PE1804/X

Anonymous submission of 29 November 2020

I would like to give the view from the flight deck as a Commercial Pilot who has operated for many years in and around the islands of Scotland and will be impacted by any changes that affect safety, reliability or usability of HIA airports.

The introduction of a radar capability down to low level will undoubtedly provide another tool to enable Air Traffic Control Officers to provide a safe and efficient environment for aircraft to operate within Scottish airspace.

The crux of the argument, however, seems to be whether this should be incorporated in the current, well established and proven system or whether it should be introduced in an untested and expensive experiment funded not by industry, but by Government.

For HIA's proposals to truly have merit, they should lead to an improvement in safety, reliability and flexibility or at the very least be able to provide the same level as is offered under the current system.

The current system of Procedural Control requires suitably trained ATCOs to apply the principles of lateral and vertical separation, to allow the safe and efficient movement of aircraft in and around HIA's estate of airports. Control of aircraft in and out of an airport has always relied on eyes on the ground, whilst control of aircraft between airports has always been conducted remotely through Radar or Procedural services – aircraft are generally 'unseen' other than at the very beginning or end of a journey.

Radar or Procedural service can easily be provided remotely as is currently practised by Sumburgh Radar, based in Aberdeen or Scottish Control based at Prestwick. What is now in question is whether the principle of directly viewing aircraft as they physically land and take off can be improved by removing those eyes to a distance and inserting layers of technology between them and the aircraft they are viewing. The question is whether this will enhance the current level of safety, reliability and utility or whether additional risks will be introduced that are not currently present?

Clearly, risks will be introduced and the question is what extra procedures, technology and backup systems must be developed to mitigate these risks and at what extra cost?

These risks may be mitigated at a price – several independent communication links to offshore island locations will never be cheap for example – but will safety, reliability and flexibility be maintained or degraded?

Airports that have transitioned to Remote Control Towers have one major thing in common – a single runway with arrivals funnelling into a single approach corridor that is easy to monitor and control. HIA, however, operate airports with intersecting runways that allow a high degree of flexibility for Commercial Operators when weather, especially wind, would otherwise affect operations from a single runway.

Currently ATCOs at HIA airports integrate movements of aircraft operating under both Instrument and Visual Flight Rules, arriving and departing from these intersecting runways. In addition to aircraft simultaneously operating on intersecting runways, ATCOs control the necessary movements of ground vehicles in, around and across the active runways to ensure that Runway Incursions do not occur that would adversely affect safety. This is a complex environment that is not simple to monitor or control.

For HIA to introduce Remote Control Towers and maintain the same level of safety as currently experienced, intersecting runways would no longer be tolerable and airports would be limited to a single runway. If HIA airports were to be downgraded to a single runway this would have grave repercussions for the reliability and efficiency of Lifeline operations that rely on the extra utility of additional into wind runways.

Air services in Scotland are not just city to city jaunts that enhance lifestyle, but are crucial aspects of everyday life, especially in the islands. Maybe only island residents can truly appreciate the actual standard of living enhancement that safe and reliable air services provide. To interfere with a system that currently works so safely and effectively with no guarantee of at least the same level of utility should be viewed as reckless and financially wasteful folly.

Your Committee as guardians of our public services and finances need independent, unpartisan advice from an operator of a Remotely Controlled airport with more than a single runway, operating lifeline services in remote, challenging environments, integrating IFR and VFR traffic with levels of daily aircraft movements comparable to those of a busy HIA airport.

Only then will you have evidence that it is possible to maintain the current level of service provision with no adverse impact on safety or reliability. Currently we have only the fanciful claims of the HIA MD who thinks that these proposals will 'allow aircraft to land on a sixpence' and the vested interests of technology providers and HIA consultants.

Good luck. I have struggled to find such an airport.