

Stage 5 Clarification Questions for ACP 2015-04 2nd set.



#	Submission Document Name, Page/Para	Question/Issue	Tech/Conslt/ Env/Econ/ ATM/IFP/ General	Date of response	Response – State if and where a submitted document will be changed.
1	LoAs.	Garforth – supplied draft LoA, with caveat ‘if the need arise’; what does this mean? Have Garforth been engaged with? Safety Case para 7.2.3 states that Garforth is a minor consideration but an LoA ‘will be established to cover any coordination required’. Tong – is an LoA with Tong required? The supplied NPAS (Carr Gate LoA) references Rwy 06 and LEA not Sherburn?	Tech/Conslt/Gen		We have updated the LoA wording re Garforth. No LoA with Tong is required. The NPAS LoA has been corrected.
2	ACP Para 1.4	It states that this ACP, ‘ <i>Specifically, the proposal meets the criteria specified at Part 1C, paragraph 356</i> ’. However, supporting evidence has not been provided. On page 7 you state there are approximately 35,000 aircraft movements annually and ‘ <i>The level of flying activity at the aerodrome has been relatively consistent and has recovered considerably since the lifting of Covid-19 related restrictions</i> ’. Please provide a forecast for the baseline year and first two years after introduction of the ACP, in addition to supporting evidence for the remaining criteria so that the regulator can determine if CAP 1616 para 356 has been met.	Env		More justification has now been included in an updated ACP document. Please see table in the new ACP document.

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3	ACP page 5, page 8, Safety Case para 7.2.5.	<p>You state <i>‘Both IFR and training use under VFR will require prior permission from SAC and an allotted slot time. There will be a maximum of 1 approach per hour, at either Leeds or Sherburn. Slots will be allocated on a first come, first served basis’.</i></p> <p>It is also stated <i>‘Currently the SAC flight training organisation operates round 100 flights per year that involve training pilots for flight under Instrument Flight Rules, normally operating under VFR with an approved instructor providing the training and look out. We do not anticipate a significant increase in overall traffic of this type.’</i></p> <p>In the Sep submission it was estimated that an <i>‘utilisation 2/3 a day when weather conditions are poor averaging one per day’.</i></p> <p>We asked if this over a year, but the question was not answered.</p> <p>Please confirm that the estimated usage will be 100 training slots a year and an average of 1 IFR slot a day could occur? Would it be reasonable to determine that up to 500 slots could be booked/used over a year? Will training be for practicing the procedure, or will the procedure used to practice flying a recovery in IMC? What is an ‘unofficial’ approach, if every approach requires a slot?</p>	Tech/Gen		<p>SAC believe an average of two per day is realistic.</p> <p>The reference to 100 training flights was not intended to specifically indicate an estimated 100 training flights on the IAP per year. Having revisited this figure, SAC now believe the figure is closer to 200 training flights.</p> <p>The ‘training flights’ figure is an approximate indication of the existing number of flights from Sherburn which involve training pilots for flight under IFR/in IMC. It is reasonable to assume that many of these flights will utilise the IAP once it is in place, but most of these will not be ‘new’ movements – they will mostly be IFR training flights that are already taking place but currently terminate in a visual approach. Such training flights, using the IAP or not, will take place under VFR.</p> <p>The reference to ‘unofficial approaches’ in the safety case was originally referring to pilots possibly flying the trajectory of the IAP without any prior agreement with SAC, we have deleted the term ‘unofficial’ and implemented alternative text in the safety case.</p>

