St. Mary's Airport

RNP Instrument Approaches Runway 27/32

Impact Assessment

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Abbreviations

ACP Airspace Change Procedure
AIP Aeronautical Information Publication
AMSL Above Mean Sea Level
CDFA Continuous Descent Final Approach
DH Descent Height
DME Distance Measuring Equipment
FAF Final Approach Fix
FAT Final Approach Track
GNSS Global Navigation Satellite System
IAF Initial Approach Fix
IAP Instrument Approach Procedure
IFR Instrument Flight Rules
LERMZ Land's End Radio Mandatory Zone
LNAV Lateral Navigation
LoA Letter of Agreement
MAP Missed Approach Procedure
MAPt Missed Approach Point
MATS Manual of Air Traffic Services
MDH Minimum Descent Height
NDB Non-Directional Beacon
OCH Obstacle Clearance Height
PAPI Precision Approach Path Indicator
PINS Point in Space
RNAV Area Navigation
RNP Required Navigation Performance
VFR Visual Flight Rules
VOR VHF Omnidirectional Range

1. Introduction

St Mary's Airport is located on St Mary's in the Isles of Scilly; an archipelago of islands off the Southwest tip of Cornwall. IAPs are available on Runways 27 and 32 which currently utilize an NDB (STM) which was installed in 2009.

The objective of this document is to identify the possible impact of the implementation of RNP Approaches on scheduled operations which constitute the islands' lifeline link to the mainland, local communities and environment.

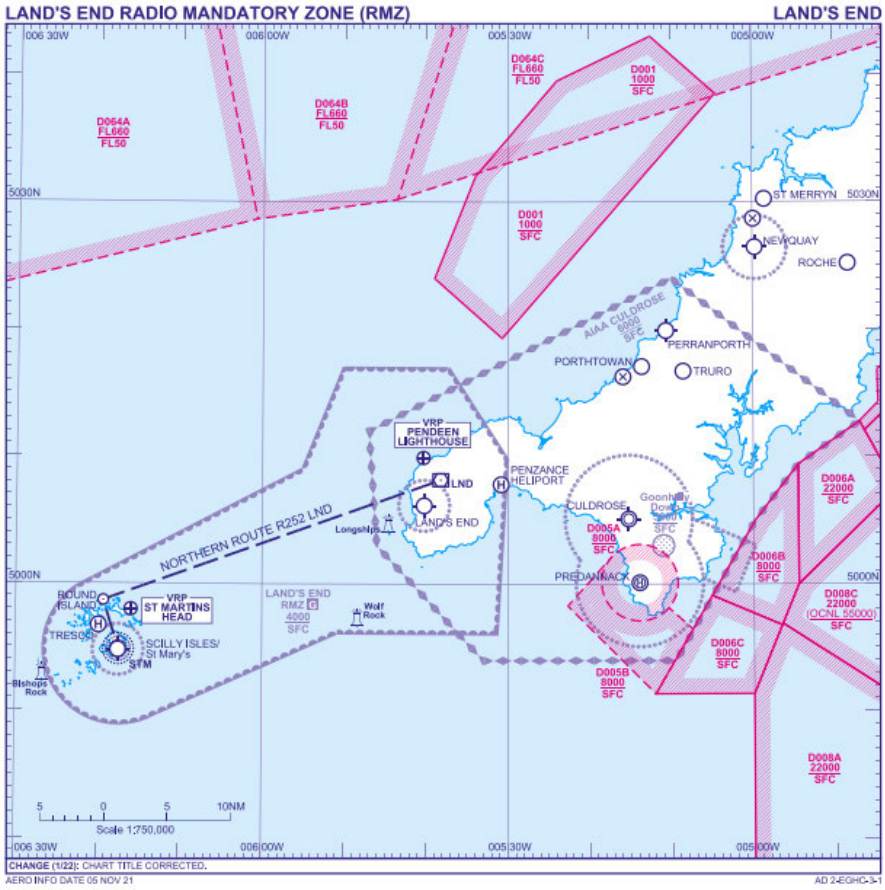
2. Justification for Change

There is an increasing time and cost strain to continue maintaining serviceability of St Mary's NDB (STM). There are also well documented limitations of use of NDBs such as Coastal Refraction, Precipitation, Static or Night Effects. Further issues due to the location of St Mary's NDB include salt build up, which needs to be cleaned frequently, as well as drastically reduced reliability during periods of heavy rain. Due to its age, general and preventative maintenance of the NDB is also becoming increasingly more expensive, which is putting a strain on Airport resources.

