



# WYCOMBE AIR PARK CONSULTATION FEEDBACK REPORT

## CHANGES TO THE WAY AIRCRAFT APPROACH THE AERODROME

10<sup>th</sup> NOVEMBER 2017



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# 1. Executive Summary

Wycombe Air Park is proposing to introduce a GNSS procedure for aircraft making an approach to runway 24 only. This will be used in conjunction with the existing visual approaches to runways 06, 24 and 35.

On 8th July 2014, Wycombe Air Park commenced engagement with the CAA to discuss the viability of the proposal and formally commenced the Airspace Change Proposal with a Framework Briefing at CAA London on 25<sup>th</sup> October 2016. It was agreed that the consultation period will be 12 weeks. Notes of the formal Framework Briefing can be found at <http://www.caa.co.uk/Commercial-industry/Airspace/Airspace-change/Decisions/Wycombe-Air-Park-GNSS-IAP-Rwy-24/>

The consultation was launched on 1<sup>st</sup> March 2017 seeking views from aviation stakeholders and local residents on the proposal. An advert was placed in the local newspaper, who also published an article about the proposal. 2 drop-in sessions were held at the air park for local residents to raise questions about the proposal. The consultation team also discussed the proposal at meetings of both the Wycombe Air Park Joint Consultative Committee and London Airspace User Working Groups encouraging all parties to respond.

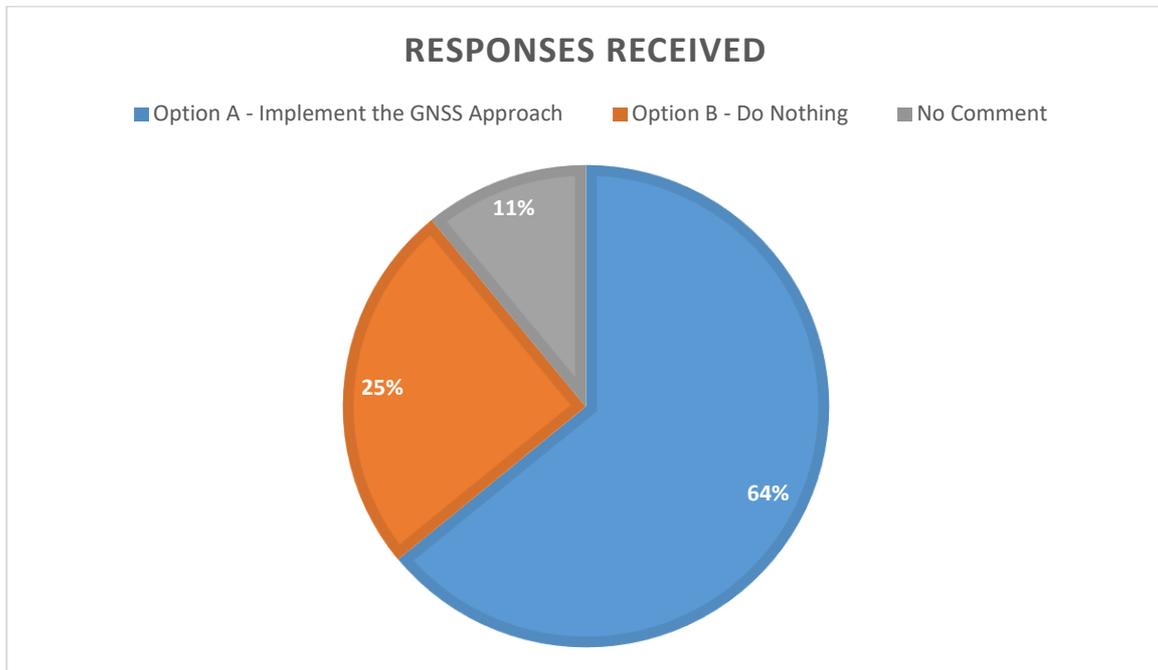
A total of 62 responses were received from a mixture of consultees and local residents/members of the public. 49 responses were in support of Option A – Implement the proposed approach, 9 were in support of Option B – Do nothing and 4 wished to make no comment.

This document summarises the comments received for both Option A and B and outlines the next steps in the process.

