PE1804/JJ

Highlands and Islands Airport Limited submission of 2 March 2021

There seems to be some confusion around claims of 'Radar in The Tower' (RiTT) and that this was an option dismissed in the Helios report as it was unacceptable to the Civil Aviation Authority (CAA). It was not.

RiTT allows controllers who hold both an Aerodrome Control (ADI) and an Approach Radar Control (APS) validation on their Air Traffic Controller License to utilise their Approach Radar validation radar capabilities to provide the combined delivery of an Approach Radar Service (a service provided to aircraft approaching, departing and transiting the airport including vectoring and sequencing) with an Aerodrome Control Service (a service that provides instructions and information to aircraft landing and taking off at the airport and to aircraft, vehicles and personnel on the airport manoeuvring area).

Due to traffic volumes and airspace complexities Approach Radar and Aerodrome Control are normally undertaken by two controllers from two different controller working positions. RiTT would allow one controller to undertake both services under certain conditions, **including a limitation on the number of aircraft movements that can be handled in a given period of time**. To deliver a RiTT operation, relevant air traffic control personnel must have both Approach Radar (APS) and an Aerodrome Control (ADI) license endorsements specific to the airport the service is provided for.

Airports at HIAL currently provide a Procedural Service rather than a Radar Approach Service - with the exception of Inverness airport which currently provides an Approach Radar Service and Sumburgh airport where the Approach Radar Service is currently provided by NATS from Aberdeen but will be taken in-house under the ATM Strategy.

The term RiTT is not used in the Helios report although the report does discuss this type of concept under option 2a on page 60 albeit that the report refers to a combined Aerodrome Service (ADI) and Approach Radar Service (APS) as opposed to RiTT.

"A potential, though riskier variation, could be to put a case to the regulator for a combined ADI and APS in the visual tower. Since the legal change that now permits ADI and APS to be provided by a single ATCO if traffic and complexity permits, it could be possible for current ADI ATCOs providing APP services to be re-trained to include an APS licence in their rating, and to then provide both services when on duty. This type of operation is starting to gain traction as a concept and is already applied for low periods of traffic (eg "night time" periods) at Aberdeen and Newcastle. It would likely require limitations on applicability (eg traffic density or complexity) and would also require a process of training and validation to gain approval from the CAA. CAA's feedback from the 8th of August 2017 suggested that APS ATCOs would need to gain experience at busier IAP environments (eg INV) before being able to validate on such a concept at their home units. The number of existing ATCOs able to validate on combined APS and ADI may therefore limit the potential for savings in this option. It is likely that the current general model of an ATCO and ATSA at the ATC airports would be continued."

The paragraph above includes feedback from the CAA on 8 August 2017 which suggests air traffic control officers (ATCOs) would need to gain experience at busier operational environments (e.g. Inverness) before being able to validate on such a concept at their local units. The report does not state that it would be unacceptable to the CAA. However, option (2a) was discounted in the Helios report as it was believed to be cost prohibitive and less feasible – not because it was unacceptable to the CAA. This is included on page 67 of the report.

Whilst the concept of a RiTT type service was considered when exploring the option for local surveillance, it was discounted due to the operational constraints and limitation of aircraft movement numbers that could be safely controlled under this system. To explain, given the current schedules at our airports two air traffic controllers would be required per shift to provide both the Aerodrome Control Service and the new Approach Radar Service. Therefore, the introduction of a new standalone Approach Radar Service at each airport, would result in a significant increase in staffing and costs and exacerbate the challenges we already face in relation to air traffic controller recruitment, training and lack of local resilience.

Within our ATMS programme, the intention is to provide two separate positions for Aerodrome Control and Approach Radar Control at our Combined Surveillance Centre (CSC) during core hours (airport opening hours) for each airport. Out of hours, and in circumstances where air traffic movements are low and it is safe to do so, there is the potential to combine the two positions for a given airport into a single RiTT position for that specific period of time i.e. during quiet periods and dependent upon regulatory approval.