To circumvent these technical issues and to future proof the life-line service St Mary's Airport is looking to implement RNP approaches with a view to eventually phasing out the NDB IAPs when the equipment comes to the end of its life, which the manufacturers have estimated to be in approximately 3-5 years. All en-route NDBs have already been decommissioned. St Mary's Airport is currently in the process of consulting with stakeholders to aid in risk assessing the change.

3. Airspace Description

St Mary's Airport is located on St Mary's, the largest Island in the Isles of Scilly archipelago, within Class G Airspace. North-West of the Aerodrome is Tresco Heliport, which sits just outside of St Mary's ATZ. The next nearest adjacent Airfield is Land's End Airport approximately 28 miles to the East and Penzance Heliport. All of these airfields sit within the Land's End Radio Mandatory Zone which extends from the surface up to 4000ft amsl.



The current Rwy 32 NDB IAP leaves the RMZ briefly to the Southeast of the field, however all the critical segments of the approach take place within the zone. Due to our location, there is very little transiting traffic from and to the West, on the occasions that there is they are in two-way contact with either Culdrose Radar or Scillies Approach. It is our intention to apply for an alteration to the size and shape of the RMZ to encompass the entirety of the RNP IAPs once they have been approved.

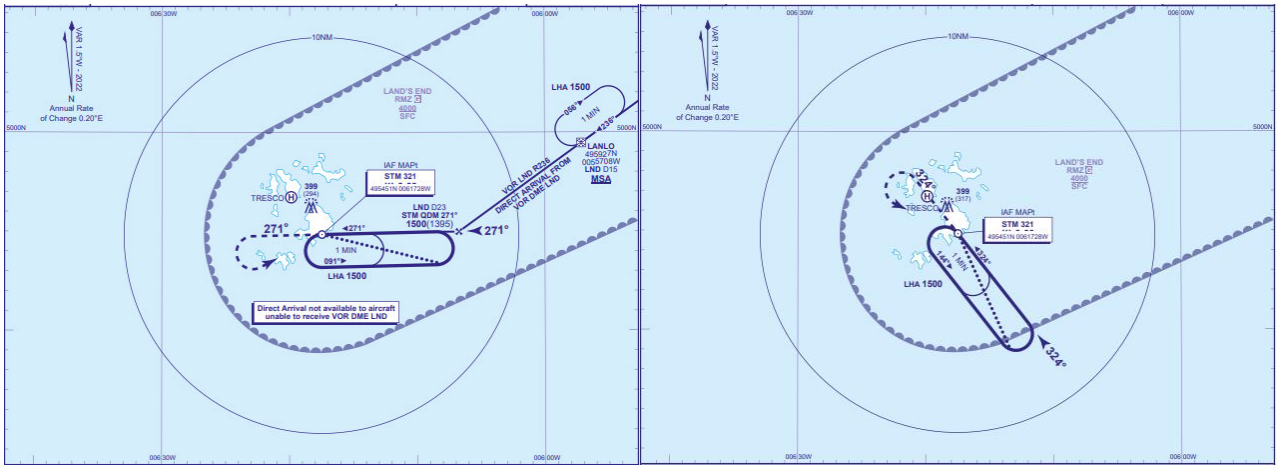
The Runways at St Mary's are 09, 14, 27 and 32. There are existing IAP utilising the NDB (STM) for Runways 27 and 32. The Direct Arrival Approach for Runway 27 also utilizes the LND VOR/DME. The LND is not scheduled to be decommissioned as part of the VOR/DME rationalisation scheme.

Scillies Approach provide a combined TWR & APP Service to aircraft within the RMZ, however we have a DOC of 10,000ft and 40NM, which is more than adequate for the proposed RNP IAPs as there will be no significant alteration in the range or levels of the approaches. It is not expected that the implementation of these approaches will have an impact on the frequency of traffic or the workload of the ATCOs.

There are 2 Commercial Air Transport companies who operate out of the islands; Isles of Scilly Skybus who use BN2 Islanders and DHC6s to and from St Mary's, and Penzance Helicopters who contract StarSpeed Helicopters who routinely use two S76 helicopters. St Mary's Airport service a variety of visiting GA ranging from ULACs to PC12s; most visiting GA fit into the 500-1500kg weight bracket. There are a small number of locally based GA including P28A's, PA32, AA5. The islands also see frequent military aircraft for training including EH101s and A400M and also periodic visits from Trinity House helicopters to service the various lighthouses in the area.

4. Description and Usage of Existing Procedures

Runways 27 and 32 currently have timed NDB approach procedures with either a racetrack pattern or, in the case of the alternate approaches, a tear drop pattern for aircraft in speed Category A only. Runway 27 also has a Direct Arrival procedure which uses ranges and radials from the LND VOR/DME and includes a hold at LANLO.