Given that most of the responses received were in favour of Option A, Wycombe Air Park will be proceeding to submit a Formal Airspace Change Proposal to implement the approach as outlined in the consultation with no amendments.

## 2. Response Rate

A total of 62 responses were received during the consultation period. Responses were received from a variety of sources with 27 from local residents/members of the public and 21 received from airfield users. Of the 73 organisations identified as key stakeholders, responses were received from 14. Of these 14 responses 4 stated that they did not wish to comment.

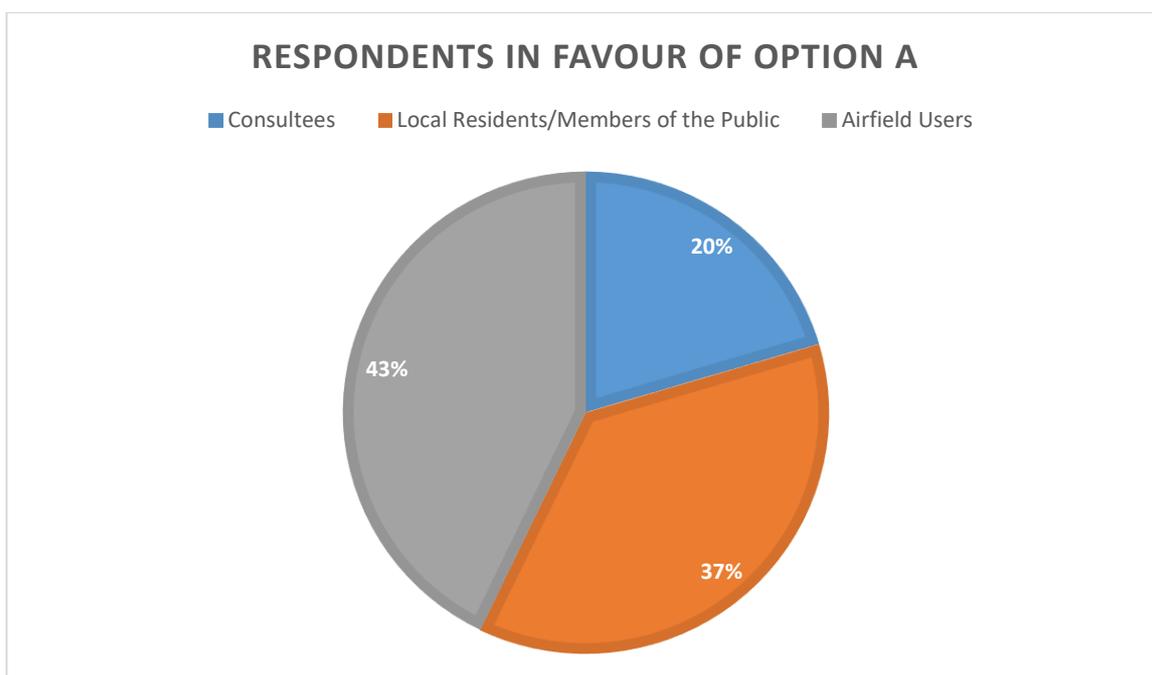


### 3. Responses to the Consultation

The following is a summary of responses received during the consultation, identifying common themes and aspects that were raised. Please note that this is not an exhaustive list of all responses received. All feedback that was received will be considered and submitted to the CAA as part of the final Airspace Change Proposal (ACP) submission.

#### Support for the proposal

Of the 62 responses received 49 were in support of Option A – Implement the GNSS Approach.



Amongst the comments of support from these respondents for the approach the following comments were noted:

*“What plans are in place to ensure that pilots are suitably qualified to carry out the approach and that it is not used for unqualified aircrew to ‘sneak in’ in deteriorating or below minima weather?”*

Whilst we appreciate the respondents concern regarding the unauthorised use of the approach by unqualified pilots, the responsibility to check a pilot’s qualifications rests with the aircraft operator and not the Aerodrome or Air Traffic Control Unit. The requirement for pilots to be appropriately qualified will however be highlighted in the self-briefing material. If the Air Traffic Control Unit are made aware or have a suspicion of unqualified pilots using the approach then the CAA will be notified of an “Alleged Breach of Air Navigation Legislation” for investigation.

