic using DSA did not justify Class D in the first place. The original PIR and the alternative options presented by DSA supported that. Given the CAT movement and passenger number statistics available from the CAA website which are still nowhere near original predictions we assert that this this is still the case. Class D should only be allocated on a “use it or lose it” basis. We shall continue to push for action to resolve this overclassification via routes other than this ACP.

7. Within the scope of this supplementary consultation, DSA welcomes all feedback on the airspace classification of the additional CTA to the south of DSA intended to contain the ROGAG SIDs (i.e. CTA-13). Please feel free to express your views on the subject of this supplementary consultation. Whilst further comments on the matters outside the scope of this supplementary consultation (such as the introduction of the Standard Instrument Departures) will be noted, any comment received will be discounted from the analysis as these matters may have been consulted upon previously. ***(Free-text response)***

Unless relatively easy access is provided to a CTA-13 further funneling and congestion (and increased risk) for GA traffic (including gliders) to the east of DSA airspace will be created by imposing a vertical limit on the narrow band of Class G (following the Trent Valley) used by that community to avoid the already congested Upton Corridor.

Within the range of options provided to the focus group, Options 2 and 3 provide that level of access for all our cross-country pilots. Option 1, if managed as discussed above would also provide access but as always, entering and transiting Class D provides added difficulties for glider pilots concentrating on staying airborne. Options 4 and 5 restrict access to only those with transponders.

██████████ – Regional Soaring Airspace Group (RSAG) – Yorks, Derbyshire and Nottinghamshire

1. Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively? **(Yes or No)**

FYI, the Regional Soaring Airspace Group (RSAG) was established to respond to the Leeds Bradford Airspace Change Proposal (LBA ACP) and has representatives from eleven gliding and soaring clubs in the region. In addition, the airspace’ leads’ from both the British Gliding Association (BGA) & British Hang-Gliding & Paragliding Association (BHPA) as members, as well as a representative from the GA Alliance.

Following the CAA's recent rejection of the LBA ACP, the Group has determined that it will remain as a coordinating for the soaring community's response to all ACPs and allied matters in the region. However, we recognise that individual clubs may/will respond to this ACP and, depending on their location and needs, may have slightly different responses on your individual questions.

Accordingly, we request that you acknowledge RSAG as a stakeholder in any future correspondence etc in respect of this ACP.

YES – a representative from one of our clubs attended.

2. Do you or the organisation you represent routinely use the volume of airspace in question (i.e. CTA13 between FL85-FL105)? (Yes or No. If No move to question 4)

Yes

3. If you or the organisation you represent use the volume of airspace cited in question 2, how often is it used on average in a calendar month and for what purpose? (Please indicate frequency and purpose)

By the very nature of gliding, our pilots do not always set tasks when they take off and will often fly to the prevailing conditions. Consequently, not all flights are logged in detail or subsequently analysed, therefore it is difficult to quantify usage.

FYI, a 'task' is a cross-country flight between pre-determined 'way points' and experienced pilots can achieve flights covering hundreds of kilometres during flights lasting several hours. Indeed, 'out and return' flights in excess of 500 and 750 kilometres have been achieved by pilots from RSAG clubs. Due to airspace restrictions to the north (Durham and Newcastle), such flights usually involve transits to the South, with the Trent Valley Corridor (east of Doncaster Airport (DSA)) being a key route. This is already a congested route and reducing the available Class G airspace in the Corridor will significantly limit gliding operations by pilots, not only from RSAG clubs but also those operating from as far afield as London, Oxford and Cambridge keen to fly to the north of the country. High attitude 'wave' flying is one of the tactics used by these pilots to achieve such transits and this ACP will be detrimental to this tactic. In effect, this ACP will adversely impact North/South transits within the soaring community.

