

PE1804/R

Comhairle nan Eilean Siar submission of 2 November 2020

Further to your letter of 2 October 2020 and Comhairle nan Eilean Siar's response to HIAL's retrospective Island Communities Impact Assessment (ICIA) consultation, the Comhairle welcomes the opportunity to provide additional comments to the Committee in light of more recent events, perhaps not covered in its initial response.

The Comhairle welcomed the comments from the Chair and members of the Committee which seemed to reflect considerable understanding of the principles set out in the petition and its contention that HIAL's proposal equates to centralisation of services without due regard to the likely socio-economic impacts on the communities served, the views received from staff and local authorities and other stakeholders.

The Comhairle was concerned to read what appeared on the Public Contracts Portal yesterday. In summary, HIAL wishes to purchase a fully configurable air traffic control simulator to enable research and development for remote tower and training in approach radar services. The simulator will be used in a research and development context which will enable new procedures to be worked up and tested, permit camera location positions to be modelled, demonstrate the ability to use multi-runway operations utilising the 3D tower simulation, and testing of Radar in the Tower procedures. The simulator will also be used for the delivery of training for air traffic controllers and suppliers must take into account the requirements in CAP584 when the simulator is being used for training purposes.

The successful supplier shall supply the simulator hardware, software and licences and peripherals (including headsets). The supplier shall also be responsible for the installation of the simulator, networking of simulator equipment and testing. The supplier shall supply peripherals such as headsets and a flight strip printer. The supplier shall provide "train the trainer" user, aerodrome modelling and airspace design training to HIAL employees. The contract is stated to be worth £240K, but in the view of the relevant trade union, Prospect, this may be grossly underestimated. They also suggest that expenditure to date on the project is significantly over budget, although there is a general lack of transparency about actual costs. What it does show, however, is that HIAL are pressing on with proposals, irrespective of the ICIA and stakeholder opinion.

It should be noted that Prospect have issued a further employee survey to their Air Traffic Control members to ascertain their views as to the current direction of the project and actions which may be required going forward. A survey was issued two years ago but Prospect felt the need to update that to take cognisance of all that has happened in the intervening two years. Suffice to say that the project has never had buy-in from ATC staff. The results of this latest survey will no doubt be made available to the Committee once finalised.

With specific regard to the downgrading of Benbecula Airport, the view from the professional community is that the number of airlines prepared to tender for the PSO air route between Benbecula and Stornoway would be limited if Benbecula was designated as an AFISO. In addition, Prospect have stated that the CAA would approve flexible airspace at Benbecula which would allow the current ATC arrangements to remain. The following press release by the Comhairle today encapsulates and reflects current community concerns and issues:

<https://www.cne-siar.gov.uk/news/2020/october/uist-community-unites-to-fight-the-downgrade-of-benbecula-airport/>

In terms of any economic arguments advanced by HIAL, there is a Report by Copenhagen Economic (26 March 2019), which argues that remote towers do not save money when the airport is not competitive. The key findings can be summarised as follows: “competition is needed to guarantee that cost savings from remote towers benefit the airports and not the providers of air traffic control; competition can generate cost savings that remote towers cannot generate; remote towers are unlikely to achieve savings of the same magnitude as competition; the case for remote towers seems to be exaggerated because required investments in remote towers are underestimated while foregone investments in conventional towers are overestimated; and the risk and associated costs of cyber and physical attacks on centralised remote towers seems to be underestimated”.

The Comhairle has sought legal advice from Counsel in recent weeks on the legitimacy in law of HIAL’s proposals and we would be happy to share the outcome of these deliberations with the Committee in due course.

In the meantime, the Comhairle awaits the consultant’s Report on the ICIA which I understand is to go before the HIAL Board in November 2020, with a view to the Report being released by the end of this year.

Please contact me if any further information is required.

Yours sincerely,

Malcolm Burr
Chief Executive
Comhairle nan Eilean Siar