*“It would be really useful to the many ATS units that provide services to aircraft within your vicinity if the GNSS IFR aircraft had some form of conspicuity squawk.”*

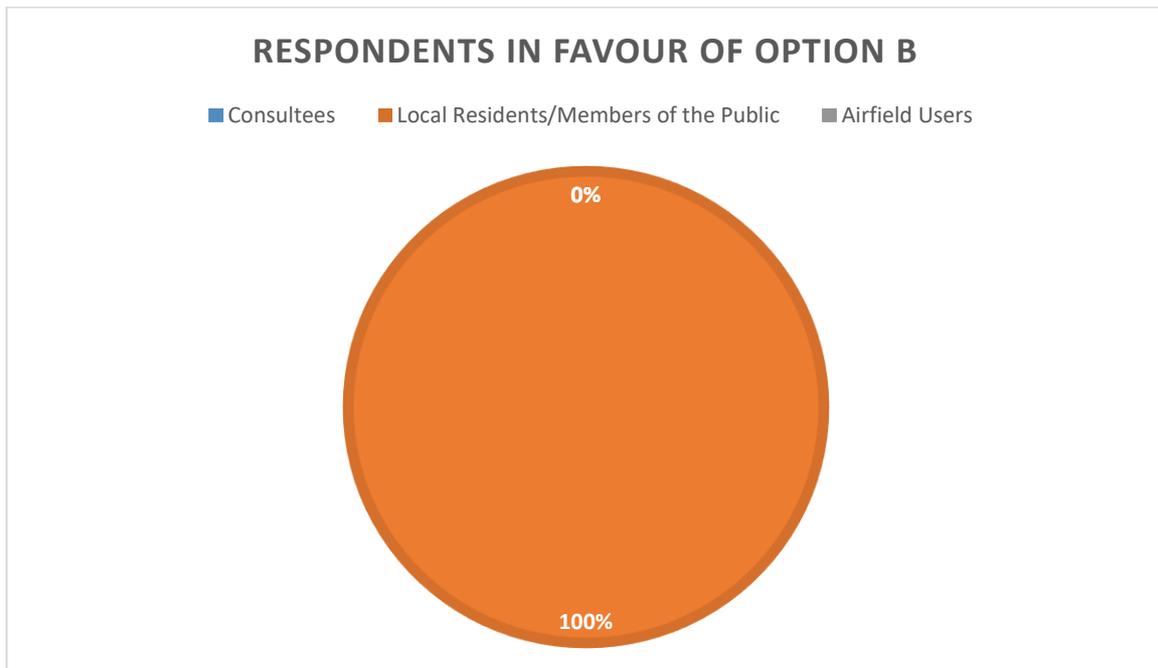
The CAA have allocated Wycombe Air Park a conspicuity squawk (3637) which will be utilised solely for aircraft flying the proposed approach. This will allow other units to identify the traffic as flying the approach and pass safety critical traffic information to aircraft they are controlling.

*“It is understood that it is proposed to operate the new procedure only during normal park opening hours. These are advertised as seven days a week from 09:00 to 17:30 and extended in the summer on Saturdays, Sundays, Tuesdays and Thursdays from 9:00 to 20:00. In winter night flying takes place until 19:00 on a Tuesday. This automatically limits the potential noise impact and [\*\*\*] recommends that a condition of use be that the route can only be operated between the hours 08:00 and 20:00 daily.”*

In order for the Aerodrome to operate the approach safely in conjunction with its Air Traffic Control service the approach will only be available for authorised use during the operating hours as published in the UK AIP. It is however important to highlight that this does not mean that there will be an absence of other traffic outside of the operating hours.

## Objections to the proposal

Of the 62 responses received 9 were in support of Option B – Do Nothing



We have thoroughly analysed the responses received in objection to the proposal and have identified the following recurring issues.

*“Your consultation as set out will involve additional overflights by aircraft across the hilltop Villages of Hyde Heath and south Heath creating an additional, cumulative and severe impact. Your consultation has failed to illustrate the impact on these villages and has failed to take into consideration the cumulative impact of noise from this proposal together with the noise of the High Speed Train currently set to be constructed and noise from additional overflights should the 3rd runway at Heathrow be constructed.”*

Whilst the proposed flight track does take aircraft close to villages to the north west of Amersham the aircraft on this section will be no lower than 2200ft altitude. The proposed route provides a safety margin between the corner of the Luton CTA next to the A41 where there is known to be a high density of traffic. This part of the track also originally overflowed Chesham, Chesham Bois and Amersham and was moved to the proposed route during the early stages of development in order to avoid overflight of the greatest number of houses possible.