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4	<p>Safety Case 7.2.4 - Conflict between traffic flying the approach and visual circuit traffic</p> <p>Safety Case 7.3.3 – Integration at Sherburn</p> <p>ACP Page 18</p> <p>Pilot Brief v1.20 paras 34, 38, 54 - 61</p>	<p>References mitigation, procedure 6.2.3; there is no 6.2.3?</p> <p>Para 7.2.4 states that <i>‘when cloud base is above 1200ft AAL, approach traffic shall adopt normal visual joining procedures and integrate visually from the overhead or dead side.’</i></p> <p>Additionally:</p> <p><i>‘When the cloud base falls below an estimated 1,200 ft AAL, training in the visual circuit by SAC aircraft use is no longer permitted in accordance with the SAC Flying Order Book and Aerodrome Manual. VFR arrivals and departures may still take place, but these would likely be very infrequent during such conditions’.</i></p> <p>Para 7.3.3 states that <i>‘it shall be the general rule that when the cloud base is approximately 1,200 ft AGL or more aircraft shall adopt normal visual joining procedures (normal join is overhead at 2,000 ft) appropriate to the prevailing conditions. This should reduce the likelihood of encountering visual traffic both inside or outside the ATZ’. ‘...if VMC prevails at Sherburn, pilots must adopt visual joining procedures as soon as they are in VMC and confident of maintaining VMC until landing’.</i> <i>‘SAC does not normally continue circuit training when the cloud base is assessed to be 1,200 ft AAL or below’.</i></p> <p>On page 18 of the ACP, it states, <i>‘Ensuring that if traffic on the IAP is in VMC prior to entering the ATZ they follow normal visual joining procedures and integrate with any visual traffic; and when the cloud base is 1200 ft AGL or lower, local</i></p>	Tech/Gen		<p>We have updated the paragraph numbering in the safety case to ensure it is consistent.</p> <p>We have further clarified the wording in the relevant documents to remove inconsistencies between words such as ‘shall’, ‘must’ etc.</p> <p>The term ‘visual circuit’ refers to VFR traffic that is specifically forming a traffic circuit around the aerodrome, whereas VFR arrivals/departures may or may not constitute visual circuit traffic.</p>

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		<p><i>procedures do not allow VFR traffic in the aerodrome circuit.</i></p> <p>Para 34 Pilot brief: <i>'To avoid conflict with VFR operations the IAP is not normally available when the cloud at SAC is above 1200ft'.</i></p> <p>Para 38 Pilot brief: <i>'...if good VMC prevails, pilots are strongly encouraged to proceed under VFR as soon as practicable.'</i></p> <p>Para 54 Pilot brief: <i>'In general the use of the Sherburn circuit for training stops when the cloud base is at 1200ft or below. But other VFR traffic could be in the circuit.'</i></p> <p>Paras 57, 58 and 59 all use the phrase <i>'recommended'</i>.</p> <p>Please explain the difference between use of the wording 'visual circuit' and 'VFR arrivals/ departures'; the scenarios will create different risks, so they must be clearly described.</p> <p>There is contradictory language, which could be confusing; please explain why 'shall' or 'must' vs 'recommended' is used in the ACP, Safety Case and Pilot Brief?</p>			
5	Safety Case Para 7.2.2, 7.2.3, 7.2.4, 7.2.6,	There is no para 7.2.9 referenced. There is no para 6.2.4. There is no Para 6.2.3. There is no para 6.4. There is no para 6.2.4	Tech		This has been corrected.
6	ACP Page 5 and Safety Case para 7.2.5. Meeting with CAA Apr 21.	Its now clearer in the ACP that the IAPs will be used for 'training purposes'; in the meeting held with the CAA 23 Apr 21, SAC confirmed that <i>'the procedures will be implemented solely for providing operational resilience and safety in IFR conditions'</i> .	Tech/Gen		The training for the use of the procedure will take place in VMC. The previous statement was not intended to imply that pilots would not be permitted to fly the procedure under VFR for training purposes. The statement quoted remains the purpose for

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		Please explain what is meant by training purposes (is it to train for the procedure in poor weather, or simply to train students for the procedure?) and how the training aligns with the previous statement?			<p>implementation – but if you are going to implement an IAP it seems reasonable to allow training on the IAP by SAC approved pilots.</p> <p>For the purposes of projecting the utilisation rate, we have decided to just estimate an overall average of 2/day, which includes both use of the procedure ‘for real’ in IMC/IFR and training flights that will take place under VFR.</p>
7	Safety Case Para 7.3.4, LBA and DSA LoAs, Pilot brief paras 61, 62. ACP paras 5.1 and 5.5.	Please clarify when the MAPs can be used (ie does contact need to be made with a radar unit?) and what ‘should’, ‘shall’, ‘must’ be done in order to mitigate any risk that has been determined.	Tech		<p>The missed approaches will always be available to an aircraft conducting the IAP – that is a fundamental requirement of flying an approach procedure.</p> <p>In the early years of the IAP development (2016-18) it was suggested to SAC by the CAA that LoAs with LBA and DSA airports should be established. These associated procedures request that pilots attempt to obtain a UK FIS service prior to the IAP and during portions of the MAP. These services are not guaranteed by the relevant ATC units but it is not intended to imply that the unavailability of a ATC service prevents the use of the missed approach – it is only requested that pilots makes use of one if it is available. The risk is considered acceptable either way.</p>

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8	Safety Case 7.2.6, Pilot Brief Para 47.	How does the pilot brief mitigate the risk, stated in the safety case?	Tech		The pilot brief specifically draws attention to the risk of infringement of DSA airspace, thereby providing mitigation.