



The Scottish Parliament
Pàrlamaid na h-Alba

PUBLIC PETITION NO.

PE01804

Name of petitioner

Alasdair MacEachen, John Doig and Peter Henderson on behalf of Benbecula Community Council

Petition title

Halt Highlands & Islands Airports Ltd's Air Traffic Management Strategy

Petition summary

Calling on the Scottish Parliament to urge the Scottish Government to halt Highlands & Islands Airports Ltd's Air Traffic Management Strategy Project to conduct an independent assessment of the decisions and decision-making process of the ATMS project.

Action taken to resolve issues of concern before submitting the petition

This issue has been raised with Liam McArthur MSP, Alasdair Allan MSP and Rhoda Grant MSP. It has also been raised with Alistair Carmichael MP and Angus Brendon MacNeil MP.

Petition background information

We call on the Scottish Government to:

1 Halt HIAL's ATMS project and conduct an independent assessment of the decisions and decision-making process of the whole ATMS project and its potential safety, economic & quality of service impacts, and make recommendations on the options for ATS provision at HIAL airports accordingly. ATCOs at all HIAL airports should be called on for evidence, as the only experts in air traffic control at HIAL airports.

2 Instruct HIAL to suspend their policy on changing the Air Traffic Services provision at Benbecula and Wick until the UK Civil Aviation Authority (CAA) have published their own official guidance to UK Air Navigation Service Provider's (such as HIAL) on the effects of European Union Authority for Aviation Safety (EASA) policy on Air Traffic Control provision.

3 Conduct an independent islands impact assessment as under the Islands (Scotland) Act 2018 for all affected island communities.

Highlands & Islands Airports Limited (HIAL) announced its remote tower air traffic

management strategy (ATMS) involving seven of its airports in January 2018. A Business Case was approved by the Board in December 2019, which listed four main challenges to ensure the resilience of Air Traffic Control (ATC) operations and the continuation of safe, efficient air travel though the Highlands and Islands:

- Low staff numbers and difficulties with resilience, recruitment and retention have, in some instances, led to airport closures
- The changing regulatory environment and compliance with new policies on safe service provision requires change
- The urgent need to modernise an ageing infrastructure and outdated methods of controlling air traffic
- The need to create a competitive edge in the operation and ultimately deliver a more sustainable and cost-effective service

We believe that difficulties with recruitment and retention have existed only at a minority of HIAL airports. This can be overcome by local recruitment as suggested in Highlands & Islands Enterprise's EKOS report where it states that "grow your own'... [has] been successful for HIAL in recruiting – this should continue in some form to address future staffing requirements". HIAL ATCO salaries have in the recent past been considerably less than the industry standard and may have been a factor in the retention of staff at some of HIALs locations.

We agree that the changing regulatory environment and compliance with new policies on safe service provision requires change, however, we do not believe HIAL's ATMS provides the best answer for HIAL airports. The option chosen by HIAL is the costliest and riskiest as stated in their own Helios report.

We agree there is a need to modernise ageing equipment and infrastructure, but this could be done at each airport without the need to move the ATC service to a centralised facility or downgrading the Air Traffic service provision.

We do not agree that HIAL's plans for ATMS will deliver a more sustainable and cost-effective service. In fact, in the long term the reverse may occur due to the expensive new infrastructure itself needing to be replaced after a number of years of service in a hostile environment (climate) and the extra Air Traffic Engineering support required to maintain the day to day integrity of these new systems.

We believe that quality of service of scheduled flights to the communities served at the seven airports may be compromised due to the potential for an increase in flight delays, cancellations and airport closures at Stornoway, Inverness, Sumburgh, Kirkwall & Dundee due to:

- Communications failures / malfunctions between the remote airport & Inverness centre.
- Equipment failures / malfunctions at the Inverness Centre may lead to airport closures.
- Operational limits of cameras – the maximum wind speed they can operate in before camera shake makes visuals unusable
- Maintenance of cameras due to salt corrosion and scouring on the lens by wind-blown sand / particles. There will be delays in repairing outages of cameras and associated equipment as Air Traffic Engineering (ATE) support staff need to be detached in.
- Loss of runway availability – existing digital remote towers do not support cross runway operations. Some runways will be closed resulting in more flight cancellations due to cross winds.

At Benbecula and Wick airports the use of an Aerodrome Flight Information Service (AFIS) in non-visual conditions in particular, would cause a significant increase in the number of flight delays compared to the present ATC service. No positive deconfliction advice to aircraft pilots in the air is possible with AFIS. (An AFIS current Licencing and legal issue).

