

# Edinburgh Airport Airspace Change Programme 2019

Stage 1 communications outwith the CAP1616  
process

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## Communications from the Edinburgh Airport Noise Advisory Board (EANAB)

### EANAB's response to the Statement of Need – 10 to 19 April 2019

#### Email from the EANAB representative – 10 April 2019

From: [REDACTED]  
Sent: 10 April 2019 13:10  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: Draft Statement of Need (SoN)

[REDACTED]

As discussed at last Wednesday's EANAB meeting, the ACP Sub-Group has met to consider the draft SoN which was issued to the Board in confidence. On behalf of EANAB we attach our comments for consideration by the EAL Board at their meeting this week.

We appreciate the confidence you have shown in EANAB by sharing this draft with us at this early stage and we hope our comments will be of assistance.

Kind regards

[REDACTED]  
For EANAB ACP Sub-Group

An attachment to the email 10 April 2019 –

**Text of Response to EAL in respect of the Statement of Need prepared by Edinburgh Airport Limited - for comment by members of the EANAB ACP Sub-Group**

The Edinburgh Airport Noise Advisory Board (“EANAB”) welcomes having been given sight of the draft Statement of Need being prepared by EAL for Step 1 of the CAP1616 process for Airspace Change, appreciating that this is still a confidential document but also welcoming the opportunity to offer comments on it, which are as follows -

- It would be good for the Statement of Need to be sufficiently evidence based so that EANAB members are able to pass on to the communities they represent a full and accurate explanation of why the ACP is deemed necessary. In particular, with regard to the data relating to the projected growth of air traffic movements at Edinburgh Airport.
- On a particular point, which may just be a drafting error, there is the statement that “the first wave of departures in the morning [occur] usually between 0400 - 0700”. We wonder if two times of the day have been merged here. The first wave of departures in the morning tends to occur between 0600 – 0700 but whereas the evening peak tends to be between 4pm and 7pm. We think EAL should clarify and, if necessary, amend that statement.
- We are concerned that some options may be being excluded at this early stage by not including some of the headings under Sections 3 and 4, which are presently unticked. For instance, making greater use of the Forth Estuary may well require changes to controlled airspace.

The Board notes that the Step 1B Design principles set out in CAP 1616 “encompass the safety, environmental and operational criteria and strategic policy objectives that the change sponsor seeks to achieve in developing the airspace change proposal (ACP)” and are to be “developed through engagement with stakeholders” to form a “qualitative structure against which design options can be evaluated”.

As we move forward in the CAP1616 process, EANAB hopes that EAL will continue to involve them at the earliest possible opportunity in each Stage of the ACP process, before any key decisions are reached by EAL so that the Board’s advice can be taken into account as things progress, thus fulfilling the expectation of CAP 1616 that “early engagement may help to avoid disagreement later in the process”.

In particular, we would anticipate that the following matters, which the Board has considered at various stages in the past months, would be included in the formative stages of the ACP -

- That the requirements/recommendations of CAP 1736 and noise modelling in accordance with the advice given by the CAA will be implemented in full;
- Due attention will be given to recent Government policies, including in particular the Air Navigation Guidance 2017, concerning the need to manage noise appropriately to minimise disruption to communities;
- Consideration should also be given to public health issues, including, in particular the negative effects of night time flying;
- Due attention should be given to the option of SID replication in accordance with paragraph 3.3b of the Air Navigation Guidance 2017 where appropriate, for example, in respect of air

traffic movements through West Lothian where long established SIDs are routed over sparsely populated land designated as Countryside Belt/Commercial sites; and

- Full consideration should be given to greater use of the Forth Estuary for Runway 24 arrivals and Runway 06 departures to route air traffic away from centres of population in order to significantly reduce overflying of populated areas. There has already been considerable support shown for this by many Community Councils on both sides of the Forth.

These matters encapsulate the initial thoughts of EANAB, and may well be augmented and/or further commented upon. They are offered in the spirit of co-operation and engagement with EAL at this early stage with a view to achieving an acceptable and sustainable balance between commercial objectives and community wellbeing.

**Email to the EANAB representative - 18 April 2019**

**From:** [REDACTED]  
**Subject:** Statement of Need Response  
**Date:** 18 April 2019 at 09:08:06 BST  
**To:** [REDACTED]  
**Cc:** [REDACTED]

Good Morning [REDACTED]

Many thanks for sending over your comments on the Statement of Need last week.

We have gone through these and have responded in the attached document by way of the red text.

We are planning on lodging our Statement of Need formally today and I will let you know when it has been published online.

Kind regards

[REDACTED]

Attachment to the email – 18 April 2019

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- It would be good for the Statement of Need to be sufficiently evidence based so that EANAB members are able to pass on to the communities they represent a full and accurate explanation of why the ACP is deemed necessary. In particular, with regard to the data relating to the projected growth of air traffic movements at Edinburgh Airport.

**The Statement of Need (SoN) is the first stage and does not include evidence. The purpose of the SoN is to highlight the problems we want to find solutions to. We will be evidencing why we need change, it's just that this is not the stage to do so, it will happen later on in the process. With regard to the projected passenger number increase over the coming years, this is reflective of the actual growth against our projected growth as outlined in our Masterplan – [www.edinburghairport.com/masterplan](http://www.edinburghairport.com/masterplan). As you can see, we expected to reach 13.1million passengers by 2020, and in 2018, we reached 14.3 million passengers.**

- On a particular point, which may just be a drafting error, there is the statement that “the first wave of departures in the morning [occur] usually between 0400 - 0700”. We wonder if two times of the day have been merged here. The first wave of departures in the morning tends to occur between 0600 – 0700 but whereas the evening peak tends to be between 4pm and 7pm. We think EAL should clarify and, if necessary, amend that statement.

**This has been amended to 0600-0700.**

- We are concerned that some options may be being excluded at this early stage by not including some of the headings under Sections 3 and 4, which are presently unticked. For instance, making greater use of the Forth Estuary may well require changes to controlled airspace.

**This part of the form is the initial statement of need and what would be expected to change based on our current needs. What it doesn't do is cover all eventualities of potential solutions. What is interesting about a consultation is you can't predetermine the outcome of a consultation; therefore, we haven't predicted what the outcome will be by checking a change to our controlled airspace.**

The Board notes that the Step 1B Design principles set out in CAP 1616 “encompass the safety, environmental and operational criteria and strategic policy objectives that the change sponsor seeks to achieve in developing the airspace change proposal (ACP)” and are to be “developed through engagement with stakeholders” to form a “qualitative structure against which design options can be evaluated”.

As we move forward in the CAP1616 process, EANAB hopes that EAL will continue to involve them at the earliest possible opportunity in each Stage of the ACP process, before any key decisions are reached by EAL so that the Board's advice can be taken into account as things progress, thus fulfilling



the expectation of CAP 1616 that “early engagement may help to avoid disagreement later in the process”.

In particular, we would anticipate that the following matters, which the Board has considered at various stages in the past months, would be included in the formative stages of the ACP -

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These matters encapsulate the initial thoughts of EANAB, and may well be augmented and/or further commented upon. They are offered in the spirit of co-operation and engagement with EAL at this early stage with a view to achieving an acceptable and sustainable balance between commercial objectives and community wellbeing.

**We are constantly trying to achieve a balance between our operational requirements, our regulatory requirements and the needs of our many stakeholders. We welcome a constructive relationship between EANAB and EAL during our Airspace Change Programme, to ensure we hear from all our communities and achieve the right balance between the community, operational and regulatory requirements of CAP1616.**

**Email from the EANAB representative – 19 April 2019**

**From:** [REDACTED]

**Sent:** 19 April 2019 17:14

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Fwd: Statement of Need Response

[REDACTED]

Thanks for this.

[REDACTED]

As it has not yet been circulated to the Board I am doing so now.

Regards

[REDACTED]

## Correspondence with EANAB pertaining to the ACP process – 10 July – 1 August 2019

### Email from the EANAB representative to the CAA – 10 July 2019

On 10 Jun 2019, at 07:47, [REDACTED] via Edinburgh Airport Noise Advisory Board [REDACTED] wrote:

[REDACTED]

EANAB welcomes both the decision by EAL to base the noise modelling on radar data and the willingness of the ERCD to engage with EANAB on noise modelling carried out at EDI.

With this in mind, we'd like to continue the conversation instigated during the CAA's visit on 26 March and to maintain it until the noise modelling method followed does not leave room for concerns about the validity of the resulting noise maps.

Given the evidence from the To70 Report, the current maps could be misleading as to the true impact of aircraft noise over populated areas. Another concern is their use for current Planning purposes. There is therefore a need for some urgency if our communities are to have confidence in EAL's role in minimising aircraft-related noise. With all due respect, from our point of view we see little indication of this and would therefore appreciate an understanding of the programme for producing the maps. More specifically EANAB would like to be involved in the discussion about the improvements to the noise modelling methodology and in particular the input data to the ANCON model. The To70 analysis showed that vertical profiles are significantly different for the various SIDs at EDI. Therefore EANAB expects that average profile will be used for each SID in order to prevent the underestimation/overestimation of noise over certain areas.

In addition the To70 Report clearly indicated the planes do not follow the SIDs. We therefore would appreciate assurance that the modeling is carried out for the actual paths and allowing for the dispersal.

Also, in order to better understand and better communicate the impact of EDI operations to the affected communities EANAB has asked EAL that, in addition to any average noise map (e.g. Laeq) single event footprints (Lmax/SEL) are provided for noise dominant aircraft types and all SIDs.

We look forward to hearing from you.

Regards

[REDACTED]  
on behalf of EANAB Aviation Consultancy Sub-Group

Sent from my iPhone

### Email from the EANAB representative to EAL – 12 July 2019

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**From:** [REDACTED]  
**Sent:** 12 July 2019 14:13  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Re: [EANAB] Noise modelling

[REDACTED] may by now have updated you on the discussion we had on this topic at last Wednesday's EANAB meeting.

You'll be aware of the very productive EAL/EANAB/CAA/ERDC meeting in Edinburgh on 26 March, when it was agreed that the technically-minded representatives of ERDC [REDACTED] and EANAB [REDACTED] could enter into direct dialogue to assist in improving the accuracy of the noise modelling for EDI flights. This why we sent our email of 10 June (below) to [REDACTED] and copied it to yourself and others. You will see in the second paragraph we stressed the need for urgency and requested the programme for producing the updated noise maps. Unfortunately, although that was over 4 weeks ago, as yet, there has been no response from either ERCD or EAL. However, we were encouraged when [REDACTED] advised us at last Wednesday's EANAB meeting, that you had escalated the urgency of the need for new noise maps with ERCD.

Meanwhile, your current ACP is progressing, with stage 1B of CAP1616 due to complete on 25 October - this is, in less than 4 months time. The ACP programme is to then immediately move onto stage 2 - development of options. A fundamental prerequisite for the exploration of options, is an accurate understanding of the existing noisescapes experienced by our communities. This is why EANAB has been explaining its concerns about assumptions made for producing noise maps at EDI since August 2018. These concerns were justified by To70 analysis at end of 2018.

Given EANAB's role both as a stakeholder in the CAP1616 process and as a central part of EAL's community engagement programme we note:

- We need to have an open discussion about the details of noise modelling methodology to be applied at EDI before the maps are produced.
- To70 analysis has shown that the departure profiles at EDI are SID dependent and therefore it would be problematic to assume an average (radar measured) profile for all SIDs. This is even truer in the context of an ACP where noise modelling will be key to determining which levels of aircraft noise will affect which area.
- We seek confirmation that Lmax/SEL footprint of noise dominant aircraft types for all existing SIDs based on an updated noise modelling method will be provided to EANAB as representatives of many of the communities affected by aircraft noise.

Given the growing urgency around this central issue we would greatly appreciate an early reply.

Kind regards

[REDACTED]  
On behalf of EANAB

## Email to the EANAB representative – 17 July 2019

On 17 Jul 2019, at 11:32, [REDACTED] wrote:

[REDACTED]

Following your email, here is our suggestion on a way forward. It's based on a few key thoughts. Firstly, we want to be best in class, providing clear modelling and giving our communities and other stakeholders as much confidence in possible in our mapping. Secondly, it also has to be complaint with our regulator. And lastly, and I hope this is where we can agree, that it needs to be deliverable by ECRD and not too cumbersome that they struggle with the workload.

With that in mind, here is our proposal:

- We want all modelling to be based on EDI Radar Data
- We want to take dispersal of tracks into consideration in the mapping provided to communities (ERCD ANCON system dependent)
- We want 5-year Noise Action Plans (NAP) in future to include an annexe containing supplemental mapping for the following factors/measurements on each SID:
  - o LAeq, Lmax, and SEL
  - o Most frequent aircraft based on the previous year's data
  - o 2 x loudest jet aircraft
  - o 1 x quietest aircraft
- Contour mapping will be produced for the Insulation Scheme separately biannually for LAeq only.

With regards to modelling on the ANCON system, while we are happy to take into account the dispersal of tracks within a flight path, we are awaiting further communication from ERCD detailing what the ANCON system can and cannot provide.

Once we get clarity on this mapping can be commissioned.

We believe this approach delivers on our criteria, is pragmatic and allows us to establish a strong baseline before any ACP process.

[REDACTED]

Regards

[REDACTED]

**Email from the EANAB representative – 29 July 2019**

Sent: 29 July 2019 07:36

To: [Redacted]

Cc: [Redacted]

Subject: ACP Questions

[Redacted]

Following discussion of this topic at this month's EANAB meeting here are the Board's questions in relation to the current ACP.

We note that we are now well into Stage 1B - Design Principles. We think it will be helpful to highlight some relevant points from the early part of CAP1616 (using the paragraph numbers as references):

- (107) Step1B is for the change sponsor to identify and communicate the design principles to be applied to the airspace change design.
- (109) Design principles to be drawn up through discussion between change sponsor and affected stakeholders.
- (110) The aim is for there to be a good level of understanding by change sponsors as to what design considerations are important to stakeholders. This is a key stage in preventing misunderstanding or later disagreements by facilitating conversations, particularly concerning changes with more significant potential impacts.
- (111) The design principles must be developed in a local context and must address any local trade-offs that need to be made, for example by addressing whether aircraft should, as a priority, avoid flying over specific local areas or populations.
- (113) Change sponsors must seek feedback from stakeholders on the proposed airspace change proposal Level.
- (114) The design principles and the outcome of the engagement activity must be submitted to the CAA for review.

Can you therefore share your Design Principles with us now so we can consider them prior to discussing them with you?

Given the central importance of accurate noise modelling in the ACP and your wish for the noise modelling to be "best in class", we are also copying this to [Redacted] at ERCD and [Redacted] at the CAA, to assist our ongoing dialogue with them on this issue. In this regard we note your [Redacted] email to us of 17/7/19 (copy attached for information). We have contacted [Redacted] to arrange an early meeting with her.

As the end of Stage 1B is rapidly approaching, we would greatly appreciate an early response.

Regards

[Redacted]  
On behalf of EANAB

Attachment to the email of 29 July

| Topic                             | Item | Question   |
|-----------------------------------|------|--|
| Capacity                          | 1    | The reference to a target maximum runway capacity of 50 movements per hour disappears between v1 and v2 of the Statement of Need. In the minutes of the Assessment Meeting there is no record that this change was requested by the CAA.<br><b>What is the reason for this change?</b>   |
|                                   | 2    | A Runway Capacity Target is one of the key operational criteria required for a meaningful development of design principles in step1B of the CAP1616 process.<br><b>What is the target runway capacity target driving the ACP?</b>  |
|                                   | 3    | The current declared runway capacity is a maximum of 42 movements per hour. It is essential for affected communities to better understand the runway capacity issue driving the ACP.<br><b>Will EAL provide EANAB with the number of flights per hour data for the last 36 months?</b>   |
| Growth                            | 4    | Separate statements have been made by EAL concerning the negative impact on growth that would arise from cancelling the anticipated halving of APD.<br><b>What were the initial growth projections relevant to the capacity issue (assuming ADP cut) and what are the revised growth projections used for this ACP?</b>  |
|                                   | 5    | Since the recent declaration by the Scottish government of the country being in a "Climate Emergency" and its setting of targets for carbon emissions there have been media reports about the impact on flying in the UK. In particular the possibility of domestic flights being restricted/banned in the UK. This is speculation at the moment and even if it occurs it will be medium to long term before it happens.<br><b>However can EAL advise how they view this and how they see it impacting future planning for growth?</b> |
| Airspace issues and opportunities | 6    | <b>Can EAL provide more details on the "confined airspace" issue mentioned in slide 5 of EAL's presentation during the assessment meeting?</b>   |
|                                   | 7    | <b>How many early turns and flight paths are being planned by EAL on each runway and what determines these targets?</b>  |
|                                   | 8    | <b>Previous trial and ACP targeted a 1-minute departure interval. Is that the case for this ACP?</b>   |
|                                   | 9    | Some experience was gained from the previous trial for the old ACP, over the last 4 years, to educate this new ACP.<br><b>What is the maximum distance and altitude at which the "early turn" can be situated from DER to allow the desired departure interval?</b>  |
|                                   | 10   | <b>Would a single additional flight path (combined with existing flown flight paths) be sufficient to fix the capacity issue?</b>  |
|                                   | 11   | EAL have been working with NATS looking at ways in which the upper airspace around EDI might be better used, in particular the area out over the Firth of Forth. <b>What ideas are emerging from these meetings?</b>   |
|                                   | 12   | <b>What is the opportunity for a change to the "designated end of runway"?<br/>Is EAL's intention seeking an early turn before current DER position?</b>   |
|                                   | 13   | <b>Can specific details be provided of discussions with NATS and/or other stakeholders regarding FASI-N and the relationship with EAL's ACP? What are the 'opportunities' as outlined in the minutes of the Stage 1a assessment meeting and what is the likelihood of any integration of the EAL ACP with the FASI-N project?</b>  |

|                                 |    |  |
|---------------------------------|----|--|
|                                 | 14 | <b>Will the sponsors contemplate a simpler RNAV replication exercise, as opposed to the creation of additional flight paths?</b>   |
| Environmental impact assessment | 15 | <b>As baseline noise maps and footprints are crucial to the development of Design Principles at step1B, when is the target date for producing these?</b>   |
|                                 | 16 | Some significant changes are to be made to the way ANCON noise modelling is carried out at EDI, notably the use of radar data to define where the aircraft are flown.<br><b>Will radar data analysis be used to define both the vertical profile and track position of aircraft?</b>   |
|                                 | 17 | Previous independent analysis of radar data revealed that the vertical profile varied significantly over the various SIDs.<br><b>Will the radar data used to define the vertical profile of aircraft be SID specific in an effort to make the noise modelling as representative as possible of operations at EDI?</b>  |
|                                 | 18 | <b>What period will be used for establishing the baseline of the environmental impact assessment both in terms of radar analysis and traffic analysis?</b>   |
|                                 | 19 | <b>Can EAL confirm that population impact analysis will be carried within the LOAEL of 51db LAeq16h and 45dB LAeq8h for daytime and night time respectively?</b>   |
|                                 | 20 | <b>Can EAL confirm that SEL/Lmax footprint maps for B738, EA33, EA319C, and EA320C will be provided to EANAB to allow a meaningful engagement from and beyond step1B of the CAP1616 process?</b>   |
| Design principles               | 21 | <b>What environmental criteria are used by the sponsors as part of the development of the design principles in step 1B of the CAP1616 process?</b>   |
|                                 | 22 | <b>Will the ACP be developed to avoid the overflying of new people (i.e. people not currently overflown by existing flight paths)?</b>   |
|                                 | 23 | <b>Will the ACP be developed to minimise the overall number of people exposed to aircraft noise (within LOAEL limits)?</b>   |
|                                 | 24 | <b>Will the ACP be designed to keep the overall population within LOAEL levels equal or lower to the current baseline situation?</b>   |
|                                 | 25 | <b>Given two areas, A and B, with different baseline aircraft noise levels; area A is exposed to higher levels than area B. The previous ACP had proposals that allowed area A's exposure to aircraft noise to increase and to balance that by reducing area B's exposure to aircraft noise. Will the same rationale be contemplated as an environmental criterion for the development of design principles in step 1B of the CAP1616 process?</b> |
|                                 | 26 | <b>Can EAL provide EANAB with details of the Noise Preferential Routes and noise abatement procedures relevant to the development of design principles?</b>  |
|                                 | 27 | <b>Can EAL clarify what, in its view, will constitute overflying in terms of height and distance?</b>  |
|                                 | 28 | <b>How will the altitude-based-priorities (as defined in the Air Navigation Guidance 2017) be taken into account during the development of design principles and in particular in the context of creating an early turn below 7000ft?</b>  |
|                                 | 29 | <b>Can EAL provide EANAB with the up-to-date local plans in area affected by the proposals which are used to inform the development of design principles?</b>  |
|                                 | 30 | <b>Will EAL consider night time flight restriction as part of development of design principles?</b>  |

|                   |    |   |
|-------------------|----|---|
| <b>Engagement</b> | 31 | <p>EAL are abandoning public meetings in favour of focus groups and drop-in sessions. While these activities can be very useful, from the perspective of our communities, it lays EAL open to the following concerns:</p> <ol style="list-style-type: none"> <li>1) It is wrong to abandon public meetings. Yes, maybe only a few <u>folk</u> get to speak, but everyone hears the points they are making and can indicate their support or otherwise.</li> <li>2) Using only focus groups and drop in sessions could be seen as a divide and rule strategy.</li> <li>3) They are open to abuse as the focus groups can be carefully selected to get the required result.</li> <li>4) Most groups in our communities don't have a full command of all the issues involved, making it easy for EAL to bamboozle them with lots of figures and aviation abbreviations, and produce facts that the participants are not equipped to challenge.</li> </ol> <p><b>Will EAL reconsider carrying out community engagement via public meetings?</b></p> |
|-------------------|----|---|

**Email to the EANAB representative – 31 July 2019**

**From:** [REDACTED]  
**Sent:** 31 July 2019 17:34  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: ACP Questions

Hello [REDACTED]

Thank you for the email below.

[REDACTED] has agreed an EANAB meeting for 21 August to discuss the ACP process with EANAB. We have received your attachment with 31 questions. Thank you for providing this. We'll base our presentation for this meeting on these questions.

As you know, we must work to guidelines from the CAA in our Airspace Change Programme. CAP1616 is very descriptive with the Stages and Steps we must follow. We currently are working through our Step 1B plan and we can discuss this with you on 21 August.

I note your separate email about an urgent meeting re noise modelling to which I have just responded.

Let me know if there's anything you want to discuss before the meeting on 21 August.

Regards, [REDACTED]

**Email from the EANAB representative – 1 August 2019**

**From:** [REDACTED]  
**Sent:** 01 August 2019 15:55  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Re: ACP Questions

[REDACTED]  
Thanks for your response.  
You ask if there is anything we'd like to discuss before the meeting on 21/8/19. As noted in my email of 29/7/19 (below) to you, could you please send us your ACP Design Principles so that the Board can make an informed contribution to their discussion at the meeting on 21 August.  
Regards  
[REDACTED]  
on behalf of EANAB



**Email to the EANAB representative – 1 August 2019**

**From:** [redacted]  
**Sent:** 01 August 2019 16:29  
**To:** [redacted]  
**Cc:** [redacted]  
[redacted]  
**Subject:** RE: ACP Questions

Hello [redacted]

As you know, CAP1616 outlines the process to follow for the development of design principles.

We do not have design principles to share with EANAB. They will be developed through a stakeholder engagement process which will take a number of weeks and which is being facilitated by an external provider.

We can talk about the CAP1616 process further at the meeting on 21 August, and Edinburgh Airport’s approach to the Airspace Change Programme for the next three years.

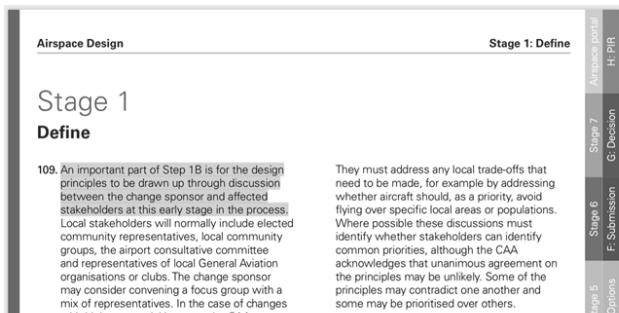
Regards, [redacted]

**Email from the EANAB representative – 10 August 2019**

**From:** [redacted]  
**Sent:** 10 August 2019 10:07  
**To:** [redacted]  
**Cc:** [redacted]  
**Subject:** RE: ACP Questions

We refer to your responses of 31 July and 1 August to our email to [redacted] and yourself of 29 July. All these emails are in the thread below.

With all due respect, we are having difficulty in understanding how you can cite CAP1616 as a reason for being unable to share your Design Principles with us at this stage, when all of our justifications for requesting this information are taken from the same document - that is CAP1616. Here is a screen shot from it where we have highlighted in blue, the essence of what should be happening.



You are currently well into Step 1B (due to complete at the end of October) so time is limited, which is why we were pleased your colleague [redacted] was able to confirm at the Board’s monthly meeting on Wednesday that a special EAL/EANAB meeting would proceed on 21 August to discuss the ACP. As your Noise Advisory Board, we are keen to work with you on the basis of CAP1616 to meaningfully engage with you on your current ACP. During our meeting it was noted for us to be able to do this, we would need to receive written answers to as many of our questions as you can manage by Friday 16 August. This would allow the Board a few days in which to consider the answers to facilitate an informed discussion at the meeting.

We look forward to hearing from you.

Regards  
[redacted]  
On behalf of EANAB

## Email to the EANAB representative - 12 August 2019

On 12 Aug 2019, at 10:13 [REDACTED] wrote:

Hello [REDACTED]

Thanks for your email.