The current NDB Intermediate and Final Approach tracks are 2 degrees (Runway 27) and 3 degrees (Runway 32) offset from the extended runway centre lines and intercept the runway centreline 0.9 nautical miles before the threshold. This ensures that aircraft on the NDB approaches are currently aligned with the runways when crossing the coast and the cliff-top location of the thresholds ensure that no Properties are overflown on the approaches.

The STM NDB is the missed approach holding fix for the holds associated with the NDB IAPs.

The missed approach procedures for both runways are to climb straight ahead to 1500' amsl and turn left back to the STM NDB. An alternative tear drop procedure is available for both runways for aircraft approaching from the West or attempting again from a Missed Approach.

Although the existing NDB IAPs are available to all Cat A aircraft, they are predominantly used by Skybus.

The table below illustrates the number Runway Movements with percentage usage along with the number of IAPs flown for runways 27 and 32 over a seven-year period.

2015 Runway Movements		2016 Runway Movements		2017 Runway Movements		2018 Runway Movements		2019 Runway Movements		2020 Runway Movements		2021 Runway Movements	
Rwy 27	Rwy 32	Rwy 27	Rwy 32	Rwy 27	Rwy 32	Rwy 27	Rwy 32	Rwy 27	Rwy 32	Rwy 27	Rwy 32	Rwy 27	Rwy 32
2796	4472	2752	5093	1852	2023	1582	2602	1370	2158	1163	1002	1150	1501
23%	*37%*	*21%*	*39%*	*31%*	*34%*	*24%*	*39%*	*22%*	*36%*	*38%*	*32%*	*26%*	*34%*
IAP's Flown		**IAP's Flown**		**IAP's Flown**		**IAP's Flown**		**IAP's Flown**		**IAP's Flown**		**IAP's Flown**	
33	16	32	9	23	4	45	10	29	2	23	11	9	9

Runway 27 gets the majority of IAPs as it is the most convenient with the Direct Arrival allowing aircraft to make an approach without first coming to the overhead.

***Note**: During 2020 & 2021 the Airport was under reduced operations due to Covid.*

Although difficult to quantify it is believed that approximately 2.5% of all NDB approaches flown result in a Missed Approach being executed.

There is no history of undershoot events at St. Mary's Airport

5. Description of Proposed Procedures

5.1 General

In line with St. Mary's runway characteristics, the RNP IAP's to be provided, have been designed in accordance with ICAO Doc. 8168 (Pans-OPS) for aircraft in Approach Speed Category A with the following approach types;

- LNAV – Lateral navigation procedures equivalent to a GNSS Non Precision Approach that can be flown by aircraft equipped with a standard (TSO/ETSO 129) GPS receiver.

The procedures have been originally prepared by Davidson Ltd and subsequently taken over by Osprey Ltd for LNAV minima with 3.5 degree vertical path angles, harmonized with the existing PAPIs with a Reference Datum Height (Threshold Crossing Height) of 40' in accordance with ICAO 8168, Part 3 Section 2, Chapter 6, Para 6.2 b.

The 3.5 degree approach was a deliberate design choice to maintain aircraft height on approach, this is of particular importance as the AIP notifies that "Turbulence and/or windshear may affect the final half mile of approaches to all runways and may be increased by valley effect and/or structures when using Runways 09, 14 or 27."