4. If you had to choose one of the five options presented in the brief provided, which would be your preferred option? (Choose one)

- Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;

- Option 2. Change classification to Class E;
- Option 3. Change classification to Class E but add RMZ;
- Option 4. Change classification to Class E but add TMZ; or
- Option 5. Change classification to Class E but add RMZ/TMZ.

Our strong preference is for the area under consideration to remain as Class G. Our clubs have a number of CA commercial jet pilots as members and their professional opinion is, that with some minor readjustments of existing routes, DSA's requirements could be met within the existing Class D airspace.

5. Do you believe that all available options have been explored? **(Yes or No. If no, please expand upon your answer)**

No. See our answer to 4 above. We firmly believe that the retention of Class G should have been an option, as well as altering routes within the existing Class D to preclude the necessity of seeking additional Class D airspace.

6. If you had to put the options presented in the brief provided in order of preference (1 most desirable and 5 least desirable), how would you score them? **(Score each 1-5)**

N.B. This is an ambiguous question as it can be interpreted in different ways. For example, as a preference list from RSAG or a scoring option, so some of the proposed options could have the same score. Moreover, it does not allow the responder to insert options (such as Class G retention) which the proposer does NOT put forward.

FYI, we have chosen to interpret it as a preference option.

- Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;
- Option 2. Change classification to Class E;
- Option 3. Change classification to Class E but add RMZ;
- Option 4. Change classification to Class E but add TMZ; or
- Option 5. Change classification to Class E but add RMZ/TMZ.

RSAG Preference	DSA Proposed Options
1	2
2	3
3	1
4	5
5	4

Of particular concern, is any option that requires the fitting of transponders which most gliders are not fitted with, nor are they

required to be so fitted. Non-fitting results from a number of factors including: availability, weight, technical fit, power supply and cost. It is stated BGA policy to oppose such mandatory fitting.

N.B. DSA's proposed Option 1 is only acceptable if DSA continues with its existing practise of providing gliders with transit access to its existing Class D subject to appropriate radio communication between DSA's ATC and the glider.

7. Within the scope of this supplementary consultation, DSA welcomes all feedback on the airspace classification of the additional CTA to the south of DSA intended to contain the ROGAG SIDs (i.e. CTA-13). Please feel free to express your views on the subject of this supplementary consultation. Whilst further comments on the matters outside the scope of this supplementary consultation (such as the introduction of the Standard Instrument Departures) will be noted, any comment received will be discounted from the analysis as these matters may have been consulted upon previously.

Crossing Class D airspace is a challenge for even the most experienced glider pilot even in a modern high-performance machine, especially as the soaring conditions in the North are less favourable than those even 100 miles to the south of DSA. Therefore, the imposition of additional Class D airspace, particularly where other options have not been explored properly, is concerning and, in principle, is challenged by the soaring community. It is particularly worrying considering the concerns expressed by the CAA in its recent PIR on DSA's existing airspace which challenges its size due to its massive under-utilisation. Indeed, it is RSAG's position that the volume of traffic using DSA does not justify the existing airspace let alone the addition of further Class D.

We are also concerned about the safety aspects arising from the deterring of our pilots away from yet more Class D (as outlined above), which will result in more funneling of gliders (and other GA traffic) (to the east of DSA airspace.

**██████████ - The Derbyshire & Lancashire Gliding Club
(Camphill Airfield) response to the questions raised are as follows:**

1. Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively?

No. It would only rarely affect our members and we only had short notice of the meetings so we decided that others could represent us effectively

2. Do you or the organisation you represent routinely use the volume of airspace in question (i.e. CTA13 between FL85-FL105)?

Not routinely but occasionally

4. If you had to choose one of the five options presented in the brief provided, which would be your preferred option?
- Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;
 - Option 2. Change classification to Class E;
 - Option 3. Change classification to Class E but add RMZ;
 - Option 4. Change classification to Class E but add TMZ; or
 - Option 5. Change classification to Class E but add RMZ/TMZ.