In the para you have highlighted, it says engagement activity must take place regarding design principles. Design principles are a list of agreed criteria to help evaluate future flight path options and provide the foundations for the Airspace Change Programme.

There are many ways developing the list of design principles can happen – we considered two options: a sponsor can decide a list of design principles and test these with a number of stakeholders; or a sponsor can work with a number of stakeholders to develop a list of draft design principles for the sponsor to evaluate and short list, then retest the short list with stakeholders. At Edinburgh Airport, we have decided on the second approach – we believe this to be a much more open process.

We have engaged a market research supplier who will be running a number of engagement and discussions sessions on our behalf – stakeholders will cover representatives of industry and community. Due to the feedback from EANAB throughout the process of CAP725 on our approach, we believe appointing an external market research supplier to run these sessions on our behalf provides a very measured and independent approach allowing for better discussion, accuracy of process, and accurate data capture. We won't be completely hands off, as we understand this is a very important stage during the CAP1616 process.

As you can imagine, there are many stakeholders to involve. We have listed EANAB as one of stakeholders needing to be involved in this process.

As you know I've been on leave for a week, so I'm just working my way through a few hundred emails... but let me know if you have any further questions about CAP1616's process, and I'll do my best to clarify our application of the guidance before our meeting next week.

Regards [REDACTED]

**Email from the EANAB representative – 13 August 2019**

**From:** [REDACTED]

**Sent:** 13 August 2019 12:06

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Re: ACP Questi

We refer to our meeting this morning when [REDACTED] and yourself, primarily to discuss noise modelling.

We also briefly discussed the special EANAB/EAL meeting to be held on 21 August to review the ACP. You noted you intended to answer at that meeting the questions attached to our email to you of 29 July (a further copy attached for information). I responded we'd received further questions from Board members, which as agreed are attached. Some of them may be similar to earlier ones and we appreciate you may not be able to address all of these additional questions at our forthcoming special meeting.

Regards

[REDACTED]  
On behalf of EANAB

**ADDITIONAL ACP QUESTIONS**

On the CAA website, Edinburgh Airport Limited ("EAL") is quoted as stating that the purpose for its proposed ACP is as follows: -

"Edinburgh Airport is growing fast. We propose to introduce a number of RNAV1 Standard Instrument Departures (SIDs), RNAV1 Arrival Transitions and RNAV5 STARS in order to meet technical requirements and improve airspace efficiency and capacity. Our target runway capacity is 50 movements per hour. These new routes will take advantage of improved navigational capability, which will allow better planning and increase the capacity of the airspace and the runway, particularly in peak times. This may also minimise the environmental impacts of flights in terms of the total number of people overflowed, as well as when and how often they are overflowed while also cutting average CO2 emissions. We believe an improved airspace with the right flight paths and technology for Edinburgh Airport will ensure our airport can meet existing and future demand by increasing the capacity of its runways and allow flights to depart with fewer delays and environmental impacts."

The following additional questions arise re the ACP:

1. Could EAL please provide substantiated evidence of (a) those dates/times, if any, at which ATMs exceeded 42 per hour ("ph"); (b) those dates/times, if any at which ATMs equalled 42ph; and (c) if the target of 42 ph currently in force has not been met at any time, the maximum number of ATMs achieved in any one-hour period at EA in the last seven years - including the date(s)/time(s) that the maximum number of ATMs ph has been achieved?
2. What account, if any, has EAL taken of the significant decrease in the rate of growth demonstrated on the graph recently produced by [REDACTED] graph to be attached???
3. What account has EAL taken of the recent declaration by the Scottish Government of a climate emergency which involves Scotland's target of reducing greenhouse gases to "net-zero" by 2045 - given that transport - including aviation - accounts for the largest share - 36.8% of emissions in Scotland?
4. What account has EAL taken of the recent decision of the Scottish Government not to reduce Air Passenger Duty?
5. What account has EAL taken of the general population, but in particular, younger people, being influenced by the Extinction Rebellion movement and its aims to reduce emissions by inter alia travelling less by air in future?
6. Why has EAL referred to "runways" in its stated purpose above when it has recently sacrificed its second runway?

7. What account has EAL taken of UK Government Guidance - as set out in ANG 2017 sections:
- 3.3 - that "when considering requests to change the airspace design, the CAA should apply the following altitude-based priorities of the government: a. in the airspace from the ground to below 4,000 feet the government's environmental priority is to limit and, where possible, reduce the total adverse effects on people; b. where options for route design from the ground to below 4,000 feet are similar in terms of the number of people affected by total adverse noise effects, preference should be given to that option which is most consistent with existing published airspace arrangements"?
- 3.7 - Below 4,000 feet, there is a strong likelihood that aircraft could create levels of noise exposure above the LOAELs identified above, which is reflected in the Altitude Based Priorities.
- 3.8 - There may however be options which perform comparatively better in terms of minimising more serious impacts as opposed to annoyance, or certain options may be better for day noise than night noise, or vice versa. In these instances, the CAA should verify that sponsors have considered the relative trade-offs and taken into account any community views on what the objectives in terms of noise should be.
- 5.18 - that "In order to provide communities with transparency on the numbers of aircraft flown near them, the designated airports should publish details of where the aircraft are actually flying and the amount of noise created. These airports, working with their local communities, can determine the precise information they wish to publish but we [the CAA] anticipate that it may include: a. the average distance of how close to the standard instrument departure route the aircraft have flown up to an altitude of 4,000 feet, or higher if the airport wishes; b. the areas, and the specific number of departing aircraft, where 80%, 90%, 95% and 99% of air traffic has flown up to an altitude of 4,000 feet and the noise level in each of these areas; and c. details on the areas overflowed by arriving aircraft from an altitude of below 4,000 feet to when they reach the runway?"
8. Given that a substantial number of residents in the Broxburn/Uphall/Winchburgh live within a distance similar to the residents of Barnton/Cramond, will EAL ensure that these residents are not overflowed in the airspace from the ground to below 4,000 feet (amsl)?
9. Given that the existing SID on Runway 24 follows a route from the point of departure at Edinburgh Airport to the A899 dual carriageway at Livingston over land formally designated as Countryside Belt by West Lothian Council which is almost entirely comprised of agricultural land/industrial estates and is therefore sparsely populated, will EAL retain that route - by replication of the route - and thus avoid the significant adverse effects which would be sustained by residents in Broxburn/Uphall/Winchburgh if they are overflowed by jet aircraft in the airspace from the ground to below 4,000 feet (amsl) - contrary to UK Government Guidance?

Supplementary question to Q.28 of our list of 29 July -

How will EAL's desire to create an early turn, increasing, or introducing, noise at a particularly sensitive time (6-7am) in many communities be reconciled with current Government policy on aviation noise?

## Email to the EANAB representative – 13 August 2019

On 13 Aug 2019, at 12:44, [REDACTED] wrote:

Hello [REDACTED]

It was good to meet today, I think we moved a bit closer to where we are both trying to get to. We are working up the notes from the meeting and as discussed will circulate this around the group soon.

Thanks for sending these additional 10 questions on – as you mentioned, there is duplication in the new questions to the previous list. I'll include and cross reference answers where appropriate. I'll aim to get the full list of questions back to you by the end of the week but hopefully in the next day or two.

As discussed, I think the meeting would be best placed if we went through CAP1616 and EAL's approach to the Airspace Change Programme. Hopefully the answers to the 40-ish questions are self-explanatory and don't need further discussion at the meeting, but happy to pick up anything that is not clear. The meeting is planned to start at 6.30pm and finish by 9pm so just want to make sure we both get the most out of the time together.

Regards [REDACTED]

(FYI I've haven't copied [REDACTED] as this email doesn't give them any new information. Also, we can't email Edinburgh-nmb-member email as it sends us a rejection email).

### Email from the EANAB representative – 15 August 2019

On 15 Aug 2019, at 12:42, [REDACTED] wrote:

[REDACTED]

Given the technical nature of Monday's discussion you kindly offered to share notes taken by [REDACTED] so we could review them to assist in ensuring the noise modelling requirements are agreed prior to you instructing ERCD.

I had gathered from our meeting that we would have received them by now, so can you advise when they will be sent?

Regards

[REDACTED]

### Email to the EANAB representative – 15 August 2019

**From:** [REDACTED]

**Date:** 15 August 2019 at 18:07:50 BST

**To:** [REDACTED]

**Cc:** [REDACTED]

[REDACTED]

**Subject:** ACP Question Responses

Good Evening [REDACTED]

As discussed earlier, please see attached the responses to EANAB's ACP questions.

Hopefully this will lead to informed discussions ahead of next Wednesday's meeting where you can ask any follow up questions.

All the best

[REDACTED]

Attachment to the email of 15 August 2019

| Topic    | Item | EANAB question   | Edinburgh Airport answer   |
|----------|------|--|--|
| Capacity | 1    | The reference to a target maximum runway capacity of 50 movements per hour disappears between v1 and v2 of the Statement of Need. In the minutes of the Assessment Meeting there is no record that this change was requested by the CAA.<br><b>What is the reason for this change?</b>   | It was CAA advice to not pre-determine our outcomes, so we removed the end of the sentence that referenced 50 movements per hour.  |
|          | 2    | A Runway Capacity Target is one of the key operational criteria required for a meaningful development of design principles in step1B of the CAP1616 process.<br><b>What is the target runway capacity target driving the ACP?</b>  | Our published runway capacity approved by the CAA is 42 movements (mixed arrivals and departures) per hour. The objective of the Airspace Change Programme is to increase runway capacity and to reduce delays during peak times. As discussed in Q1's answer, we haven't pre-determined this with a 'number'. However, a number will be realised as part of the process.  |
|          | 3    | The current declared runway capacity is a maximum of 42 movements per hour. It is essential for affected communities to better understand the runway capacity issue driving the ACP.<br><b>Will EAL provide EANAB with the number of flights per hour data for the last 36 months?</b>   | No.<br><br>Why do you need data for the past three years?  |
| Growth   | 4    | Separate statements have been made by EAL concerning the negative impact on growth that would arise from cancelling the anticipated halving of APD.<br><b>What were the initial growth projections relevant to the capacity issue (assuming ADP cut) and what are the revised growth projections used for this ACP?</b>  | The Scottish Government announced in May that it was to scrap its promised cut to aviation tax and the introduction of Air Departure Tax, a decision we predict will deliver a slowdown in passenger numbers. As a responsible business, it is our aim to continue to deliver growth in terms of destinations and routes to encourage passengers to travel - this is demonstrated in the recent announcement of Wizz Air starting operations from Edinburgh later this year. |
|          | 5    | Since the recent declaration by the Scottish government of the country being in a "Climate Emergency" and its setting of targets for carbon emissions there have been media reports about the impact on flying in the UK. In particular the possibility of domestic flights being restricted/banned in the UK. This is speculation at the moment and even if it occurs it will be medium to long term before it happens.<br><b>However can EAL advise how they view this and how they see it impacting future planning for growth?</b> | We are watching this with interest. At the moment all of our growth plans are based on current data - this is currently speculation. We will continue our work with wider industry through various working groups and Sustainable Aviation to understand changes to industry and the challenges and opportunities these present.   |

|                                   |    |   |   |
|-----------------------------------|----|---|---|
| Airspace issues and opportunities | 6  | <b>Can EAL provide more details on the "confined airspace" issue mentioned in slide 5 of EAL's presentation during the assessment meeting?</b>  | As with all airports, Edinburgh Airport operates within regulated airspace surrounding the airport. Our airspace has neighbouring airspace controlled by the MOD, General Aviation and other airports.  |
|                                   | 7  | <b>How many early turns and flight paths are being planned by EAL on each runway and what determines these targets?</b>   | We have no plans for any flight path options - we are just beginning the CAP1616 Airspace Change process. Flight path options begin in Stage 2, specifically Step 2A: Options development.  |
|                                   | 8  | <b>Previous trial and ACP targeted a 1-minute departure interval. Is that the case for this ACP?</b>  | We have no plans for any targeted departure interval separation times - we are just beginning the CAP1616 Airspace Change process. Flight path options begin in Stage 2, specifically Step 2A: Options development and it is during this process that potential usage is discussed as part of the development of a wider route network.   |
|                                   | 9  | Some experience was gained from the previous trial for the old ACP, over the last 4 years, to educate this new ACP.<br><b>What is the maximum distance and altitude at which the "early turn" can be situated from DER to allow the desired departure interval?</b> | The guidance for our current runway usage is that flights can begin their turn before the DER and a small number do that. The CAA has been clear in the past that any new designs must follow current design guidelines that state that no flights can turn before the DER. This will be considered when we come to finalising our design options.  |
|                                   | 10 | <b>Would a single additional flight path (combined with existing flown flight paths) be sufficient to fix the capacity issue?</b>   | There are two points to this answer:<br>- the direction of our departures and arrivals is weather dependent, whatever happens at one end of the runway needs to be replicated at the other end of the runway. This means there is no solution where just one additional flight path would be a solution within our Airspace Change Programme.<br>- the position of a flight path is not the only thing that is considered during the Airspace Change Programme - what aircraft use the flight path (ie jet or propeller) and what times of operation (ie peak, non-peak, night time) are also considered. The entire need and solution need to be |

|                                 |    |   |   |
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|                                 |    |   | considered in the whole, therefore currently this question is impossible to answer.   |
|                                 | 11 | EAL have been working with NATS looking at ways in which the upper airspace around EDI might be better used, in particular the area out over the Firth of Forth. <b>What ideas are emerging from these meetings?</b>  | Based on our discussions with EANAB and from our learnings during our previous airspace change programme, we have been pushing NATS Prestwick centre to consider allowing us to use the Firth of Forth more – we have been challenging old thinking.<br><br>NERL (part of NATS) have proposed an option that would allow EAL to use part of the MOD airspace and fly over the Firth of Forth. This proposal is a concept and we have agreed to further the investigation into this concept to see if it is a viable option for EAL to consider within scope of our Airspace Change Programme. |
|                                 | 12 | <b>What is the opportunity for a change to the “designated end of runway”?<br/>Is EAL’s intention seeking an early turn before current DER position?</b>  | The guidance for our current runway usage is that flights can begin their turn before the DER and a small number do that. The CAA has been clear in the past that any new designs must follow current design guidelines that state that no flights can turn before the DER. This will be considered when we come to finalising our design options.  |
|                                 | 13 | <b>Can specific details be provided of discussions with NATS and/or other stakeholders regarding FASI-N and the relationship with EAL’s ACP? What are the ‘opportunities’ as outlined in the minutes of the Stage 1a assessment meeting and what is the likelihood of any integration of the EAL ACP with the FASI-N project?</b> | The opportunity is what is mentioned in Q11’s answer.<br><br>This proposal is a concept and we have agreed to further the investigation into this concept to see if it is a viable option for EAL to consider within scope of our Airspace Change Programme.  |
|                                 | 14 | <b>Will the sponsors contemplate a simpler RNAV replication exercise, as opposed to the creation of additional flight paths?</b>  | Replication of existing routes will be included in the flight path options development and analysis.  |
| Environmental impact assessment | 15 | <b>As baseline noise maps and footprints are crucial to the development of Design Principles at step 1B, when is the target date for producing these?</b>   | Baseline noise maps and footprints are critical to the CAP1616 process – these are needed at stage 2A not 1B.   |
|                                 | 16 | Some significant changes are to be made to the way ANCON noise modelling is carried out at EDI, notably the use of radar data to define where the aircraft are flown.   | Yes   |
|                                 |    | <b>Will radar data analysis be used to define both the vertical profile and track position of aircraft?</b>   |   |
|                                 | 17 | Previous independent analysis of radar data revealed that the vertical profile varied significantly over the various SIDs.<br><b>Will the radar data used to define the vertical profile of aircraft be SID specific in an effort to make the noise modelling as representative as possible of operations at EDI?</b>             | Yes   |
|                                 | 18 | <b>What period will be used for establishing the baseline of the environmental impact assessment both in terms of radar analysis and traffic analysis?</b>  | One year’s full traffic data – Jan 1st to December 31st for the year prior to the assessment being carried out.   |
|                                 | 19 | <b>Can EAL confirm that population impact analysis will be carried within the LOAEL of 51db LAeq16h and 45dB LAeq8h for daytime and night time respectively?</b>  | Yes   |
|                                 | 20 | <b>Can EAL confirm that SEL/Lmax footprint maps for B738, EA33, EA319C, and EA320C will be provided to EANAB to allow a meaningful engagement from and beyond step 1B of the CAP1616 process?</b>   | June has confirmed that we will supply this mapping as requested through EANAB – we are currently waiting on ERCD to provide further information to allow us to progress.<br><br>CAP1616 requires us to show SEL/Lmax footprint maps – however on which aircraft type is yet to be determined and this will be determined as part of the Airspace Change Programme when we reach that stage.  |
|                                 | 21 | <b>What environmental criteria are used by the sponsors as part of the development of the design principles in step 1B of the CAP1616 process?</b>  | We have engaged an environmental consultancy to provide guidance and advice on the environmental requirements under CAP1616.  |
|                                 | 22 | <b>Will the ACP be developed to avoid the overflying of new people (i.e. people not currently overflown by existing flight paths)?</b>  | Design principles are a list of agreed criteria to help evaluate future flight path options and provide the foundations for the Airspace Change Programme.<br><br>CAP1616 says that engagement activity must take place regarding the development of design principles. We will work with a number of stakeholders to develop a list of draft design principles for the sponsor to evaluate and short list, then retest the short list with stakeholders. We believe this to be a much more open process.   |

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|--|----|--|--|
|  |    |  | <p>We have engaged a market research supplier who will be running a number of engagement and discussions sessions on our behalf – stakeholders will cover representatives of industry and community. Due to the feedback from EANAB throughout the process of CAP725 on our approach, we believe appointing an external market research supplier to run these sessions on our behalf provides a very measured and independent approach allowing for better discussion, accuracy of process, and accurate data capture. We won't be completely hands-off, as we understand this is a very important stage during the CAP1616 process.</p> <p>Therefore, at this stage, it is impossible to answer this question.</p>  |
|  | 23 | <b>Will the ACP be developed to minimise the overall number of people exposed to aircraft noise (within LOAEL limits)?</b>   | <p>Design principles are a list of agreed criteria to help evaluate future flight path options and provide the foundations for the Airspace Change Programme.</p> <p>CAP1616 says that engagement activity must take place regarding the development of design principles. We will work with a number of stakeholders to develop a list of draft design principles for the sponsor to evaluate and short list, then retest the short list with stakeholders. We believe this to be a much more open process.</p> <p>We have engaged a market research supplier who will be running a number of engagement and discussions sessions on our behalf – stakeholders will cover representatives of industry and community. Due to the feedback from EANAB throughout the process of CAP725 on our approach, we believe appointing an external market research supplier to run these sessions on our behalf provides a very measured and independent approach allowing for better discussion, accuracy of process, and accurate data capture. We won't be</p>  |
|  |    |  | <p>completely hands-off, as we understand this is a very important stage during the CAP1616 process.</p> <p>Therefore, at this stage, it is impossible to answer this question.</p>  |
|  | 24 | <b>Will the ACP be designed to keep the overall population within LOAEL levels equal or lower to the current baseline situation?</b>   | <p>Design principles are a list of agreed criteria to help evaluate future flight path options and provide the foundations for the Airspace Change Programme.</p> <p>CAP1616 says that engagement activity must take place regarding the development of design principles. We will work with a number of stakeholders to develop a list of draft design principles for the sponsor to evaluate and short list, then retest the short list with stakeholders. We believe this to be a much more open process.</p> <p>We have engaged a market research supplier who will be running a number of engagement and discussions sessions on our behalf – stakeholders will cover representatives of industry and community. Due to the feedback from EANAB throughout the process of CAP725 on our approach, we believe appointing an external market research supplier to run these sessions on our behalf provides a very measured and independent approach allowing for better discussion, accuracy of process, and accurate data capture. We won't be completely hands-off, as we understand this is a very important stage during the CAP1616 process.</p> <p>Therefore, at this stage, it is impossible to answer this question.</p> |
|  | 25 | <b>Given two areas, A and B, with different baseline aircraft noise levels; area A is exposed to higher levels than area B. The previous ACP had proposals that allowed area A 's exposure to aircraft noise to increase</b> | <p>Design principles are a list of agreed criteria to help evaluate future flight path options and provide the foundations for the Airspace Change Programme.</p>  |



|    |  |   |  |
|----|--|---|--|
|    |  | <b>and to balance that by reducing area B's exposure to aircraft noise. Will the same rationale be contemplated as an environmental criterion for the development of design principles in step 1B of the CAP1616 process?</b>             | <p>CAP1616 says that engagement activity must take place regarding the development of design principles. We will work with a number of stakeholders to develop a list of draft design principles for the sponsor to evaluate and short list, then retest the short list with stakeholders. We believe this to be a much more open process.</p> <p>We have engaged a market research supplier who will be running a number of engagement and discussions sessions on our behalf – stakeholders will cover representatives of industry and community. Due to the feedback from EANAB throughout the process of CAP725 on our approach, we believe appointing an external market research supplier to run these sessions on our behalf provides a very measured and independent approach allowing for better discussion, accuracy of process, and accurate data capture. We won't be completely hands-off, as we understand this is a very important stage during the CAP1616 process.</p> <p>Therefore, at this stage, it is impossible to answer this question.</p> |
| 26 |  | <b>Can EAL provide EANAB with details of the Noise Preferential Routes and noise abatement procedures relevant to the development of design principles?</b>   | <p>Noise preferential routes and noise abatement procedures are currently in place at EAL even though we don't have a requirement to do so. Aircraft must reach an altitude of 3,000ft before turning from the SID, unless the plane is jet on GRICE3C which must reach an altitude of 4,000ft before turning from the SID.</p> <p>As mentioned, the design principles are being developed through stakeholder engagement.</p>   |
| 27 |  | <b>Can EAL clarify what, in its view, will constitute overflying in terms of height and distance?</b>   | <p>CAP1616 includes a definition of overflight: "For the purposes of airspace changes, overflight is defined according to the CAA's report, CAP1498 which outlines a measurement based</p>   |
|    |  |   | <p>on community perception. It does not portray noise impacts – <a href="http://www.caa.co.uk/cap1498">www.caa.co.uk/cap1498</a>.</p>  |
| 28 |  | <b>How will the altitude-based-priorities (as defined in the Air Navigation Guidance 2017) be taken into account during the development of design principles and in particular in the context of creating an early turn below 7000ft?</b> | <p>Our Airspace Change Programme will meet Air Navigation Guidance 2017. At this stage I can not confirm how it will be taken into account in the context of creating an early turn below 7,000ft as we are not in the place where an early turn is an option – this will be investigated and applied as part of Stage 2 specifically 2A Options Development.</p>  |
| 29 |  | <b>Can EAL provide EANAB with the up-to-date local plans in area affected by the proposals which are used to inform the development of design principles?</b>   | <p>There are currently no proposals for new flights. We are right at the early stages of CAP1616 which involve stakeholder engagement to develop design principles. If ever needed Local Plans are available direct from the relevant local authorities.</p>   |
| 30 |  | <b>Will EAL consider night time flight restriction as part of development of design principles?</b>   | <p>Design principles are a list of agreed criteria to help evaluate future flight path options and provide the foundations for the Airspace Change Programme.</p> <p>CAP1616 says that engagement activity must take place regarding the development of design principles. We will work with a number of stakeholders to develop a list of draft design principles for the sponsor to evaluate and short list, then retest the short list with stakeholders. We believe this to be a much more open process.</p> <p>We have engaged a market research supplier who will be running a number of engagement and discussions sessions on our behalf – stakeholders will cover representatives of industry and community. Due to the feedback from EANAB throughout the process of CAP725 on our approach, we believe appointing an external market research supplier to run these sessions on our behalf provides a very measured and independent approach allowing for better discussion, accuracy of process, and accurate data capture. We won't be</p>            |

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|                   |    |  | <p>completely hands-off, as we understand this is a very important stage during the CAP1616 process.</p> <p>Therefore, at this stage, it is impossible to answer this question.</p>   |
| <b>Engagement</b> | 31 | <p>EAL are abandoning public meetings in favour of focus groups and drop-in sessions. While these activities can be very useful, from the perspective of our communities, it lays EAL open to the following concerns:</p> <ol style="list-style-type: none"> <li>1) It is wrong to abandon public meetings. Yes, maybe only a few folk get to speak, but everyone hears the points they are making and can indicate their support or otherwise.</li> <li>2) Using only focus groups and drop in sessions could be seen as a divide and rule strategy.</li> <li>3) They are open to abuse as the focus groups can be carefully selected to get the required result.</li> <li>4) Most groups in our communities don't have a full command of all the issues involved, making it easy for EAL to bamboozle them with lots of figures and aviation abbreviations, and produce facts that the participants are not equipped to challenge.</li> </ol> <p><b>Will EAL reconsider carrying out community engagement via public meetings?</b></p> | <p>You raise four points that I'd like to address:</p> <ol style="list-style-type: none"> <li>1) No, it is not wrong. When considering our approach, we looked at all the options available to us for community engagement – and with three public consultations under our belt, we have looked at what mechanisms we consider to be most informative for our communities. Drop In sessions will be open to the public for longer periods, with more information and assistance provided than public meetings</li> <li>2) I'm unsure how providing open drop in sessions and focus groups as part of a wider engagement strategy is seen as 'divide and rule'.</li> <li>3) By 'they', I presume you mean focus groups – these are being independently recruited for by our market research agency. The agency is accredited and has achieved Market Research Services standards and completely independent.</li> <li>4) I agree, which is why it is important to give everyone the opportunity to understand. I thought that one of the fundamental roles of EANAB is to help us help communities understand noise? Therefore, we are working together to ensure no one is bamboozled.</li> </ol> <p>Regarding your question - No, as we have previously considered this.</p> <p>We have considered and evaluated our engagement opportunities throughout the Airspace Change Programme in length and consider our approach to be the best approach for us following the CAP1616 process.</p> |

