

Item: 12

Development and Infrastructure Committee: 4 February 2025.

Civil Aviation Authority – Inspection of Council Airfields.

**Report by Corporate Director for Enterprise and Sustainable
Regeneration.**

1. Overview

- 1.1. As a licensee for the North Isles airfields, the Council is subject to a Civil Aviation Authority (CAA) inspection annually, alternating between an aerodrome audit one year and a desk top audit the following year.
- 1.2. The desktop audit, carried out in October 2023, was reported to the Development and Infrastructure Committee on 10 September 2024 following response to the CAA findings and observations.
- 1.3. The on-site airfield inspections were carried out during the period 13 to 15 August 2024 to verify continued compliance with national licensing requirements as set out by the CAA.
- 1.4. The audit found no Level 1 non-compliance items across the six airfields but identified two Level 2 findings and 21 observations as detailed at Section 3 of this report.
- 1.5. The CAA oversight report is attached at Appendix 1 to this report, outlining the audit scope and findings.

2. Recommendations

- 2.1. It is recommended that members of the Committee:
 - i. Scrutinise the CAA Oversight Report, attached at Appendix 1, together with the Council’s response to the Level 2 findings and observations, outlined in section 4 of this report, in order to obtain assurance that the Council-owned airfields are operating in compliance with national licensing requirements.

3. Background

- 3.1. Aerodrome inspections and the closing of remedial actions are a condition of the Aerodrome Operating Licence. Failure to close out remedial actions to an agreed schedule, and/or the issuing of a Level 1 non-compliance creating a significant safety hazard, will result in the withdrawal of certification and the resultant closure of the Council's airfields.
- 3.2. Level 1 non-compliance creating a significant safety hazard is reported to the Accountable Manager for action if a major failure of compliance has been identified with the aerodrome licensing requirements set out in either the Air Navigation Order, the Aerodrome Licence, ICAO Annex 14 or Civil Aviation Publication (CAP) 168.
- 3.3. If any Level 1 items are reported, the major failure of compliance must be rectified immediately or within the short timescales indicated. Failure to do so will result in the CAA having to take regulatory action, which could result in suspension of the Aerodrome Licence. Any Level 1 findings would be highlighted to this Committee for discussion and appropriate action as appropriate.
- 3.4. Level 2 items are reported to the Accountable Manager for action if it has been identified that the Aerodrome is not in full compliance with the aerodrome licensing requirements set out in either the Air Navigation Order, the Aerodrome Licence, ICAO Annex 14, Civil Aviation Publication (CAP) 168 or the Aerodrome Manual.
- 3.5. If any Level 2 items are reported, the CAA Aerodrome Oversight team must be informed that these items have been rectified by the dates agreed during the inspection and shown in the Latest Correction Date Box. Failure to rectify any items within the agreed time scale may result in the CAA having to take regulatory action, which could result in suspension of the Aerodrome Licence.
- 3.6. An observation may be raised where there is potential for future non-compliance if no action is taken, or where the CAA may wish to indicate an opportunity for safety improvement or something that is not good practice. Corrective action is not obligatory for an observation, but acknowledgement and the identification of any intended action is expected. If the Council reject an observation, then the licensee must justify their rationale.

4. CAA Audit Findings and Observations

4.1 Overall, the feedback has been positive from the CAA inspections, recognising the commitment of the Council to continuously improve and maintain the airfields in a safe, fit for purpose condition. The desktop Audit Level 2 findings and observations are summarised as follows:

Requirement	Details	Action
<u>Findings</u>		
CAP 168, Chapter 3, paragraph 3.51 – Code 1 Runway Strip Requirements	<p>It was highlighted during the audit that the cleared and graded area surrounding the runway 03-21 at North Ronaldsay was non-compliant with the regulatory requirement detailed within CAP 168, Chapter 3, paragraph 3.51.</p> <p>The Apron area at North Ronaldsay was within close proximity to runway 03-21 and significantly encroached the runway strip.</p>	<ul style="list-style-type: none"> • Observation closed on 23/12/24. • OIC to ensure that the Apron area is fully safeguarded and free of any obstacles should runway 03-21 be used by any landing/departing aircraft. • Safety briefing given to all staff to ensure the Apron area remains free of any obstacles. • Discussions carried out with Loganair Chief Pilot. • Aerodrome Manual updated re: Apron Management. • Alternative parking allocated for GA light aircraft including new signage. • White lines added to ensure the Apron is kept clear of fire vehicles. • Risk assessment and procedure shared with the CAA Aerodrome Inspector. • Works completed December 2024.