There is no requirement as part of the Airspace Change Proposal to take into account cumulative effects of third-party projects whose details are not yet available.

*“I would only support it if you guarantee no early/late low level flights over Marlow Bottom where your traffic is too low early evening way too often!”*

The overflight of Marlow Bottom is outside the scope of this consultation because it is not in proximity to the proposed routing.

*“The only occasions when we are able to enjoy our environment free from the racket made by aircraft, (particularly glider tugs), are at times of poor visibility. If these navigation aids are introduced, the Consultation Document readily admits that there will not only be aircraft noise during periods of low visibility, but there will be an increase of air traffic concentrated into a narrow flight path over our residential area at all times.”*

As stated in the consultation document there will be an increase in traffic during periods of low visibility, however, the volume will be nowhere near the levels of traffic seen when operating circuits on a busy good weather day.

*“...if aircraft are approaching the runway and are relying on this navigation aid at times of poor weather, there is an increased chance of a serious accident with dire consequences for people in Cressex and residential areas*

*in South East Wycombe if there is a technical failure of the navigation system.”*

The use of GNSS as a navigation aid particularly when using a Satellite Based Augmentation System (EGNOS) to check the accuracy of the satellite data received is of far higher safety margins to the alternative options. In addition to the accuracy of the system, pilots flying the proposed approach will have received specific training, in the format of an Instrument Rating, to fly this type of approach and what to do in the event of a data integrity failure. Wycombe Air Park has also signed an EGNOS Working Agreement which will ensure that advanced notification is received of any planned system outages at which point the approach will be notified as unavailable.

*“I don't think the impact has been fairly described. The additional flight operations have been averaged out over a complete year, where in fact they will be concentrated on the days where conditions suit instrument only flying”*

Whilst the overall impact has been averaged out over the year the number of movements when the approach is in use will be lower than when the circuit is in use on a busy good weather day therefore the impact on days suited to instrument only flying will still remain low.

*“You need to get an independent environmental impact assessment done not just declare yourself it has no impact. This is being deliberately misleading. Chesham is already used a stacking area for heathrow and is the largest town in the Chilterns district and also the most densely populated when you consider Amersham. Therefore this levels of airplane noise is already exceeding acceptable environment levels for residents. You provided no details as to how you are going to mitigate the damage airplane noise is having or how you are going to reduce the flying over of residential properties in Chesham. Airplane noise is damaged to the health is already linked to high rate of diabetes. Have you specifically consulted with Buckinghamshire County, Chiltern District and Chesham Town Council's.”*

The requirement for this Airspace Change Proposal was assessed and agreed with the Civil Aviation Authority at the Framework briefing on 25<sup>th</sup> October 2016 in line with CAP725 - Airspace Change Process Guidance Document. The environmental impacts of this proposal were discussed alongside the existing noise contours published in the Wycombe Air Park Noise Management and Action Plan. As a result the impact was deemed sufficiently low to not require an independent environmental impact assessment or the production of separate noise contours.

Key stakeholders, identified in Appendix A, including County, District/Borough and Town Councils overflown by the proposed route have been invited to respond to the consultation.

Numerous comments were made regarding the use of the proposed approach by helicopters.

The consultation is not about existing helicopter operations and circuits as these do not utilise the same routing as the proposal. Whilst it is possible for helicopters to fly the approach and this will not be ruled out, it is not expected to be a regular occurrence as there are very few helicopters based at the airfield that are approved for instrument flight. It is also likely that the minima for the approach will be in excess of the minima for their existing operations and therefore will not be of any significant advantage.

A local residents association, whilst appearing to not be completely against the proposal, expressed concerns that no further public consultation would be required for future aerodrome expansion post implementation.