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|                   |    |   | <p>We have also presented our approach (which included not holding public meetings) to the CAA, which they have approved in our Assessment Meeting on 17 June 2019.</p> |
| <b>Additional</b> | 32 | <p>Supplementary question to Q.28 of our list of 29 July... How will EAL's desire to create an early turn, increasing, or introducing, noise at a particularly sensitive time (6-7am) in many communities be reconciled with current Government policy on aviation noise?</p>   | <p>There are currently no proposals for new flights. We are right at the early stages of CAP1616 which involve stakeholder engagement to develop design principles.</p> |
|                   | 33 | <p>Could EAL please provide substantiated evidence of (a) those dates/times, if any, at which ATMs <del>exceeded</del> 42 per hour ("ph"); (b) those dates/times, if any at which ATMs <del>equalled</del> 42ph; and (c) if the target of 42 ph currently in force has not been met at any time, the maximum number of ATMs achieved in any one-hour period at EA in the last seven years - including the date(s)/time(s) that the maximum number of ATMs ph has been achieved?</p> | <p>Duplication of Q3 – see Q3's answer</p>  |
|                   | 34 | <p>What account, if any, has EAL taken of the significant decrease in the rate of growth demonstrated on the graph recently produced by [redacted] [graph to be attached???</p>   | <p>The graph wasn't attached – please resend.</p>   |
|                   | 35 | <p>What account has EAL taken of the recent declaration by the Scottish Government of a climate emergency which involves Scotland's target of reducing greenhouse gases to "net-zero" by 2045 - given that transport - including aviation - accounts for the largest share - 36.8% of emissions in Scotland?</p>  | <p>Duplication of Q5 – see Q5's answer.</p>   |
|                   | 36 | <p>What account has EAL taken of the recent decision of the Scottish Government not to reduce Air Passenger Duty?</p>   | <p>Duplication of Q4 – see Q4's answer.</p>   |
|                   | 37 | <p>What account has EAL taken of the general population, but in particular, younger people, being influenced by the Extinction Rebellion movement and its aims to reduce emissions by <i>inter alia</i> travelling less by air in future?</p>   | <p>We are watching this with interest. At the moment all of our growth plans are based on current data – this is currently speculation.</p>                             |
|                   | 38 | <p>Why has EAL referred to "runways" in its stated purpose above when it has recently sacrificed its second runway?</p>   | <p>We have one strip but two runways 24 and 06</p>  |

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| 39 | <p>What account has EAL taken of UK Government Guidance - as set out in ANG 2017 sections:</p> <p>3.3 - that "when considering requests to change the airspace design, the CAA should apply the following altitude-based priorities of the government: a. in the airspace from the ground to below 4,000 feet the government's environmental priority is to limit and, where possible, reduce the total adverse effects on people; b. where options for route design from the ground to below 4,000 feet are similar in terms of the number of people affected by total adverse noise effects, preference should be given to that option which is most consistent with existing published airspace arrangements"?</p> <p>3.7 - Below 4,000 feet, there is a strong likelihood that aircraft could create levels of noise exposure above the LOAELs identified above, which is reflected in the Altitude Based Priorities.</p> <p>3.8 - There may however be options which perform comparatively better in terms of minimising more serious impacts as opposed to annoyance, or certain options may be better for day noise than night noise, or vice versa. In these instances, the CAA should verify that sponsors have considered the relative trade-offs and taken into account any community views on what the objectives in terms of noise should be.</p> <p>5.18 - that "In order to provide communities with transparency on the numbers of aircraft flown near them, the designated airports should publish details of where the aircraft are actually flying and the amount of noise created. These airports, working with their local communities, can determine the precise information they wish to publish but we [the</p> | <p>Our Airspace Change Programme will meet Air Navigation Guidance 2017. At this stage I cannot confirm how it will be taken into account – this will be investigated and applied as part of Stage 2 specifically 2A Options Development.</p> |
|    | <p>CAA] anticipate that it may include: a. the average distance of how close to the standard instrument departure route the aircraft have flown up to an altitude of 4,000 feet, or higher if the airport wishes; b. the areas, and the specific number of departing aircraft, where 80%, 90%, 95% and 99% of air traffic has flown up to an altitude of 4,000 feet and the noise level in each of these areas; and c. details on the areas overflown by arriving aircraft from an altitude of below 4,000 feet to when they reach the runway?</p>  |   |
| 40 | <p>Given that a substantial number of residents in the Broxburn/Uphall/Winchburgh live within a distance similar to the residents of Barnton/Cramond, will EAL ensure that these residents are not overflown in the airspace from the ground to below 4,000 feet (amsl)?</p>  | <p>There are currently no proposals for new flights. We are right at the early stages of CAP1616 which involve stakeholder engagement to develop design principles.</p>   |
| 41 | <p>Given that the existing SID on Runway 24 follows a route from the point of departure at Edinburgh Airport to the A899 dual carriageway at Livingston over land formally designated as Countryside Belt by West Lothian Council which is almost entirely comprised of agricultural land/industrial estates and is therefore sparsely populated, will EAL retain that route - by replication of the route - and thus avoid the significant adverse effects which would be sustained by residents in Broxburn/Uphall/Winchburgh if they are overflown by jet aircraft in the airspace from the ground to below 4,000 feet (amsl) - contrary to UK Government Guidance?</p>  | <p>There are currently no proposals for new flights. We are right at the early stages of CAP1616 which involve stakeholder engagement to develop design principles.</p>   |

**Email from an EANAB representative – 28 September 2019**

**From:** [REDACTED]  
**Sent:** 28 September 2019 10:55  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Circulated Draft Minute - Extraordinary Meeting 21-08-2019

Pleased find enclosed draft copy of Minutes of the Extraordinary Meeting held on 21st August 2019, issued for discussion/acceptance at the forthcoming EANAB meeting to be held on 2nd October.

Regards

[REDACTED]

Attachment to the email of 28 September 2019

**Edinburgh Airport Noise Advisory Board  
Minutes of Extraordinary Meeting  
Tuesday 21st August 2019, 6.30 pm  
The Marriott Hotel, 111 Glasgow Road, Edinburgh**

**Present:**

Edinburgh Airport Ltd.:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

EANAB:

[REDACTED]

Elected Members:

[REDACTED] Blackness Area Community Council  
[REDACTED] Crammond Association & Vice Chair  
[REDACTED] North Queensferry Community Council  
[REDACTED] Kinghorn Community Council  
[REDACTED] Limekilns & Charleston Community Council  
[REDACTED] stand-in for [REDACTED] Dalgety Bay and Hillend Community  
Council  
[REDACTED] Ecclesmachan resident  
[REDACTED] Blackness Community Council and Edinburgh Airport Watch  
[REDACTED] Uphall Community Council  
[REDACTED] Uphall Community Council  
[REDACTED] Ratho & District Community Council  
[REDACTED] Vice Chair of Dalkeith and District Community Council  
[REDACTED] Cramond and Barnton Community Council

In Attendance: [REDACTED] (Minute Secretary)

Apologies:

[REDACTED] Ratho & District CC

|  | ACTION: |
|--|---------|
| The Chair welcomed all attendees.  |         |
| gave an introduction to presentation. Explaining the focus on the process of CAP1616, the difference from previous processes and therefore how EANAB fits into this.   |         |
| CAP 1616 is a new government consultation procedure  |         |
| gave a presentation, (Appendix A) explaining safe separation times of aircraft landings and take offs. This alters dependant on the aircraft type, larger craft create airwaves which affect smaller craft. There are typically 2 minutes between departures this can be shortened to 1 minute if smaller aircraft are first. There are 28 movements per hour. Arrivals every 1minute 45 seconds to 38 aircraft arrivals per hour. The combined movement is 42 per hour. |         |
| It was confirmed that a Statement of Need was submitted on the 14 <sup>th</sup> of April 2019 and thanked EANAB for their input. The proposal was to modernise the air space away from ground beacons.   |         |
| NERL are major stakeholders in air space and they influence the space AE uses. The entire system for the UK is being assessed. The use of the space over the Forth is being encouraged and assessed.<br><br>EAL would not deliver this a sits over 7000ft but they could work in parallel on it. It would potentially take a lot of traffic away from Fife. Any plans that are made have to have East to West mirroring.   |         |
| To70 are assessing this route change for EAL and the full scrutiny and assessment will be made available. As yet it has not passed its Statement of Need.  |         |
| It was raised that this was a contravention of rules.  |         |
| A full consultation with all community groups would take place at the appropriate time.  |         |
| EAL asked NERL to look at using the Forth.   |         |
| It was pointed out that runway 06 not 24's use of the Forth was asked for by EANAB.  |         |
| It was clarified that all stages in CAP1616 must be passed before the stage can be progressed. It is all transparent and public.   |         |
| Step 1A was passed on 1 <sup>st</sup> July 2019. Stage 1B is process focussing on Design Principles which must be very detailed and definitions clear. These principals in action should be easily identifiable in the consultation.   |         |
| The process of defining gateways is being defined hopefully by January 2020.   |         |
| Discussions:<br><br>It was clarified that all communities will be involved not just those who are  |         |

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|  | impacted currently by noise contours but those who may be in the future. There are 14 areas that represent people who will/are or may be impacted, this covers a 15 mile circle on the map for 7000 ft.  |     |
|  | EAL were asked to provide a map for 4000 ft.   | EAL |
|  | Community groups will be contacted to engage on the Design Principles from all from all catchments.  |     |
|  | The methodology from how to recruit Progressive Partnerships is being set out currently.   |     |
|  | Cap 1616 Stakeholders. Communities are key. These are listed in the graph such a Scottish Airspace etc.. These groups find specific representatives. EAL have no influence over recruitment or the debate but do receive the recommendations and feedback.   |     |
|  | Local authorities and community councils should be on the list.  | EAL |
|  | Progressive are creating the list which is to be shared with EANAB and reported on.  |     |
|  | There will be 10-20 discussion groups but this may change once the recruitment process is completed. All reasonable ideas will be recovered and it will be transparent and anonymised.   |     |
|  | It should take 3-4 years to get to Stage 7.  |     |
|  | It is hoped stakeholders come on board early so they may be educated by the process by Stage 2A.   |     |
|  | CAP1616 gives guidance on timelines.   |     |
|  | Stage 2 – consultations<br>An impact map might be useful instead of flight path maps. This could then be broken down into different impact groups on the maps. Involving passengers is also being considered.  |     |
|  | The presentation Appendixed is in confidence.  |     |
|  | It was noted that there is no opportunity to challenge or query the Statement of Need. The predictive growth is likely overstated. Proximity of MoD controlled airspace is unrepresented.  |     |
|  | The reduction of peak impacts and delays had been the focus not growth.  |     |
|  | <b>ACP QUESTIONS AND ANSWERS.</b><br>A paper to discuss EAL's response to EANAB's initial list of 41 questions relating to EAL's current ACP was tabled. The summary of the discussion of each question is highlighted, where appropriate, in red text in this minute. To avoid the meeting over-running some of the questions were intentionally not addressed at the meeting. They will be discussed at the next routine EANAB monthly meeting on 4 September. |     |

**Explanation of text in the following section:**

Standard black text EAL's response to EANAB's original question  
 Bold black text EANAB's response  
 Red text Summary of discussion at the meeting

| Topic                             | Item | Question   |
|-----------------------------------|------|--|
| Capacity                          | 1    | The reference to a target maximum runway capacity of 50 movements per hour disappears between v1 and v2 of the Statement of Need. In the minutes of the Assessment Meeting there is no record that this change was requested by the CAA.<br><b>What is the reason for this change? Noted. When will the target capacity be available?</b>  |
|                                   | 2    | A Runway Capacity Target is one of the key operational criteria required for a meaningful development of design principles in step1B of the CAP1616 process.<br><b>What is the target runway capacity target driving the ACP? As Q1</b>  |
|                                   | 3    | The current declared runway capacity is a maximum of 42 movements per hour. It is essential for affected communities to better understand the runway capacity issue driving the ACP.<br><b>Will EAL provide EANAB with the number of flights per hour data for the last 36 months? Agreed the data will be provided for the next EANAB meeting.</b>  |
| Growth                            | 4    | Separate statements have been made by EAL concerning the negative impact on growth that would arise from cancelling the anticipated halving of APD.<br><b>What were the initial growth projections relevant to the capacity issue (assuming ADP cut) and what are the revised growth projections used for this ACP? EAL were respectfully requested to answer the question as their initial response does not answer it.</b>   |
|                                   | 5    | Since the recent declaration by the Scottish government of the country being in a "Climate Emergency" and its setting of targets for carbon emissions there have been media reports about the impact on flying in the UK. In particular the possibility of domestic flights being restricted/banned in the UK. This is speculation at the moment and even if it occurs it will be medium to long term before it happens.<br><b>However can EAL advise how they view this and how they see it impacting future planning for growth? The current data is based on analysis and projections from investors, climate change groups etc. EAL to provide EANAB with this list. [redacted] stated that the current data is "based on past growth"; and on "what we know is going to happen in the next 5 years"</b> |
| Airspace issues and opportunities | 6    | <b>Can EAL provide more details on the "confined airspace" issue mentioned in slide 5 of EAL's presentation during the assessment meeting? EAL operate in the airspace they were given. There are conflicting priorities with Gliders group, MOD etc. A diagram of the designated airspace in the Forth will be sought by EAL. [redacted] stated that with regard to the MoD zones/channels from Lossiemouth south, EAL is "looking at it in the context of the NERL opportunities that have now been presented to EAL". (Post meeting note: In the interests of transparency required under CAP 1616 - and as undertaken specifically by [redacted] could this please be recorded and EAL asked to report back more fully on this - especially as</b>   |



|                                 |    |   |
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|                                 |    | <p>indicated that the discussions with NERL re Runway 24 arrivals are relevant to this?</p>   |
|                                 | 7  | <p>7-10: To be addressed at 4 September EAL/EANAB meeting.</p> <p>How many early turns and flight paths are being planned by EAL on each runway and what determines these targets?</p>  |
|                                 | 8  | <p>Previous trial and ACP targeted a 1-minute departure interval. Is that the case for this ACP?</p>  |
|                                 | 9  | <p>Some experience was gained from the previous trial for the old ACP, over the last 4 years, to educate this new ACP.</p> <p>What is the maximum distance and altitude at which the “early turn” can be situated from DER to allow the desired departure interval?</p>   |
|                                 | 10 | <p>Would a single additional flight path (combined with existing flown flight paths) be sufficient to fix the capacity issue?</p>   |
|                                 | 11 | <p>11 and 13 Can EAL expand further on this?</p> <p>EAL have been working with NATS looking at ways in which the upper airspace around EDI might be better used, in particular the area out over the Firth of Forth. What ideas are emerging from these meetings?</p>   |
|                                 | 12 | <p>What is the opportunity for a change to the “designated end of runway”?</p> <p>Is EAL’s intention seeking an early turn before current DER position?</p> <p>To be addressed at 4 September EAL/EANAB meeting.</p>  |
|                                 | 13 | <p>Can specific details be provided of discussions with NATS and/or other stakeholders regarding FASI-N and the relationship with EAL’s ACP? What are the ‘opportunities’ as outlined in the minutes of the Stage 1a assessment meeting and what is the likelihood of any integration of the EAL ACP with the FASI-N project?</p> |
|                                 | 14 | <p>Will the sponsors contemplate a simpler RNAV replication exercise, as opposed to the creation of additional flight paths? Could EAL please now respond to this matter?</p>   |
| Environmental impact assessment | 15 | <p>As baseline noise maps and footprints are crucial to the development of Design Principles at step1B, when is the target date for producing these?</p>  |
|                                 | 16 | <p>Some significant changes are to be made to the way ANCON noise modelling is carried out at EDI, notably the use of radar data to define where the aircraft are flown.</p> <p>Will radar data analysis be used to define both the vertical profile and track position of aircraft?</p>  |
|                                 | 17 | <p>Previous independent analysis of radar data revealed that the vertical profile varied significantly over the various SIDs.</p> <p>Will the radar data used to define the vertical profile of aircraft be SID specific in an effort to make the noise modelling as representative as possible of operations at EDI?</p>         |
|                                 | 18 | <p>What period will be used for establishing the baseline of the environmental impact assessment both in terms of radar analysis and traffic analysis?</p>  |
|                                 | 19 | <p>Can EAL confirm that population impact analysis will be carried within the LOAEL of 51db LAeq16h and 45dB LAeq8h for daytime and night</p>   |

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|                   |    | time respectively?   |
|                   | 20 | Can EAL confirm that SEL/Lmax footprint maps for B738, EA33, EA319C, and EA320C will be provided to EANAB to allow a meaningful engagement from and beyond step1B of the CAP1616 process? Can EAL confirm the footprint maps will be provided for the planes specified in our question?  |
| Design principles | 21 | What environmental criteria are used by the sponsors as part of the development of the design principles in step 1B of the CAP1616 process? EAL will confirm when the environmental criteria will be available at our 4 September meeting.   |
|                   | 22 | 22 - 25 EAL confirmed engagement on these matters will be towards the end of Step 1b, which is likely to be in early 2020.<br><br>Will the ACP be developed to avoid the overflying of new people (i.e. people not currently overflown by existing flight paths)?  |
|                   | 23 | Will the ACP be developed to minimise the overall number of people exposed to aircraft noise (within LOAEL limits)?  |
|                   | 24 | Will the ACP be designed to keep the overall population within LOAEL levels equal or lower to the current baseline situation?  |
|                   | 25 | Given two areas, A and B, with different baseline aircraft noise levels; area A is exposed to higher levels than area B. The previous ACP had proposals that allowed area A 's exposure to aircraft noise to increase and to balance that by reducing area B's exposure to aircraft noise. Will the same rationale be contemplated as an environmental criterion for the development of design principles in step 1B of the CAP1616 process?     |
|                   | 26 | Can EAL provide EANAB with details of the Noise Preferential Routes and noise abatement procedures relevant to the development of design principles? To be addressed later   |
|                   | 27 | Can EAL clarify what, in its view, will constitute overflying in terms of height and distance?   |
|                   | 28 | How will the altitude-based-priorities (as defined in the Air Navigation Guidance 2017) be taken into account during the development of design principles and in particular in the context of creating an early turn below 7000ft? It was pointed out on a number of occasions at the meeting EAL must take account of the Air Navigation Guidance 2017. In response, [redacted] stated first that " a Version A and Version B may be necessary" |
|                   | 29 | Can EAL provide EANAB with the up-to-date local plans in area affected by the proposals which are used to inform the development of design principles?   |
|                   | 30 | Will EAL consider night time flight restriction as part of development of design principles? It was noted that CAP1616 Appendix B, para B51 defines Day as 07:00 - 23:00 and Night as 23:00 - 07:00.   |
| Engagement        | 31 | EAL are abandoning public meetings in favour of focus groups and drop-in sessions. While these activities can be very useful, from the perspective of our communities, it lays EAL open to the following concerns:<br>1) It is wrong to abandon public meetings. Yes, maybe only a few folk get to speak, but everyone hears the points they are making and can indicate   |

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|            |    | <p>their support or otherwise.</p> <p>2) Using only focus groups and drop in sessions could be seen as a divide and rule strategy.</p> <p>3) They are open to abuse as the focus groups can be carefully selected to get the required result.</p> <p>4) Most groups in our communities don't have a full command of all the issues involved, making it easy for EAL to bamboozle them with lots of figures and aviation abbreviations, and produce facts that the participants are not equipped to challenge.</p> <p><b>Will EAL reconsider carrying out community engagement via public meetings? EALAB recorded its disappointment with the response, suggesting perhaps individual Community Councils could request and organise specific public meetings attended by EAL.</b></p> |
| Additional | 32 | <p>Supplementary question to Q.28 of our list of 29 July...</p> <p><b>How will EAL's desire to create an early turn, increasing, or introducing, noise at a particularly sensitive time (6-7am) in many communities be reconciled with current Government policy on aviation noise?</b></p> <p>There are currently no proposals for new flights. We are right at the early stages of CAP1616 which involve stakeholder engagement to develop design principles.</p>   |
|            | 34 | <p><b>What account, if any, has EAL taken of the significant decrease in the rate of growth demonstrated on the graph recently produced by [redacted] [graph to be attached???</b></p> <p>The graph wasn't attached – please resend. <b>As Q4. Note, EALAB to send EAL the graph referred to on the question</b></p>  |
|            | 35 | <p><b>What account has EAL taken of the recent declaration by the Scottish Government of a climate emergency which involves Scotland's target of reducing greenhouse gases to "net-zero" by 2045 - given that transport - including aviation - accounts for the largest share - 36.8% of emissions in Scotland?</b></p> <p>Duplication of Q5 – see Q5's answer.</p>   |
|            | 36 | <p>What account has EAL taken of the recent decision of the Scottish Government not to reduce Air Passenger Duty?</p> <p><b>Duplication of Q4 – see Q4's answer.</b></p>  |
|            | 37 | <p><b>What account has EAL taken of the general population, but in particular, younger people, being influenced by the Extinction Rebellion movement and its aims to reduce emissions by inter alia travelling less by air in future?</b></p> <p><b>We are watching this with interest. At the moment all of our growth plans are based on current data – this is currently speculation.</b></p>  |
|            | 38 | <p><b>Why has EAL referred to "runways" in its stated purpose above when</b></p>  |

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|    | <p>it has recently sacrificed its second runway?<br/>We have one strip but two runways 24 and 06</p>   |
| 39 | <p><b>What account has EAL taken of UK Government Guidance - as set out in ANG 2017 sections:</b></p> <p><b>3.3 - that "when considering requests to change the airspace design, the CAA should apply the following altitude-based priorities of the government: a. in the airspace from the ground to below 4,000 feet the government's environmental priority is to limit and, where possible, reduce the total adverse effects on people; b. where options for route design from the ground to below 4,000 feet are similar in terms of the number of people affected by total adverse noise effects, preference should be given to that option which is most consistent with existing published airspace arrangements"?</b></p> <p><b>3.7 - Below 4,000 feet, there is a strong likelihood that aircraft could create levels of noise exposure above the LOELs identified above, which is reflected in the Altitude Based Priorities.</b></p> <p><b>3.8 - There may however be options which perform comparatively better in terms of minimising more serious impacts as opposed to annoyance, or certain options may be better for day noise than night noise, or vice versa. In these instances, the CAA should verify that sponsors have considered the relative trade-offs and taken into account any community views on what the objectives in terms of noise should be.</b></p> <p><b>5.18 - that "In order to provide communities with transparency on the numbers of aircraft flown near them, the designated airports should publish details of where the aircraft are actually flying and the amount of noise created. These airports, working with their local communities, can determine the precise information they wish to publish but we [the CAA] anticipate that it may include: a. the average distance of how close to the standard instrument departure route the aircraft have flown up to an altitude of 4,000 feet, or higher if the airport wishes; b. the areas, and the specific number of departing aircraft, where 80%, 90%, 95% and 99% of air traffic has flown up to an altitude of 4,000 feet and the noise level in each of these areas; and c. details on the areas overflown by arriving aircraft from an altitude of below 4,000 feet to when they reach the runway?</b></p> <p><b>Our Airspace Change Programme will meet Air Navigation Guidance 2017. At this stage I cannot confirm how it will be taken into account – this will be investigated and applied as part of Stage 2 specifically 2A Options Development.</b></p> |
| 40 | <p><b>Given that a substantial number of residents in the Broxburn/Uphall/Winchburgh live within a distance similar to the residents of Barnton/Cramond, will EAL ensure that these residents</b></p>  |

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|    | <p>are not overflown in the airspace from the ground to below 4,000 feet (amsl)?</p> <p>There are currently no proposals for new flights. We are right at the early stages of CAP1616 which involve stakeholder engagement to develop design principles. When will the requested information be available?</p>  |
| 41 | <p><b>Given that the existing SID on Runway 24 follows a route from the point of departure at Edinburgh Airport to the A899 dual carriageway at Livingston over land formally designated as Countryside Belt by West Lothian Council which is almost entirely comprised of agricultural land/industrial estates and is therefore sparsely populated, will EAL retain that route - by replication of the route - and thus avoid the significant adverse effects which would be sustained by residents in Broxburn/Uphall/Winchburgh if they are overflown by jet aircraft in the airspace from the ground to below 4,000 feet (amsl) - contrary to UK Government Guidance?</b></p> <p>There are currently no proposals for new flights. We are right at the early stages of CAP1616 which involve stakeholder engagement to develop design principles. When will the requested information be available?</p> |

**Additional notes**

████ stated that EAL "must comply with guidance that the CAA give EAL as to what the design must include". This must be clarified. In another statement by █████ that he would read paragraph 3d) of the Minutes of the EACC meeting in May 2019 and clarify what was meant by the phrase, "the options will be different this time with the noise levels viewed 4000 feet and climate at 4000 - 7000 feet." █████ specifically undertook at the meeting on 21st August to revert back on this point after re-reading paragraph 3d).

Please ensure that EAL's position on public meetings is clarified.

The difficulties in engaging with █████ of ERCD must be recorded and an update re █████ discussions with █████ re expediting a response from ERCD obtained.

|  |   |      |
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|  | Thanks were given to EAL for their prompt responses to these questions and a vote of thanks to MA for putting the log together.   |      |
|  | A core representation of EANAB needs to be compiled as the group is too large to attend intact.   |      |
|  | Concern that air navigation guidance is interpretat4ed differently between EAL and EANAB. The minutes of the CAA meeting in May hold an anomaly. Navigations as noise and co2. GD to respond as an agenda item. | ████ |
|  |   |      |
|  | Thanks were given to all for their contributions.   |      |

There being no further business the meeting closed.