We would prefer an “Option Zero” – “to retain the airspace in question as Class G” and adjust the CAT flight plans to retain the traffic within the existing extensive and underutilised Class D. We are told by commercial pilots that it is a viable option with only minor adjustment. Failing that, we would certainly opt for Option 2 since it avoids a transponder requirement and no extra pilot workload in VMC.

5. Do you believe that all available options have been explored?

No. As stated under Q4 above, we are advised that there are better options than those listed that do not require any change of current airspace classification. R313 is raised as an issue but may be removed when the Red Arrows relocate.

6. If you had to put the options presented in the brief provided in order of preference (1 most desirable and 5 least desirable), how would you score them?
- Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;
 - Option 2. Change classification to Class E;
 - Option 3. Change classification to Class E but add RMZ;
 - Option 4. Change classification to Class E but add TMZ; or
 - Option 5. Change classification to Class E but add RMZ/TMZ.

Our order of preference would be:

Option 0 (see Q4 above) - 1

Option 2 – 2

Option 3 – 3

Option 1 – 4

Option 4 – 5

Option 5 – 6

TMZ's involve considerable and disproportionate cost and technical/operational difficulties to glider operators. Hence options 4 & 5 are lowest preferences. Experience shows that Class D clearances are often declined so Class E, even with an RMZ, would be preferable.

7. Within the scope of this supplementary consultation, DSA welcomes all feedback on the airspace classification of the additional CTA to the south of DSA intended to contain the ROGAG SIDs (i.e. CTA-13). Please feel free to express your views on the subject of this supplementary consultation. Whilst further comments on the matters outside the scope of this supplementary consultation (such as the introduction of the Standard Instrument Departures) will be noted, any comment received will be discounted from the analysis as these matters may have been consulted upon previously.

The gliding community wants to avoid the need to fit transponders in order to access airspace unless flight is to be undertaken in densely populated airspace. The reasons are cost, weight, space for fitting, power consumption and additional pilot workload. The first four points are technical issues that currently remain unsolved and the industry shows no sign of addressing them.

The workload on glider pilots remains high due to the need for lookout, interpreting the sky to find the optimal route with maximum rising air, navigating to avoid airspace, etc. while on flights of many hours. Safety is inevitably impaired when the distraction of contacting ATC is added and the DSA Class D is certainly not always accessible in my experience, particularly without a transponder. We would propose reducing the existing DSA Class D volume and perhaps changing much of it to Class E.

Safety is also impaired when additional controlled airspace of any category is introduced since it tends to compress GA traffic into ever smaller volumes of Class G

We would appreciate your acknowledgement of receipt – thank you.

██████████ - Wolds Gliding Club

1. Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively? **(Yes or No)**

NO. Late notification

2. Do you or the organisation you represent routinely use the volume of airspace in question (i.e. CTA13 between FL85-FL105)? **(Yes or No. If No move to question 4)**

YES

3. If you or the organisation you represent use the volume of airspace cited in question 2, how often is it used on average in a calendar month and for what purpose? **(Please indicate frequency and purpose)**

Wolds Gliding Club based in Pocklington E. Yorkshire regularly transit south during the thermal soaring season (March to October) when the weather conditions allow tasking of cross-country flights to the south for distance required for long sporting badge achievements. This is in preference to tasking to the west of DSA where there is already restrictive controlled airspace. Gliders in this area occur on a daily basis, numbers will vary from one or two to upwards of thirty during weeks when competitions are held at Wolds Gliding Club where we have Letter of Agreements in place (Swinefleet Corridor) to alleviate prevent the existing bottleneck between Humberside, Hibaldstow Parachute Skysports, Scampton R313 and DSA Class D.

DSA is always advised of competition tasking direction and numbers on a daily basis during competition.

On these occasions gliders use thermal and wave energy in the area of the proposed CTA to gain sufficient height (6-10000ft amsl) to pass along the narrow corridor along the Trent Valley between DSA Class D and other stakeholders.