This consultation is only regarding the implementation of the proposed approach and is required under the guidance set out in CAP725 - Airspace Change Process Guidance Document. The respondent identifies that consultation would not be required under the same guidance and framework in order to make operational changes to the aerodrome. The scenarios used by the respondent are runway extension and extensions to operating hours. Whilst this would not fall under the remit of CAP725 it would be up to the Aerodrome's Landlord (Wycombe District Council) to approve any operational changes. It is not known whether the landlord would choose to consult if these decisions were required. It is important to note that the Aerodrome Operator is not currently considering these options and that they have been raised by a respondent.

Concerns were raised regarding increases in future movements following wider adoption of GNSS technology

It is important to note that the majority of flying at Wycombe Air Park is ab-initio flight training which requires pilots to fly by visual reference to the ground and not using instruments. This is very unlikely to change and as such the aerodrome needs to maintain the existing level of visual operations. In order to significantly increase beyond the volume of proposed approaches the aerodrome would need to implement an Approach Control Service and potentially Radar. The cost of this would far outweigh any potential return on investment and the volume of visual operations would still need to decrease beyond existing levels. It is for this reason that even if all aircraft at the airfield were GNSS equipped the majority of operations would remain visual and that the use of the proposed approach will be mostly on poor weather days when visual operations are not possible.

## 4. What Happens Next

Following the largely positive feedback received during this consultation from consultees and interested parties, Wycombe Air Park has decided to proceed with submitting to the CAA for review an Airspace Change Proposal formal submission proposing the implementation of the approach with no track amendments. Any potential safety hazards which have been identified as a result of this proposal will be fed into the accompanying safety case to ensure that they are addressed, mitigated and kept under review in an acceptable manner.

Once submitted, the CAA will analyse the consultation feedback and design of the proposal against the regulatory and CAP725 requirements. Assuming all the necessary information has been provided, the CAA aim to provide a decision within 16 weeks.

It is important to highlight that the Civil Aviation Authority's Group Director, Safety and Airspace Regulation Group (SARG) is the Decision Maker in the process. Although the consultation period has now ended, representative organisation's that wish to present new evidence or data to the Group Director, SARG, for his consideration prior to making his regulatory decision regarding the proposal, can do so in writing to the following address:

Group Director  
Safety and Airspace Regulation Group  
CAA House  
45-59 Kingsway  
London  
WC2B 6TE

In the event that the proposal is approved and the approach is implemented, a post implementation review will be carried out, the date of which will be specified by the CAA. This will seek to identify any issues that may have arisen since the introduction of the approach.

## 5. Consultation Process

The purpose of this consultation is to provide you with the chance to express your opinion and to comment on the airspace change proposal, and for the aerodrome to share information with you.

The 'change sponsor' for this proposal is Wycombe Air Park, and this requires the aerodrome to be responsible for the proposal, including the consultation process, whilst the CAA's Safety & Airspace Regulation Group (SARG) is responsible for the process.

This proposal and stakeholder consultation has been developed in line with the CAA's 'Guidance on the Application of the Airspace Change Proposal' document, 'CAP725'.

Our proposal is subject to a 12-week stakeholder consultation which commenced on the 1<sup>st</sup> March 2017 and finished on 7<sup>th</sup> June 2017. This included additional time to allow for Easter.

All feedback received has been given appropriate consideration and is included in this consultation summary report, the formal proposal will now be prepared for submission to the CAA, which is likely to take place in December 2017.

A full list of consultees to this proposal can be found in Appendix A.

### Planned ACP Timetable

Date	Action
1 <sup>st</sup> March 2017	Commencement of consultation period
25 <sup>th</sup> March 2017 – 11am to 2pm	Aerodrome 'drop-in' session
25 <sup>th</sup> April 2017 - 4pm to 6:30pm	Aerodrome 'drop-in' session
7 <sup>th</sup> June 2017	End of consultation period
10 <sup>th</sup> November 2017	Issue of Consultation Summary Report
December 2017	Submission of full ACP to CAA
March 2018	CAA Regulatory Decision
August 2018	Implementation of GNSS

All information regarding the airspace change proposal can be found on Wycombe Air Park's website at [www.wycombeairpark.co.uk/gnssconsultation](http://www.wycombeairpark.co.uk/gnssconsultation) and a hard copy of the consultation document is available at High Wycombe Library, 5 Eden Place, High Wycombe HP11 2DH.