## Email to the EANAB representative – 01 November 2019

Sent: 01 November 2019 14:57

To: [REDACTED]

Subject: Further EAL comments to list of ACP questions

Afternoon [REDACTED]

Please see attached a document showing the original questions posed to EAL, the response we gave with comments from EANAB, and our responses to those comments. I'm sending this on behalf of [REDACTED] as the ACP leads.

We accept that this should have been responded to sooner, and as at the last EANAB meeting, I apologise for the delay. Much has happened since that initial meeting and hopefully through the workshops and subsequent letters and responses between yourselves and [REDACTED] there is now a better understanding of the process.

As always I'm here to help on the business as usual EANAB matters and look forward to seeing you next week.

Kind regards

[REDACTED]

## Attachment to the email of 1 November 2019

| Topic                             | Item | EANAB question  | Edinburgh Airport answer with EANAB minute comment and further questions.   | Further EAL comment   |
|-----------------------------------|------|---|---|---|
| Capacity                          | 1    | The reference to a target maximum runway capacity of 50 movements per hour disappears between v1 and v2 of the Statement of Need. In the minutes of the Assessment Meeting there is no record that this change was requested by the CAA. <b>What is the reason for this change?</b>   | It was CAA advice to not pre-determine our outcomes, so we removed the end of the sentence that referenced 50 movements per hour.<br><br><b>Noted. When will the target capacity be available?</b>  | Based on the CAA advice there should not be a target capacity. The outcome of the ACP will determine what the capacity will be.   |
|                                   | 2    | A Runway Capacity Target is one of the key operational criteria required for a meaningful development of design principles in step18 of the CAP1616 process. <b>What is the target runway capacity target driving the ACP?</b>  | Our published runway capacity approved by the CAA is 42 movements (mixed arrivals and departures) per hour. The objective of the Airspace Change Programme is to increase runway capacity and to reduce delays during peak times. As discussed in Q1's answer, we haven't pre-determined this with a 'number'. However, a number will be realised as part of the process.<br><br><b>As Q1</b>   | As Q1   |
|                                   | 3    | The current declared runway capacity is a maximum of 42 movements per hour. It is essential for affected communities to better understand the runway capacity issue driving the ACP. <b>Will EAL provide EANAB with the number of flights per hour data for the last 36 months?</b>   | No.<br><br>Why do you need data for the past three years?<br><br><b>Agreed the data will be provided for the next EANAB meeting.</b>  | There has since been follow up communication on this and information has been shared.   |
| Growth                            | 4    | Separate statements have been made by EAL concerning the negative impact on growth that would arise from cancelling the anticipated halving of APD. <b>What were the initial growth projections relevant to the capacity issue (assuming ADP cut) and what are the revised growth projections used for this ACP?</b>  | The Scottish Government announced in May that it was to scrap its promised cut to aviation tax and the introduction of Air Departure Tax, a decision we predict will deliver a slowdown in passenger numbers. As a responsible business, it is our aim to continue to deliver growth in terms of destinations and routes to encourage passengers to travel - this is demonstrated in the recent announcement of Wizz Air starting operations from Edinburgh later this year.<br><br><b>EAL were respectfully requested to answer the question as their initial response does not answer it.</b>               | Edinburgh Airport continues to predict growth regardless of ADT. Planning based on a tax cut led to predictions of significantly boosted growth. However, without the cut we still anticipate growth, just not at the originally anticipated higher level.  |
|                                   | 5    | Since the recent declaration by the Scottish government of the country being in a "Climate Emergency" and its setting of targets for carbon emissions there have been media reports about the impact on flying in the UK. In particular the possibility of domestic flights being restricted/banned in the UK. This is speculation at the moment and even if it occurs it will be medium to long term before it happens. <b>However can EAL advise how they view this and how they see it impacting future planning for growth?</b> | We are watching this with interest. At the moment all of our growth plans are based on current data - this is currently speculation. We will continue our work with wider industry through various working groups and Sustainable Aviation to understand changes to industry and the challenges and opportunities these present.<br><br><b>The current data is based on analysis and projections from investors, climate change groups etc". EAL to provide EANAB with this list. GR stated that the current data is "based on past growth"; and on "what we know is going to happen in the next 5 years"</b> | When predicting growth there are a number of factors to consider - consumer attitudes to climate change, the reaction of governments and regulators, as well as other economic and social factors. We do grapple continually with these issues; however, we are at an early stage in understanding growth of movements like 'flygskam' and how they will manifest over the coming decades. As previously reported we will continue to monitor this. |
| Airspace issues and opportunities | 6    | <b>Can EAL provide more details on the "confined airspace" issue mentioned in slide 5 of EAL's presentation during the assessment meeting?</b>  | As with all airports, Edinburgh Airport operates within regulated airspace surrounding the airport. Our airspace has neighbouring airspace controlled by the MOD, General Aviation and other airports.<br><br><b>EAL operate in the airspace they were given. There are conflicting priorities with Gliders group, MOD etc. A diagram</b>   | We will provide more information when it is appropriate to do so. FASI-N are currently looking at this they will the ones who dictate timelines.  |

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|    |   | of the designated airspace in the Forth will be sought by EAL. [redacted] stated that with regard to the MoD zones/channels from Lossiemouth south, EAL is "looking at it in the context of the NERL opportunities that have now been presented to EAL". (Post meeting note: In the interests of transparency required under CAP 1616 - and as undertaken specifically by AL, could this please be recorded and EAL asked to report back more fully on this - especially as [redacted] indicated that the discussions with NERL re Runway 24 arrivals are relevant to this?)   |  |
| 7  | How many early turns and flight paths are being planned by EAL on each runway and what determines these targets?  | We have no plans for any flight path options – we are just beginning the CAP1616 Airspace Change process. Flight path options begin in Stage 2, specifically Step 2A: Options development.<br><br>7-10: To be addressed at 4 September EAL/EANAB meeting.  | We feel there is nothing more we can say beyond our original response. We are only looking at design principles at this stage. Stage 2 is scheduled to begin on 1 <sup>st</sup> February 2020. |
| 8  | Previous trial and ACP targeted a 1-minute departure interval. Is that the case for this ACP?   | We have no plans for any targeted departure interval separation times – we are just beginning the CAP1616 Airspace Change process. Flight path options begin in Stage 2, specifically Step 2A: Options development and it is during this process that potential usage is discussed as part of the development of a wider route network.<br><br>7-10: To be addressed at 4 September EAL/EANAB meeting.   | As Q7  |
| 9  | Some experience was gained from the previous trial for the old ACP, over the last 4 years, to educate this new ACP. What is the maximum distance and altitude at which the "early turn" can be situated from DER to allow the desired departure interval? | The guidance for our current runway usage is that flights can begin their turn before the DER and a small number do that. The CAA has been clear in the past that any new designs must follow current design guidelines that state that no flights can turn before the DER. This will be considered when we come to finalising our design options.<br><br>7-10: To be addressed at 4 September EAL/EANAB meeting.  | As Q7  |
| 10 | Would a single additional flight path (combined with existing flown flight paths) be sufficient to fix the capacity issue?  | There are two points to this answer:<br>- the direction of our departures and arrivals is weather dependent, whatever happens at one end of the runway needs to be replicated at the other end of the runway. This means there is no solution where just one additional flight path would be a solution within our Airspace Change Programme.<br>- the position of a flight path is not the only thing that is considered during the Airspace Change Programme – what aircraft use the flight path (ie jet or propeller) and what times of operation (ie peak, non-peak, night time) are also considered. The entire need and solution need to be considered in the whole, therefore currently this question is impossible to answer.<br><br>7-10: To be addressed at 4 September EAL/EANAB meeting. | As Q7  |

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|                                 | 11 | EAL have been working with NATS looking at ways in which the upper airspace around EDI might be better used, in particular the area out over the Firth of Forth. What ideas are emerging from these meetings?  | Based on our discussions with EANAB and from our learnings during our previous airspace change programme, we have been pushing NATS Prestwick centre to consider allowing us to use the Firth of Forth more – we have been challenging old thinking.<br><br>NERL (part of NATS) have proposed an option that would allow EAL to use part of the MOD airspace and fly over the Firth of Forth. This proposal is a concept and we have agreed to further the investigation into this concept to see if it is a viable option for EAL to consider within scope of our Airspace Change Programme.<br><br>11 and 13 Can EAL expand further on this? | We will provide more information when it is appropriate to do so. FASI-N are currently looking at this they will be the ones who dictate timelines.   |
|                                 | 12 | What is the opportunity for a change to the "designated end of runway"? Is EAL's intention seeking an early turn before current DER position?  | The guidance for our current runway usage is that flights can begin their turn before the DER and a small number do that. The CAA has been clear in the past that any new designs must follow current design guidelines that state that no flights can turn before the DER. This will be considered when we come to finalising our design options.<br><br>11 and 13 Can EAL expand further on this?  | As Q7   |
|                                 | 13 | Can specific details be provided of discussions with NATS and/or other stakeholders regarding FASI-N and the relationship with EAL's ACP? What are the 'opportunities' as outlined in the minutes of the Stage 1a assessment meeting and what is the likelihood of any integration of the EAL ACP with the FASI-N project? | The opportunity is what is mentioned in Q11's answer.<br><br>This proposal is a concept and we have agreed to further the investigation into this concept to see if it is a viable option for EAL to consider within scope of our Airspace Change Programme.<br><br>11 and 13 Can EAL expand further on this?  | We will provide more information when it is appropriate to do so. FASI-N are currently looking at this they will be the ones who dictate timelines.<br><br>We are not mandated to co-ordinate our ACP with FASI-N, however, we are working with them as best we can to align our ACP with the wider Air Modernisation Strategy. |
|                                 | 14 | Will the sponsors contemplate a simpler RNAV replication exercise, as opposed to the creation of additional flight paths?  | Replication of existing routes will be included in the flight path options development and analysis.<br><br>Could EAL please now respond to this matter?   | As Q7   |
| Environmental impact assessment | 15 | As baseline noise maps and footprints are crucial to the development of Design Principles at step1B, when is the target date for producing these?  | Baseline noise maps are footprints are critical to the CAP1616 process – these are needed at stage 2A not 1B.  |   |
|                                 | 16 | Some significant changes are to be made to the way ANCON noise modelling is carried out at EDI, notably the use of radar data to define where the aircraft are flown. Will radar data analysis be used to define both the vertical profile and track position of aircraft?   | Yes  |   |
|                                 | 17 | Previous independent analysis of radar data revealed that the vertical profile varied significantly over the various SIDs. Will the radar data used to define the vertical profile of aircraft be SID specific in an effort to make the noise modelling as representative as possible of operations at EDI?                | Yes  |   |

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|  | 18 | What period will be used for establishing the baseline of the environmental impact assessment both in terms of radar analysis and traffic analysis?                                       | One year's full traffic data – Jan 1st to December 31st for the year prior to the assessment being carried out.  |   |
|  | 19 | Can EAL confirm that population impact analysis will be carried within the LOAEL of 51db LAeq16h and 45dB LAeq8h for daytime and night time respectively?                                 | Yes  |   |
|  | 20 | Can EAL confirm that SEL/Lmax footprint maps for B738, EA33, EA319C, and EA320C will be provided to EANAB to allow a meaningful engagement from and beyond step1B of the CAP1616 process? | <p>██████ has confirmed that we will supply this mapping as requested through EANAB – we are currently waiting on ERCD to provide further information to allow us to progress.</p> <p>CAP1616 requires us to show SEL/Lmax footprint maps – however on which aircraft type is yet to be determined and this will be determined as part of the Airspace Change Programme when we reach that stage.</p> <p>Can EAL confirm the footprint maps will be provided for the planes specified in our question?</p>   | We can't confirm which aircraft will be used at this stage. We will use data from 2019m, based on this, in early 2020 we will know which aircraft will be used. |
|  | 21 | What environmental criteria are used by the sponsors as part of the development of the design principles in step 1B of the CAP1616 process?   | <p>We have engaged an environmental consultancy to provide guidance and advice on the environmental requirements under CAP1616.</p> <p>EAL will confirm when the environmental criteria will be available at our 4 September meeting.</p>  | The approach we would take is in Appendix B of Cap1616  |
|  | 22 | Will the ACP be developed to avoid the overflying of new people (i.e. people not currently overflown by existing flight paths)?   | <p>Design principles are a list of agreed criteria to help evaluate future flight path options and provide the foundations for the Airspace Change Programme.</p> <p>CAP1616 says that engagement activity must take place regarding the development of design principles. We will work with a number of stakeholders to develop a list of draft design principles for the sponsor to evaluate and short list, then retest the short list with stakeholders. We believe this to be a much more open process.</p> <p>We have engaged a market research supplier who will be running a number of engagement and discussions sessions on our behalf – stakeholders will cover representatives of industry and community. Due to the feedback from EANAB throughout the process of CAP725 on our approach, we believe appointing an external market research supplier to run these sessions on our behalf provides a very measured and independent approach allowing for better discussion, accuracy of process, and accurate data capture. We won't be completely hands-off, as we understand this is a very important stage during the CAP1616 process.</p> <p>Therefore, at this stage, it is impossible to answer this question.</p> |   |
|  | 23 | Will the ACP be developed to minimise the overall number of people exposed to aircraft noise (within LOAEL limits)?   | <p>Design principles are a list of agreed criteria to help evaluate future flight path options and provide the foundations for the Airspace Change Programme.</p> <p>CAP1616 says that engagement activity must take place regarding the development of design principles. We will work with a number of stakeholders to develop a list of draft design principles for the sponsor to evaluate and short list, then retest the short list with stakeholders. We believe this to be a much more open process.</p> <p>We have engaged a market research supplier who will be running a number of engagement and discussions sessions on our behalf – stakeholders will cover representatives of industry and community. Due to the feedback from EANAB throughout the process of CAP725 on our approach, we believe appointing an external market research supplier to run these sessions on our behalf provides a very measured and independent approach allowing for better discussion, accuracy of process, and accurate data capture. We won't be completely hands-off, as we understand this is a very important stage during the CAP1616 process.</p> <p>Therefore, at this stage, it is impossible to answer this question.</p> |   |
|  | 24 | Will the ACP be designed to keep the overall population within LOAEL levels equal or lower to the current baseline situation?   | <p>Design principles are a list of agreed criteria to help evaluate future flight path options and provide the foundations for the Airspace Change Programme.</p> <p>CAP1616 says that engagement activity must take place regarding the development of design principles. We will work with a number of stakeholders to develop a list of draft design principles for the sponsor to evaluate and short list, then retest the short list with stakeholders. We believe this to be a much more open process.</p> <p>We have engaged a market research supplier who will be running a number of engagement and discussions sessions on our behalf – stakeholders will cover representatives of industry and community. Due to the feedback from EANAB throughout the process of CAP725 on our approach, we believe appointing an external market research supplier to run these sessions on our behalf provides a very measured and independent approach allowing for better discussion, accuracy of process, and accurate data capture. We won't be completely hands-off, as we understand this is a very important stage during the CAP1616 process.</p> <p>Therefore, at this stage, it is impossible to answer this question.</p> |   |



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|            | 25 | Given two areas, A and B, with different baseline aircraft noise levels; area A is exposed to higher levels than area B. The previous ACP had proposals that allowed area A 's exposure to aircraft noise to increase and to balance that by reducing area B's exposure to aircraft noise. Will the same rationale be contemplated as an environmental criterion for the development of design principles in step 1B of the CAP1616 process?  | Design principles are a list of agreed criteria to help evaluate future flight path options and provide the foundations for the Airspace Change Programme.<br><br>CAP1616 says that engagement activity must take place regarding the development of design principles. We will work with a number of stakeholders to develop a list of draft design principles for the sponsor to evaluate and short list, then retest the short list with stakeholders. We believe this to be a much more open process.<br><br>We have engaged a market research supplier who will be running a number of engagement and discussions sessions on our behalf – stakeholders will cover representatives of industry and community. Due to the feedback from EANAB throughout the process of CAP725 on our approach, we believe appointing an external market research supplier to run these sessions on our behalf provides a very measured and independent approach allowing for better discussion, accuracy of process, and accurate data capture. We won't be completely hands-off, as we understand this is a very important stage during the CAP1616 process.<br><br>Therefore, at this stage, it is impossible to answer this question.  |   |
|            | 26 | Can EAL provide EANAB with details of the Noise Preferential Routes and noise abatement procedures relevant to the development of design principles?  | Noise preferential routes and noise abatement procedures are currently in place at EAL even though we don't have a requirement to do so. Aircraft must reach an altitude of 3,000ft before turning from the SID, unless the plane is jet on GRICE3C which must reach an altitude of 4,000ft before turning from the SID.<br><br>As mentioned, the design principles are being developed through stakeholder engagement.<br><br>To be addressed later   | The answer provided covers this.  |
|            | 27 | Can EAL clarify what, in its view, will constitute overflying in terms of height and distance?  | CAP1616 includes a definition of overflight: "For the purposes of airspace changes, overflight is defined according to the CAA's report, CAP1498 which outlines a measurement based on community perception. It does not portray noise impacts – <a href="http://www.caa.co.uk/cap1498">www.caa.co.uk/cap1498</a> .  |   |
|            | 28 | How will the altitude-based-priorities (as defined in the Air Navigation Guidance 2017) be taken into account during the development of design principles and in particular in the context of creating an early turn below 7000ft?  | Our Airspace Change Programme will meet Air Navigation Guidance 2017. At this stage I can not confirm how it will be taken into account in the context of creating an early turn below 7,000ft as we are not in the place where an early turn is an option – this will be investigated and applied as part of Stage 2 specifically 2A Options Development.<br><br>It was pointed out on a number of occasions at the meeting EAL must take account of the Air Navigation Guidance  | EAL will meet the guidance as per CAP1616   |
|            |    |   | 2017. In response, [redacted] stated first that "a Version A and Version B may be necessary"   |   |
|            | 29 | Can EAL provide EANAB with the up-to-date local plans in area affected by the proposals which are used to inform the development of design principles?  | There are currently no proposals for new flights. We are right at the early stages of CAP1616 which involve stakeholder engagement to develop design principles. If ever needed Local Plans are available direct from the relevant local authorities.  |   |
|            | 30 | Will EAL consider night time flight restriction as part of development of design principles?  | Design principles are a list of agreed criteria to help evaluate future flight path options and provide the foundations for the Airspace Change Programme.<br><br>CAP1616 says that engagement activity must take place regarding the development of design principles. We will work with a number of stakeholders to develop a list of draft design principles for the sponsor to evaluate and short list, then retest the short list with stakeholders. We believe this to be a much more open process.<br><br>We have engaged a market research supplier who will be running a number of engagement and discussions sessions on our behalf – stakeholders will cover representatives of industry and community. Due to the feedback from EANAB throughout the process of CAP725 on our approach, we believe appointing an external market research supplier to run these sessions on our behalf provides a very measured and independent approach allowing for better discussion, accuracy of process, and accurate data capture. We won't be completely hands-off, as we understand this is a very important stage during the CAP1616 process.<br><br>Therefore, at this stage, it is impossible to answer this question.<br><br>It was noted that CAP1616 Appendix B, para B51 defines Day as 07:00 - 23:00 and Night as 23:00 - 07:00. | We will be using the CAP1616 definitions.   |
| Engagement | 31 | EAL are abandoning public meetings in favour of focus groups and drop-in sessions. While these activities can be very useful, from the perspective of our communities, it lays EAL open to the following concerns:<br>1) It is wrong to abandon public meetings. Yes, maybe only a few folk get to speak, but everyone hears the points they are making and can indicate their support or otherwise.<br>2) Using only focus groups and drop in sessions could be seen as a divide and rule strategy.<br>3) They are open to abuse as the focus groups can be carefully selected to get the required result.<br>4) Most groups in our communities don't have a full command of all the issues involved, making it easy for EAL to bamboozle them with lots of figures and aviation abbreviations, and produce facts that the participants are not equipped to challenge. | You raise four points that I'd like to address:<br>1) No, it is not wrong. When considering our approach, we looked at all the options available to us for community engagement – and with three public consultations under our belt, we have looked at what mechanisms we consider to be most informative for our communities. Drop In sessions will be open to the public for longer periods, with more information and assistance provided than public meetings<br>2) I'm unsure how providing open drop in sessions and focus groups as part of a wider engagement strategy is seen as 'divide and rule'.<br>3) By 'they', I presume you mean focus groups – these are being independently recruited for by our market research agency. The agency is accredited and has   | We note your comments, however, we will not attend public meetings arranged by other parties. As previously discussed, Edinburgh Airport will carry out drop in sessions as a means of face to face engagement with the public. |

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|            |    | <p>Will EAL reconsider carrying out community engagement via public meetings?</p>   | <p>achieved Market Research Services standards and completely independent.</p> <p>4) I agree, which is why it is important to give everyone the opportunity to understand. I thought that one of the fundamental roles of EANAB is to help us help communities understand noise? Therefore, we are working together to ensure no one is bamboozled.</p> <p>Regarding your question - No, as we have previously considered this.</p> <p>We have considered and evaluated our engagement opportunities throughout the Airspace Change Programme in length and consider our approach to be the best approach for us following the CAP1616 process.</p> <p>We have also presented our approach (which included not holding public meetings) to the CAA, which they have approved in our Assessment Meeting on 17 June 2019.</p> <p><b>EANAB recorded its disappointment with the response, suggesting perhaps individual Community Councils could request and organise specific public meetings attended by EAL.</b></p> |   |
| Additional | 32 | <p>Supplementary question to Q.28 of our list of 29 July... How will EAL's desire to create an early turn, increasing, or introducing, noise at a particularly sensitive time (6-7am) in many communities be reconciled with current Government policy on aviation noise?</p>   | <p>There are currently no proposals for new flights. We are right at the early stages of CAP1616 which involve stakeholder engagement to develop design principles.</p>  |   |
|            | 33 | <p>Could EAL please provide substantiated evidence of (a) those dates/times, if any, at which ATMs exceeded 42 per hour ("ph"); (b) those dates/times, if any at which ATMs equalled 42ph; and (c) if the target of 42 ph currently in force has not been met at any time, the maximum number of ATMs achieved in any one-hour period at EA in the last seven years - including the date(s)/time(s) that the maximum number of ATMs ph has been achieved?</p>   | <p>Duplication of Q3 – see Q3's answer</p>   |   |
|            | 34 | <p>What account, if any, has EAL taken of the significant decrease in the rate of growth demonstrated on the graph recently produced by [redacted] graph to be attached???</p>  | <p>The graph wasn't attached – please resend.</p> <p><b>As Q4. Note, EANAB to send EAL the graph referred to on the question</b></p>   | <p>We do not have the graph to comment further.</p> |
|            | 35 | <p>What account has EAL taken of the recent declaration by the Scottish Government of a climate emergency which involves Scotland's target of reducing greenhouse gases to "net-zero" by 2045 - given that transport - including aviation - accounts for the largest share - 36.8% of emissions in Scotland?</p>  | <p>Duplication of Q5 – see Q5's answer.</p>  |   |
|            | 36 | <p>What account has EAL taken of the recent decision of the Scottish Government not to reduce Air Passenger Duty?</p>   | <p>Duplication of Q4 – see Q4's answer.</p> <p><b>Duplication of Q4 – see Q4's answer.</b></p>   | <p>As Q4</p>  |
|            | 37 | <p>What account has EAL taken of the general population, but in particular, younger people, being influenced by the Extinction Rebellion movement and its aims to reduce emissions by <u>inter alia</u> travelling less by air in future?</p>   | <p>We are watching this with interest. At the moment all of our growth plans are based on current data – this is currently speculation.</p>  |   |
|            | 38 | <p>Why has EAL referred to "runways" in its stated purpose above when it has recently sacrificed its second runway?</p>   | <p>We have one strip but two runways 24 and 06</p>   |   |
|            | 39 | <p>What account has EAL taken of UK Government Guidance - as set out in ANG 2017 sections:</p> <p>3.3 - that "when considering requests to change the airspace design, the CAA should apply the following altitude-based priorities of the government: a. in the airspace from the ground to below 4,000 feet the government's environmental priority is to limit and, where possible, reduce the total adverse effects on people; b. where options for route design from the ground to below 4,000 feet are similar in terms of the number of people affected by total adverse noise effects, preference should be given to that option which is most consistent with existing published airspace arrangements"?</p> <p>3.7 - Below 4,000 feet, there is a strong likelihood that aircraft could create levels of noise exposure above the LOAELs identified above, which is reflected in the Altitude Based Priorities.</p> <p>3.8 - There may however be options which perform comparatively better in terms of minimising more serious impacts as opposed to annoyance, or certain options may be better for day noise than night noise, or vice versa. In these instances, the CAA should verify that sponsors have considered the relative trade-offs and taken into account any community views on what the objectives in terms of noise should be.</p> <p>5.18 - that "In order to provide communities with transparency on the numbers of aircraft flown near them, the designated airports should publish details of where the aircraft are actually flying and the amount of noise created. These airports, working with their local communities, can determine the precise information they wish to publish but we [the CAA] anticipate that it may include: a. the average distance of how close to the standard instrument departure route the aircraft have flown up to an altitude of 4,000 feet, or higher if the airport wishes; b. the areas, and the specific number of departing aircraft, where 80%, 90%, 95% and 99% of air traffic has flown up to an altitude of 4,000 feet and the noise level in each of these areas; and c. details on the areas overflowed by arriving</p> | <p>Our Airspace Change Programme will meet Air Navigation Guidance 2017. At this stage I cannot confirm how it will be taken into account – this will be investigated and applied as part of Stage 2 specifically 2A Options Development.</p>  |   |

|    |  |   |   |       |
|----|--|---|---|-------|
|    |  | aircraft from an altitude of below 4,000 feet to when they reach the runway?  |   |       |
| 40 |  | Given that a substantial number of residents in the Broxburn/Uphall/Winchburgh live within a distance similar to the residents of Barton/Cramond, will EAL ensure that these residents are not overflown in the airspace from the ground to below 4,000 feet (amsl)?  | There are currently no proposals for new flights. We are right at the early stages of CAP1616 which involve stakeholder engagement to develop design principles.<br><br>When will the requested information be available? | As Q7 |
| 41 |  | Given that the existing SID on Runway 24 follows a route from the point of departure at Edinburgh Airport to the A899 dual carriageway at Livingston over land formally designated as Countryside Belt by West Lothian Council which is almost entirely comprised of agricultural land/industrial estates and is therefore sparsely populated, will EAL retain that route - by replication of the route - and thus avoid the significant adverse effects which would be sustained by residents in Broxburn/Uphall/Winchburgh if they are overflown by jet aircraft in the airspace from the ground to below 4,000 feet (amsl) - contrary to UK Government Guidance? | There are currently no proposals for new flights. We are right at the early stages of CAP1616 which involve stakeholder engagement to develop design principles.<br><br>When will the requested information be available? | As Q7 |

### Email from EANAB representative – 28 November 2019

From: [REDACTED]  
Sent: 28 November 2019 11:46  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: Fwd: Further EAL comments to list of ACP questions

**WARNING:** This email did not originate within Edinburgh Airport. Please do not click on links or open attachments unless you're confident the email is legitimate. All suspicious emails should be reported.