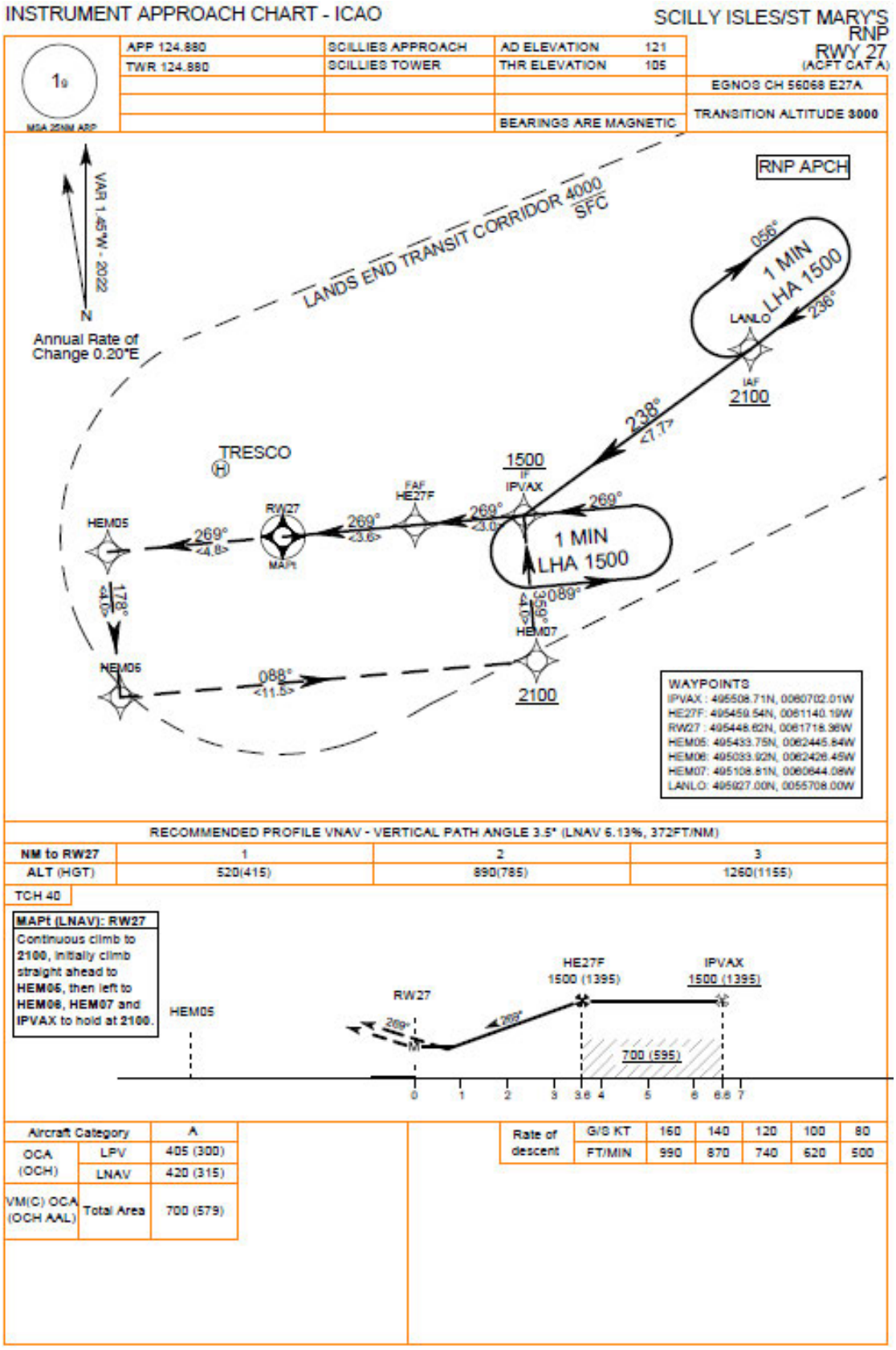
The missed approach for all procedures is to turn back to the Initial Approach Fix (IAF) and then follow the Initial Segment to hold at the Intermediate Fix (IF) of the active runway. All missed approach holds are located over the sea.

There have been numerous conversations and meetings with scheduled operators, in particular Isles of Scilly Skybus to ensure that the designs will be not only fit for purpose, but an improvement on the current NDB procedures.

