

# TravelWatch- **ISLE OF MAN**

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Representing and promoting the interests of Isle of Man Passengers

To:-

**Roger Phillips, Clerk of Tynwald.**

**Submission from TravelWatch Isle of Man to the Environment and Infrastructure Policy Review Committee's Follow-up Investigation into the "Open Skies" policy.**

1. Travel Watch Isle of Man, the Island's Passenger Watchdog, was founded in January 2007. It became a Manx Registered Charity in 2016. TravelWatch submitted evidence to the 2012/13 Tynwald Review into "Open Skies" and into an earlier Tynwald review of the Steam Packet.
2. Our approach to "Open Skies" is to give broad support, but with the important proviso that for the Isle of Man "lifeline" routes a measure of light regulation is urgently needed. At the time of the 2012/13 Tynwald Review, we expressed very similar views: we now have another five years' experience of the particular issues which concern us. We understand that "Open Skies" was originally a policy intended to encourage increased passenger numbers and thus strengthen the Island's economy.
3. Given that the Island has a population of some 85,000, we are a small market for any major air carrier. Even allowing for the considerable number of visitors especially around major events such as TT, the total number of passengers – combining both those arriving and those departing - using Ronaldsway is around 800,000 a year. Over recent decades, while there has been some redistribution of passengers between sea and air travel, the total number has not varied greatly. This is disappointing given the efforts to promote the Island as a visitor destination which is a long standing part of the Isle of Man Government's strategy for economic growth. Taking the London air services over a decade, according to CAA figures, the total carryings in 2016 (238,822)

were almost identical to 2006 (238,871). Thus the arrival of Easyjet services bringing cheap fares and larger planes does not appear yet to have grown the market; rather some redistribution of passengers between carriers.

4. Passengers seek air services which are reliable, punctual, affordable and reasonably convenient. They also expect good contingency plans when disruption occurs and an effective system for dealing with complaints. Achieving all of these aims is not easy and TravelWatch consider the Island should develop a strategy that meets these aspirations as far as possible.
5. Since 2012, TravelWatch's concerns have centred on ensuring that the high frequency services to Manchester were preserved and that there was adequate capacity on the London Services. We have also noted with increasing concern the absence of any Island based carrier and the loss of the Flybe base at Ronaldsway.
6. The London Gatwick Services were shaken up by the withdrawal of the Flybe services which had provided four weekday rotations and at least three weekend day rotations. These services had enabled passengers to make up to 130 onward connections and allowed full day return capability in both directions. This frequent service to Gatwick was regarded as the Island's single most important service. The arrival of Easyjet produced lower fares – although not for those booking late or where services were very full. With the exception of a few days around TT when 3 rotations were provided, Easyjet scheduled two rotations a day during the week and at least one rotation at weekends. However, in the peak summer months – for about ten weeks – Easyjet reduced their services by 3 or 4 rotations a week. Rotations were also reduced for part of the winter by 2 or 3 rotations a week. We understand that there was no adequate consultation with Government over these changes due to the lack of a regulatory framework.
7. Unfortunately, Easyjet's punctuality was very poor in the summer of 2016 and was poor in the summer of 2017. The occasional cancellation also led to considerable issues for passengers as alternative services were not available for several days, due to a combination of services being booked close to capacity and the reduction of the three midweek morning services during the summer peak. This led to a considerable volume of complaints, some of which TravelWatch was made aware of by passengers.
8. Providing two rotations a day also meant issues about when to schedule the flights. The evening flight tended to be scheduled to arrive into the Island around 20.30 so that outgoing passengers did not reach Gatwick until after 22.00 – if the plane was on time.

Convenience became an issue for some passengers, especially as the “cheap fare” had to be balanced against the cost of hotel accommodation for passengers arriving into Gatwick in the late evening. The morning rotation provided a different issue for passengers as outgoing passengers did not reach Gatwick until after 11.00 which was often too late for those with morning commitments in London.