[REDACTED]  
[REDACTED] has advised you will be making a presentation at next Tuesday's meeting on ACP progress.

The Board's ACP Sub-Group has therefore reviewed the ACP Questions log as updated and included with [REDACTED] email below. The ACP Questions log attached to this includes comments on EAL's responses. It would therefore be very helpful if you could respond to these comments as part of your presentation.

Kind regards  
[REDACTED]  
for EANAB ACP Sub-Group

Attachment to the email of 28 November 2019

| Topic                             | Item | EANAB question  | Edinburgh Airport answer with EANAB minute comment and further questions.   | Further EAL comment  |
|-----------------------------------|------|---|---|--|
| Capacity                          | 1    | The reference to a target maximum runway capacity of 50 movements per hour disappears between v1 and v2 of the Statement of Need. In the minutes of the Assessment Meeting there is no record that this change was requested by the CAA. <b>What is the reason for this change?</b>   | It was CAA advice to not pre-determine our outcomes, so we removed the end of the sentence that referenced 50 movements per hour.<br><br><b>Noted. When will the target capacity be available?</b>  | Based on the CAA advice there should not be a target capacity. The outcome of the ACP will determine what the capacity will be.<br><br><b>What capacity are the route designers working to?</b>  |
|                                   | 2    | A Runway Capacity Target is one of the key operational criteria required for a meaningful development of design principles in step1B of the CAP1616 process. <b>What is the target runway capacity target driving the ACP?</b>  | Our published runway capacity approved by the CAA is 42 movements (mixed arrivals and departures) per hour. The objective of the Airspace Change Programme is to increase runway capacity and to reduce delays during peak times. As discussed in Q1's answer, we haven't pre-determined this with a 'number'. However, a number will be realised as part of the process.<br><br><b>As Q1</b>   | <b>As Q1</b><br><br><b>There must be a target capacity as if there is not enough capacity created by this ACP (based on EAL's assertions regarding lack of capacity and delays) then communities may find themselves quickly faced with another ACP. Conversely, if lots of spare capacity is created, communities will have suffered an increase in noise for no reason.</b>  |
|                                   | 3    | The current declared runway capacity is a maximum of 42 movements per hour. It is essential for affected communities to better understand the runway capacity issue driving the ACP. <b>Will EAL provide EANAB with the number of flights per hour data for the last 36 months?</b>   | No.<br><br>Why do you need data for the past three years?<br><br><b>Agreed the data will be provided for the next EANAB meeting.</b>  | There has since been follow up communication on this and information has been shared.<br><br><b>This is yet to be resolved. Rolling hour data has been requested by EANAB and is yet to be received.</b>   |
| Growth                            | 4    | Separate statements have been made by EAL concerning the negative impact on growth that would arise from cancelling the anticipated halving of APD. <b>What were the initial growth projections relevant to the capacity issue (assuming ADP cut) and what are the revised growth projections used for this ACP?</b>  | The Scottish Government announced in May that it was to scrap its promised cut to aviation tax and the introduction of Air Departure Tax, a decision we predict will deliver a slowdown in passenger numbers. As a responsible business, it is our aim to continue to deliver growth in terms of destinations and routes to encourage passengers to travel - this is demonstrated in the recent announcement of Wizz Air starting operations from Edinburgh later this year.<br><br><b>EAL were respectfully requested to answer the question as their initial response does not answer it.</b>   | Edinburgh Airport continues to predict growth regardless of ADT. Planning based on a tax cut led to predictions of significantly boosted growth. However, without the cut we still anticipate growth, just not at the originally anticipated higher level.<br><br><b>What was the figure for significantly boosted growth and what is the reduced figure?</b>  |
|                                   | 5    | Since the recent declaration by the Scottish government of the country being in a "Climate Emergency" and its setting of targets for carbon emissions there have been media reports about the impact on flying in the UK. In particular the possibility of domestic flights being restricted/banned in the UK. This is speculation at the moment and even if it occurs it will be medium to long term before it happens. <b>However can EAL advise how they view this and how they see it impacting future planning for growth?</b> | We are watching this with interest. At the moment all of our growth plans are based on current data - this is currently speculation. We will continue our work with wider industry through various working groups and Sustainable Aviation to understand changes to industry and the challenges and opportunities these present.<br><br><b>The current data is based on analysis and projections from investors, climate change groups etc". EAL to provide EANAB with this list. GR stated that the current data is "based on past growth"; and on "what we know is going to happen in the next 5 years</b>  | When predicting growth there are a number of factors to consider - consumer attitudes to climate change, the reaction of governments and regulators, as well as other economic and social factors. We do grapple continually with these issues; however, we are at an early stage in understanding growth of movements like 'flygskam' and how they will manifest over the coming decades. As previously reported we will continue to monitor this.<br><br><b>What monitoring is being carried out and how is EAL grappling with the issues?</b> |
| Airspace issues and opportunities | 6    | <b>Can EAL provide more details on the "confined airspace" issue mentioned in slide 5 of EAL's presentation during the assessment meeting?</b>  | As with all airports, Edinburgh Airport operates within regulated airspace surrounding the airport. Our airspace has neighbouring airspace controlled by the MOD, General Aviation and other airports.<br><br><b>EAL operate in the airspace they were given. There are conflicting priorities with Gliders group, MOD etc. A diagram</b>   | We will provide more information when it is appropriate to do so. FASI-N are currently looking at this they will be the ones who dictate timelines.<br><br><b>What is the latest update on this and is EAL prepared to pursue their ACP before there is sufficient information on the progress of the FASI-N proposals?</b>  |
|                                   |      |   | of the designated airspace in the Forth will be sought by EAL. [redacted] stated that with regard to the MoD zones/channels from Lossiemouth south, EAL is "looking at it in the context of the NERL opportunities that have now been presented to EAL". (Post meeting note: In the interests of transparency required under CAP 1616 - and as undertaken specifically by [redacted] could this please be recorded and EAL asked to report back more fully on this - especially as [redacted] indicated that the discussions with NERL re Runway 24 arrivals are relevant to this?  |  |
|                                   | 7    | <b>How many early turns and flight paths are being planned by EAL on each runway and what determines these targets?</b>   | We have no plans for any flight path options - we are just beginning the CAP1616 Airspace Change process. Flight path options begin in Stage 2, specifically Step 2A: Options development.<br><br><b>7-10: To be addressed at 4 September EAL/EANAB meeting.</b>  | We feel there is nothing more we can say beyond our original response. We are only looking at design principles at this stage. Stage 2 is scheduled to begin on 1 <sup>st</sup> February 2020.<br><br><b>What are the opportunities for early turns as stated in the Stage 1a presentation to the CAA?</b>   |
|                                   | 8    | <b>Previous trial and ACP targeted a 1-minute departure interval. Is that the case for this ACP?</b>  | We have no plans for any targeted departure interval separation times - we are just beginning the CAP1616 Airspace Change process. Flight path options begin in Stage 2, specifically Step 2A: Options development and it is during this process that potential usage is discussed as part of the development of a wider route network.<br><br><b>7-10: To be addressed at 4 September EAL/EANAB meeting.</b>   | <b>As Q7</b><br><br><b>What are interval departure times which would solve the capacity and delay issues which EAL have asserted there are at 'peak' times?</b>  |
|                                   | 9    | Some experience was gained from the previous trial for the old ACP, over the last 4 years, to educate this new ACP. <b>What is the maximum distance and altitude at which the "early turn" can be situated from DER to allow the desired departure interval?</b>  | The guidance for our current runway usage is that flights can begin their turn before the DER and a small number do that. The CAA has been clear in the past that any new designs must follow current design guidelines that state that no flights can turn before the DER. This will be considered when we come to finalising our design options.<br><br><b>7-10: To be addressed at 4 September EAL/EANAB meeting.</b>  | <b>As Q7</b>   |
|                                   | 10   | <b>Would a single additional flight path (combined with existing down flight paths) be sufficient to fix the capacity issue?</b>  | There are two points to this answer:<br>- the direction of our departures and arrivals is weather dependent, whatever happens at one end of the runway needs to be replicated at the other end of the runway. This means there is no solution where just one additional flight path would be a solution within our Airspace Change Programme.<br>- the position of a flight path is not the only thing that is considered during the Airspace Change Programme - what aircraft use the flight path (ie jet or propeller) and what times of operation (ie peak, non-peak, night time) are also considered. The entire need and solution need to be considered in the whole, therefore currently this question is impossible to answer.<br><br><b>7-10: To be addressed at 4 September EAL/EANAB meeting.</b> | <b>As Q7</b>   |

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|                                 | 11 | EAL have been working with NATS looking at ways in which the upper airspace around EDI might be better used, in particular the area out over the Firth of Forth. <b>What ideas are emerging from these meetings?</b>  | Based on our discussions with EANAB and from our learnings during our previous airspace change programme, we have been pushing NATS Prestwick centre to consider allowing us to use the Firth of Forth more – we have been challenging old thinking.<br><br>NERL (part of NATS) have proposed an option that would allow EAL to use part of the MOD airspace and fly over the Firth of Forth. This proposal is a concept and we have agreed to further the investigation into this concept to see if it is a viable option for EAL to consider within scope of our Airspace Change Programme.<br><br><b>11 and 13 Can EAL expand further on this?</b>   | We will provide more information when it is appropriate to do so. FASI-N are currently looking at this they will be the ones who dictate timelines.<br><br><b>What is the latest update on this and is EAL prepared to pursue their ACP before there is sufficient information on the progress of the FASI-N proposals?</b>   |
|                                 | 12 | <b>What is the opportunity for a change to the "designated end of runway"? Is EAL's intention seeking an early turn before current DER position?</b>  | The guidance for our current runway usage is that flights can begin their turn before the DER and a small number do that. The CAA has been clear in the past that any new designs must follow current design guidelines that state that no flights can turn before the DER. This will be considered when we come to finalising our design options.<br><br><b>11 and 13 Can EAL expand further on this?</b>  | As Q7   |
|                                 | 13 | <b>Can specific details be provided of discussions with NATS and/or other stakeholders regarding FASI-N and the relationship with EAL's ACP? What are the 'opportunities' as outlined in the minutes of the Stage 1a assessment meeting and what is the likelihood of any integration of the EAL ACP with the FASI-N project?</b> | The opportunity is what is mentioned in Q11's answer.<br><br>This proposal is a concept and we have agreed to further the investigation into this concept to see if it is a viable option for EAL to consider within scope of our Airspace Change Programme.<br><br><b>11 and 13 Can EAL expand further on this?</b>  | We will provide more information when it is appropriate to do so. FASI-N are currently looking at this they will be the ones who dictate timelines.<br><br>We are not mandated to co-ordinate our ACP with FASI-N, however, we are working with them as best we can to align our ACP with the wider Air Modernisation Strategy.<br><br><b>What is the latest update on this and is EAL prepared to pursue their ACP before there is sufficient information on the progress of the FASI-N proposals?</b> |
|                                 | 14 | <b>Will the sponsors contemplate a simpler RNAV replication exercise, as opposed to the creation of additional flight paths?</b>  | Replication of existing routes will be included in the flight path options development and analysis.<br><br><b>Could EAL please now respond to this matter?</b>   | As Q7<br><br><b>Will the fact that aircraft are not always currently on SIDs be taken into account? i.e. noise would be concentrated over new areas if the existing SIDs were replicated.</b>   |
| Environmental impact assessment | 15 | <b>As baseline noise maps and footprints are crucial to the development of Design Principles at step 1B, when is the target date for producing these?</b>   | Baseline noise maps are footprints are critical to the CAP1616 process – these are needed at stage 2A not 1B.   |   |
|                                 | 16 | Some significant changes are to be made to the way ANCON noise modelling is carried out at EDI, notably the use of radar data to define where the aircraft are flown. <b>Will radar data analysis be used to define both the vertical profile and track position of aircraft?</b>   | Yes   |   |
|                                 | 17 | Previous independent analysis of radar data revealed that the vertical profile varied significantly over the various SIDs. <b>Will the radar data used to define the vertical profile of aircraft be SID specific in an effort to make the noise modelling as representative as possible of operations at EDI?</b>                | Yes   |   |
|                                 | 18 | <b>What period will be used for establishing the baseline of the environmental impact assessment both in terms of radar analysis and traffic analysis?</b>  | One year's full traffic data – Jan 1st to December 31st for the year prior to the assessment being carried out.   |   |
|                                 | 19 | <b>Can EAL confirm that population impact analysis will be carried within the LOAEL of 51dB LAeq16h and 45dB LAeq8h for daytime and night time respectively?</b>  | Yes   |   |
|                                 | 20 | <b>Can EAL confirm that SEL/Lmax footprint maps for B738, EA39, EA319C, and EA320C will be provided to EANAB to allow a meaningful engagement from and beyond step 1B of the CAP1616 process?</b>   | ■■■■ has confirmed that we will supply this mapping as requested through EANAB – we are currently waiting on ERCD to provide further information to allow us to progress.<br><br>CAP1616 requires us to show SEL/Lmax footprint maps – however on which aircraft type is yet to be determined and this will be determined as part of the Airspace Change Programme when we reach that stage.<br><br><b>Can EAL confirm the footprint maps will be provided for the planes specified in our question?</b>  | We can't confirm which aircraft will be used at this stage. We will use data from 2019m, based on this, in early 2020 we will know which aircraft will be used.   |
|                                 | 21 | <b>What environmental criteria are used by the sponsors as part of the development of the design principles in step 1B of the CAP1616 process?</b>  | We have engaged an environmental consultancy to provide guidance and advice on the environmental requirements under CAP1616.<br><br><b>EAL will confirm when the environmental criteria will be available at our 4 September meeting.</b>   | The approach we would take is in Appendix B of Cap1616<br><br><b>Can EAL now confirm what environmental requirements they have been advised to include?</b>   |
|                                 | 22 | <b>Will the ACP be developed to avoid the overflying of new people (i.e. people not currently overflown by existing flight paths)?</b>  | Design principles are a list of agreed criteria to help evaluate future flight path options and provide the foundations for the Airspace Change Programme.<br><br>CAP1616 says that engagement activity must take place regarding the development of design principles. We will work with a number of stakeholders to develop a list of draft design principles for the sponsor to evaluate and short list, then retest the short list with stakeholders. We believe this to be a much more open process.<br><br>We have engaged a market research supplier who will be running a number of engagement and discussions sessions on our behalf – stakeholders will cover representatives of industry and community. Due to the feedback from EANAB throughout the process of CAP725 on our approach, we believe appointing an external market research supplier to run these sessions on our behalf provides a very measured and independent approach allowing for better discussion, accuracy of process, and accurate data capture. We won't be completely hands-off, as we understand this is a very important stage during the CAP1616 process.<br><br>Therefore, at this stage, it is impossible to answer this question. |   |

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| 23 | <p><b>Will the ACP be developed to minimise the overall number of people exposed to aircraft noise (within LOAEL limits)?</b></p>   | <p>Design principles are a list of agreed criteria to help evaluate future flight path options and provide the foundations for the Airspace Change Programme.</p> <p>CAP1616 says that engagement activity must take place regarding the development of design principles. We will work with a number of stakeholders to develop a list of draft design principles for the sponsor to evaluate and short list, then retest the short list with stakeholders. We believe this to be a much more open process.</p> <p>We have engaged a market research supplier who will be running a number of engagement and discussions sessions on our behalf – stakeholders will cover representatives of industry and community. Due to the feedback from EANAB throughout the process of CAP725 on our approach, we believe appointing an external market research supplier to run these sessions on our behalf provides a very measured and independent approach allowing for better discussion, accuracy of process, and accurate data capture. We won't be completely hands-off, as we understand this is a very important stage during the CAP1616 process.</p> <p>Therefore, at this stage, it is impossible to answer this question.</p> |   |
| 24 | <p><b>Will the ACP be designed to keep the overall population within LOAEL levels equal or lower to the current baseline situation?</b></p>   | <p>Design principles are a list of agreed criteria to help evaluate future flight path options and provide the foundations for the Airspace Change Programme.</p> <p>CAP1616 says that engagement activity must take place regarding the development of design principles. We will work with a number of stakeholders to develop a list of draft design principles for the sponsor to evaluate and short list, then retest the short list with stakeholders. We believe this to be a much more open process.</p> <p>We have engaged a market research supplier who will be running a number of engagement and discussions sessions on our behalf – stakeholders will cover representatives of industry and community. Due to the feedback from EANAB throughout the process of CAP725 on our approach, we believe appointing an external market research supplier to run these sessions on our behalf provides a very measured and independent approach allowing for better discussion, accuracy of process, and accurate data capture. We won't be completely hands-off, as we understand this is a very important stage during the CAP1616 process.</p> <p>Therefore, at this stage, it is impossible to answer this question.</p> |   |
| 25 | <p><b>Given two areas, A and B, with different baseline aircraft noise levels; area A is exposed to higher levels than area B. The previous ACP had proposals that allowed area A's exposure to aircraft noise to increase and to balance that by reducing area B's exposure to aircraft noise. Will the same rationale be contemplated as an environmental criterion for the development of design principles in step 1B of the CAP1616 process?</b></p> | <p>Design principles are a list of agreed criteria to help evaluate future flight path options and provide the foundations for the Airspace Change Programme.</p> <p>CAP1616 says that engagement activity must take place regarding the development of design principles. We will work with a number of stakeholders to develop a list of draft design principles for the sponsor to evaluate and short list, then retest the short list with stakeholders. We believe this to be a much more open process.</p> <p>We have engaged a market research supplier who will be running a number of engagement and discussions sessions on our behalf – stakeholders will cover representatives of industry and community. Due to the feedback from EANAB throughout the process of CAP725 on our approach, we believe appointing an external market research supplier to run these sessions on our behalf provides a very measured and independent approach allowing for better discussion, accuracy of process, and accurate data capture. We won't be completely hands-off, as we understand this is a very important stage during the CAP1616 process.</p> <p>Therefore, at this stage, it is impossible to answer this question.</p> |   |
| 26 | <p><b>Can EAL provide EANAB with details of the Noise Preferential Routes and noise abatement procedures relevant to the development of design principles?</b></p>  | <p>Noise preferential routes and noise abatement procedures are currently in place at EAL even though we don't have a requirement to do so. Aircraft must reach an altitude of 3,000ft before turning from the SID, unless the plane is jet on GRICE3C which must reach an altitude of 4,000ft before turning from the SID.</p> <p>As mentioned, the design principles are being developed through stakeholder engagement.</p> <p>To be addressed later</p>  | <p>The answer provided covers this.</p> <div style="border: 1px solid red; padding: 5px; width: fit-content;"> <p>Why is the height for GRICE3C higher?</p> </div>                    |
| 27 | <p><b>Can EAL clarify what, in its view, will constitute overflying in terms of height and distance?</b></p>  | <p>CAP1616 includes a definition of overflight: "For the purposes of airspace changes, overflight is defined according to the CAA's report, CAP1498 which outlines a measurement based on community perception. It does not portray noise impacts – <a href="http://www.caa.co.uk/cap1498">www.caa.co.uk/cap1498</a>.</p>  |   |
| 28 | <p><b>How will the altitude-based-priorities (as defined in the Air Navigation Guidance 2017) be taken into account during the development of design principles and in particular in the context of creating an early turn below 7000ft?</b></p>  | <p>Our Airspace Change Programme will meet Air Navigation Guidance 2017. At this stage I can not confirm how it will be taken into account in the context of creating an early turn below 7,000ft as we are not in the place where an early turn is an option – this will be investigated and applied as part of Stage 2 specifically 2A Options Development.</p> <p>It was pointed out on a number of occasions at the meeting EAL must take account of the Air Navigation Guidance</p>   | <p>EAL will meet the guidance as per CAP1616</p> <div style="border: 1px solid red; padding: 5px; width: fit-content;"> <p>What exactly does version A and version B mean?</p> </div> |

|            |    |   |  |   |
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|            |    |   | 2017. In response, [redacted] stated first that "a Version A and Version B may be necessary"   |   |
|            | 29 | Can EAL provide EANAB with the up-to-date local plans in area affected by the proposals which are used to inform the development of design principles?  | There are currently no proposals for new flights. We are right at the early stages of CAP1616 which involve stakeholder engagement to develop design principles. If ever needed Local Plans are available direct from the relevant local authorities.  |   |
|            | 30 | Will EAL consider night time flight restriction as part of development of design principles?  | Design principles are a list of agreed criteria to help evaluate future flight path options and provide the foundations for the Airspace Change Programme.<br><br>CAP1616 says that engagement activity must take place regarding the development of design principles. We will work with a number of stakeholders to develop a list of draft design principles for the sponsor to evaluate and short list, then retest the short list with stakeholders. We believe this to be a much more open process.<br><br>We have engaged a market research supplier who will be running a number of engagement and discussions sessions on our behalf – stakeholders will cover representatives of industry and community. Due to the feedback from EANAB throughout the process of CAP725 on our approach, we believe appointing an external market research supplier to run these sessions on our behalf provides a very measured and independent approach allowing for better discussion, accuracy of process, and accurate data capture. We won't be completely hands-off, as we understand this is a very important stage during the CAP1616 process.<br><br>Therefore, at this stage, it is impossible to answer this question.<br><br>It was noted that CAP1616 Appendix B, para B51 defines Day as 07:00 - 23:00 and Night as 23:00 - 07:00. | We will be using the CAP1616 definitions.   |
| Engagement | 31 | EAL are abandoning public meetings in favour of focus groups and drop-in sessions. While these activities can be very useful, from the perspective of our communities, it lays EAL open to the following concerns:<br>1) It is wrong to abandon public meetings. Yes, maybe only a few folk get to speak, but everyone hears the points they are making and can indicate their support or otherwise.<br>2) Using only focus groups and drop in sessions could be seen as a divide and rule strategy.<br>3) They are open to abuse as the focus groups can be carefully selected to get the required result.<br>4) Most groups in our communities don't have a full command of all the issues involved, making it easy for EAL to bamboozle them with lots of figures and aviation abbreviations, and produce facts that the participants are not equipped to challenge. | You raise four points that I'd like to address:<br>1) No, it is not wrong. When considering our approach, we looked at all the options available to us for community engagement – and with three public consultations under our belt, we have looked at what mechanisms we consider to be most informative for our communities. Drop In sessions will be open to the public for longer periods, with more information and assistance provided than public meetings<br>2) I'm unsure how providing open drop in sessions and focus groups as part of a wider engagement strategy is seen as 'divide and rule'.<br>3) By 'they', I presume you mean focus groups – these are being independently recruited for by our market research agency. The agency is accredited and has   | We note your comments, however, we will not attend public meetings arranged by other parties. As previously discussed, Edinburgh Airport will carry out drop in sessions as a means of face to face engagement with the public. |