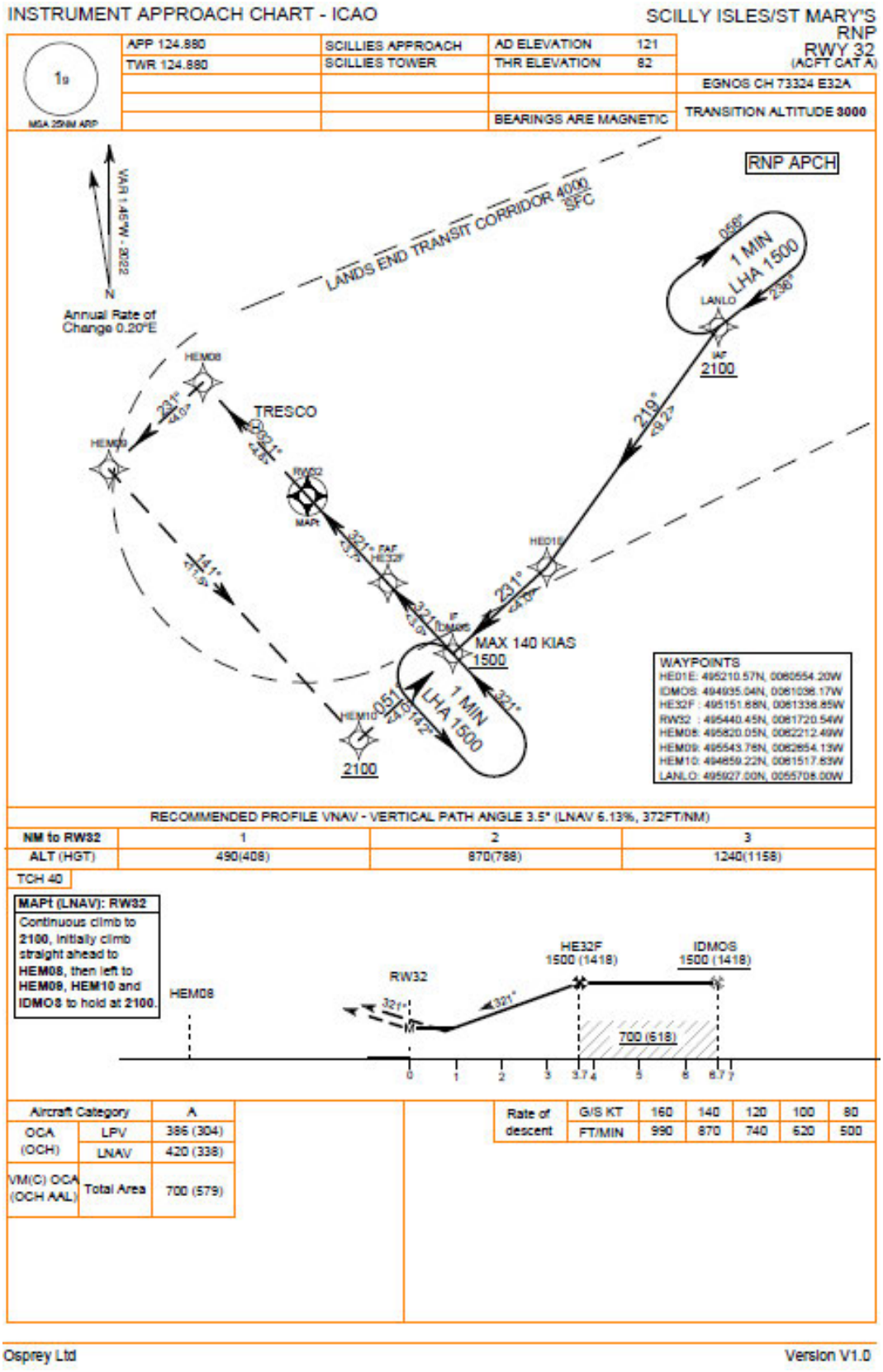
It should be noted that RNP Approaches do not require installation of any ground-based equipment, which will mean a reduction in engineering costs and will also satisfy Design Principle 8 (Appendix A)

As per the design principles identified by the consultation undertaken (Appendices A & B), the proposed procedures have been initially modelled on the existing NDB procedures to reduce the operational and environmental impact.

5.2 Proposed RWY 27 Procedure:



5.3 Proposed RWY 32 Procedure:



Note: these charts will be amended in the near future to include the LERMZ. The dimensions around the islands are currently the same as the LETC was.

Note 2: Charts will have LPV minima lines and channel numbers removed from the final versions due to lack of EGNOS

6 Operational Impact

6.1 General RNP

LNAV IAPs significantly reduce pilot workload compared with the NDB Non-Precision Approaches where the pilot has to assess and compensate for drift during the approach.

LNAV IAPs are not affected by Coastal Refraction, Precipitation, Static and Night effect, all of which degrade the NDB approach increasing pilot workload.

RNP provides lateral guidance aligned with the runway heading facilitating a CDFA down to the MDH thereby minimizing significant aircraft positioning within the visual phase of the landing.

The tracks in the LNAV IAPs are set, as opposed to being timed as the existing NDB approaches are. This means that the pattern of the existing NDB IAP will change size depending on the performance of the aircraft, wind conditions, etc. but the LNAV tracks will always remain the same. This increases safety and decreases pilot workload.

It is expected that the RNP procedures will result in fewer missed approaches due to the geometric lateral guidance aligned with the runways and PAPIs facilitating stabilized approaches.

The combined effect of reducing pilot workload, providing accurate alignment laterally to the Runway and the expected reduction in MAP's is considered to improve the safety of operations in IFR and there are no identifiable adverse operational impacts.

6.2 RWY 27

Runway 27 Arrivals remain in line with the current NDB procedure direct arrival, including LANLO hold with no significant increase in track mileage, satisfying Design Principles 3 & 6 (Appendix A).

The MAPt remains the same as for the existing NDB Approach.

The Missed Approach routes South of all of the islands rather than returning to the NDB. This negates the requirement for the Alternative Procedure, simplifying the procedure as a whole.

The proposed FAT is 269°, the same as the Runway magnetic heading. This alignment will mean a reduced risk of missed approach vs the existing NDB Approach and is also expected to further improve safety by reducing the risk of Runway Excursion due to minimizing the requirement for last minute positioning as the aircraft will be already aligned with the Runway at Minimum Decent Height (MDH). This helps to satisfy Design Principle 1 (Appendix A)

The proposed Obstacle Clearance Height (OCH) is 305ft. This is a 100ft reduction on the existing NDB Approach, facilitating further resilience during periods of poor weather, satisfying Design Principle 5 (Appendix A). All MDH are over the sea.

