

PE1804/B

Scottish Government submission of 13 August 2020

Thank you for your e-mail of 2 June 2020 requesting the Scottish Government's views on the action called for in petition 'PE1804: Halt Highlands & Islands Airports Ltd's Air Traffic Management Strategy'. We appreciate the opportunity to provide our views on this Project which is designed to ensure the future of air services in the Highlands and Islands.

The Scottish Government is keen to ensure that the Highlands and Islands benefit from good connectivity to support business and tourism and facilitate essential travel for the NHS and other social needs, while at the same time maintaining connectivity for this remote part of Scotland. Accordingly, it is important that we recognise the need to modernise Air Traffic Control (ATC) to ensure that we can continue to provide sustainable and reliable air services in the Highlands and Islands into the future. Highlands and Islands Airports Limited (HIAL) has been tasked with taking this process forward to find the safest and most sustainable solution for the airports they operate and communities they serve. HIAL needs to future-proof their operations in Scotland against a background of issues including increasing regulation, future operational safety and staff recruitment and retention. Air services form an essential piece of the Highlands and Islands transport infrastructure and it is vital that the airports take steps to improve their operations so that the islands not only remain viable but can thrive and reach their full potential.

The Air Traffic Management Strategy (ATMS) is a multi-strand project which, when taken in its entirety, will help to secure air services into the future. It involves the establishment of a Central Surveillance Centre, including the use of Remote Digital Towers, the introduction of Controlled Airspace and the introduction of new surveillance technology. No one element of the project will address every issue we face but taken together we agree with the HIAL Board's decision that the ATMS will bring the long term security to services that we all want.

HIAL's top priority in relation to ATC is to ensure the safe operation of air services. The ATMS Project will further enhance safety by introducing surveillance at additional airports so that Air Traffic Controllers can see where all aircraft are at all times. While current services remain safe, surveillance provides the opportunity to make them more so. The introduction of Controlled Airspace will mean that all aircraft in the environs of an airport are being controlled by the Air Traffic Controller. These measures will also enable more direct routing of aircraft which will both reduce journey times and fuel burn resulting in a reduction in CO₂ emissions.

HIAL need to be mindful of EU regulation and UK regulatory momentum which will require Air Navigation Service Providers to introduce Controlled Airspace at aerodromes that provide an ATC service. One element of the ATMS Project is to progress this work to ensure that HIAL maintains regulatory compliance into the future.

HIAL continues to find recruitment of Air Traffic Controllers challenging. While HIAL is managing this situation in order to avoid, where possible, any impact on services, the lack of resilience this provides is not sustainable in the longer term. Despite HIAL's best efforts, this lack of resilience at some airports has already resulted in unscheduled

closures due to unavailability of staff. Without action this situation will only worsen in the future. By moving to a Centralised Surveillance Centre under the ATMS, HIAL will be able to improve resilience through having a larger number of controllers to call upon to cover staff absences. A situation such as the Covid-19 pandemic highlights the need to have robust resilience measures in place in order to maintain services. This is especially the case when dealing with lifeline services to remote communities. The move to using a Centralised Surveillance Centre with Remote Towers at individual airports will improve resilience leading to more reliable air services.

Remote Digital Towers are being increasingly used across the industry and are being deployed at airports in the UK and Ireland, such as London City and Dublin, while also being used as a contingency at Heathrow and Jersey. They are currently in use at seven airports in Sweden, one in Germany, are in planned transition at eight airports in Colorado, and are in development at airports in the Netherlands, Norway, Denmark, Belgium and Brazil. The expectation within the industry is that there will be a more general move away from towers at airports. Introducing this type of technology means that HIAL will be competing on a like-for-like basis with other airports. The current position is that HIAL practices Procedural Approach which is becoming increasingly rare and, given that, it is vital that they modernise or fail to provide the base for lifeline services. It is essential that a smaller airport operator like HIAL does not get left behind in a global industry shifting to new technology that can improve safety and reduce the environmental impact of aviation.

Throughout the Project HIAL has undertaken a significant programme of staff and stakeholder engagement which will continue as the Project progresses. Although the decision to proceed with the ATMS was taken before the Islands Act was passed, and while not legally obliged to do so, HIAL are currently undertaking a retrospective Islands Impact Assessment (IIA) which is being carried out by an independent consultant.

We are satisfied that HIAL has taken their decision based on the best available information and an in-depth analysis of the different options. We do not believe that a further assessment of the decisions that HIAL has taken or the decision making process they have used in relation to the ATMS Project is required. A failure to move in the same direction as the rest of the industry now will simply store up problems for HIAL which will have to be addressed in the future. It is essential that HIAL stays ahead of the curve to ensure that connectivity is protected.

The provision of the ATMS at HIAL's ATC airports is crucial to the delivery of modern, efficient and environmentally sound Air Traffic Services in the Highlands and Islands, where safe operation is key.