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|            |    | Will EAL reconsider carrying out community engagement via public meetings?   | achieved Market Research Services standards and completely independent.<br>4) I agree, which is why it is important to give everyone the opportunity to understand. I thought that one of the fundamental roles of EANAB is to help us help communities understand noise? Therefore, we are working together to ensure no one is bamboozled.<br><br>Regarding your question - No, as we have previously considered this.<br><br>We have considered and evaluated our engagement opportunities throughout the Airspace Change Programme in length and consider our approach to be the best approach for us following the CAP1616 process.<br><br>We have also presented our approach (which included not holding public meetings) to the CAA, which they have approved in our Assessment Meeting on 17 June 2019.<br><br>EANAB recorded its disappointment with the response, suggesting perhaps individual Community Councils could request and organise specific public meetings attended by EAL. |  |
| Additional | 32 | Supplementary question to Q.28 of our list of 29 July... How will EAL's desire to create an early turn, increasing, or introducing, noise at a particularly sensitive time (6-7am) in many communities be reconciled with current Government policy on aviation noise?   | There are currently no proposals for new flights. We are right at the early stages of CAP1616 which involve stakeholder engagement to develop design principles.   |  |
|            | 33 | Could EAL please provide substantiated evidence of (a) those dates/times, if any, at which ATMs exceeded 42 per hour ("ph"); (b) those dates/times, if any at which ATMs equalled 42ph; and (c) if the target of 42 ph currently in force has not been met at any time, the maximum number of ATMs achieved in any one-hour period at EA in the last seven years - including the date(s)/time(s) that the maximum number of ATMs ph has been achieved? | Duplication of Q3 – see Q3's answer  | This is yet to be resolved. Rolling hour data has been requested by EANAB and is yet to be received. |
|            | 34 | What account, if any, has EAL taken of the significant decrease in the rate of growth demonstrated on the graph recently produced by [redacted] graph to be attached???  | The graph wasn't attached – please resend.<br><br>As Q4. Note, EANAB to send EAL the graph referred to on the question   | We do not have the graph to comment further.   |
|            | 35 | What account has EAL taken of the recent declaration by the Scottish Government of a climate emergency which involves Scotland's target of reducing greenhouse gases to "net-zero" by 2045 - given that transport - including aviation - accounts for the largest share - 36.8% of emissions in Scotland?  | Duplication of Q5 – see Q5's answer.   |  |
|            | 36 | What account has EAL taken of the recent decision of the Scottish Government not to reduce Air Passenger Duty?   | Duplication of Q4 – see Q4's answer.<br><br>Duplication of Q4 – see Q4's answer.   | As Q4.   |

|    |  |  |  |
|----|--|--|--|
| 37 | What account has EAL taken of the general population, but in particular, younger people, being influenced by the Extinction Rebellion movement and its aims to reduce emissions by inter alia travelling less by air in future?  | We are watching this with interest. At the moment all of our growth plans are based on current data – this is currently speculation.   |  |
| 38 | Why has EAL referred to "runways" in its stated purpose above when it has recently sacrificed its second runway?   | We have one strip but two runways 24 and 06  |  |
| 39 | What account has EAL taken of UK Government Guidance - as set out in ANG 2017 sections:<br><br>3.3 - that "when considering requests to change the airspace design, the CAA should apply the following altitude-based priorities of the government: a. in the airspace from the ground to below 4,000 feet the government's environmental priority is to limit and, where possible, reduce the total adverse effects on people; b. where options for route design from the ground to below 4,000 feet are similar in terms of the number of people affected by total adverse noise effects, preference should be given to that option which is most consistent with existing published airspace arrangements"?<br><br>3.7 - Below 4,000 feet, there is a strong likelihood that aircraft could create levels of noise exposure above the LOAELs identified above, which is reflected in the Altitude Based Priorities.<br><br>3.8 - There may however be options which perform comparatively better in terms of minimising more serious impacts as opposed to annoyance, or certain options may be better for day noise than night noise, or vice versa. In these instances, the CAA should verify that sponsors have considered the relative trade-offs and taken into account any community views on what the objectives in terms of noise should be.<br><br>5.18 - that "In order to provide communities with transparency on the numbers of aircraft flown near them, the designated airports should publish details of where the aircraft are actually flying and the amount of noise created. These airports, working with their local communities, can determine the precise information they wish to publish but we [the CAA] anticipate that it may include: a. the average distance of how close to the standard instrument departure route the aircraft have flown up to an altitude of 4,000 feet, or higher if the airport wishes; b. the areas, and the specific number of departing aircraft, where 80%, 90%, 95% and 99% of air traffic has flown up to an altitude of 4,000 feet and the noise level in each of these areas; and c. details on the areas overflowed by arriving | Our Airspace Change Programme will meet Air Navigation Guidance 2017. At this stage I cannot confirm how it will be taken into account – this will be investigated and applied as part of Stage 2 specifically 2A Options Development. | How can the ACP be said to meet ANG 17 when it is not clear how it will be taken into account? |
|    | aircraft from an altitude of below 4,000 feet to when they reach the runway?   |  |  |
| 40 | Given that a substantial number of residents in the Broxburn/Uphall/Winchburgh live within a distance similar to the residents of Barnton/Cramond, will EAL ensure that these residents are not overflowed in the airspace from the ground to below 4,000 feet (amsl)?   | There are currently no proposals for new flights. We are right at the early stages of CAP1616 which involve stakeholder engagement to develop design principles.<br><br>When will the requested information be available?              | As Q7  |
| 41 | Given that the existing SID on Runway 24 follows a route from the point of departure at Edinburgh Airport to the A899 dual carriageway at Livingston over land formally designated as Countryside Belt by West Lothian Council which is almost entirely comprised of agricultural land/industrial estates and is therefore sparsely populated, will EAL retain that route - by replication of the route - and thus avoid the significant adverse effects which would be sustained by residents in Broxburn/Uphall/Winchburgh if they are overflowed by jet aircraft in the airspace from the ground to below 4,000 feet (amsl) - contrary to UK Government Guidance?   | There are currently no proposals for new flights. We are right at the early stages of CAP1616 which involve stakeholder engagement to develop design principles.<br><br>When will the requested information be available?              | As Q7  |



**Correspondence pertaining to requests for flight data – 23 August -1 October 2019**

**Email from EANAB representative – 23 August 2019**

From: [REDACTED]  
 Sent: 23 August 2019 08:14  
 To: [REDACTED]  
 Cc: [REDACTED]  
 Subject: EANAB's request of flight data

As discussed at Wednesday evening's meeting we clarify our request for air movement data.

We are seeking the "flights per hour" data for the last 36 months in a format which allows EANAB to look at runway usage.

The data should be in a table format (csv, excel) with the following 4 columns -date -time period (e.g. 00:00-1:00) -number of departure (in that time period) -number of arrivals (in that time period)

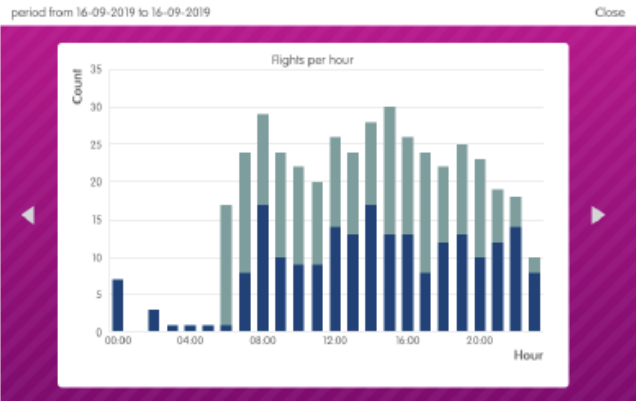
We look forward to receipt of the data.

Kind regards

[REDACTED]  
 On behalf of EANAB

**Attachment to the email of 23 August 2019**

| date     | from  | to    | arrivals | departures | total |
|----------|-------|-------|----------|------------|-------|
| 16/09/19 | 00:00 | 01:00 | 7        | 0          | 7     |
| 16/09/19 | 01:00 | 02:00 | 0        | 0          | 0     |
| 16/09/19 | 02:00 | 03:00 | 3        | 0          | 3     |
| 16/09/19 | 03:00 | 04:00 | 1        | 0          | 1     |
| 16/09/19 | 04:00 | 05:00 | 1        | 0          | 1     |
| 16/09/19 | 05:00 | 06:00 | 1        | 0          | 1     |
| 16/09/19 | 06:00 | 07:00 | 1        | 16         | 17    |
| 16/09/19 | 07:00 | 08:00 | 8        | 16         | 24    |
| 16/09/19 | 08:00 | 09:00 | 17       | 12         | 29    |
| 16/09/19 | 09:00 | 10:00 | 10       | 14         | 24    |
| 16/09/19 | 10:00 | 11:00 | 9        | 13         | 22    |
| 16/09/19 | 11:00 | 12:00 | 9        | 11         | 20    |
| 16/09/19 | 12:00 | 13:00 | 14       | 12         | 26    |
| 16/09/19 | 13:00 | 14:00 | 15       | 11         | 26    |
| 16/09/19 | 14:00 | 15:00 | 17       | 11         | 28    |
| 16/09/19 | 15:00 | 16:00 | 19       | 17         | 36    |
| 16/09/19 | 16:00 | 17:00 | 19       | 19         | 38    |
| 16/09/19 | 17:00 | 18:00 | 8        | 16         | 24    |
| 16/09/19 | 18:00 | 19:00 | 12       | 10         | 22    |
| 16/09/19 | 19:00 | 20:00 | 15       | 12         | 27    |
| 16/09/19 | 20:00 | 21:00 | 10       | 13         | 23    |
| 16/09/19 | 21:00 | 22:00 | 12       | 7          | 19    |
| 16/09/19 | 22:00 | 23:00 | 14       | 4          | 18    |
| 16/09/19 | 23:00 | 00:00 | 8        | 2          | 10    |



**Email from the EANAB representative – 29 August 2019**

From: [REDACTED]  
Sent: 29 August 2019 12:18  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: Re: EANAB's request of flight data

[REDACTED]

Sorry to chase but can you please advise when we may expect receipt of the requested information?

Many thanks

[REDACTED]

On behalf of EANAB Aviation Consultancy Sub-Group

**Email to the EANAB representative – 2 September 2019**

From: [REDACTED]  
Sent: 02 September 2019 09:21  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: EANAB's request of flight data

[REDACTED]

Thanks for this.

We've considered this and will not be releasing raw data. Its too easy to be misinterpreted and as we discussed, there is a lot of data.

I am happy to commission a 3rd party, such as T070, to look at this issue for you; or to provide you with a report from Edinburgh Airport analysts.

Let me know how you want to move forward and we can work on scoping document to get you the analysis you need.

[REDACTED]

**Email from the EANAB representative – 12 September 2019**

On 12 Sep 2019, at 21:51, [REDACTED] via Edinburgh Airport Noise Advisory Board [REDACTED] wrote:

[REDACTED]

With all due respect there is no issue with interpretation.

Given EAL advised the data would be provided to EANAB, we are disappointed you are now refusing to do so, especially in the light of the following extracts from CAP1616:

paragraph 12

The CAA has reformed the airspace change process to ensure that it meets modern standards for regulatory decision-making, and is fair, transparent, consistent and proportionate. The process must be impartial and evidence-based, and must take account of the needs and interests of all affected stakeholders.

paragraph 16

The Air Navigation Guidance 20173 creates new expectations for the aviation industry in relation to transparency about its ongoing operations, and specifically requirements concerning proactive engagement with local communities about noise impacts. These cover:

- requirements to highlight and explain aircraft operational changes retrospectively through the production of information, and
- proactive expectations to make information available relating to aircraft movements.

We therefore ask you to reconsider and provide us with the data - we are simply asking for noise data, that is the number/frequency of noise events for 36 months.

We look forward to your response.

Regards

[REDACTED]  
For EANAB

**Email from the EANAB representative – 13 September 2019**

**From:** [REDACTED]  
**Sent:** 13 September 2019 10:28  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** Re: [EANAB] EANAB's request of flight data

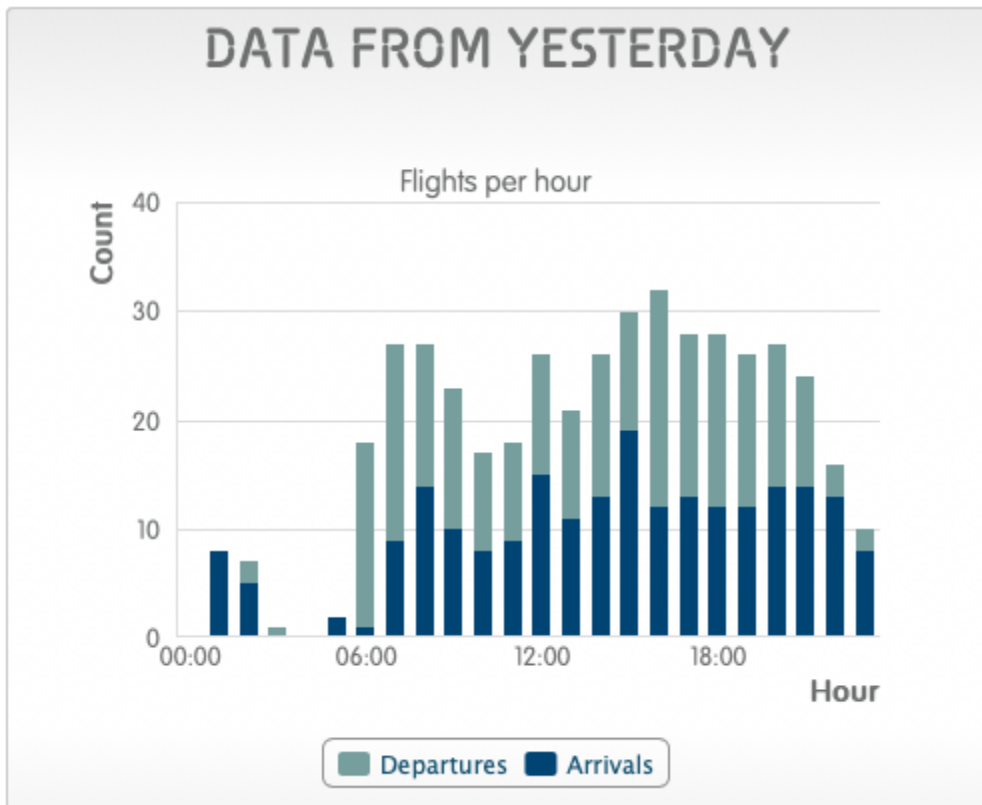
Hi,

For clarity I attached a screenshot from the "Casper noise lab webpage" showing the data we are after. It is the "flight per hour" data. We want it in a table format (showing arrivals and departures) for the last 36 months.

With due respect, I cannot understand why EAL would not assist EANAB in providing this very fundamental data in a convenient format.

Regards,

[REDACTED]



## Email to the EANAB representative – 13 September 2019

On 13 Sep 2019, at 10:56, [REDACTED] wrote:

Hi all

I'll try and combine replies to [REDACTED] in one email.

Firstly and most importantly, we are trying to assist in providing you the information that you want.

Additionally, we are very clear about our obligations under CAP 1616.

However, we will not be providing raw data.

In my email I offered to provide a report from our analysts or to engage in the service of a consultant who can create the analysis required.

The provision of raw data previously saw work produced that was not peer reviewed; that was briefed externally before we had a chance to respond and that was found in some areas to be flawed.

I don't think that assisted either of us in discussing the issue at hand.

So we will not be providing raw data.

However, that does not mean we cannot provide the analysis or tables that you require.

Our analyst team can start work on this today if you are content with that – otherwise, we can perhaps begin to scope out the brief for a third party to carry it out.

Happy to discuss on the phone today if that's of use.

Regards

[REDACTED]

**Email from the EANAB representative – 25 September 2019**

**From:** [REDACTED]

**Sent:** 25 September 2019 21:41

**To:** [REDACTED]

**Cc:** [REDACTED]

[REDACTED]

**Subject:** Re: [EANAB] EANAB's request of flight data

[REDACTED]

We refer to your response of 13 September to our request for flights/hour data and footprint data.

We have taken on board your concerns over releasing raw data, so in terms of our 2 requests for data we note:

**FLIGHTS/HOUR**

We are not seeking raw data (date and times of departures and arrivals). Instead we are requesting "flights per hour data" as it is compiled on the online Casper Noiselab page. There is no difference to the content, just the format. In further response to your concerns we are prepared to reduce our request from 36 to 12 months of data.

As you know EANAB relies on volunteers giving up their valuable time, which is why we are asking EAL to assist by providing the data in a convenient table format (e.g. csv, excel) we can easily look at. We would certainly be grateful for such help. For clarity we include below an example showing the difference in format between the data available online and the data we are seeking (table on the left).

Again, we are struggling to see how this data would be open to misinterpretation (or what service an analyst would provide here). The data sought relates to the number of departure/arrival noise events at EDI, so it doesn't get more basic and relevant than this as far as EANAB and the affected communities are concerned. It will show us how the usage of the runway varies with time and highlight busy and quiet periods, which are very relevant to both the noise impact over affected communities and the proposed airspace change.

We would then hope to be able to start a conversation about what the data shows.

**FOOTPRINT DATA**

We welcome and appreciate what has been offered to date and given your concerns over raw data (that is xy grid data) we now remove that request. However, to be of real benefit to our communities it is crucial that the footprint data is supplied in a zoomable map format (KML file would be acceptable).

Similarly, because the maps are being produced using input data based on local radar, it is essential for EANAB to be provided with that information. We therefore request the following:

- The mean and dispersed tracks produced by the radar analysis (kml format is acceptable) and the same for the vertical profiles.
- Mean vertical profile for the relevant a/c types

Given our role as your advisors on our communities' interest in aircraft noise, we think these requests are reasonable and look forward to a positive response

Regards

[REDACTED]

For EANAB

**Email to the EANAB representative – 1 October 2019**

**From:** [REDACTED]  
**Sent:** 01 October 2019 11:54  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: [EANAB] EANAB's request of flight data

Hi [REDACTED]

I totally understand that you are volunteers and I appreciate very much the time and effort that EANAB members expend in their advisory roles.

Regarding the first point – I've asked our internal analysts to commence this work. I'll revert as soon as I can with timescales.

In respect to the Foot Print data I'm still fairly sure the formats you ask for are considered 'raw data'.

I'm keen to understand more clearly what questions you're trying to answer so that we can get to the solution as quickly as possible and find the best format with which to provide the information.

For example – what does the zoomable map offer?

[REDACTED]

**Email from EANAB representative – 8 October 2019**

**From:** [REDACTED]  
**Sent:** 08 October 2019 15:05  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Re: [EANAB] EANAB's request of flight data

[REDACTED]

We do appreciate EAL's ongoing assistance in providing technical information, to improve our communities' understanding of the likely noisescapes resulting from EDI aviation operations, which is why we are so determined to work with you to produce "best in class" data for them.

Thanks for your response of 1 October - can you advise when we may expect the flights/hour data?

Regarding the footprint data, can we explain why we consider we are not asking for raw data? Raw data is the grid data, not the footprint data. Footprint data shows contour lines, which are extracted from the grid data. The reason why we need the Lmax/SEL footprints in a zoomable format is to allow the viewer to zoom in/out, to be able to accurately see where a particular contour line is situated. This will be difficult/impossible to do with the footprint provided in pdf format. So we hope you can now appreciate why we are requesting zoomable Lmax/SEL footprints and also why the footprint provided in pdf format would not be suitable.

EANAB wants to understand how aviation noise is spread across the various affected communities. Some of these communities may be on the receiving end of significant amounts of aircraft noise and therefore deserve to know.

With footprint in a KML format we will be able to look at the noise associated with a given SID in the necessary detail which will enable us, down the line, to have an informed and meaningful discussion about the new proposals in the ACP.

Now the track and vertical profiles are measured by radar at EDI, EANAB would like to know the result of that exercise. Therefore in addition to the Lmax/SEL footprint (for the various SIDs and for the agreed a/c types) we ask that EAL provide the following additional data:

- The mean and dispersed tracks produced by the radar analysis and used as input to the ANCON model (kml format is acceptable)
- Mean vertical profile for the relevant a/c types on the various SIDs (csv format is acceptable).

This will give us the best possible understanding of the likely noise impact of ACP proposals on our communities.

We look forward to your response.

Regards

[REDACTED]  
For EANAB

**Correspondence pertaining to twinning of flights paths – 2 to 17 September 2019**

**Email from the EANAB representative – 2 September 2019**

From: [REDACTED]  
Sent: 02 September 2019 09:33  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RWY06 Flights down the Forth Estuary

[REDACTED]

We have another question for you arising from our meeting on 21 August.

At the meeting you noted a route down the Forth could only be introduced on RWY06 if there was an equivalent route for RWY24 to take off towards Livingston and then do a u-turn right to fly down the Forth. Why does there have to be a RWY24 equivalent?

We look forward to hearing from you.

Regards

[REDACTED]

**Email from the EANAB representative – 16 September 2019**

From: [REDACTED]  
Sent: 16 September 2019 22:01  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: Re: RWY06 Flights down the Forth Estuary

[REDACTED]

Given its potential relevance to the soon-to-be-emarked upon Design Principles stage of EAL's ACP, we again ask you to reply to our under-noted question of 2 September.

We look forward to hearing from you.

Regards

[REDACTED]

On behalf of EANAB ACP Sub-Group



**Email to the EANAB representative – 17 September 2019**

From: [REDACTED]  
Sent: 17 September 2019 14:21  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: RWY06 Flights down the Forth Estuary

[REDACTED]

You raised a valid question and we and TO70 have been investigating. It's been conventional wisdom that routes are paired i.e. mirrored off both ends of the runway (all of our current SIDs are as are the SIDs at many airports) mainly down to the onward journey requirements of airlines and NATS. However the UK and international guidelines are just that - we couldn't see rules that compel us to pair routes and indeed there is some contradiction.

I think this is an issue for the design principles as it is a decision that requires involvement and input of other stakeholder. It is a decision that we can discuss with NATS, our airlines and the regulator. This will enable us to set a policy that works for Edinburgh and that is clear to all.

[REDACTED]

**Correspondence pertaining to EANAB attending Stage 1B workshops – 17 to 27 September 2019**

**Email from the Chairman of EANAB – 17 September 2019**

**From:** [REDACTED]

**Sent:** 17 September 2019 16:56

**To:** [REDACTED]

**Subject:** Progressive Partnership

Dear [REDACTED]

We reiterate our view that there is no conflict of interest for EANAB to both advise EAL of community concerns and participate in workshops to inform the Design Principles.

In the Introduction to CAP 1616E2 (paragraph 12 on page 8), the CAA describe their intentions in reforming the airspace change process: -

"to ensure that it meets modern standards for regulatory decision-making, and is **fair, transparent, consistent and proportionate**. The process must be **impartial and evidence-based**, and must take account of the needs and interests of **all** affected stakeholders" [emphasis added].

A cornerstone of the process set out in Appendix C of CAP 1616 ("Consultation and Engagement") is summarised at page 135 and requires: -

"Best practice ongoing engagement to ensure that airspace change proposals are received by an **informed, engaged audience able to effectively feed-in their views**." [Emphasis added]

Having spent more than 2 years becoming informed and engaged through voluntary participation in EANAB, EANAB members representing their respective communities are well placed to be able to effectively feed in informed views to the process.

In light of the above, could you please explain why you have determined that there is a conflict of interest in both advising EAL of community views and participating in workshops that seek to explore design principles for options that will in future be put forward by EAL.

Regards

[REDACTED]  
Chairman  
EANAB

**Email to the Chairman of EANAB – 18 September 2019**

On 18 Sep 2019, at 15:55, [REDACTED] wrote:

[REDACTED]

Thank you for your email. As you know, we met with EANAB members this morning to discuss further. This email therefore outlines why we've adopted this stance and a potential solution.

We rely on a number of advisors to assist us through what is a complex and intensive CAP1616 process. The Consultation Institute is one of those and they advise us on engagement and consultation.

When reviewing our engagement plans for Stage 1b, they raised concerns about EANAB's role. We were clear that EANAB should have a role at this stage, which is why we asked you how you wanted to engage given the advice.

I understand there is consternation and disagreement on this which I hope that we can resolve.

The advice and rationale is clear.

In TCI's advice, placing EANAB in a focus group or workshop which is designed to provide a broad and wide representation of many interests is not fair nor consistent. The purpose of the workshops is to give an opportunity to invited Stakeholder categories (as per CAP1616) and to the wider public (through Focus Groups) to present views, insights and opinions which may not normally be heard by the airport.

This is the very start of the process, so permitting EANAB to have a "dual" role within the process may risk it being regarded by other less privileged and less well informed stakeholders to be unfair and may encourage or attract accusations of bias, lack of fairness and potentially pre-determination.

CAP 1616 requires the change sponsor to start with a blank sheet of paper. Many factors, not just noise, need to be considered when determining the design principles. It is therefore important to create spaces for the wide representation of many interests to talk openly about many possibilities without risk of expert, specialist or heavily weighted views on one issue in particular.

As this is the start of the process we are recruiting representative voices, and also ordinary public voices to inform its approach; it is our intention to go back to these individuals at the different stages of the process, as well as seek views more broadly, as those involved from the beginning will develop their knowledge and understanding. Some of those will already be knowledgeable, others less so. However, by going back to these same stakeholders we develop a core grouping of people and enhance their knowledge.

We would value EANAB's contribution as an advisor on our implementation of CAP 1616 due to not only its close working relationship that already exists with the airport, but because of its knowledge base and specific special interest. This would not preclude EANAB from participating in the formal consultation at Stage 3.

We are committed to meaningful engagement throughout this process. That includes continuing engagement with EANAB. We presented to EANAB our proposed approach to CAP1616, seeking insights and input. As such we believe there are many avenues in which EANAB has the opportunity to participate in this process without fear of being overlooked or other stakeholders being concerned regarding undue influence.

It's TCI's advice that to proceed in any other manner in which EANAB is permitted to both contribute to shaping the design principles and then to assess the prioritisation of these design principles would indeed fundamentally call into question the impartiality of this process.

However – we hear you on your desire to help shape the design principles. I also sensed at this morning's meeting an understanding of our position on EANAB's part.

We discussed compromise and potential ways forward this morning where we tried to understand exactly how EANAB could participate whilst also retaining an advisory role whilst also heeding the advice I've just detailed.

The idea of an EANAB only "community noise" workshop was discussed and having spoken with our advisers would seem be an acceptable way forward.

We have a few caveats which we think make this as fair as we can. Duplication of attendance prevents other views from being heard. This is a fair process that will hear and record views, so attending multiple workshops to reiterate or reinforce views would be redundant and a loss of opportunity for another representative. So those at the EANAB session should not attend any other focus group.

I'm sure that you'll find this reasonable and we can proceed in asking Progressive Partnership to organise the session.

We'll be back in due course with the relevant details.

Happy, as ever, to discuss.

Regards



**Email to the EANAB representative – 19 September 2019**

**From:** [REDACTED]  
**Sent:** 19 September 2019 11:18  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Setting up EANAB only discussion group for 1B

Hello [REDACTED]

As discussed at the meeting and to streamline communications, I'll email you everything regarding ACP with [REDACTED] in cc. Could I please ask that you also cc our generic [airspace\\_change@edinburghairport.com](mailto:airspace_change@edinburghairport.com) email address, as when I'm away it will still be picked up by someone in the office. Hopefully this will keep communications timely.

