

PE1804/J

Highlands and Islands Airport Ltd submission of 29 October 2020

Thank you for your email of 2 October. HIAL appreciates the opportunity to provide more detail on the project whilst correcting misleading and inaccurate information presented by the petitioners.

HIAL provide lifeline and essential services to remote communities in the North and West of Scotland. Accordingly it must have resilient air traffic provision to ensure that lifeline services continue and importantly, are future proofed.

Since announcing the project in 2018, HIAL has presented the challenge of maintaining lifeline links in remote areas to a number of organisations and welcomes this further opportunity.

Notwithstanding the challenges of COVID, the original reasons for introducing the Air Traffic Management Strategy (ATMS) remain: the opportunity to enhance safety, improve resilience, a changing legislative framework, ageing operating models, staff recruitment and retention issues.

The impact of COVID in the short term, is recognised. However, over the medium to long term the issues remain.

To be clear, our first priority is - and will always be - safety. Neither HIAL, nor the CAA as regulator, would permit the installation of an air traffic management system that was not safe or fit for purpose. HIAL encourages the Committee, if not already done so, to seek the views of the CAA, the regulatory body with responsibility for aviation safety within the UK.

For petitioners to portray remote digital tower technology as unsafe and untested is uninformed and misleading. This technology has been operational since 2015. There are currently four other multiple airport digital tower operations in service or development, including two in Sweden, one in Norway and one in the United States.

Currently, Swedish, Norwegian, German, Dutch, Danish, Belgian, Irish and UK national Air Navigation Service Providers have either implemented, or are in the process of implementing, this technology, including one for London City, one of the busiest sections of managed airspace in Europe.

There is consensus across some MSPs, Prospect Trade Union and members of staff that doing nothing is not an option, the differing opinion centres on the chosen option. Responding to the petitioners' assertion that the HELIOS scoping study contained numerous errors and that the chosen solution was the most complex, we note that the petitioners did not present the errors. However, we agree that the best suited solution is the most complex and to overcome issues of complexity HIAL has employed in-house technical experts from remote locations, and specialists from elsewhere in the country to help design the system.

The decision by the HIAL Board to revise the level of air traffic provision at Benbecula and Wick followed a comprehensive evaluation process of all requirements. The proposal for an Air Flight Information Service (AFIS) at these airports is not based purely on volume of traffic and is certainly not a cost-saving exercise. It is based on the volume and complexity of air traffic that operates at, and in the environs of, each aerodrome and providing a

proportionate level of service. HIAL has safely and effectively provided AFIS services at four of its airports for a number of years, just as other aerodromes do elsewhere in the UK.

As with any change in service a full safety case will be prepared in conjunction with the CAA before any approval is granted.

Much has been made of the independence of the island impact assessment commissioned by HIAL, which the petitioners' described as a 'tick box' exercise. To be clear - it is not.

The ATMS strategy was approved in January 2018 with the Bill for The Islands (Scotland) Act 2018 being passed by the Parliament on 30th May 2018, receiving Royal Assent on 6th July 2018.

Accordingly, HIAL is not required to undertake an island impact assessment. Notwithstanding, to ensure transparency and objectivity, we commissioned an independent consultant, Reference Economic Consultants (REC), to undertake a retrospective island community impact assessment on our behalf.

As no guidance existed on how island impact assessments should be undertaken, the Scottish Government Islands Team was consulted by REC for guidance before starting the process. As a result, the approach the independent consultant is taking reflects the Islands Act's requirement that an islands impact assessment should '*describe the likely significantly different effect of the policy, strategy or service compared to its effect on other communities (including other island communities) in the area in which the authority exercises its functions*'. Rather than recommend whether the programme should or should not go ahead, the assessment process underway will assess '*the extent to which the authority considers that the policy, strategy or service can be developed or delivered in such a manner as to improve or mitigate, for island communities, the outcomes resulting from it*'.

HIAL absolutely refutes the petitioners' allegations of poor engagement with staff and stakeholders, and would caution against conflating objection to the project with a lack of engagement. HIAL has undertaken over 150 meetings since announcing the project, with staff and politicians, local and national, and will continue to do so.

The current COVID pandemic has emphasised the important role HIAL's airports plays in our communities, but it has also highlighted the vulnerability of our current air traffic service provision and resilience. For example, losing two ATCOs at an island airport will likely result in closures whereas this is highly unlikely in a combined surveillance centre.

HIAL would welcome the opportunity to present more detailed information directly to the Petitions Committee.

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