9. Any analysis of the London services over the last five years is complicated by changing patterns of operators, airports and services. Flybe opened a route to Stansted with 3 weekday rotations a day. This ran only for a year. British Airways increased their capacity to London City including occasionally using larger planes for some services for a year before reverting to their previous practice. In 2017, Easyjet opened a new service from London Luton with three rotations a week. This service was reduced to two rotations in the ten week summer peak and the service is being closed for the winter.
10. The use of larger planes – 150 seats – at Ronaldsway has also caused some handling problems especially on occasions when two larger planes are scheduled to arrive close together. In 2017, there have been growing passenger complaints about delays in getting through security at Ronaldsway. When one of the larger planes has to be cancelled providing information and proper services to the 150 or so passengers caught up in the disruption is a larger and more difficult task which has also contributed to increased passenger complaints. The lack of a regulatory framework allows operators to announce schedules with either no or minimal consultation with Airport Management or the Isle of Man Government.
11. In addition to the problems on the London Services, TravelWatch has been very concerned at the potential threat to the frequent services run by Flybe to Manchester – currently 5 rotations a day. Since the withdrawal of Flybe from Gatwick, the Manchester service has become of critical importance to the Island. It provides an excellent choice of flights throughout the day to a major UK airport enabling connections to be made with a wide variety of carriers and destinations. TravelWatch regard this service as vital both for the Island and for many passengers. Consequently, we consider it requires to be protected against predatory moves by other operators. In 2012/13, we wrote: “To safeguard the economic future and wellbeing of the Isle of Man, we believe that it is important that legislation is put in place

as a matter of urgency to enable regulation of certain air services to be introduced without delay if required in the future.”

We had in mind developing a Manx version of the regulation operating in Guernsey.

12. While we regard “light regulation” as necessary only on the London and NorthWest Services, we are concerned that recently the services to Belfast and Glasgow, previously run by CityWing, appear to have attracted much criticism since Eastern stepped in at short notice to try and maintain services. Passengers have been concerned about frequency and timing of services and about cost. We doubt there is an obvious or simple answer to these issues but we consider they need flagging up to the Review Committee as our task is - at least in part – to reflect the concerns we hear from passengers.
13. TravelWatch has been interested to see developments in Guernsey where reviews of their air regulations have been taking place recently. The Review Committee may wish to study Guernsey’s experience to see if there are lessons suitable for application to the Isle of Man. We draw particular attention to the conclusion that the state ownership of Aurigny should continue and that:-  
“the company is to be considered and treated as an economic enabler for the Bailiwick through focussing on essential economic enablement routes”.
14. The Review Committee may also wish to consider the vital role of the Island’s Patient Transfer Service. Some 30,000 of the departures and arrivals at Ronaldsway are accounted for by this service, mainly to Liverpool. Many of the passengers using this service are vulnerable, some very vulnerable. While some progress has been made recently in providing dedicated quiet space for these passengers at Liverpool Airport and at Ronaldsway, there is still much to do to ensure a consistent high quality service is delivered to these vulnerable passengers. TravelWatch understands that similar challenges are faced by patients travelling to specialist hospitals from the Channel Islands and the Scottish Islands so developing standards for such services is a wider challenge for several communities across these Islands. To ensure an adequate Patient Transfer Service, it should be regarded as a “lifeline “service for the purposes of light air regulation.

15. The 2012/13 Tynwald Report into “Open Skies” made a number of recommendations. Three of these requested Government action viz:-
- Prepare a contingency plan to maintain a licencing regime, whether a light touch regime or otherwise, against the day when commercial realities demand this;
  - Consider amending the charging system at Ronaldsway to allow “Open Skies” and competition to continue, but to safeguard the position of particular routes and flight timings;
  - Investigate the possibility of establishing a franchise based airline which could be operated by companies for the Island’s Government using leased aircraft and which would allow the Island’s Government to buy landing slots
16. We supported these recommendations although we would have liked the previous committee to have gone further and faster towards “Light Regulation”. However, we are dismayed and concerned at the lack of progress in implementing these recommendations. TravelWatch consider that progress towards light regulation is now very urgently needed and we look to the present Committee to consider recommending urgent action.
17. TravelWatch also consider that the international climate was changed for the worse with the uncertainties over Brexit making it even more urgent that the Island has proper contingencies in place for Light Air Regulation.
18. TravelWatch will be willing to attend the Committee to answer questions and discuss issues if this will be helpful. We are content for this submission to be published.

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