Requirement	Details	Action
CAP 168, Chapter 7, paragraph 7.90 – Markings on unpaved Runways	It was identified that the runway had no edge markings to clearly delineate the boundaries of the unpaved runway at Papa Westray (runway 06-24).	<ul style="list-style-type: none"> • Observation closed on 14/11/24. • White flat rectangular markers flush with the surface, 3m x 1m, at intervals not exceeding 90m – finding closed off 14/11/24 • Frangible markers placed at intervals not exceeding 90m – finding closed off 14/11/24. • Runway threshold marker boards to clearly define the runway threshold – finding closed off 14/11/24.
<u>Observations</u>		
Assessment of 1000m Response Areas	A detailed 1000m response plan had been completed for all six airfields (July 2023) however it was recommended that these plans were regularly reviewed with local farmers and other multi-agencies to ensure that these areas remain accessible.	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • Airfield Superintendent to visit each airfield during a Scottish Fire and Rescue Service drill night in May/June 2025, along with other available agencies to carry out a walk around the area.
Airside Driver Training and Runway Incursion Prevention	All Council airfields have an airside driver training package in place however whilst reviewing it was recommended that improvements were made to the training material.	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • Additional slides will be incorporated into training module to ensure that the training is tailored to be more specific for each airfield and formal definition of runway incursion.
Aerodrome Inspection Procedures	The Airfield Superintendent carried out monthly inspections of the airfield and the OIC Lead Engineer	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • Inspections to be included/referenced in all

Requirement	Details	Action
	performed annual on-site engineering inspection. However, these were not detailed in the Aerodrome Manuals.	Aerodrome Manuals and outline compliance with CAP 168, Appendix 3F.
Aerodrome Safeguarding	Aerodrome Manuals defines the Aerodrome Safeguarding procedure however this does not include a procedure for assessing developments or tall objects such as cranes. Crane authorisation process should also be outlined.	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • Training to be provided regarding Aerodrome Safeguarding Training. • Airfield Superintendent to contact relevant stakeholders to ensure that they are aware of the process and what is required from them.
Wildlife Hazard Management – Grass Maintenance	Long grass policy stated in Aerodrome Manual in Sanday although following inspection it was evident that a short grass policy was implemented.	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • Full review of airfields wildlife surveys will be carried out and policy changes will be notified accordingly.
Safety Management System – Safety Promotion	No newsletters or safety surveys had taken place for some time. Recommended that the Safety Performance Indicators (SPI) should be reviewed in order to encourage safety reporting.	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • The issue of safety newsletters will resume bi-annually as per manuals. Going forward, safety surveys will be conducted annually and SPIs will be amended.
Aerodrome Manual – Mandatory Occurrence Reporting	Aerodrome Manuals referred to CAP 382 which is no longer valid. Reference to UK Regulation 376/2014 and IR 2015/1018.	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • All six manuals will be amended as advised.

Requirement	Details	Action
Aerodrome Manual – Battery Lighting Inspections	Aerodrome Manuals outline the process for inspecting all emergency battery lights weekly however evident that this was not taking place weekly and not always logged.	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • Procedure amended to confirm monthly inspection.
Aerodrome Safeguarding – CAP 232 Survey	Review of CAP 232 – unclear how the surveyed heights of all objects were being assessed against obstacle limitation surfaces (OLS) of the airfield.	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • Review of data will be conducted in conjunction with the next airfield surveys in 2025.
Stronsay Airfield – Location of Windsleeve	Inspection identified that the existing windsleeve would need to be relocated as it was within the centre of the worksite area for the new terminal building.	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • CAP 791 submission approved on 24 October 2024 to relocate windsleeve.
Papa Westray Airfield – Maintenance of Grass Runways	To ensure that the grass runway surface comply with CAP 168 Chapter 3 (Appendix 3A), OIC should look to source a suitable roller.	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • OIC has secured the use of a grass roller for future use.
RFFS Operational Objective – Response Times	No recording of times during exercises.	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • Amendments have been made to the record keeping to include the time, location and weather during the exercise.
RFFS Personnel Medical Assessments	OIC partially implemented a policy in 2019 for RFFS personnel re staff medical assessments however this had not been implemented.	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • Policy is currently under review. Final policy shall be shared with the CAA inspector.

Requirement	Details	Action
North Ronaldsay- Runway 13-31 Edge Markers	Inspection identified that some of the grass runway edge markers on RWY 13-31 required a paint mark refresh.	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • Resolved on 10 October 2024.
Eday Airfield Inspection/General Maintenance	Some paint markings surrounding the boundary were badly worn/not visible. Additional signage required and need to address weed/thistle growth in grass areas surrounding the runway.	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • Markings to be painted, additional signage ordered and weed/thistle growth to be managed.
Westray Airfield Inspection/General Maintenance	Some of the runway edge markings surrounding the old disused grass runway require the application of green paint to ensure no confusion by flight crews. Runway 31 threshold lights was observed to be misaligned (green/red lenses re-aligned)	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • Edge markings resolved on 24/9/24 and lights on 16/8/24
Wildlife Hazard Management	High rabbit population noted at Westray and Papay. Airfield Wildlife Management Manual should detail how they intend to control the wildlife risk at each of their airports. Local grass area map to clearly report wildlife activity should be considered for each airfield.	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • Wildlife review to be carried out for each airfield area. • Airfield Wildlife Management Manuals to be updated during 2024/25.
Authorisation of Drones	OIC to develop a procedure for the authorisation of drones at all six airfields, using CAP 722 guidance.	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • OIC to draft policy using CAP 722 guidance.