If you would like to request a hard copy of this consultation summary report, please contact the aerodrome using any of the options below:

Email: [gnsconsultation@wycombeairpark.co.uk](mailto:gnsconsultation@wycombeairpark.co.uk)

Telephone: 01494 443737

Letter:       Airspace Change Consultation  
              Airways Aero Associations Ltd  
              Wycombe Air Park  
              Booker  
              Marlow  
              SL7 3DP

If you would like to make any comments regarding the CAA's Guidelines for Airspace Change Proposals (CAP725), please write to the Airspace Regulator (Coordination), Safety & Airspace Regulation Group, CAA House, 45-49 Kingsway, London WC2B 6TE, or email:

[airspace.policy@caa.co.uk](mailto:airspace.policy@caa.co.uk)

## 6. Glossary

ACP	Airspace Change Proposal
AIP	Aeronautical Information Publication
ANO	Air Navigation Order
ATCU	Air Traffic Control Unit
ATZ	Air Traffic Zone
CAA	Civil Aviation Authority
CAP725	Airspace Change Process Guidance Document
CTA	Control Area
ERCD	Environmental Research and Consultancy Department
GNSS	Global Navigation Satellite System
GPS	Global Positioning Satellite
IAF	Initial Approach Fix
IAP	Instrument Approach Procedure
ICAO	International Civil Aviation Organisation
NATMAC	National Air Traffic Management Advisory Committee
NAZ	Noise Abatement Zone
Nm	Nautical mile
TMA	Terminal Manoeuvring Area
VMC	Visual Meteorological Conditions

## Appendix A - List of Consultees

### **Wycombe Air Park Joint Consultative Committee**

- Booker Common & Woods Protection Society
- Booker Cressex Wycombe District Council Member
- Booker Gliding Club
- Chiltern Rise Wycombe District Council Member
- Great Marlow Parish Council
- Greater Marlow Wycombe District Council Member
- Hambleden Parish Council
- Hambleden Valley Wycombe District Council Member
- Heli Air
- Lane End Parish Council
- Marlow Bottom Parish Council
- Sands Wycombe District Council Member
- West Wycombe Parish Council
- Wycombe Air Park Action Group
- Wycombe District Council

### **Other Aerodrome Operators**

- Air Training Services
- Helicopter Services
- Light Sport Flying Club
- Personal Plane Services
- Private Aircraft Owners

### **London Regional Airspace User Working Group**

- Denham Aerodrome
- Elstree Aerodrome
- Farnborough Radar
- Heathrow Tower
- London Heathrow Airport
- London Luton Airport
- London Stansted Airport
- North Weald Aerodrome
- RAF Benson
- RAF Halton
- RAF Northolt
- White Waltham Aerodrome

### **Local Government**

- Amersham Town Council
- Buckinghamshire & Milton Keynes Association of Local Councils
- Buckinghamshire County Council
- Chiltern District Council
- Dacorum Borough Council

- Hertfordshire Association of Parish and Town Councils
- Hertfordshire County Council
- Oxfordshire Association of Local Councils
- Oxfordshire County Council
- South Oxfordshire District Council
- St Albans City & District Council
- Three Rivers District Council

**NATMAC (National Air Traffic Management Advisory Committee)**

- Aircraft Owners and Pilots Association
- Airport Operators Association
- Aviation Environment Federation
- BAE Systems
- British Air Line Pilots Association
- British Airways Plc
- British Balloon and Airship Club
- British Business and General Aviation Association
- British Gliding Association
- British Hanggliding and Paragliding Association
- British Helicopter Association
- British Microlight Aircraft Association
- British Model Flying Association
- British Parachute Association
- Civil Aviation Authority
- Future Airspace Strategy VFR Implementation Group
- General Aviation Safety Council
- Guild of Air Traffic Control Officers
- Heavy Airlines Group
- Helicopter Club Great Britain
- Honorable Company of Air Pilots
- Light Aircraft Association
- Light Airlines Group
- Low Cost Airlines Group
- Military Aviation Authority
- National Air Traffic Services
- PPL/IR (Europe)
- UK Airprox Board
- UK Flight Safety Committee
- Unmanned Aerial Vehicle Systems Association

Campaign to Protect Rural England

Chiltern Society

National Trust

Natural England – AONB Chiltern Hills