

## PE1804/Z

Petitioner submission of 1 December 2020

Thank you for the invitation to provide further additional new evidence in support of our Petition.

We note that Air Navigation Solutions (ANSL) the Air Navigation Service Provider at both Edinburgh, and London (Gatwick) airports made reference to *'the delivery of a 'greenfield' Air Traffic Control (ATC) validation, which enabled Carlisle Airport to recommence commercial air traffic operations after more than 25 years.'* ANSL omitted to state that this was to re-establish full ATC with Approach Control for the airport to accept traffic, mostly schedules, which would require the use of the airport's Instrument Approach aids in bad weather. Scheduled flights at Carlisle pre-COVID-19, were less than those at either Benbecula or Wick. Airspace surrounding Carlisle has the same aviation classification as that at Benbecula and Wick, with similar complexity and adjacent areas of aerial military activity. (Note: Carlisle operations are currently suspended due to COVID-19)

HiAL state in their own submission that they have *'safely and effectively provided AFIS services at four of its airports for a number of years, just as other aerodromes do elsewhere in the UK.'* This statement should be qualified for the benefit of airport stakeholders and the general flying public.

HiAL have now admitted that *'HiAL Approved'* flights operating in bad weather (low cloud and/or visibility) at their AFIS airports maybe allocated Arrival/Departure times at 30-minute intervals. The Petitioners while accepting that this is an effective safety mechanism, re-emphasise that on occasion, significant flight delays in bad weather will occur should more than one aircraft wish to operate, inbound or outbound, within the same 30-minute window.

We understand that Gamma Aviation, Air Ambulance operator and Loganair are the exclusive HiAL *'Approved operators.'* We are still looking for answers from HiAL officials on the process, criteria and timescale used for other operators to apply to become *'HiAL Approved'* at their AFIS airports. We suspect that HiAL have no processes in place and that no additional operators can be added to the *'approved'* list. This lack of transparency from HiAL officials in our opinion falls short of the recommendations of the National Standards for Community Engagement.<sup>1</sup>

The *'other aerodromes elsewhere in the UK'* to which HiAL refer do not for the most part have scheduled services. They are general aviation<sup>2</sup> or restricted use aerodromes. At those with schedules, using the two Scottish examples, Oban and Lerwick, Instrument Approaches procedures do not exist. Pilots of aircraft arriving at these locations fly in visual contact with the surface. This information was obtained from the official UK Aeronautical Information Publication and airline schedules.

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<sup>1</sup> [NSfCE online\\_October.pdf \(voicescotland.org.uk\)](#)

<sup>2</sup> General aviation is defined as a civil aircraft operation other than a commercial air transport flight operating to a schedule or military aviation.

In November 2020 HIAL appointed a consultancy company Osprey CSL<sup>3</sup> to assist them in delivery of their ATMS Programme. The petitioners understand that local aviation companies have been in communication with Osprey, suggesting that the company draws on local and recent experience to gather the information that they need, particularly as there is nobody on their ATMS team with HIAL experience.

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<sup>3</sup> Aviation | Airport | Defence | Renewables Consultancy - Osprey Consulting Services Limited (ospreycl.co.uk)