Requirement	Details	Action
Grass Apron GA Parking Areas	Grass apron areas used by small light GA Aircraft should have directional signage in the correct size and format. AIP chart should be updated to clearly illustrate the location of GA grass parking areas and outline regulations.	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • New signage ordered for airfields • Charts to be updated accordingly.
Runway Strip and Runway end safety areas (RESA)	OIC to review the survey data for all runways to ensure that the runway strip length is compliant.	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • Minimum runway strip length is available for each runway. • Total length of runway end safety areas will be noted separately on aerodrome survey documents prior to July 2025 along with any updated supporting risk assessment.
APAPI Flight Checks	APAPI (night landing) flight checks to take place every 6 months instead of annually.	<ul style="list-style-type: none"> • Observation closed on 11/11/24 • Aerodrome Manual should be reviewed to reflect a flight inspection of the APAPI's at least every 6 months. • Check of lights took place on 10 October 2024.

4.2 The table above sets out the updates completed by the Airfield Superintendent and team to address the findings and observations raised. The audit was closed off on 23 December 2024, following completion of the works at North Ronaldsay Airfield. The remaining Observations will be addressed during 2025, prior to the next desk top audit.

- 4.3 The CAA Oversight Report, attached at Appendix 1 to this report, outlines the findings and observations in greater detail.
- 4.4 Completion of reports for each airfield are required prior to the CAA arrival, highlighting the rigorous process involved with adhering to CAA inspections and desk top audits. Responding to the findings and observations also has a cost implication and results in considerable staff time to ensure the operation and airfields are maintained to the standard expected by the CAA. The cost of materials, plant and labour, carried out by the airfields team, was in the region of £8,500 to address the two Level 2 findings.
- 4.5 Safety Review Board meetings are held every four months with officers and the Chair and Vice Chair of the Development and Infrastructure Committee to discuss any areas of concern and how these would be reduced or resolved.
- 4.6 A Multi-Agency Exercise was held on 13 July 2024 in Westray involving Airfield personnel and key agency groups including NHS Orkney, Police Scotland, Scottish Fire and Rescue Service and HM Coastguard. The completion of a multi-agency exercise is a requirement of the CAA, involving a de-brief exercise and reporting process. The exercise is extremely valuable for all agency groups to gain experience working together, dealing with a mass casualty scenario.
- 4.7 The response to the Level 2 findings and observations outlined by the CAA has a significant resource and budget implication however ensures that the conformity requirements are met at each of the six Council owned airfields.

For Further Information please contact:

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Implications of Report

1. Financial

It should be noted that a maintenance programme for the runways is in progress, however, the existing budget has no provision for such works and is therefore insufficient to cover the costs. This work is required to keep the runways to a suitable standard for lifeline services and ensure compliance with the CAA. A service pressure, in the sum of £70,000, has therefore been submitted for consideration as part of the budget setting process for 2025/26, with further costs to be incurred during 2026/27.

Landing fees for charters and general aviation flights are charged in accordance with the Council Charges Register. Landing fees are proposed to be increased by 10% as part of the budget setting process for financial year 2025/26.

2. Legal

The Council requires to comply with the requirements of its Aerodrome Operating Licence. Regular inspections assist the Council in complying with such requirements.

3. Corporate Governance

Not applicable.

4. Human Resources

The CAA audit and inspection process is to ensure a safe operation which includes the safety of the airfield staff employed by the Council.

5. Equalities

An Equality Impact Assessment is not required for performance monitoring.

6. Island Communities Impact

An Island Communities Impact Assessment is not required for performance monitoring.

7. Links to Council Plan

The proposals in this report support and contribute to improved outcomes for communities as outlined in the following Council Plan strategic priorities:

- Growing our economy.
- Strengthening our Communities.
- Developing our Infrastructure.
- Transforming our Council.

8. Links to Local Outcomes Improvement Plan

The proposals in this report support and contribute to improved outcomes for communities as outlined in the following Local Outcomes Improvement Plan priorities:

- Cost of Living.
- Sustainable Development.
- Local Equality.

9. Environmental and Climate Risk

The CAA audit and inspection process identifies some environmental risks which could be addressed by the Council.

10. Risk

The CAA audit and inspection process identifies any risks to the Council so that they can be dealt with appropriately.

11. Procurement

Not relevant to the recommendations of this report.

12. Health and Safety

The CAA audit and inspection process identifies key health and safety concerns so that they can be dealt with appropriately.

13. Property and Assets

Orkney Islands Council is responsible for the six Outer North Isles airfields and associated airfield terminal buildings and for ensuring compliance with current CAA legislation.

14. Information Technology

Not relevant to the recommendations of this report.

15. Cost of Living

Not relevant to the recommendations of this report.

List of Background Papers

CAP 168 - [CAP 168: Licensing of Aerodromes | Civil Aviation Authority \(caa.co.uk\)](https://www.caa.co.uk/~/media/CAA/~/media/Information%20and%20Publications/CAP168/CAP168_Licensing_of_Aerodromes.pdf)

Appendix

Appendix 1 CAA Oversight Report (23 December 2024)



Oversight Report

Report Date:
23 December 2024

Details

Audit Reference Number ADR.300	Organisation Name Orkney Islands Council
Lead Auditor David Hindson	Audit Type AAA\Aerodromes\Onsite\Ongoing Oversight

Dates

Start Date 13/08/2024	End Date 15/08/2024	Closed Date 23/12/2024
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Overview

A periodic on-site audit was conducted at Eday, North Ronaldsay, Papa Westray, Sanday, Stronsay and Westray to verify continued compliance with national licensing requirements set out in the Civil Aviation Publication (CAP) 168 'Licensing of Aerodromes', the Air Navigation Order, the Aerodrome Licence and the Aerodrome Manual.