6.3 RWY 32

The IAF will be at point LANLO, this will mean that Runway 32 Arrivals will have a slight reduction in track mileage compared to the existing NDB IAP as they will not have to come to the NDB to commence the procedure. This is the same as the proposed Runway 27 Approach.

The Missed Approach Point (MAPt) is the same as the existing NDB procedure. The Missed Approach Procedure (MAP) is to the Southwest of the field, rather than returning to the NDB; this means that the alternate procedure is no longer necessary as with the Runway 27 procedure.

The proposed FAT is 321°, the same as the Runway magnetic heading. This alignment will mean a reduced risk of missed approach vs the existing NDB Approach and is also expected to further improve safety by reducing the risk of Runway Excursion due to minimizing the requirement for last minute positioning as the aircraft will be already aligned with the Runway at MDH. This helps to satisfy Design Principle 1 (Appendix A)

The proposed Obstacle Clearance Height (OCH) is 318ft. This is a 100ft reduction on the existing NDB Approach, facilitating further resilience during periods of poor weather, satisfying Design Principle 5 (Appendix A). All MDH are over the sea.

7. Environmental Impacts

The proposed approaches for both the Runway 27 and Runway 32 commence from point LANLO. This negates the requirement for aircraft to overfly the islands to commence the approaches, as is required by most of the existing approaches. This will result in a reduction in noise affecting both the local community and the various colonies of breeding birds around the islands.

The Missed Approach Procedures for both Runways are almost totally to the South of the field for Runway 27 and South-West of the field for Runway 32, rather than returning to the NDB, reducing the need to overfly St Mary's and also avoiding overflying St Agnes, which helps to satisfy Design Principles 2 & 4 (Appendix A).

All MDH are over the sea.

8. Operational Arrangements with Adjacent Units

Land's End Airport currently have RNP Approaches to all 4 of their Runways (Rwy 07, Rwy 16, Rwy 25 and Rwy 34). These IAPs are not separated from the current St Mary's NDB Approaches. To mitigate the risk of not being able to achieve the required separation minima as detailed in MATS Part 1, the LERMZ LoA contains the procedure that shall be used during IFR operations in numerous scenarios. This includes inbound and outbound aircraft to/from St Mary's, Land's End, Tresco and Penzance.

The proposed RNP Approaches will also not be separated from Lands' End's procedures, and it is not expected that the procedures contained within the LoA will materially need to be changed. A draft amendment can be found in Appendix C but it should be noted that the whole document, including this section will still need to be reviewed and agreed by all stakeholders including Land's End Airport, Skybus, Tresco Heliport, Penzance Helicopters and RNAS Culdrose.

Both Tresco and Penzance have submitted ACPs for PINS Approaches for use by the scheduled helicopter service. All of the stakeholders in the corridor, including St Mary's Airport, Tresco Heliport, Penzance Heliport, Land's End Airport and RNAS Culdrose maintain close contact and cooperatively develop the LERMZ LoA to ensure the safe transit of this busy area of airspace. This will include discussing scenarios when there are potentially multiple IFR aircraft within the RMZ.

9. Safety Summary Statement

From the comparison of the proposed RNP and the existing NDB Instrument Approach Procedures, it is shown that the proposed differences have been specifically designed to improve safety and effectiveness of the Procedures. The majority of the proposed IAPs are over water and will therefore not be perceptible to the island communities but will have a positive effect of the reliability of the lifeline link which is currently relying on aging equipment.

The implementation of the RNP approaches has no significant impact on emissions as the 27 approach is only slightly longer and the 32 approach is slightly shorter in terms of track miles. With the increased accuracy it is expected that there will be a reduction in Missed Approaches as well as increased efficiency due to the availability of CDFA which will see a further reduction in emissions. The existing ATS provision and ATM procedures remain sufficient to accommodate the implementation of the RNP approaches. The workload is not expected to increase and neither equipment nor staffing will require change, The LoA will require amendment but a working group of airfields routinely collaborate to maintain this document.

