

OPEN LETTER

24th September 2024

BLACKPOOL AIRPORT DEVELOPMENT PROPOSALS – LOSS OF RUNWAY CAPACITY

I would like to draw to your attention certain matters arising from the proposed development at Blackpool Airport which will have a significant impact upon its' operational future.

Irrespective of the numerous town planning issues arising from the proposed solar farm development - which will be a matter for debate following the submission of any planning application - the recently submitted EIA screening application indicates that, as a result of the scheme, runway 13/31 will be closed. The rather off-hand justification for the loss of such an important asset (justified on only 1 years' data) requires more detailed consideration before irreversible actions are taken that will permanently impact the future use of the airport.

A solar farm can be sited almost anywhere, an airport runway cannot. Once that runway is lost to use there is no prospect of it ever being replaced. And the retention of runway 13/31 is of significance not only as a means of supporting the primary business users of the airport, but also for flight safety reasons.

The department of Transport publication 'Flightpath to the Future' (DoT 2022) acknowledges that:

"Aviation also has a central role in delivering local benefits across the UK. This includes championing the levelling up agenda, strengthening union connectivity, boosting economic success, and supporting local jobs. It is important to recognise the role our extensive airport, airfield and aviation infrastructure network plays in providing benefits to local communities, as well as supporting associated supply chains and the aerospace industry"

"The aviation sector as a whole will have an important role to play in supporting these ambitions. This includes through grassroots General Aviation, which can offer a test bed for innovation through the availability of smaller aircrafts, as well as our important airfield network to support trials. Regional airports and new vertiports will have the opportunity to play a key role as these new vehicles offer local and regional travel options.

In particular, Chapter 8 clearly recognises that; *"General Aviation (GA) forms the grassroots of aviation in the UK and has a vital role to play in the wider sector's success over the coming years"*.

Therefore, it is incumbent upon developers, those responsible for operating the airport, and the two local authorities concerned, to definitively demonstrate and fully justify - in public - why there is no longer any need for runway 13/31, before it is permanently lost.

Blackpool Airport

Blackpool is one of the busiest airports in terms of aircraft movements in the UK. Civil Aviation Authority (CAA) data for 2023 shows that Blackpool is ranked 15th in the UK, excluding the London Airports. It is the 3rd busiest in the North-West after Manchester and Liverpool, both of which have substantial commercial passenger operations. Blackpool has more aircraft movements than Leeds-Bradford.

The primary user of the airfield are the flying clubs with flight training being their main role. They consistently represent some 50% of annual movements. The other key user is private flights. Together they provide some 70-80% of annual movements (See Appendix 1). These activities are undertaken almost exclusively in single engine light aircraft.

Blackpool has some 9 flying clubs, the most on any airfield in the North-West, including Cumbria. The next nearest clubs (other than small microlight concerns) are at Manchester (Barton) and Liverpool some 50 miles away. Barton is a grass airfield close to Manchester Airport and susceptible to closure after heavy rain. Liverpool is a busy commercial airport and their training aircraft regularly use Blackpool instead of staying local to Merseyside. The same applies to training aircraft based at Leeds.

Blackpool is therefore an important regional asset for light aircraft training as much as it is for its' home businesses.

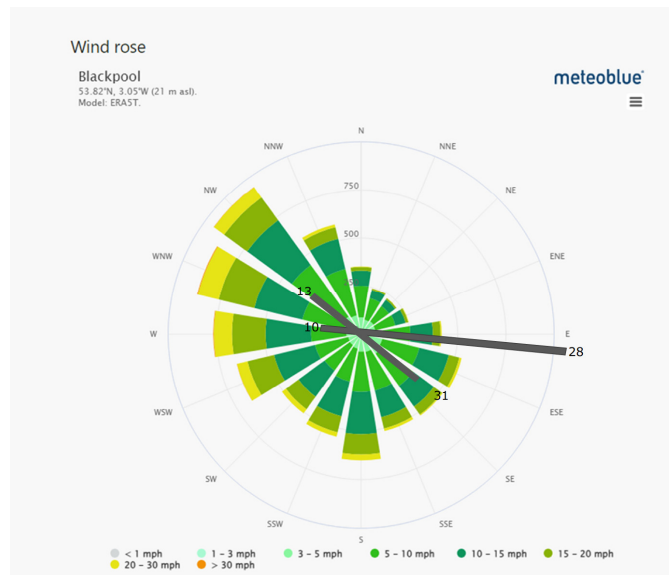
Airline and commercial aviation operations have come and gone, but flight training and general aviation has been the financial lifeblood of Blackpool Airport for many decades. The proposal to lose runway 13/31 will impact primarily upon the predominant long-term users of the airport. The consequential financial and employment impacts upon those businesses resulting from a direct removal of an important asset should be factored into any decision.

Why is runway 13/31 such an Important Asset?

The fundamental requirement for any successful airport is to have runways of sufficient length and suitable direction. Aircraft of whatever size endeavour to take-off and land into wind. The wind direction need not be directly in line with the runway direction at all times, but there are limits. And this is the crucial point. All aircraft have crosswind limits. Although helicopters can manoeuvre more easily to face into wind, the rig helicopters at Blackpool still use the surfaced runways for take-off, landing and taxiing.

Being an open coastal location, where wind direction and strength can vary considerably over relatively short time periods, the original airfield was built with runways in varying directions that ensured the airfield was useable pretty much all the time. Having alternative runways that favour a range of into-wind directions for take-offs and landings is therefore extremely valuable, and this is particularly so for light aircraft.