We believe that the proposals will have a significant long-term adverse economic impact on the communities of Caithness, Orkney, Shetland, and the Western Isles

through:

- 1.The relocation or loss of well-paid and high skilled ATC jobs at HIAL airports, particularly within the more rural and 'fragile' communities, and the loss of spouse and partner's jobs from the communities.
- 2Loss of ATC associated jobs, e.g. air traffic and admin support staff.
- 3A reduction in customer confidence caused by extensive new delays, technical failures, safety concerns and airfield limitations.
- 4In communities reliant on airport accessibility for economic activity, a 'downgrade' of the airports at Benbecula and Wick will result in a reduction or end of the use of the airport by the following (because the norm is an ATC service): -
 - Ad-hoc civil charter flights at Benbecula in support of the Hebrides Ranges.
 - Aeroplane manufacturers for test flights in non-visual conditions.
 - The potential for new scheduled operators to be attracted to these airports or a change in status with the present scheduled service operator.
 - Ad-hoc tourism flights

We believe the ATMS plans will reduce the safety of services provided at all airports operated by HIAL due to the following reasons: -

- 1.Currently Meteorological (MET) observations are carried out by Air Traffic Controllers or MET qualified support staff who use local knowledge of geography and topography to assess the MET conditions. Instruments can be used as an aid to observations if necessary. Due to limitations of MET instruments they can be incorrect and the MET observer can disregard readings when appropriate. MET observations under ATMS will completely rely on instruments which will create high risks in these very exposed airports where weather conditions can be a considerable hazard to aircraft.
- 2.The potential for reduced safety in the air at Benbecula and Wick: -
 - A downgrade to Aerodrome Flight Information Service will result in pilots receiving only generic information on any conflicting aircraft, with the pilots themselves having to resolve any conflicts based on the information received. Positive deconfliction advice to aircraft in the air would not be possible due to current legislation and AFIS licencing. Air Traffic Controllers provide a layer of safety which will be removed from scheduled passenger flights, ambulance flights, transiting military aircraft, private visiting aircraft and helicopters used by local businesses such as fish-farms.
 - Benbecula has military Ranges in the vicinity, and both airports have nearby aeronautical Danger Areas which can, if active, affect aircraft flight paths and profiles in/out of these airports
- 3.By relying on new, largely untested technologies, we are exposing Air Traffic Services to a suite of new, never seen before safety risks and points of failure which do not exist within current operations. Historically HIAL have never done this because of the risk – we ask what is their rationale for changing policy now?
- 4.Multi-mode operations have been suggested by HIAL. This involves Air Traffic Controllers operating several airports and/or approaches simultaneously. This suggested concept is unproven and may come with additional safety risks.
- 5.Safety critical local knowledge of geography, weather, facilities and much more will be lost, replaced with a "remote Air Traffic Controller" who will lack such awareness.
- 6Air Traffic Controllers currently look out a window to ensure the safety of aircraft in their vicinity. Seeing aircraft, obstructions, obstacles and everything else is more challenging when looking at a TV screen.
- 7.Situational awareness is essential to aircraft safety. A digital remote tower will compress a 360 degrees' view across 270 degrees on the TV screens, making situation awareness far more difficult.
- 8Being absolutely reliant on technology means technology failures will be another new risk factor which does not exist at present.
- 9.Cyber security – air traffic services across the entire Highlands and Islands region will be IT based. A cyber-attack against any part of it would have the potential to shut down

the entire operation, exposing every aircraft to yet more new risks that do not currently exist.

The majority of ATC Staff are opposed to the proposed ATMS and if they refuse to move to the new centre it could be necessary to staff it with ATCOs who have no previous experience at HIAL airports. HIAL have stated that they would consider training ATCOs from scratch with training provided by instructors who haven't worked at the airports concerned. This essentially removes decades of invaluable experience, training and safety management.

We believe the technical feasibility of this project has not been proven as the implementation and delivery of the remote tower and surveillance centre is the largest and most complex project HIAL have ever undertaken and yet the HIAL's Management team delivering the project, and HIAL's board who approved the project, do not have any civil aviation qualifications. The Scoping Study (Helios Report), the basis of the ATMS project, had many errors identified in it and these have not been corrected by HIAL or given sufficient answers as to mitigation.

Unique web address

<https://www.parliament.scot/GettingInvolved/Petitions/airservices>

Related information for petition

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YES

How many signatures have you collected so far?

0

Closing date for collecting signatures online

06 / 05 / 2020

Comments to stimulate online discussion

The connections our air services provide across Scotland from Benbecula to Sumburgh to Dundee are necessary for our communities' health, economy and leisure. Islanders in particular depend on our life-line air services and HIAL's ATMS project could mean a significant increase in delays and cancellations in airports already often constrained by extreme weather.

Do you agree that there should be an independent assessment of the decisions and decision-making process of the ATMS project?