I'm setting up the additional piece of work with our market research suppliers to host this session.

To begin, I just need to know if it's to be inside work hours or outside work hours – the workshops are for approximately 1.5-2 hours.

[REDACTED]

**Email from the EANAB representative – 19 September 2019**

**From:** [REDACTED]  
**Sent:** 19 September 2019 15:02  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Re: Setting up EANAB only discussion group for 1B

[REDACTED]  
If you are referring to the EANAB workshop, given the likely EANAB participants, it would be better to be held outside work hours.  
[REDACTED]

Sent from my iPhone

**Email to the EANAB representative – 19 September 2019**

**From:** [REDACTED]  
**Sent:** 19 September 2019 17:07  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Setting up EANAB only discussion group for 1B

Hello [REDACTED]

We can run a EANAB session...

As I stated in our meeting, the workshops begin on Monday so there are very limited space during the programme of works to fit in another session.

Our suppliers can offer a session Saturday 28 September, Friday night 4 October or Saturday 5 October.

The session would be in Edinburgh and it would be for 8-10 people.

Can you please confirm quite urgently which date you would prefer (I need to book out of hours workers to host these so need to sort resources).

We can sort further details after this.

Please let me know.

Regards, [REDACTED]

**Email from the EANAB representative – 19 September 2019**

**From:** [REDACTED]  
**Sent:** 19 September 2019 18:35  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Re: Setting up EANAB only discussion group for 1B

[REDACTED]  
What would be the maximum number of EANAB members who could attend the workshop?

Sent from my iPhone

**Email to the EANAB representative – 19 September 2019**

**From:** [REDACTED]  
**Sent:** 19 September 2019 18:36  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Setting up EANAB only discussion group for 1B

Hello [REDACTED]

Caught me still here – it would be for 8-10 people.  
[REDACTED]

**Email from the EANAB representative – 23 September 2019**

**From:** [REDACTED]  
**Sent:** 23 September 2019 12:42  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Fwd: [EANAB] Setting up EANAB only discussion group for 1B

[REDACTED]

In response to your email just received, Saturday 28th September is the preferred date.

Can you confirm: venue, time and parking arrangements if any?

[REDACTED]  
For EANAB

**Email to the EANAB representative – 23 September 2019**

**From:** [REDACTED]  
**Sent:** 23 September 2019 15:29  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: [EANAB] Setting up EANAB only discussion group for 1B

Hello [REDACTED]  
Can you please provide email addresses and phone numbers for those who can make Saturday.  
Our market research will handle pre-event communication so it is a consistent approach to the other sessions.  
Thanks, [REDACTED]

**Email from the EANAB representative – 23 September 2019**

**From:** [REDACTED]  
**Sent:** 23 September 2019 20:37  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Re: [EANAB] Setting up EANAB only discussion group for 1B

[REDACTED]

I do not have phone numbers for Board members.

Board members wishing to attend on the 28th are: [REDACTED]  
[REDACTED] Their email addresses are in the Cc: field above.

[REDACTED]  
For EANAB

**Email from the EANAB representative – 24 September 2019**

**From:** [REDACTED]

**Sent:** 24 September 2019 17:23

**To:** [REDACTED]

**Cc:** [REDACTED]

[REDACTED]

**Subject:** Re: [EANAB] Setting up EANAB only discussion group for 1B

[REDACTED]

Can you confirm the details of the workshop as noted in my email of yesterday? I understand [REDACTED] attendance at last night's workshop means they will not be allowed to attend Saturday's.

[REDACTED]

For EANAB

**Email to the EANAB representative – 24 September 2019**

**From:** [REDACTED]

**Sent:** 24 September 2019 17:28

**To:** [REDACTED]

**Cc:** [REDACTED]

[REDACTED]

**Subject:** RE: [EANAB] Setting up EANAB only discussion group for 1B

Hello [REDACTED]

This exercise is about us gaining a wide range of views in a limited space.

As per [REDACTED] email last night and as we agreed, we prefer not to have duplication in attendance as these views are already been heard. [REDACTED] were at last night's session and as such their views have already been heard and documented. It would be great to give a space and a voice to someone whom we haven't heard a view from yet.

I'm unsure if a second attendance will bring any wider or different views.

Regards, [REDACTED]



**Email from the EANAB representative – 25 September 2019**

**From:** [REDACTED]

**Sent:** 25 September 2019 14:11

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Re: [EANAB] Setting up EANAB only discussion group for 1B

[REDACTED]

For the 3rd time I ask again, can you please confirm the details of Saturday's EANAB-only workshop, so I can advise Board members?

[REDACTED]

For EANAB

**Email to the EANAB representative – 25 September**

**From:** [REDACTED]

**Sent:** 25 September 2019 14:17

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Re: [EANAB] Setting up EANAB only discussion group for 1B

Hi [REDACTED]

As I have advised our supplier is handling this and will deal directly with attendees.  
I'll chase though as this obviously hasn't happened.

[REDACTED]

**Email from the EANAB representative – 27 September 2019**

**From:** [REDACTED]  
**Sent:** 27 September 2019 08:03  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** Re: Progressive Partnership

[REDACTED]

At our meeting on 17 September attended by yourself, [REDACTED] and myself, we made clear that we did not accept that there is a conflict in attending a workshop, becoming informed of the process, and advising EAL of our communities' concerns. In fact attendance at both would enhance the advisory role.

We therefore note that the restriction you have imposed, resulting in Board members who have already participated in an earlier workshop being unable to attend Saturday's EANAB-only workshop, is regarded as unilateral.

Regards

[REDACTED]

For EANAB ACP Sub-group

**EANAB response to the Statement of Need and Stage 1B process – 7 November 2019**

**Email from EANAB representative – 7 November 2019**

**From:** [REDACTED]  
**Sent:** 07 November 2019 15:12  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Fwd: presentation

WARNING: This email did not originate within Edinburgh Airport. Please do not click on links or open attachments unless you're confident the email is legitimate. All suspicious emails should be reported.

[REDACTED]

As requested at last night's EANAB meeting here are the slides which [REDACTED] presented to us. I had a problem in viewing some of them on my laptop, so please let me know if you have any such problems, in which case I'll ask [REDACTED] to send you them direct. The presentation should be viewed in "slide show" mode to activate the animation in slides 11 and 20.

While slide 18 is not yet fully representative of EANAB's position, you will know from the ensuing discussion last night, that generally the Board now considers, based on the data presented, EAL's own data, that there are no runway capacity issues preventing EAL meeting the increase in flights they had anticipated.

So, as requested, can EAL please, by next Wednesday 14 November, provide evidence of the need for greater runway capacity?

Regards

[REDACTED]  
For EANAB

Attachment to the email of 7 November 2019

# EDI runway capacity

EANAB  
6<sup>th</sup> November 2019

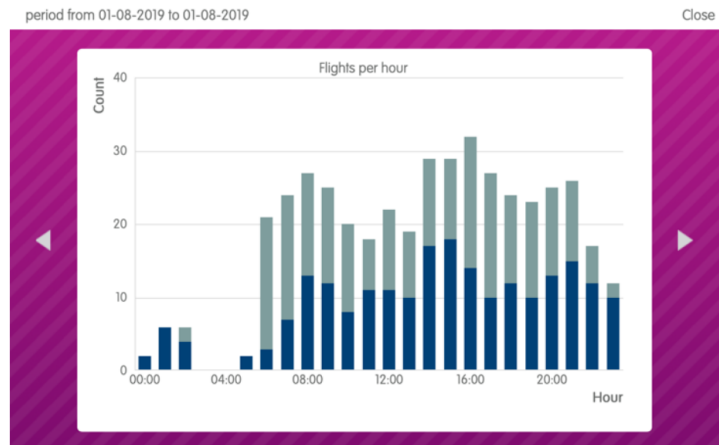
CAP1616

16. The Air Navigation Guidance 2017<sup>3</sup> creates new expectations for the aviation industry in relation to transparency about its ongoing operations, and specifically requirements concerning proactive engagement with local communities about noise impacts. These cover:

- requirements to highlight and explain aircraft operational changes retrospectively through the production of information, and
- proactive expectations to make information available relating to aircraft movements.

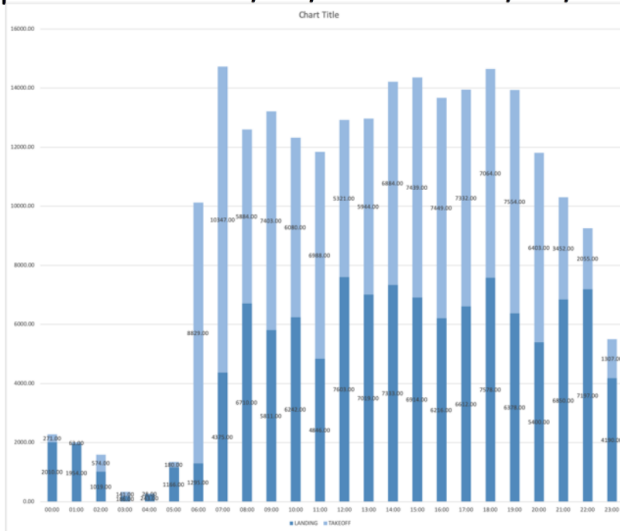
The CAA is required by the Government to prepare and publish guidance to help industry meet government expectations in respect of this community engagement, and this guidance (which we group under the heading 'airspace information') forms part of this document.

Request for runway usage data: the data behind “Flights per hour” graphs on Casper Noise Lab webpage



Source: <https://noiselab.casper.aero/edi/>

Cumulative flight per hour data was provided for period from 01/01/2018 to 30/09/2019



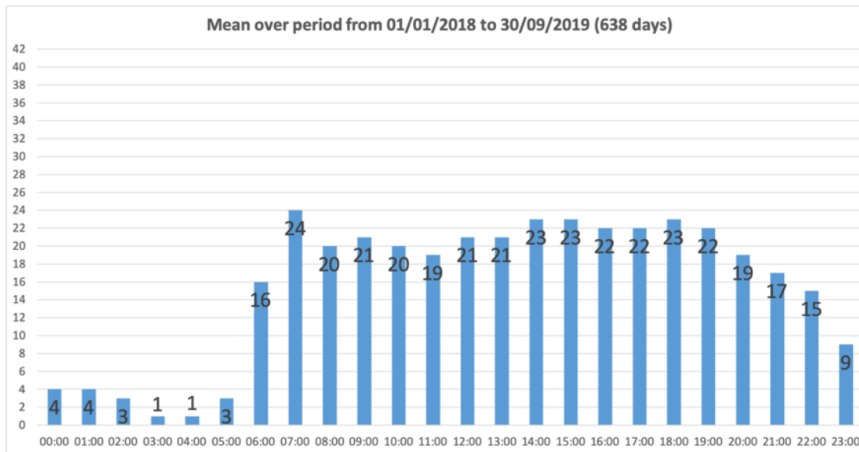
Source: EAL 29/10/19 flights per day per hour by arrivals and departures 01012018 to 30092019 inclusive.xlsx

| Hour  | LANDING | TAKEOFF  |
|-------|---------|----------|
| 00:00 | 2010.00 | 271.00   |
| 01:00 | 1954.00 | 63.00    |
| 02:00 | 1019.00 | 574.00   |
| 03:00 | 186.00  | 141.00   |
| 04:00 | 243.00  | 28.00    |
| 05:00 | 1166.00 | 180.00   |
| 06:00 | 1295.00 | 8829.00  |
| 07:00 | 4375.00 | 10347.00 |
| 08:00 | 6710.00 | 5884.00  |
| 09:00 | 5811.00 | 7403.00  |
| 10:00 | 6242.00 | 6080.00  |
| 11:00 | 4846.00 | 6988.00  |
| 12:00 | 7603.00 | 5321.00  |
| 13:00 | 7019.00 | 5944.00  |
| 14:00 | 7333.00 | 6884.00  |
| 15:00 | 6914.00 | 7439.00  |
| 16:00 | 6216.00 | 7449.00  |
| 17:00 | 6612.00 | 7332.00  |
| 18:00 | 7578.00 | 7064.00  |
| 19:00 | 6378.00 | 7554.00  |
| 20:00 | 5400.00 | 6403.00  |
| 21:00 | 6850.00 | 3452.00  |
| 22:00 | 7197.00 | 2055.00  |
| 23:00 | 4190.00 | 1307.00  |

Not the most informative data, as we can only look at the average over the period the data was provided for.

01/01/2018 – 30/09/2019 = 638 days

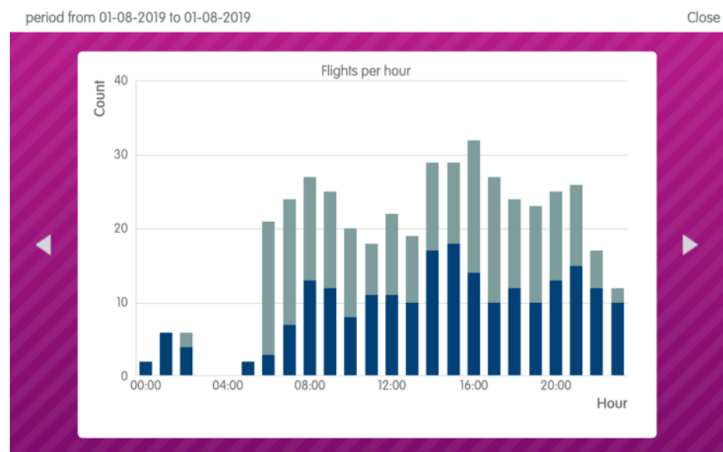
Data provided when averaged over 638 days



| Hour  | LANDING | TAKEOFF  | 638 days Mean |
|-------|---------|----------|---------------|
| 00:00 | 2010.00 | 271.00   | 4             |
| 01:00 | 1954.00 | 63.00    | 4             |
| 02:00 | 1019.00 | 574.00   | 3             |
| 03:00 | 186.00  | 141.00   | 1             |
| 04:00 | 243.00  | 28.00    | 1             |
| 05:00 | 1166.00 | 180.00   | 3             |
| 06:00 | 1295.00 | 8829.00  | 16            |
| 07:00 | 4375.00 | 10347.00 | 24            |
| 08:00 | 6710.00 | 5884.00  | 20            |
| 09:00 | 5811.00 | 7403.00  | 21            |
| 10:00 | 6242.00 | 6080.00  | 20            |
| 11:00 | 4846.00 | 6988.00  | 19            |
| 12:00 | 7603.00 | 5321.00  | 21            |
| 13:00 | 7019.00 | 5944.00  | 21            |
| 14:00 | 7333.00 | 6884.00  | 23            |
| 15:00 | 6914.00 | 7439.00  | 23            |
| 16:00 | 6216.00 | 7449.00  | 22            |
| 17:00 | 6612.00 | 7332.00  | 22            |
| 18:00 | 7578.00 | 7064.00  | 23            |
| 19:00 | 6378.00 | 7554.00  | 22            |
| 20:00 | 5400.00 | 6403.00  | 19            |
| 21:00 | 6850.00 | 3452.00  | 17            |
| 22:00 | 7197.00 | 2055.00  | 15            |
| 23:00 | 4190.00 | 1307.00  | 9             |

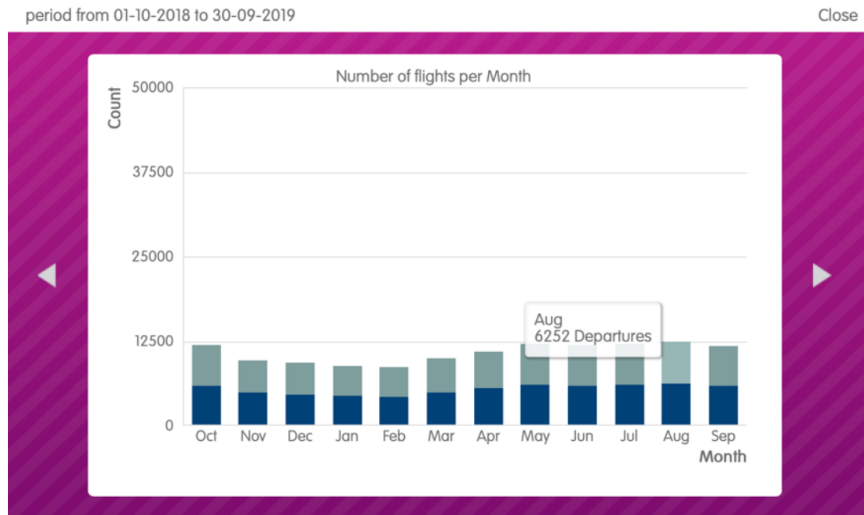
Source: EANAB 06/11/19

We do not have the table data we wanted but we can still look at screenshots of the daily data as shown on the Casper Noise Lab webpage.



Source: <https://noiselab.casper.aero/edi/>

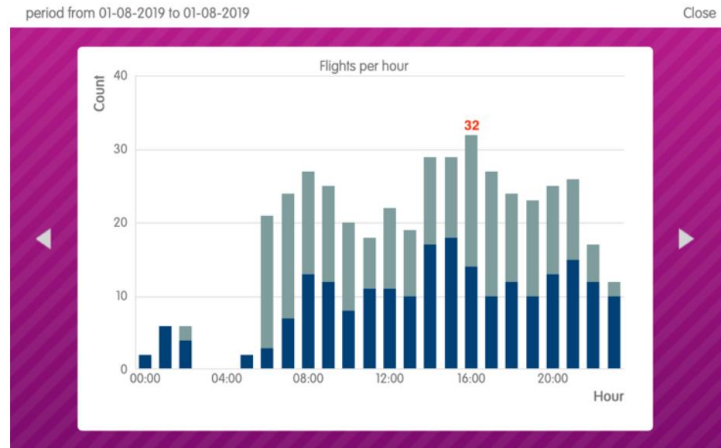
Let's focus on the busiest month in the year with the record number of flights: August 2019



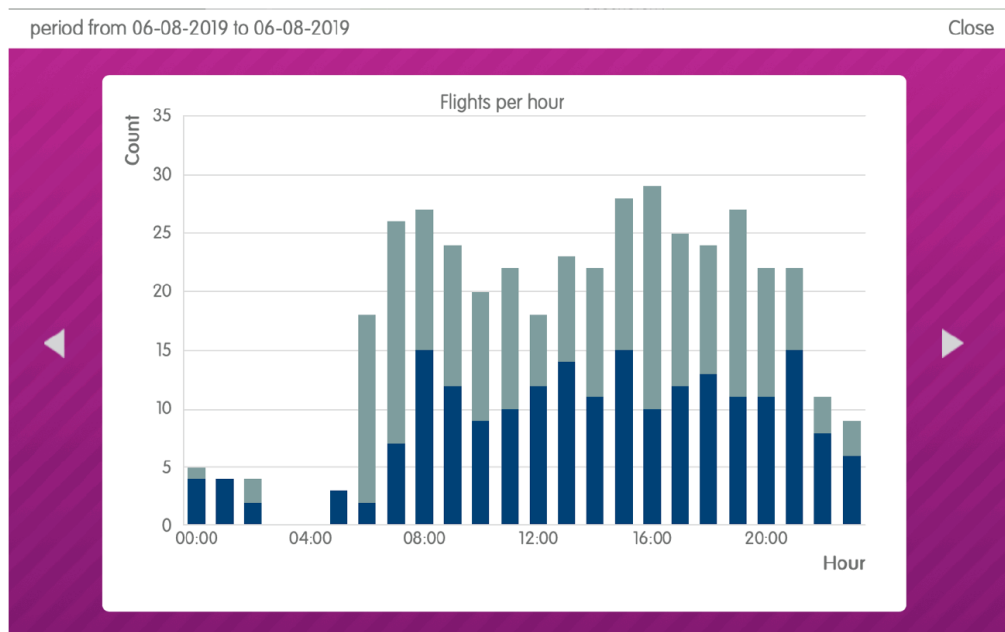
Source: <https://noiselab.casper.aero/edi/>

The current declared runway capacity is a maximum of 42 movements per hour.

Let's look at when the number the flights per hour is greater or equal to 30 (71% of maximum capacity)



Source: <https://noiselab.casper.aero/edi/>



Source: <https://noiselab.casper.aero/edi/>



## What have we learned?

- There are  $24 \times 31 = 744$  1h time slots in August
- The maximum number of flights per hour in August 2019 was 35.  
It was observed for a single 1h time slot (14:00-15:00 on 11<sup>th</sup> August).
- The number of flights per hour exceeded 30 (71% of maximum capacity) for 44 out of the 744 1h time slots. That's 3.7% of the time.
- Only two of the 744 1h time slots exhibited flights per hour greater or equal to 34. That's 0.3% of the time.

## Statement of Need v1

With this growth comes the need to maximise the frequency at which aircraft can depart in succession. The frequency at which aircraft can depart in succession is determined by wake vortex (or flow of air behind aircraft) and by the route design. Currently due to the design of the departure routes, the standard departure interval between successive departures is two minutes, but can be up to five minutes, depending on aircraft performance, which is impacted by a number of factors including type, age, weight, and passenger load. These departure intervals often result in delays at busy times, especially during the first wave of departures in the morning usually between 0600-0700. Hence the initial portion of the departure routes is a bottle-neck which limits the runway capacity and causes delays. The current dedared runway capacity is a maximum of 42 movements per hour.

The proposal:

We propose to introduce a number of RNAV1 Standard Instrument Departures (SIDs), RNAV1 Arrival Transitions and RNAV5 STARs in order to meet technical requirements and improve airspace efficiency and capacity. Our target runway capacity is 50 movements per hour.

## Spare capacity

- Through the current ACP, EAL is seeking to increase its maximum runway capacity to 50 from 42. That's +8 flight per hour.
- The data made available to us shows that, in August 2019, a spare capacity of +8 flights per hour was available for 99.7% of the time.

## Edinburgh Airport Noise Advisory Board

### Terms of Reference

#### A. Introduction

The Edinburgh Airport Noise Advisory Board (the Board) has been established to create and maintain an impartial pathway for the Community at large to engage with Edinburgh Airport Limited (EAL) in the understanding and resolution of issues relating to aircraft noise associated with Edinburgh Airport (EDI), with the primary aim of minimising the noise impact on affected or potentially affected communities. Members of the Board appointed under paragraph D.1. represent organisations with differing remits and responsibilities some of which include prescribed regulatory or rule-based functions.

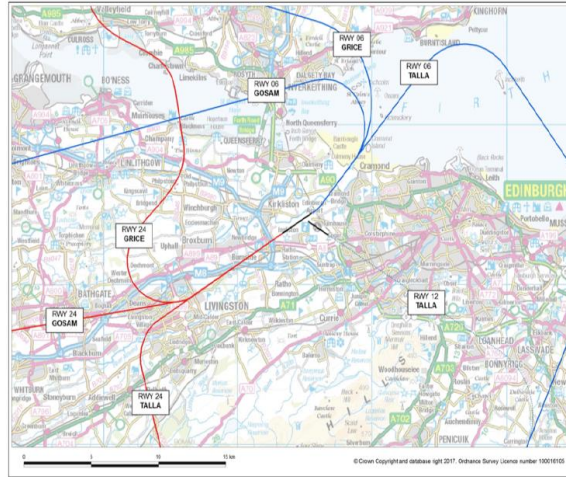
The Board has no legal status or standing; its effectiveness depends upon the cooperation and constructive participation of its membership. The Board addresses noise issues at a strategic and technical level. It does not itself make decisions; its power comes from its ability to make evidence based recommendations to the relevant decision makers.

Our evidence based recommendations should be:

- There is no evidence of runway capacity issue in the data made available to us, therefore EANAB concludes that there is no runway capacity issue unlike it has been claimed in the SoN.
- EANAB recognises the need for modernisation. However it cannot support flight path expansion, which will inevitably result in the redistribution of noise and increase its impact on population, as it is not necessary for the foreseeable future.
- Flight path expansion could be revisited in a future ACP when the need is evidenced, the same way that the introduction of a second runway could be.
- Therefore EANAB recommends that the ACP should be limited to keeping the number of flight path the same.
- In addition EANAB recommends that each SID is designed (tracks and vertical profiles) to minimise the noise impact below 4000ft. Between 4000-7000ft the noise should also be minimised unless evidence is presented that it will disproportionately increase CO2 emissions.

This is what flight path expansion looks like (1<sup>st</sup> ACP)

Figure 1 Edinburgh Airport existing SIDs



Source: [https://s3-eu-west-1.amazonaws.com/edinburghairport/files/acpv2/consultation-material/library/CAA\\_ERCD\\_Noise\\_Analysis.pdf](https://s3-eu-west-1.amazonaws.com/edinburghairport/files/acpv2/consultation-material/library/CAA_ERCD_Noise_Analysis.pdf)

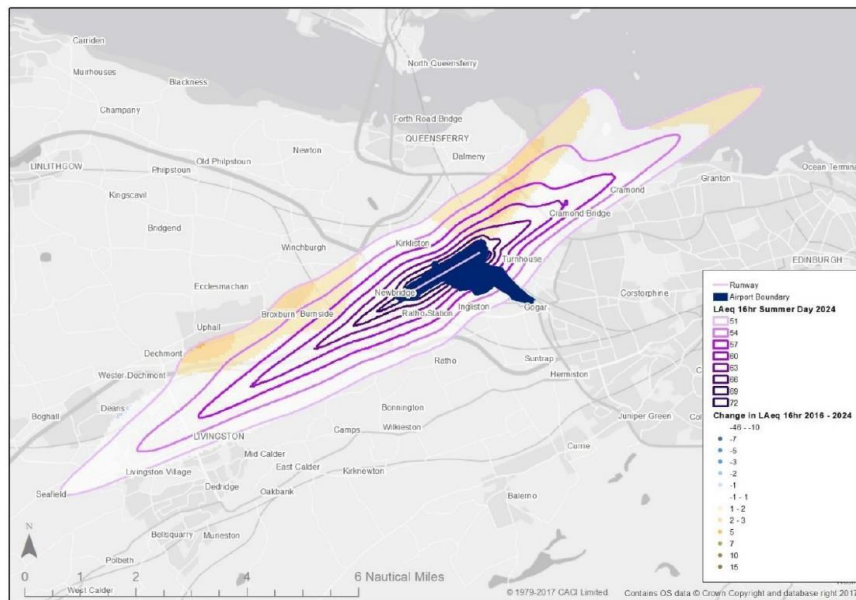


Figure 6.4 Difference in summer day  $L_{Aeq,16hr}$  between 2016 and 2024, Edinburgh Airport

Source: [https://s3-eu-west-1.amazonaws.com/edinburghairport/files/acpv2/2018/Consultation-material/EIA\\_Aug\\_2018.pdf](https://s3-eu-west-1.amazonaws.com/edinburghairport/files/acpv2/2018/Consultation-material/EIA_Aug_2018.pdf)

**EANAB comments following the conclusion of first round of engagement sessions – 11 – 18  
October 2019**

**Email from the chair of EANAB – 11 October 2019**

**From:** [REDACTED]  
**Sent:** 11 October 2019 18:25  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** EANAB Concerns

Dear [REDACTED]

Please find attached a letter expressing the considered view of the Edinburgh Airport Noise Advisory Board members in relation to the board's various ongoing concerns.