Appendix A – Design Principles

As identified during consultation with the community and 3rd party stakeholders in 2015 and confirmed in 2018 (See Appendix B)

	Design Principle	Stakeholder agreement	Comments	Final Principle	Rationale
1	Designs must meet the acceptable levels of flight safety	AONB	Safety compliance is of paramount importance. "The implications of an aircraft incident and the islands could be far reaching and measures that help reduce this likelihood are a benefit that is welcome."	Designs must maintain or improve on the current safety situation	Design must maintain required level of flight safety
2	Minimise impact of noise on the community and the environment	AONB	A large part of the tourist trade is built on the peacefulness of the islands. Old Town is located in the Runway 09 undershoot. Aircraft for this runway routinely flight overhead Hugh Town also.	Minimise the impact of noise as much as practicable	Maintain the ethos of the islands, protect native and visiting wildlife and continue to foster a good working relationship with the local community. Copies of Noise Certificate for BN2P, DHC6 & AW169 have been obtained.
3	Work within existing flight paths			Wherever possible currently used flight paths should be used so as not to increase impact on communities	
4	Avoid noise sensitive buildings and areas		St. Mary's Hospital is in the Runway 09 undershoot. Several bird breeding areas around the islands.	Avoid noise sensitive buildings and areas as much as practicable	See item 2
5	Reduce minima for IFR approaches to improve regularity during poor weather		The lower the minima the more useful the approach will be.	Establish minima as low as possible while ensuring high level of safety	It is important that the approaches are useable in the poor weather for which they will be designed. Ideally lower minima.
6	Be complimentary to existing approaches as well as proposed PINS approaches at Tresco		Due to the nature of operations at St Mary's Airport the use of multiple runways is common	Approaches should be complimentary to the existing approaches for Runways 27 & 32.	There are currently no procedural separation on GNSS vs NDB besides vertical. There are no deemed separations around the islands.
7	Be complimentary to IAPs established at adjacent units	Land's End Airport	"A need for a collaborative approach to their initial design and implementation"	Consider Land's End approached when developing our designs, use the same designer (Matthew Davidson).	Close co-ordination is going to be required for approaches at both ends of the zone. This collaboration should be built in at the design stage.
8	No ground-based equipment required to be installed	Historic England, AONB	"The airport contains a number of scheduled monuments which are vulnerable to change."	No physical equipment is required to operate GNSS Approaches.	

Appendix B – Consultation Material - Public Meeting

Airport & Fire Service

The Airport is a pivotal piece of infrastructure to the social and economic wellbeing of the Islands. We aim to run a safe, efficient and customer focussed operation.

The Fire Service provides emergency response as well as fire safety advice to business and the wider community.

AIRPORT

Airport Improvement Project

The project is nearing completion and has delivered newly resurfaced runways, new aeronautical ground lighting and ATC facilities.

Passenger drop off area

Following constructive feedback the area outside the front of the terminal is being redesigned to include a passenger drop off area.

EGNOS

The airport is in the process of implementing EGNOS approach procedures for our runways and wish to consult on this matter. Come and learn what this involves and the improvements this will bring.

If you would like any information, would like to make a comment or give feedback, please talk to any of the representatives here today or complete one of the feedback forms provided.

FIRE SERVICE

Fire Safety Advice

The Fire Service provides advice and support to the community in order to make buildings safe from fire. Prevention is better than cure.

Home Fire Safety Visits

We provide home fire safety visits on domestic property, providing advice on how to make homes safe from fire and what to do in the case of fire starting. This service is free of charge and can be booked through the airport.

Business Fire Safety

Legislative fire audits are carried out on business premises throughout the Islands. Advice to business is always available on this subject.

Appendix B – Consultation Material - Consultation Letter to Stakeholders and list of consultees

COUNCIL OF THE ISLES OF SCILLY

Town Hall, St Mary's, Isles of Scilly, TR21 0LW
01720 424000
enquiries@scilly.gov.uk

Dear Sir/Madam

Re: Implementation of EGNOS GNSS Instrument Approach Procedures at the Isles of Scilly Airport
(European Geo-Stationary Navigation Overlay Global Navigation Satellite System)

In accordance with the Civil Aviation Authority (CAA) guidance and recommendations, I am writing to inform you of proposed changes to the Isles of Scilly Airport.

The proposal is to implement GNSS (Global Navigation Satellite System) for each of the 4 runways at the Isles of Scilly Airport on St Mary's subject to approval by the Civil Aviation Authority (CAA). GNSS will enable suitably equipped aircraft to operate an Instrument Landing System approach without the need for costly ground based navigation aids and enable our current sole airline operator (Skybus) to potentially land in lower visibility and cloud conditions, subject to the company obtaining the relevant Air Operators Certificate of approval. Currently, the Isles of Scilly Airport only has a Non-Directional Beacon offering Non-Precision approaches to 2 runways with a higher altitude restriction for descending to obtain visual reference with the runway.

The reason for consulting your organisation is to seek your observations on the proposal to implement GNSS approaches at the Isles of Scilly Airport. The proposal will improve resilience and reliability of current services by enabling scheduled flights in poor weather conditions. Although the proposal will allow more flights during poor weather conditions than now, the proposal in itself will not create any additional flights, lead to the use of larger aircraft or increase noise levels with the same flights paths used as existing. Furthermore, the proposal for the navigational system will not require the installation of any ground equipment and therefore will have no visual impact. As such, it is considered that the proposal will not have any negative impact on the environment or community but would benefit aviation safety and improve the reliability of the air service.

