

## PE1804/P

Petitioner submission of 30 October 2020

In communications with HIAL managers the Benbecula Community Council (BCC) and Far North Aviation based at Wick Airport have found out that the HIAL Board have made their decision to downgrade the air traffic service provision at Benbecula and Wick airports without any supporting operational safety assessments or formal operational Safety Cases.

Regardless that the Safety Cases have not yet been written, HIAL are now pressing on with implementing their decision, which have flight safety and flight regularity implications.

Both Communities (Benbecula & Wick) have stakeholders, retired pilots/air traffic controllers who have the technical understanding to either comment on or review these Safety Cases when they written. Will HIAL permit any stakeholder involvement, the BCC suspect not.

One of HIALs Managers has recently advised a stakeholder at Wick '*the Flight Information Service unit would still allow most normal operations to take place*'. This is a very glib statement for HIAL to make, considering that the operational Safety Cases have not been written.

Using HIAL Islay airport as an example where Flight Information Service is the level of air traffic service provided, the following information is officially published under type of traffic permitted at the airport. (Instrument Flight Rules (IFR) /Visual Flight Rules (VFR)) The Aeronautical Information Publication (AIP) states VFR.

Additionally, under Flight Procedures in the same document there is a warning: - Use of RNP (*effectively IFR*) procedures at this Aerodrome restricted to Highlands and Islands Airports Ltd - Approved Operators only. This raises the question how do IFR customers gain access to Benbecula and Wick if the airports are downgraded to the likes of Islay, and what is the HIAL the criteria required to become an HIAL 'Approved Operator'. i.e. for pilots to use the instrument flight procedures to enable an approach to the airport in bad weather. The latter point is not published, and no one from HIAL has commented or expanded on this issue.

At Wick ad-hoc flights like the Atlantic or North Sea fuel-stops are serviced by Far North Aviation, or in the case of Benbecula, any charter flights in support of the QinetiQ firing ranges would only be able to operate when the weather was good, (i.e. no low cloud or visibility) if the operators were not HIAL 'Approved'. This has knock on implications for local businesses.

The BCC has enquired from the UK CAA about the criteria required for Controlled Airspace. Both Benbecula and Wick would meet their criteria for making an initial application. One of the criteria required is shared use of the surrounding airspace with the controlled airspace being established around user requirements. We believe that HIAL have mis-informed both communities on this aspect. The justification for the change of policy from HIAL since January 2020 seems to be saving costs at Benbecula and Wick to help finance the Remote Tower Project at its other locations.

The BCC through the Caithness Chamber of Commerce understand that there will be no provision for Public Service Obligations (PSO) route(s) to/from Wick until 2023 allowing for the various Sc Government processes to be put in place. The BCC & Far North Aviation, Wick airport suspect that the number of airlines who would be prepared to tender for a PSO air route where Aerodrome Flight information was the level of air traffic service provision would be extremely limited. Both communities know that Loganair have no issues with this, however other air operators might not be able to tender on this basis. This also affects Benbecula, as there is a PSO route to/from Stornoway sponsored through Comhairle nan Eilean Siar. The BCC knows that PSOs are periodically retendered. The re-tendering process also applies to Royal Mail flights, Benbecula is a destination for such flights. What happens in the future if the Royal Mail awards their contract to another air operator? In both scenarios, the 'downgrading' plan has the potential to lead to less than competitive tendering.

The 'downgrading' does nothing to future proof the airports and their communities in terms their long-term viability as it somewhat relies on current air operators which may or may not be around in the future.

To conclude, it would be useful for community stakeholders in Caithness, the Uists and Benbecula to be able to directly communicate with the HIAL Board over their Air Traffic Service (ATS) downgrading policy in respect of Wick and Benbecula. To date, although there has been communication with HIAL, it has so far been at employee level, albeit managers who have no option but to put forward the HIAL Boards policy and who are unable to field immediate answers to questions raised. Employees are for obvious reasons unable to talk through the Boards thought process on its decision to downgrade the ATS provision.

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