The Accountable Manager should confirm rectification of findings to the relevant Aerodrome Inspector by the target date shown.

Although corrective action is not obligatory for an observation, acknowledgement and any intended action should be notified to the relevant Aerodrome Inspector by the target date shown. If you reject an observation, please justify your rationale.

For finding definitions, please click the following link: <https://www.caa.co.uk/commercial-industry/airports/aerodrome-licences/licences/licensed-aerodrome-finding-and-observations-definitions/>

Audit Scope

Licensing Documentation

Aerodrome Inspection

Surveys

Apron Management

Runway/Taxiway Incursion Prevention

Aeronautical Ground Lighting (AGL)

Wildlife Hazard Management

Aerodrome Safeguarding

On-Aerodrome Developments

EC376/2014

Minimum Scale of Services to be provided

Level of Protection

Remission

Extinguishing Agents, Vehicles & Ancillary Equipment

Audit Scope

Minimum number of Staff Designated as RFFS Personnel

Training

Emergency Planning

Vehicles

Ancillary Equipment and Medical Provision

Response Time

RFFS/emergency planning theme items

Access to emergency response areas

CAA Audit Team

David Hindson

Auditees

Symeon Grayson

Findings

Findings

Number	ADR.5729	Requirement	CAP 168 - Chapter 3: Runway strips		
Details					
CAP 168, Chapter 3, paragraph 3.51 - Code 1 Runway Strip Requirements					
<p>The cleared and graded area surrounding runway 03-21 at North Ronaldsay was non-compliant with the regulatory requirement detailed within CAP 168, Chapter 3, paragraph 3.51. For a code 1 non-instrument runway, a distance of 30m shall be provided either side of the extended runway centreline, where the area must remain clear of obstacles and be fully graded, ensuring that any exposed vertical faces are not present that could endanger an aircraft in the event of a runway excursion.</p> <p>It was evident that the Apron area at North Ronaldsay was within close proximity to runway 03-21 and significantly encroached the runway strip.</p> <p>Communication with the Loganair Chief Pilot confirmed that runway 03-21 is critical to the operation, and although this is a shorter cross runway, would be used in the event of the crosswind limits for the main RWY 10-28 being exceeded.</p> <p>It was agreed that OIC would formalise a procedure to ensure that the Apron area is fully safeguarded and free of any obstacles should runway 03-21 be used by any landing / departing aircraft. The below recommendations were made during the on-site audit:</p> <ol style="list-style-type: none"> OIC to issue an initial safety briefing to all staff to ensure that the Apron area remains sterile and free of any obstacles whenever RWY 03-21 is in use. OIC to discuss the importance of RWY 03-21 with the Loganair Chief Pilot in order to fully understand the frequency of use and criticality to their operation. OIC to produce a procedure that shall form part of North Ronaldsay's Aerodrome Manual regarding Apron Management and the safeguarding of the runway strip surrounding RWY 03-21. The procedure shall also detail how both short term and long term closures of RWY 03-21 will be communicated to all flight crews in the event of any obstacles being present on the Apron area. This procedure should be supported by a risk assessment. An alternative location for GA parking was suggested, where the grass area located to north of the wall beside the Terminal building may be considered, thus ensuring that any GA Aircraft are parked out-with the cleared and graded area of RWY 03-21, with no penetration of the transitional surface. Additional information signage as detailed within CAP 168 (Chapter 7, Fig.7A.9) should be appropriately positioned to provide clear directional guidance to GA flight crew of the GA parking area, where the boundary of the GA Apron should be clearly delineated using markers / lin-laners to ensure that all other runways and taxiways are fully safeguarded, whilst providing the necessary wingtip / rotor clearances. The AIP chart should be amended to clearly illustrate the location of the GA grass Apron and section AD.2.20 of the AIP should include local aerodrome regulations regarding the use of the GA Apron and the runway restriction in force for RWY 03-21 in the event of any obstacles being present on the main Apron It is recommended that a solid white line is applied to the surface of the RFFS Station forecourt area to ensure that the parking of any fire vehicles / equipment is not positioned on the Apron. <p>Both the risk assessment and procedure shall be shared with the CAA Aerodrome Inspector for review and will form part of the safety assurance documentation to support the application for a variation to the aerodrome licence and the re-issue of form CA 1560J.</p> <p>Extended by D.Hindson on the 1st November 2024 - See correspondence from S.Grayson entitled: "20241028 Orkney Island Council On-Site Aerodrome Oversight Audit Report - Extension Request for ADR.5729 and ADR.5736", which has been uploaded to SPO.</p> <p>Closed by D.Hindson on the 23rd December 2024 - See correspondence from S.Grayson entitled: "20241203 ADR.5729 - Level 2 Finding - North Ronaldsay Response V.1" and "20241209 ADR.5729 - Level 2 Finding - North Ronaldsay Response V.2", which has been uploaded to SPO.</p>					
Level	Status	Target Date	Closure Date	Raised By	
2	Closed	20/12/2024	23/12/2024	David Hindson	