4. If you had to choose one of the five options presented in the brief provided, which would be your preferred option? **(Choose one)**

▮ Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;

▮ Option 2. Change classification to Class E;

▮ Option 3. Change classification to Class E but add RMZ;

▮ Option 4. Change classification to Class E but add TMZ; or

▮ Option 5. Change classification to Class E but add RMZ/TMZ.

Wolds Gliding Club preference would be for the area of the proposed CTA-13 to remain as Class G which is not listed. Advice from some professional pilots support this.

In the absence of our preference our choice would be Option 2. Change to Class E.

5. Do you believe that all available options have been explored? **(Yes or No. If no, please expand upon your answer)**

No – see our answer to question 4. Class G should still be an option.

6. If you had to put the options presented in the brief provided in order of preference (1 most desirable and 5 least desirable), how would you score them? **(Score each 1-5)**

▮ Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;

▮ Option 2. Change classification to Class E;

- | Option 3. Change classification to Class E but add RMZ;
- | Option 4. Change classification to Class E but add TMZ; or
- | Option 5. Change classification to Class E but add RMZ/TMZ.

Wolds G C Preference DSA Proposed Options

- 1 2
- 2 3
- 3 1
- 4 5
- 5 4

Options including mandating transponders (4 and 5) will severely restrict the use of this area due to the well documented power requirements for carriage in gliders with limited battery capacity (and weight limitation) and cost prohibitive. This will prevent a significant proportion of our cross-country pilots who currently use this route on the grounds of safety from doing so. This may also affect National competitions held by the club

Provided that as is the current practice at DSA, i.e. when conditions allow, clearances to enter/transit Class D are given to all gliders able to maintain two-way radio dialogue including those not fitted with transponders, Option 1 would be preferable to Options 4 and 5.

I was involved with DSA as Chief Flying Instructor at Trent Valley G C in Kirton In Lindsey and attended meetings for Stakeholders in 2006.

Documentation presented showed current movements and future projections for DSA passenger numbers

Given the CAT movement and passenger number statistics available from the CAA website which are still nowhere near original predictions Class D should only be allocated on a “use it or lose it” basis. We shall continue to push for action to resolve this overclassification via routes other than this ACP.

7. Within the scope of this supplementary consultation, DSA welcomes all feedback on the airspace classification of the additional CTA to the south of DSA intended to contain the ROGAG SIDs (i.e. CTA-13). Please feel free to express your views on the subject of this supplementary consultation. Whilst further comments on the matters outside the scope of this supplementary consultation (such as the introduction of the Standard Instrument Departures) will be noted, any comment received will be discounted from the analysis as these matters may have been consulted upon previously.

Unless relatively easy access is provided to a CTA-13 further funneling and congestion (and increased risk) for GA traffic (including gliders) to the east of DSA airspace will be created by imposing a vertical limit on the narrow band of Class G (following the Trent Valley) used by that community to avoid the already congested Upton Corridor.

Interestingly on a personal level I live in Kirton In Lindsey and regularly observe arriving CAT aircraft from the east at relatively low level descending in existing Class G at different time of day outside controlled airspace. So why have controlled airspace for protection of

CAT when the traffic does not use it?

– Burn Gliding Club

1. Did you or a representative from your organisation attend either of the Focus Groups held on 1 and 8 May 2019 respectively? **(Yes or No)**

No

2. Do you or the organisation you represent routinely use the volume of airspace in question (i.e. CTA13 between FL85-FL105)? **(Yes or No. If No move to question 4)**

No

3. If you or the organisation you represent use the volume of airspace cited in question 2, how often is it used on average in a calendar month and for what purpose? **(Please indicate frequency and purpose)**

4. If you had to choose one of the five options presented in the brief provided, which would be your preferred option? **(Choose one)**

Option 0 – Do Nothing – Modify the SID to fit within the confines of existing Class D leaving CTA-X as Class G = Preferred Option

- Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace;
- Option 2. Change classification to Class E;
- Option 3. Change classification to Class E but add RMZ;
- Option 4. Change classification to Class E but add TMZ; or
- Option 5. Change classification to Class E but add RMZ/TMZ.