The main runway at Blackpool is orientated East-West (10/28). The secondary runway (13/31) is oriented almost North-West/South-East. The reason runway 13/31 has been retained where other runways on the airfield have been closed over the years is due to its importance in relation to the second most predominant wind direction after East-West. The following graphic shows a wind rose for Blackpool over which the runway directions have been overlaid. It is quite evident that runway 13/31 is very usefully aligned.



The wind rose shows how many hours per year the wind blows from the indicated direction.

Whilst pilots are trained to take-off and land taking crosswinds into account, if the wind is of sufficient strength and angle relative to the runway heading which results in crosswind limits being exceeded, then it would be dangerous to attempt a landing (or take-off for that matter). The runway may become unavailable completely until the wind direction/strength returns to within flyable limits.

Light aircraft generally have published crosswind limits of around 15-17 knots. It is important to recognise though that these are test pilot demonstrated limits. Private pilots of varying capabilities will likely set themselves lower limits commensurate with their level of experience. Flight training operations set wind strength and crosswind limitations for their trainees. These are generally lower than the maximum demonstrated crosswind for the particular aircraft concerned. Even commercial operators apply maximum crosswind limits as part of their safety parameters.

And these crosswind limits are just as relevant - and potentially more so - to any future electric aircraft.

The loss of runway 13/31 does not mean that aircraft can just simply transfer to the main runway instead. It may mean that they cannot land or take-off at all.

If the principal users of Blackpool airport (the flying training organisations) are restricted to only using the main 10/28 runway in the future, their business operations will be impacted as a result. For example, the decision to send a trainee on a practice flight, where the wind direction is variable and may potentially present the student with an out of crosswind limits landing, will result in not flying at all. Therefore, loss of business to the club and loss of revenue to the airport.

Private aircraft hoping to fly into and out of Blackpool will also make judgements about wind direction and not use the airport if the wind is, or is likely to be, out of limits. This is part of any pilots' pre-flight assessment. The benefit that Blackpool has is the option to use a runway that is more directly into the most common prevailing winds.

The EIA submissions indicate that runway 13/31 was used only 4% of the time in 2023. However, this is an essential 4% not a discretionary choice. The use was almost exclusively

by flying club and private light aircraft. Irrespective of the level of use, if that runway closes the use will not transfer to the main runway, it will mean a direct 4% loss in movements and hence revenue.

The loss of this runway would therefore be a self-inflicted reduction in potential income.

Operational safety may also be compromised. Blackpool's runway 13/31 is the only accessible North-West /South-East oriented runway within 60 nautical miles. The nearest runway at Barrow is closer, but not open to use by general light aircraft. The next nearest available airfields with a NW-SE oriented runway (including Sleaf-57nm, Carlisle-70nm, Wolverhampton-80nm and Leicester-100nm) all close by 6pm.

A diversion due to a change in wind direction that would make a landing unsafe at Blackpool on the single remaining runway would involve a considerable additional flight to another airfield that may not be as readily available. The same applies to aircraft unable to land safely at their chosen airfield who could divert to Blackpool's runways instead.

And, looking ahead to future light aviation, this becomes even more significant. The Pipistrel VELIS Electro is the world's first fully electric aircraft to receive type certification. This has been developed primarily for private and commercial flight training. It has an endurance of 50 minutes plus a 20-minute reserve. This restricted flight time would present severe limitations in even reaching an alternative airfield if crosswinds prevented landing on the main runway.

Blackpool aspires to re-introducing a commercial service to the Isle of Man using relatively small airliners. City Wings who operated to the Isle of Man were not infrequent users of runway 13/31 due to their operational safety requirements in relation to crosswinds.

Runway 13/31 therefore provides a valuable aviation asset not just for the flying clubs and private flight users, but for commercial operations as well, and is of wider benefit to the aviation community as a whole.

Other Consequences

There are unintended consequences that would result from this closure. The loss of the runway will not only affect airport income through permanently lost movements, but if the landlord is deliberately removing an asset of significance to the tenants, which they have relied upon as part of their business operation for decades, it is only to be expected that lease negotiations for rent reductions will result.

The juxtaposition of a solar farm so close to the main runway will introduce issues of glare and hence flight safety.

There is the latent risk of losing the airport completely, by virtue of deliberately causing a permanent reduction in movements that could then justify reduced operations; and the spiral of decline associated with constantly trimming back as a result.

Fylde Council's strategic policy in relation to Blackpool Airport notes inter alia that;

"the continuing operation and viability of the airport as a sub-regional facility will be supported"

The inadvertent, or deliberate, loss of runway 13/31 is fundamentally contrary to this strategic objective.

I recognise that whilst there is a cost associated with retaining runway 13/31 in use, there could be a far greater financial impact from its loss, which will materially affect those small businesses which have continued to sustain Blackpool Airport as an operational entity for so long.

I would ask that you give particular attention not just to the current proposals for the solar farm development, but to any proposals that would materially impact or effectively cause the loss of this important aviation asset.

Thank you.

Yours sincerely



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APPENDIX 1

BLACKPOOL AIRPORT STATISTICS							
	Total Movements	Air Transport Total	%	Aero Clubs	%	Aero and Private	%
2023	38918	5128	13	23092	59	31378	81
2022	37259	3694	10	21096	57	29140	78
2021	39587	816	2	23252	59	30791	78
2020	25404	3694	15	12429	49	17557	69
2019	36289	5084	14	20545	57	27499	76
2018	37526	5870	16	19524	52	27366	73
2017	33429	6628	20	15912	48	23173	69
2016	33749	8158	24	16166	48	22927	68
2015	33075	7830	24	16793	51	22524	68

Taken from CAA Movements Returns