Findings

Number	ADR.5736	Requirement	CAP 168 - Chapter 7: Markings		
Details					
CAP 168, Chapter 7, paragraph 7.90 - Markings on unpaved Runways					
During a walking inspection of runway 06-24 at Papa Westray it was identified that the runway had no edge markings to clearly delineate the boundaries of the unpaved runway.					
In accordance with CAP 168, Chapter 7, paragraph 7.90: "where aircraft performance considerations necessitate the notification of field lengths for a grass aerodrome, the boundaries of unpaved runways and stopways should be delineated by runway edge markers visible from an aircraft on the approach at a range of at least 2km. Delineation should be effected by either of the following methods:					
1. white, flat, rectangular markers flush with the surface, 3m long, 1m wide and spaced at intervals not exceeding 90m; or					
2. frangible markers single-coloured to contrast with their background and firmly secured to the surface spaced at intervals not exceeding 90m; the height of the markers should not exceed 500mm.					
3. Due to the difficulty of placing edge markings to define the threshold marking of RWY 24 (due to the hardcore / gravel surface), Runway threshold marker boards should be positioned either side of the runway in order to clearly define the runway threshold that is displaced due to the starter extension. See CAP 168, Chapter 7, figs. 7.23(d) and 7.34.					
Extended by D.Hindson on the 1st November 2024 - See correspondence from S.Grayson entitled: "20241028 Orkney Island Council On-Site Aerodrome Oversight Audit Report - Extension Request for ADR.5729 and ADR.5736", which has been uploaded to SPO.					
Closed by D.Hindson on the 14th November 2024 - See correspondence from G.Grayson entitled: "20241113 Level 2 Finding ADR.5736 - Works Complete V1.1.					
Level	Status	Target Date	Closure Date	Raised By	
2	Closed	20/12/2024	14/11/2024	David Hindson	

Observations

Number	ADR.5715	Requirement	CAP 168 - Chapter 8: Difficult environs, the 1000m area and access roads		
Details					
Observation: Assessment of 1000m response areas					
Although all six airfields had a well detailed 1000m response plan, which were last reviewed in July 2023, consideration to regularly review these plans with local farmers and other multi-agencies that would be expected to respond within these areas will prove beneficial in ensuring that these areas remain accessible. Failure to regularly asses these areas could result in the 1000m response plan being inaccurate and not reflecting the current environment. CAP 168, Chapter 8, paragraph 8.130 details areas to be considered whilst performing an assessment of the approach and departure areas within 1000m from the threshold.					
Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO. The Airfield Superintendent will visit each airfield during a Scottish Fire and Rescue Service drill night in May/June 2025, along with any other available agencies, to carry out a walk around the area.					
Level	Status	Target Date	Closure Date	Raised By	
AAA-Observations	Closed	18/11/2024	11/11/2024	David Hindson	

Number	ADR.5716	Requirement	Runway/Taxiway Incursion Prevention		
Details					

Observation: Airside Driver Training and Runway Incursion Prevention

It was evident that all OIC Airfields had an airside driver training package in place, however, whilst reviewing lecture 11 it is recommended that the below improvements are made to the training material, where CAP 790, Appendix B provides good guidance material:

1. Include Airfield topography and a map of each local airfield to ensure that all drivers are made aware of the general geography of their local aerodrome, an understanding of airfield paint markings and signage, airfield terminology, including definitions of runways, Taxiways, Apron Areas, cleared and graded area and any local restrictions at each of the airfields i.e. GA Parking areas etc.
2. Include procedures for how to deal with RT failures.
3. Include the ICAO definition of a Runway Incursion to ensure that all staff are fully aware of not only the definition, but also the potential consequences of such an event. The formal ICAO definition of a runway incursion is as follows: "Any occurrence at an aerodrome involving the incorrect presence of an aircraft, vehicle or person on the protected area of a surface designated for the landing and take-off of aircraft".

Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO. Additional slides will be incorporated into training module 11 to ensure that the training is tailored to be more specific for each airfield, which will include a procedure for dealing with RT failures and the formal ICAO definition of a runway incursion.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	18/11/2024	11/11/2024	David Hindson

Number	Requirement
ADR.5717	Appendix 3F Aerodrome pavement maintenance and inspection procedures

Details

Observation: Aerodrome Inspection Procedures

It was evident that the Airfield Superintendent carried out monthly inspections of the airfield and that the OIC Lead Engineer performed annual on-site engineering inspections. Note however that these inspections were not detailed within the Aerodrome Manuals. It is recommended that these inspections are included in all of the Aerodrome Manuals and that further details regarding the inspection regime are detailed within section 5, paragraph 5.6 to clearly detail how their inspection regime complies with CAP 168, Appendix 3F.

Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO. Information from David Custer, Lead Engineer and Symeon Grayson, Airfield Superintendent will be added as advised.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	18/11/2024	11/11/2024	David Hindson

Number	Requirement
ADR.5718	Aerodrome Safeguarding

Details

Observation: Aerodrome Safeguarding

Section 4, paragraph 4.21 of the Aerodrome Manuals very briefly defines the Aerodrome Safeguarding procedure, however, a separate AOI detailing the Aerodrome Safeguarding procedure for assessing developments or tall objects such as cranes should be clearly defined to ensure that none of the obstacle limitation surfaces (OLS) surrounding the airfield are penetrated. The procedure should also include the process for reporting any obstacles via NOTAM or AIP entry. It is highly recommended that the Airfield Superintendent should attend an aerodrome safeguarding course to further enhance his current knowledge of Aerodrome Safeguarding.

With regards to crane operations, OIC should engage with the their local planning authority and local crane operators to make them aware of the crane authorisation process (www.caa.co.uk/commercial-industry/airspace/event-and-obstacle-notification/crane-notification/) and their requirement to notify the Aerodrome and the CAA using the ACOMS system via the CAA Customer portal. Notification is required if a crane is:

1. To be used within a 6km radius of the ARP, operating above the height of 10m above ground level (AGL) or that of surrounding structures or trees, if higher or
2. To be operated at or above a height of 100m AGL regardless of location or height of surrounding structures.

Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO. Airfield Superintendent already in contact with a training provider regarding aerodrome safeguarding training. The Airfield Superintendent will write to the relevant stakeholders to ensure that they are aware of the process and what is required from them.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	18/11/2024	11/11/2024	David Hindson

Number	ADR.5719	Requirement	Wildlife Hazard Management		
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Details

Observation: Wildlife Hazard Management - Grass Maintenance

Section 4, paragraph 4.19 of Sanday's Aerodrome Manual (Version 6.10, dated 13th February 2024) states that a long grass policy (LGP) is in place as part of their wildlife hazard control plan. Whilst inspecting the Airfield, it was evident that Sandy was trialling a short grass policy, which did not comply with the recommended grass height of 220mm to 300mm as specified within CAP 772. Should OIC decide to adopt a short grass policy and deviate from the LGP detailed within CAP 772, appropriate safety assurance documentation should be provided, detailing how the wildlife strike risk will be effectively managed.

Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO. A full review of all of the airfields' wildlife surveys will be carried out by the Airfields Superintendent, and will notify of any policy changes accordingly.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	18/11/2024	11/11/2024	David Hindson

Number	ADR.5720	Requirement	Safety Management Systems		
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Details

Observation: Safety Management System (SMS) - Safety Promotion

Whilst reviewing all Safety Performance Indicators (SPI's) for all six OIC Airfields, it was evident that no newsletters or safety surveys had taken place for some time. It is highly recommended that safety newsletters and safety surveys are regularly issued / carried out in order to not only understand the current safety culture across all airfields, but to also effectively communicate any key safety messages / lessons learned to all airport staff.

It is also highly recommended that the SPI of 6 or less hazard / safety reports within the year should be reviewed in order to encourage safety reporting.

At the time of the audit the CAA Aerodrome Inspector shared a link to Skywise to enable OIC to receive all notifications and alerts from the CAA.

Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO. The issue of safety newsletters will resume bi-annually as per manuals. Going forward, safety surveys will be conducted annually and SPIs will be amended from 6 to unlimited for MOR's / VOR's.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	18/11/2024	11/11/2024	David Hindson

Number	ADR.5721	Requirement	Aerodrome Manual		
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Details

Observation: Aerodrome Manual - Mandatory Occurrence Reporting

Whilst reviewing all of the Aerodrome Manuals for all six airfields, it was noted that section 4, paragraph 4.15 entitled "Regulatory requirements" still made reference to CAP 382, which is no longer valid. CAP 382 should therefore be deleted, with all references made to UK Regulation 376/2014 and IR 2015/1018 which provides a list of reportable occurrences. MOR guidance can be found on the UK CAA website.

Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO. All six manuals will be amended as advised.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	18/11/2024	11/11/2024	David Hindson

Number	ADR.5722	Requirement	Aerodrome Manual		
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Details

Observation: Aerodrome Manual - Battery Lighting Inspections

Aerodrome Operational Instruction (AOI) No.7 detailed within all of the Aerodrome Manuals, outlines the process for inspecting all emergency battery lights weekly, with all inspection records to be recorded on record sheet No.3. At the time of the audit, it was evident that these inspections were not taking place weekly and were not always being logged at some of the airfields. OIC should review the content of AOI 7 and agree a frequency of inspection of these emergency battery powered lights to ensure a standardised approach across all airfields, whilst ensuring that a record of all inspections are maintained.

Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO. AOI No.7 will be amended in all six airfield manuals to show a frequency of monthly checks at each airfield.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	18/11/2024	11/11/2024	David Hindson

Number	ADR.5723	Requirement	Aerodrome Safeguarding		
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Details

Observation: Aerodrome Safeguarding - CAP 232 Survey

Whilst reviewing the last CAP 232 survey date for all airfields, it was unclear as to how the surveyed heights of all objects surrounding the airfield were being assessed against the obstacle limitation surfaces (OLS) of the airfield. OIC should review this data for all airfields to ensure that the obstacles promulgated within section AD 2.10 of the AIP are accurate and relevant.

Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO. A review of the data will be conducted in conjunction with the next airfield surveys in 2025.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	18/11/2024	11/11/2024	David Hindson

Number	ADR.5724	Requirement	CAP 168 - Chapter 7: Signals		
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Details

Observation: Stronsay Airfield - Location of Windsleeve

Although works to build a new Terminal building at Stronsay had not yet commenced, it was evident at the time of the audit that the existing windsleeve would be located within the centre of the worksite area. As a result, OIC should look to relocate the windsleeve, ensuring that the chosen location complies with the requirements detailed within CAP 168, Chapter 7, paragraph 7.12.

As a result of this change, the aerodrome will need to submit a CAP791 submission to developments@caa.co.uk for regulatory approval, prior to the relocation taking place.

Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO. CAP791 submission was approved on 24 October 2024.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	18/11/2024	11/11/2024	David Hindson

Number	ADR.5725	Requirement	Appendix 3A Runway Surfaces – Technical Details		
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Details

Observation: Papa Westray Airfield - Maintenance of Grass Runways

At the time of the audit, it was evident that the grass runways at Papa Westray were well maintained, however, due to them not having access to a suitable roller, it meant that they were unable to roll their grass runways. In order to ensure that the rideability qualities of the runway surface comply with CAP 168, Chapter 3, Appendix 3A, OIC should look to source a suitable roller.

Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO. OIC has secured the use of a roller for future use.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	18/11/2024	11/11/2024	David Hindson

Number	ADR.5726	Requirement	CAP 168 - Chapter 8: Operational objective		
Details					
Observation: RFFS Operational Objective - Response Times					
Although all airfields could confirm that response time exercises were taking place, there was no record detailing the times that were achieved. The record should also detail the location that the crew responded to.					
Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO. Amendments have been made to the record keeping to include the time, location and weather during the exercise.					
Level	Status	Target Date	Closure Date	Raised By	
AAA-Observations	Closed	18/11/2024	11/11/2024	David Hindson	

Number	ADR.5727	Requirement	CAP 168 - Chapter 8: Medical standards		
Details					
Observation: RFFS Personnel Medical Assessments					
It was evident during the audit that all RFFS staff had completed a pre-employment health questionnaire that had been signed off by their local GP / Council Occupational Health Advisor, declaring them fit for duty.					
Note however that the OIC had partially implemented a policy in 2019 regarding the assessment process to be adhered to for assessing the medical suitability of all RFFS personnel, this policy stated: "The airfields staff medical assessments will be undertaken by an occupational health nurse and will be undertaken every three years for staff up to 59 years old and annually for staff 60+ years old. New staff will receive a medical assessment on appointment. Each member of staff assessed will be given a pass/fail certificate and provided with feedback."					
The above process had not be followed at all airfields, and the OIC should review their policy to ensure that they are fully satisfied that the process for assessing RFFS personnel medical fitness has been clearly defined and suitable for the aerodrome operation.					
Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO. OIC confirmed that the policy was under review, where a copy of the final policy shall be shared with the CAA Inspector as part of their on-going oversight.					
Level	Status	Target Date	Closure Date	Raised By	
AAA-Observations	Closed	19/11/2024	11/11/2024	David Hindson	

Number	ADR.5732	Requirement	CAP 168 - Chapter 7: Markings		
Details					
Observation: North Ronaldsay - Runway 13-31 Edge Markers					
During a walking inspection of the Airfield at North Ronaldsay, it was noted that some of the grass runway edge markers on RWY 13-31 (particularly towards the 13 end of the runway) required a paint mark refresh.					
Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO. Resolved on the 10th October 2024.					
Level	Status	Target Date	Closure Date	Raised By	
AAA-Observations	Closed	19/11/2024	11/11/2024	David Hindson	

Number	ADR.5733	Requirement	Aerodrome Inspection		
Details					

Observation: Eday Airfield Inspection / General Maintenance

During a walking inspection of Eday Airfield, the below observations were made:

1. Some of the double white paint markings surrounding the boundary of the Apron area were badly worn / not visible, where a paint mark refresh is required.
2. In accordance with condition 6 of the aerodrome licence, it is recommended that additional signage is installed along the coastal track to prevent unauthorised access on to the airfield and to warn the general public of danger from aircraft.
3. It was noted that there was significant weed / thistle growth within the grass areas surrounding the runway, which if not addressed could result in an increased bird strike risk due to a potential food source / attractant.

Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	19/11/2024	11/11/2024	David Hindson

Number	ADR.5734	Requirement	Aerodrome Inspection
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Details

Observation: Westray Airfield Inspection / General Maintenance

During a walking inspection of Westray Airfield, the below observations were made:

1. Some of the runway edge markings surrounding the old disused grass runway require the application of green paint to ensure no confusion by flight crews.
2. One of the Runway 31 threshold lights was observed to be misaligned, where the green / red lenses should be re-aligned to face the correct direction in accordance with CAP 168, Chapter 6, paragraph 6.55.

Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO. Point 1 resolved on the 24th September 2024 and point 2 resolved on the 16th August 2024.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	19/11/2024	11/11/2024	David Hindson

Number	ADR.5735	Requirement	Wildlife Hazard Management
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Details

Observation: Wildlife Hazard Management

It was noted that there was a high rabbit population at both Westray and Papa Westray. At the time of the audit, it was highlighted that an off-airfield wildlife survey of all OIC Airfields was being undertaken this summer in order to update the current survey data detailed within the Airfield Wildlife Management Manual. As part of this wildlife survey and update of the manuals, each aerodrome should detail how they intend to control the wildlife risk at each of their Airports.

OIC may consider introducing a local grass area map for each of the six airfields so that all wildlife patrols clearly record any wildlife activity seen against a particular grass area. Going forward this will provide data to clearly identify the wildlife hotspot areas by species and assist in the development of future control measures to effectively manage the wildlife strike risk.

Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	19/11/2024	11/11/2024	David Hindson

Number	ADR.5737	Requirement	Aerodrome Safeguarding
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Details

Observation: Authorisation of Drones

The OIC should develop a procedure for the authorisation of drones at all six airfields, using CAP 722 as guidance. This procedure should be detailed within each of the Aerodrome Manuals and consideration to roll out a safety campaign across all of the six islands may prove beneficial to enhance awareness, where the CAA website provides good guidance regarding the flying of drones safely and responsibly.

The CAA Inspector also shared a copy of the CAA Drone Model Aircraft Code.

Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	19/11/2024	11/11/2024	David Hindson

Number	ADR.5738	Requirement	CAP 168 - Chapter 3: Aprons and stands		
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Details

Observation: Grass Apron GA Parking Areas

During the audit it was observed that a number of airfields have grass apron areas to be used by small light GA Aircraft. All aerodromes providing these areas should consider the below:

1. Installation of directional signage (yellow background and black characters) either in the form of physical sign or paint marking on the ground will provide clear guidance to flight crews. The specification for this signage can be found within CAP168, Chapter 7. Fig. 7A.9. Currently a white sign with black characters is used to identify these GA Apron areas, and due to the dimensions of the sign it is extremely difficult to see.
2. The AIP chart should be updated to clearly illustrate the location of these GA Grass parking areas.
3. Section 2.20 of the AIP should also be updated to include information regarding local aerodrome regulations, where information regarding the use of these GA Apron grass areas can be detailed.

Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	19/11/2024	11/11/2024	David Hindson

Number	ADR.5739	Requirement	CAP 168 - Chapter 3: Runway strips		
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Details

Observation: Runway Strip and Runway end safety areas (RESA)

OIC should review the survey data for all runways to ensure that the runway strip length is compliant with CAP 168, Chapter 3, paragraph 3.41. For a code 1 non-instrument runway a distance of 30m beyond each end of the runway and any associated stopway shall be maintained.

During the review of the survey data, OIC may also want to understand what length of RESA is available at the end of each runway to minimise the risk of damage to an aeroplane in the event of an overrun or undershoot of the runway. Note that in accordance with CAP 168, Chapter 3, paragraph 3.62 and 3.64, the provision of a RESA for a non-instrument code 1 runway is to be considered by the aerodrome, where a length of 30m beyond the runway strip is recommended. Where the RESA does not extend to the recommended distance of 30m, the licence holder, as part of their safety management system, should assess the risk of both a runway excursion and a runway overshoot and implement appropriate and suitable mitigation measures as necessary. See CAP 168, Chapter 3, Appendix 3I for guidance on factors to consider when creating your RESA risk assessment.

Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1", which has been uploaded to SPO. The Airfield Superintendent has been able to confirm that the minimum runway strip length is available for each runway. The total length of RESA will be noted separately on aerodrome survey documents prior to July 2025, along with any updated supporting risk assessment as part of OIC's runway excursion risk mitigation.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	20/11/2024	11/11/2024	David Hindson

Number	ADR.5728	Requirement	CAP 168 - Chapter 6: Maintenance of AGL systems		
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Details

Observation: CAP 168 Chapter 6, paragraph 6.231 - APAPI Flight Checks

Whilst reviewing the APAPI flight check records at North Ronaldsay, it became evident that the last APAPI flight check took place on the 9th October 2023. In order to comply with the CAP 168 requirement (Chapter 6, paragraph 6.231), all APAPI's shall be flight checked at least every 6 months.

OIC have arranged for a flight check of the APAPI's at North Ronaldsay to take place in October 2024.

Version 7.2 of North Ronaldsay's Aerodrome Manual should also be reviewed, ensuring that paragraph 5.5 is amended to reflect a flight inspection of the APAPI's at least every 6 months. Note that an annual check of all other AGL is compliant with the CAP 168 requirement as specified within CAP 168 Chapter 6, paragraph 6.230.

Closed by D.Hindson on the 11th Nov 2024 - See correspondence from S.Grayson entitled: "20241101 - OIC Audit Responses V.1" and "20241111 - OIC Audit Response - Closure evidence for ADR.5728" which has been uploaded to SPO. APAPI flight check took place on the 10th October 2024.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	19/11/2024	11/11/2024	David Hindson

Report issue	
Issued to	Original Report Issue Date
Symeon Grayson	22/08/2024