Any observations should be made in writing and sent to the Infrastructure & Planning Department (or by e-mail to cdryden@scilly.gov.uk) no later than **4.30 pm on Friday 17th April 2015**.

All comments that are returned on time and relevant to the proposal will be considered by the Council.

Please do not hesitate to contact me if you require any further information or would like to discuss the contents of the draft consultation document.

Yours sincerely

[redacted]
Senior Manager: Infrastructure & Planning

...working for a strong, sustainable and dynamic island community

English Heritage/Historic England	Isles of Scilly Wildlife Trust
ANOB Partnership	RSPB
Natural England	Duchy of Cornwall Council
Land's End Airport	Isles of Scilly Steamship Group
Tresco Estate	Islands' Partnership

Appendix B – Consultation Material – Consultation Confirmation Email (Sent June 2018)

Dear Sirs,

In 2015 you kindly engaged with us regarding the implementation of new GNSS Approaches at St. Mary's Airport.

Early this year the process for the application of these approaches changed and so, with you permission, we would like to use the comments that you gave us in support of the development of the Design Principles, along which the final approaches will be designed.

As part of the new process we will undertake another round of consultation, hopefully later this year that we hope you will also be kind enough to take part in.

If you have any questions please don't hesitate to contact either myself or Tamar Smethurst.

Kind Regards,

[redacted]
Manager Air Traffic Services & Airport

Air Traffic Services, St. Mary's Airport, St. Mary's, Isles of Scilly, TR21 0NG
[redacted]

Appendix C – Draft LERMZ LoA Amendment

3. Separation Standards:

It must be noted that there are no Separation Standards available to Land's End or St. Mary's ATC, other than Vertical, for RNP Approaches or RNP v NDB Approaches. Likewise there are no deemed Separations available between EGHC & EGHE Holds or procedures.

Multiple IFR flights between EGHC, EGHK, EGHT & EGHE are to expect delays in clearances and or releases from ATC.

4. For aircraft requiring an IAP into St. Mary's:

a) For an aircraft in flight – Cleared Level at the IAF and EAT based on the aircrafts' ETA should be obtained by the Pilot prior to entering the LERMZ.

b) For a flight from Land's End –Cleared Level at the IAF and EAT based on the aircrafts' ETA should be requested through Land's End Tower prior to start-up.

Note: Aircraft departing Penzance requesting an IFR departure to Tresco or St Mary's must obtain a clearance before aircraft start is approved and must obtain Release from St Mary's ATC before departure

Instrument Approach Procedures – St. Mary's Airport

1. When the prevailing visibility is less than 1500m, St. Mary's ATC will inform Land's End ATC and Penzance Radio that weather conditions necessitate the use of IAP's into St. Mary's Airport for scheduled operators. The following procedures will then come into force:

   a) St. Mary's ATC will telephone Land's End ATC and Penzance Radio to advise that all departures to St. Mary's are subject to release by Scillies Approach;

   b) Land's End ATC / Penzance Radio will request engine startup and IFR clearance from St. Mary's ATC;

Note: For IFR departures to/from Penzance, Scillies will contact Culdrose to coordinate the transit of their AIAA and helicopter training areas.

   c) When the aircraft is ready for departure Land's End ATC / Penzance Radio will request a release from St. Mary's ATC. A release will only be withheld if safety is likely to be compromised or for deconfliction purposes. In such cases a Release restriction may be issued;

   d) Inbound flights from Newquay and Exeter will call Scillies Approach for a weather update at least 10 minutes flying time East of the LND VOR, and, if IAPs are in operation should be in receipt of an IFR clearance (Cleared Level at the IAF and EAT based on the aircrafts' ETA) prior to entering the LERMZ;

NOTE: *Rapidly changing weather conditions may preclude the above notice being achievable. If this occurs Scillies Approach will endeavor to achieve the Deconfliction Minima under a Procedural Service, and allocate levels and EATs appropriate to the aircraft's current position and ETA.*

   e) Pilots wishing to continue receiving a Radar service from Culdrose or Newquay radar within the LERMZ must ensure that they are transferred to St. Mary's ATC in sufficient time to enable the safe change from a radar-based service to a Procedural service i.e. before reaching LANLO.

2. During periods where the weather criteria require IAPs and IFR departures from St. Mary's, St. Mary's ATC will:

   a) Request the type of ATS Service required by the Pilots of departing flights;

b) Endeavour to provide the service requested;

Issue a departure clearance aimed at achieving the Deconfliction Minima.