5. Do you believe that all available options have been explored? **(Yes or No. If no, please expand upon your answer)**

No – I don't believe all available options have been explored. Humberside airport has no Class D airspace at all and still manages to run passenger services without any problems. RHDSA has an enormous piece of Class D airspace surrounding it and we believe it is perfectly possible to redesign a ROGAG SID to keep within its confines until it reaches the base level of the airway structure above at FL85 and FL105 to the east of that.

6. If you had to put the options presented in the brief provided in order of preference (1 most desirable and 5 least desirable), how would you score them? **(Score each 1-5)**

- Option 0 – Do Nothing – Change the ROGAG SID so that it will fit within the confines of the existing Class D airspace and existing airway structure above without the need to add CTA-X at all. = 1 Most Desirable
 - Option 1. Do Nothing, i.e. do not change the existing proposal of Class D airspace; = 2 Not desirable but keeps all the proposed airspace the same classification
 - Option 2. Change classification to Class E; = 3 Will cause confusion.
 - Option 3. Change classification to Class E but add RMZ; = 4 Will cause more confusion
 - Option 4. Change classification to Class E but add TMZ; or = 5 Will cause confusion and preclude non equipped gliders from using the airspace.
 - Option 5. Change classification to Class E but add RMZ/TMZ. = 5 Will cause confusion and preclude non equipped gliders from using the airspace.
7. Within the scope of this supplementary consultation, DSA welcomes all feedback on the airspace classification of the additional CTA to the south of DSA intended to contain the ROGAG SIDs (i.e. CTA-13). Please feel free to express your views on the subject of this supplementary consultation. Whilst further comments on the matters outside the scope of this supplementary consultation (such as the introduction of the Standard Instrument Departures) will be noted, any comment received will be discounted from the analysis as these matters may have been consulted upon previously. (**Free-text response**)

RHDSA airport have generated procedures that supposedly require the extension of existing controlled airspace to contain them, rather than generating procedures that can be contained within the existing Class D airspace. Nobody would doubt the need for standard instrument departure procedures to be drawn up, so we have no problem with the introduction of SID's per say. However, it would appear that the introduction of SID's is being used as a means to justify further expansion of controlled airspace around RHDSA when its quite clear that a different ROGAG SID procedure could easily be devised, requiring just a few more track miles - that would allow CAT to stay within the existing Class D and airway structure above.

The attached documentation from Cyrrus Consulting also tries to make out that the Upton Corridor is seldom used – “as the gliding community don't think it has the right dimensions”. This statement must be challenged in the strongest possible terms as this is a clear attempt at justifying the removal of the Upton Corridor agreement going forwards. The Upton Corridor is frequently opened to facilitate the N/S transit of gliders flying cross country between Burn/Pontefract and the M1/M18 junction to the east of Sheffield when weather conditions are suitable for long distance cross country glider flying and cloud bases are higher than 4500ft. Granted, the dimensions

aren't perfect and the gliding community would welcome raising the base of CAS in the Upton Corridor to 5000 or even 5500ft amsl to more easily facilitate transits through this area.

So to summarise our position, we firmly believe that RHDSA can devise a suitable ROGAG SID procedure that will keep aircraft within the existing class D until they reach the base of the existing airway structure to the east of the Class D at FL105. On this basis we believe that the requirement or necessity for the proposed CTA-X block of airspace has not been proven and so consulting with local airspace users on whether this airspace be classified as Class D or Class E with or without an RMZ or TMZ is simply a way of "massaging minds" into believing they have a say in the proposal going ahead in some form, when in reality the whole thing should be rejected.