Signed in email form by myself in my capacity as Independent Chair.

I look forward to hearing your thoughts before long.

Regards,

[REDACTED]

Attachment to the email of 11 October 2019

Dear [REDACTED]

Based on our recent experience of the Design Principles workshops, EANAB have concerns over what we see as serious shortcomings in the way things are being done by EAL or at their behest, particularly with the engagement process. Given the tight timescale that has been set, we consider there are some aspects of the process that need addressed urgently to ensure that the communities that we represent can have confidence in the eventual outcomes.

For reasons we have outlined below, we are recommending the ACP is limited to a modernisation exercise, without flight path expansion, to allow proper consideration of our concerns. Given many of our issues with EAL's current approach are based on the guidance given in CAP1616, we are including [REDACTED] CAA Policy Director in the circulation of this letter.

**STRUCTURE OF ENGAGEMENT WORKSHOPS:**

- a) The Feedback from workshop attendees indicates that the value and integrity of any information derived from the events may be compromised by the methods employed. For example:
  - i. Apart from the Statement of Need, no further ACP information was provided to participants prior to the workshops. We advise that community and other representatives were confused as to what could, and could not be discussed, in the very short period given.
  - ii. Many attendees had no prior knowledge of aviation other than concern about noise. The introductory presentation, when there was one, should have made it clearer what was meant by a "Design Principle" as at some workshops participants were encouraged and allowed to put forward any suggestion for improving the airport, even if it had nothing to do with an ACP. This was partly because the company running the workshops, while they might know how to run a workshop, knew little about aviation. Also, if the same company is to produce a report based on these meetings how can it be verified as accurate? This would not meet the guidance of CAP1616 or the Gunning principles for an open and honest consultation.
  - iii. The workshop structure evolved over time with all being run slightly differently. This inconsistency also showed in the responses given to requests from participants to be sent a copy of the workshop transcripts. No transcripts have been issued to date.
- b) In the interest of transparency, we'd like a detailed understanding of the process as to how, when and by whom the Design Principles will now be established and precisely what role EANAB and other stakeholders will have in this so that we can feed this back to our communities.
- c) In particular, will all attendees of the first workshops be invited back to the follow up sessions? If not, it might be construed that those who were selected to attend a follow up session were the ones who seemed most compliant, or were advocating Design Principles agreeable to EAL during the first workshop sessions.
- d) It was very unfortunate that an attempt was made to exclude EANAB members from participating in the community workshops.

- e) It was reported that at a number of workshops, people were asked to vote between noise and CO2. This is very concerning as it undermines the "altitude based priorities" policy expressed in the UK air navigation guidance, central to the CAP1616 process.

**EAL'S ENGAGEMENT WITH EANAB REGARDING THE ACP:**

- The Board appreciated the efforts made by EAL to respond to their initial list of ACP questions and to attend the Extraordinary Meeting on 21 August. At that meeting, due to limited time, it was not possible to address all of EANAB's questions, so EAL agreed to answer the remaining ones at the monthly Board meeting on 4 September. However, without any prior notification, none of EAL's ACP team attended either the September or October EANAB meetings, so these questions could not be addressed. The Board consider EAL's behaviour on this amounts to disrespect. Will you now properly address EANAB's reasonable questions relating to the ACP?

In addition to the list of questions already posed, we have several key and urgent questions relating to the process overall:

**STATEMENT OF NEED:**

- ATM Data does not support EAL's claim that the busiest time is between 6.00am and 7.00am.
- Where is the evidence to support EAL's statement that altering airspace and changing flight paths will significantly reduce delays?
- As previously discussed with you, we would like to have consideration of Airspace changes between 7000 - 20000 ft included in the ACP, to allow the possibility of routes down the Forth.

**CAPACITY LEVELS:**

- Where is the evidence that EAL needs additional runway capacity beyond the 42 ATMs an hour already available? Data shows that almost all of the time it is operating below 75% of its runway capacity.
- Where is the data that forms the basis for future growth projections?
- Do these growth figures take account of recent changes, such as the non-implementation of the cut in APD, the rapid rise in concern over the effects of climate change caused by air travel, and the fast growth of "flygskam", which has already led to a decrease in passenger numbers in Sweden?

**CLIMATE CHANGE:**

Climate Change Act: Lord Deben, the Chair of the Committee on Climate Change advised the UK Government on 24<sup>th</sup> September:

*Airport capacity. The Government should assess its airport capacity strategy in the context of net zero. Specifically, investments will need to be demonstrated to make economic sense in a net-zero world and the transition towards it. Current planned additional airport capacity in London, including the third runway at Heathrow, is likely to leave at most very limited room for growth at non-London airports.*

*Demand. In the absence of a true zero-carbon plane, demand cannot continue to grow unfettered over the long-term. Our scenario reflects a 25% growth in demand by 2050*

*compared to 2018 levels. This compares to current Government projections which are for up to a 49% increase in demand over the same period.*

- What account is being taken of this letter and the imminent changes in Government legislation on climate change, as a result of the Government's declared future policy on Climate Change, and the resulting increased restrictions on emissions?
- Individuals and Community Councils cannot accept an ACP which results in an increased capacity, which leads to an increase in flights, with a corresponding increase in carbon emissions. This is the complete opposite of what society at present is being asked to do.

**RECOMMENDATIONS:**

1. At one of the workshops it emerged that Aberdeen and Glasgow Airports have recently held similar events for those involved in the aviation industry, and that the aspiration of participants was that these ACPs offered an opportunity to redraw the airspace arrangements with a "clean sheet". It would therefore seem sensible at this time for all three airports to combine and seek a co-ordinated solution for the whole of Scotland, with NERL as part of the AMS, rather than approaching this opportunity to update airspace design in a piecemeal fashion. We would urge and support EAL to take the necessary steps to initiate such a solution.
2. We note that EAL's ACP has 2 elements:
  - Modernise Edinburgh Airport's airspace.
  - Increase Edinburgh Airport's runway movements per hour capacity.

We therefore ask for the ACP to be limited to a modernisation exercise, without flight path expansion, to allow time for all the issues described above to be clarified and agreed.

Yours sincerely





**Email to the Chairman of EANAB – 18 October 2019**

**From:** [REDACTED]  
**Sent:** 18 October 2019 14:31  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: EANAB Concerns

[REDACTED]

As discussed please find attached our response to your letter.

[REDACTED]

Attachment to the email of 18 October 2019



Edinburgh Airport  
EH12 9DN  
Scotland

W: [edinburghairport.com](http://edinburghairport.com)

Dear [REDACTED]

Thank you for your letter. As ever, we value feedback from EANAB and I hope this letter will go some way to easing your Board's concerns.

Let me be clear in stating that Edinburgh Airport has a robust process in place for this Airspace Change process.

It is being advised by the CAA, our regulator, The Consultation Institute, specialists in best practice engagement, and is supported by several expert partners, including Progressive Partnership.

Stage 1b is an initial stage but an important one. The plan we've put in place to engage with stakeholders is to ensure that the creation of design principles is stakeholder-informed, and not only complies with CAP1616 but goes above and beyond what the regulator asks of us.

We have engaged with EANAB as a key stakeholder fully in this process. No other stakeholder organisation has had a separate briefing, a tailored workshop nor a dialogue that saw over 50 questions being answered.

We do this because we seek and welcome EANAB's input.

What we cannot do, however, is to have a process that is in any way perceived to be skewed towards EANAB and therefore unfair to others. Our process I believe, provides accommodation for EANAB's unique and privileged position, whilst maintaining the integrity of the exercise.

I hope that we can agree that balance needs to be struck and that Edinburgh Airport has sought to include EANAB properly in our engagement.

You raised some specific issues in your letter which I will deal with below.

#### **Engagement Workshops**

I want to be clear at the outset that these are pre-consultation engagement sessions – this is not yet a full consultation and therefore is governed only by CAP1616 that sets out the guidance in Stage 1B; I'm confident we're surpassing its requirements.

Our objective here is to gather views to assist us in formulating design principles - not consult on our SON, nor consult on particular flightpath options, nor even on the validity of an ACP at all. The opportunity for wider debate on Airspace options comes later in the process laid down by CAP1616; after this 'pre-consultation' under 1B, and after Options Development and Options Appraisal under Stage 2; then comes the Stage 3 Consultation.

Progressive has been commissioned by Edinburgh Airport to conduct elements of our engagement process during this 1B stage of CAP 1616.

Edinburgh Airport Limited, incorporated in Scotland  
(Company number: SC096623). Registered office is at  
Edinburgh Airport, Edinburgh EH12 9DN.  
VAT registration number 123 4230 62.

We have chosen this external agency model, to ensure its professionalism and objectivity, separated from the airport team. We shall consider their reports as evidence fed in to our 1B process.

As such, I would request that any further queries you have in relation to the process should be directed to EAL as the owners of the process. The best point of contact for this is [REDACTED]. Any further correspondence to Progressive will be forwarded to [REDACTED].

We assure you that we have a thorough and robust process in place to meet the engagement requirements of CAP1616, regularly reported to CAA and assured independently by The Consultation Institute. The aim of the second round of workshops is to test the understanding and interpretation of all the information and insights we gathered during the initial round of workshops of stakeholders, and focus groups drawn from the general public.

In compiling the invitation lists for the workshops, we ensure there will be broad and varied representation of different stakeholder perspectives. At this stage we are not seeking to discover the views of individual communities; there will be ample opportunity for that in Stage 3, the Public Consultation. Rather, we want to ensure the different types of stakeholder are represented, geographically and sectorally, including aviation interests, local government, currently overflowed, and not-overflowed areas.

We will not be issuing (probably redacted) workshop transcripts until this phase of the exercise is completed, so as not to allow the contamination of later inputs.

The next stage of the process is straightforward. Based on the engagement sessions Progressive Partnership is drafting a longlist of draft design principles and is producing a report on the process, which will be part of our submission to the CAA.

The longlist will be discussed during a meeting attended by the Airspace Change Project team and other internal stakeholders, including our technical experts. At the end of this session, a shortlist of draft design principles will be agreed.

The reasons for merging or discarding any longlist design principles will be carefully recorded and will also form a part of our submission. The shortlist of draft design principles will then be discussed and tested during our two engagement recall sessions, which will include representatives from all geographical areas affected and other sectoral stakeholders. Any feedback from these sessions and any resulting changes to the draft design principles will, once again, be part of our submission to the CAA, and published on its portal.

#### **Statement of Need/Capacity**

I understand your concerns with the Statement of Need, however it has already been accepted by the CAA and we're now at a different part of the process.

I also understand your focus on the need for increased capacity and the impacts it, or the lack of it, has on our operation. The appropriate time to explain and discuss this issue is when we consult on possible

solution(s), in line with the SON and the yet to be agreed Design Principles, and Options Development/ Appraisal (also yet to be prepared). I look forward to having the discussion at that time, but you will appreciate that time is not now.

You mention our morning peak. Typically in the airport we describe the peak as being between 0600am and 0700am but this does not always translate into movements i.e. passengers moving through security etc. The peak for movements can be between 0600am and 0900am. I think what's important here for the discussion of design principles, is the establishment of the concept of peak.

What I would say on capacity is that we will be clear on the challenges we're trying to address and to show how we assess that pressure now and forecast its impact in the future.

Clearly, as you point out there are other factors to consider – consumer attitudes to climate change, the reaction of governments and regulators, as well as other economic and social factors. We do grapple continually with these issues; however I would suggest we are at an early stage in understanding growth of movements like 'flyskam' and how they will manifest over the coming decades.

In terms of the scope of the ACP and considering airspace above 7000ft, I've been clear with EANAB that we are exploring with NERL how best to take routes down the Forth if possible. It is not something that Edinburgh Airport can do unilaterally.

#### Climate Change

Part of our preparation and engagement in creating our design principles is to understand better all the factors we need to consider. In doing that we've included the opinions of environmental groups in the process, so this issue can be reflected in our designs; we are also required to take account of pre-existing legislation in this arena and much governmental and regulatory guidance.

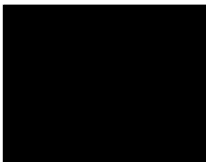
The airport has a wider sustainability agenda into which ACP will feed.

The current part of the process is to assist in the creation of design principles. It has been a rich and lively exercise that has given us much to consider.

All of the relevant points you raise will be tested publicly as we go through the process and, as I have said, and as our actions have demonstrated, we wish EANAB to be a key stakeholder as the process progresses.

Thank you for your participation and I look forward to discussing the resulting design principles and consequential options with you and colleagues amongst thousands of other interested parties, too.

Regards



**EANAB comments following community recall workshop – 8 - 11 November 2019**

**Email from EANAB representative – 8 November 2019**

**From:** [REDACTED]  
**Sent:** 08 November 2019 18:14  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Recall session on 5 November to review Provisional Design Principles (PDPs) list

WARNING: This email did not originate within Edinburgh Airport. Please do not click on links or open attachments unless you're confident the email is legitimate. All suspicious emails should be reported.

[REDACTED]

At Tuesday's recall session in which [REDACTED] participated, along with other Communities Stakeholders, we made a number of comments on the draft list of 16 PDPs.

As discussed at EANAB's monthly meeting on Wednesday we thought it might be helpful to provide a note of some of our comments, which we understand, subject to the outcome of discussion of the same list at the Aviation Stakeholders recall session on 13 November, were agreed and would be acted upon.

Accordingly I have collated the comments from the above-noted Board members in the attached document.

Kind regards

[REDACTED]

On behalf of EANAB

Attachment to the email of 8 November 2019



|       |                  |   |
|-------|------------------|---|
|       |                  |   |
| PDP1  | Safety (Core)    | The airspace design and its operation must be as safe or safer than it is today   |
| PDP2  | Technical (Core) | The prioritised requirements of airspace users must be taken into account when designing flight paths   |
| PDP3  | Technical (Core) | Flight paths must be flyable.   |
| PDP4  | Noise (Core)     | Flight paths should be designed to minimise the total adverse effect on health and quality of life impacts created by aircraft noise and emissions  |
| PDP5  | Economy          | Flight paths should be designed to increase airspace capacity and meet Scotland's demand for connectivity   |
| PDP6  | Environment      | Flight paths should be designed to minimise CO2 emissions above an altitude of 7000ft and, where it doesn't have a detrimental effect on adverse noise impacts, also between 4000ft and 7000ft  |
| PDP7  | Environment      | Flight paths should be designed to minimise adverse local air quality impacts   |
| PDP8  | Operational      | Flight paths should be designed with cost effective routes that minimise track miles and fuel burn  |
| PDP9  | Operational      | Flight paths should be designed to ensure efficient and effective route management  |
| PDP10 | Operational      | Flight paths must be designed to accommodate PBN traffic in line with CAA's modernisation strategy.   |
| PDP11 | Health           | Flight paths should be designed to minimise population overflown below 4000ft and, where possible, between 4000ft and 7000ft, taking into account any potential adverse impact due to those overflown having protected characteristics as defined by the Equalities Act 2010. |
| PDP12 | Health           | Flight paths should be designed where possible to minimise overflying sensitive locations and noise sensitive receptors   |
| PDP13 | Noise            | Where possible flight paths should be designed to include track concentration and/or track dispersal options to provide noise respite   |
| PDP14 | Noise            | The predictability of flight tracks must be maximised for consistency of operations   |
| PDP15 | NERL (Core)      | Collaborate with other Scottish airports and NATS to ensure that the airspace design options are compatible with the wider programme of lower altitude and network airspace changes being coordinated by the FASl North programme.  |

- Agreed this be changed to "must" and that the many related DPs from the long list be included as bullet points, all of which must be adhered to for route options to comply
- We argued this should be removed from the list as capacity is not a Design Principle issue according to the CAA
- It was noted that the relevant wording from ANG2017 should be substituted
- This has put the two environmental issues the wrong way round. Between 4000 and 7000ft, reducing noise is the main priority unless evidence is presented to show this would disproportionately increase CO2 emissions.
- Agreed this phrase should be deleted
- The phrase "where possible" to be removed otherwise it makes it almost impossible for this DP not to be passed by an option.
- Comment as for PDP11
- As comment for PDP11



|       |            |   |
|-------|------------|---|
| PDP16 | GLA (Core) | Routes to/from Glasgow and Edinburgh airports should be procedurally deconflicted from the ground to a preferred level in coordination with NATS Prestwick. |
|-------|------------|---|

General Notes

- 1 The comments in the right-hand margin are some of those made by EANAB members [redacted] who attended the first recall session on 5 November, for Communities Stakeholders. We understand, subject to the outcome of the discussion at the second recall session on 13 November, for Aviation Stakeholders, that our comments are agreed and will be acted on.
- 2 [redacted] (WSP) agreed to provide a Glossary to explain the jargon within the text boxes of this document and will also provide a note of the various Long List DPs that have been merged into each of the draft 16 PDPs in this list.
- 3 [redacted] will send EANAB copies of the slides for both the Draft DPDs Short List and Long List presented at the session on 5 November, on completion of the second recall session on 13 November.

**Email to the EANAB representative – 11 November 2019**

On 11 Nov 2019, at 16:31, [redacted] wrote:

Hello [redacted]

Thank you for taking the time to put your thoughts from the recall workshop down on paper. The CAA asks us to ensure that we have a strong evidence base for any decisions we make.

The recall workshops are an extremely important part of our process in this Airspace Change Programme. I wanted to reassure you that with the sessions being recorded and transcribed, all comments from both recall workshops will be collated in an outputs report by Progressive for Edinburgh Airport to consider.

In addition to the workshops we will be keeping a record of other inputs, such as this, that have been collected outwith this process.

After we receive the outputs report from Progressive, next steps for us are to finalise these design principles and submit them with an application to the CAA to pass CAP1616's Stage 1: Define.  
Thank you again for your continuing contribution.

Regards, [redacted]

**Email from the Chairman of EANAB – 13 November 2019**

**From:** [REDACTED]  
**Sent:** 13 November 2019 16:28  
**To:** [REDACTED]  
**Subject:** EANAB Priorities on Design Principles

**WARNING:** This email did not originate within Edinburgh Airport. Please do not click on links or open attachments unless you're confident the email is legitimate. All suspicious emails should be reported.

Hello [REDACTED]

Having taken account of the many strands of debate that EANAB have been engaged in during the last 36 hours, please find attached a short letter from myself highlighting our stance the topic, along with a document focusing on Design Principles, labelled EANAB Priority Issues.

All the best,

[REDACTED]



Attachment 1 to the email of 13 November 2019

Dear [REDACTED]

In our recent exchange of correspondence, we both indicated a desire to look at ways of working together on the ACP and its development.

While there are areas of disagreement, the principle of the Board acting in its advisory capacity as a critical friend is an important step in the direction of a proper working partnership. This is what we all wish.

We wish to examine ways that the Board could and should work with EAL to develop a more robust approach to the ACP within the limits set by the CAA process. This should be one that jointly attempts to deal with the issues we have raised while recognising the need for pragmatism. We consider that this would best be done by the Board having a role in the discussion of the direction of the consultation and of the design principles as they develop.

This might be best carried out with the Board working with EAL to critically review the progress and outcome of the whole process, as we believe was suggested in your response to our first letter. This could be done through active participation in the process through regular review and discussion with EAL probably through a representative subgroup. We consider that this should be active involvement involving both parties within the terms of the MOU.

It is our intention to be constructive critics and support you and our communities through bringing an alternative view where needed. Such a robust approach should assist in the required assessment of needs and directions, adding weight where needed to the proposal and challenging areas where there are questions.

In summary we should:

1. Discuss and agree the level of active involvement of the Board in the ACP Process.
2. Agree a joint approach that meets the requirements.
3. Appoint a small Board SG to manage the interaction.
4. Review the Design Principles and agree priorities.
5. Report back to the Board and EAL including on areas of difference.
6. Agree any further action.

We hope that you can agree to this so that we can rapidly and jointly act.

Kind regards,

[REDACTED]

Attachment 2 to the email of 13 November 2019

| Category | <p><b>EANAB Priorities</b><br/>To support the design principles to help encompass the safety, environmental and operational criteria and strategic policy objectives that the change sponsor aims for in developing the airspace change proposal. They are developed through engagement with stakeholders and form a qualitative structure against which design options can be evaluated.</p> | Comments   |
|----------|---|--|
| 1        | Flight paths designs should <b>reduce</b> the number of people significantly affected by adverse impacts from aircraft noise  | One of the UK Government's three key objectives in its Aviation Policy Framework, in support of sustainable development of aviation, is: "to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise". The Environmental Noise (Scotland) Regulations 2006 are framed under the European Directive on Noise (Directive 2002/49/EC) (END) which aims to "define a common approach intended to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise" CAP1165 The CAA believes that any proposal to increase airport capacity in the UK must show that it is sustainable, must abide by the Government's aim of limiting and where possible reducing aviation noise over time, and must ensure that where communities are affected by noise, the impact is minimised, mitigated and compensated appropriately. |
| 2        | In conjunction with the UK Airspace Modernisation Strategy, where the present Edinburgh Terminal Manoeuvring Area boundaries might otherwise prevent the design of flight paths that would reduce adverse aircraft impacts the Edinburgh TMA must be reconfigured to allow for such flightpaths.  | This ACP is for the lower airspace and would require a second, maybe concurrent ACP initiated in conjunction with NATS and NERL to be implemented. CAA have not yet indicated a timetable for this before the completion of AMS by 2026? The previous ACP did have a concurrent NATS sponsored ACP that did not include such a recognition of potential for reduction in impact.   |
| 3        | No flight paths should overfly land and communities when alternatives over water are available;   |  |
| 4        | Flight paths to the east of the Airport should maximise the use of the extensive and available airspace down the centre of the Firth of Forth.  |  |
| 5        | Departing aircraft off Runway 06 should fly down the centre of the Forth until they reach a height of 10,000 feet   |  |
| 6        | Arriving aircraft for Runway 24 should not cross the coast below 10,000 feet.   | See above  |
| 7        | Designs of Flight paths should seek to minimize overflight of presently unaffected communities  | This may require a trade off against increased noise for existing residents.   |
| 8        | New flight paths should adhere to Aviation Guidance relative to environmental impacts   | This is a requirement. The environmental reporting will however require close scrutiny by EANAB.   |
| 9        | Designs should seek to avoid overflight of notified noise sensitive areas and buildings   | ANG2017 3.37   |
| 10       | Departing flightpaths from runway 024 should include an extended westerly climb profile before a later easterly turn  |  |
| 11       | Departing flight paths on runway 024 and arrival flightpaths on flightpath 06 should follow the M8 corridor.  |  |
| 12       | Route designs must consider AMS, FASI-N objectives and ensure alignment   | This is current policy but we need an update on FASI-N progress towards the as yet nonexistent Master plan. Also will require any FASI-N and AMS objectives to be aligned with noise and emissions minimisation possibilities  |
| 13       | For arrivals on runway 024 and departures on runway 06 a new comprehensive and continuous east coast high level air corridor should be developed to provide an addition and an alternative to the current main and over loaded corridor down the centre of Britain  | See 13 above. This will require working with EAL, NATS and NERL.   |
| 14       | Minimise the practice of radar vectoring below 7,000ft  | Since noise is a required consideration below 7000ft, controls on vectoring are required to provide consistency and transparency to airspace usage.  |
| 15       | Flight paths should seek to minimise noise exposure during the night-time period between 10.00pm and 7.00am   |  |

**Correspondence regarding Edinburgh Airport capacity – 15 November 2019**

**Email to the EANAB representative – 15 November 2019**

From: [REDACTED]  
Sent: 15 November 2019 17:01  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: Draft for [REDACTED]

Good afternoon [REDACTED]

Please see below an email sent on behalf of [REDACTED] in response to the capacity presentation discussed at last week's EANAB meeting.

Kind Regards

[REDACTED]

---  
[REDACTED]

Thank you for sending over the presentation regarding capacity at Edinburgh Airport. Our analysts have looked at it and provided the detailed response below, I would appreciate you sharing this with the Board.

As you will see we have five key concerns with the analysis carried out by EANAB:

1. It simplifies demand to discrete clock hour as opposed to continuous rolling hour
2. It focuses on total movements instead of departures, which is the more imminent concern
3. It only considers actual movements and does not consider scheduled demand
4. It treats all operational hours as though they are the same, which they are not
5. It focuses on what has happened in the past and does not consider forecasted growth

More detail is provided on each point below.

The analysis carried out by EANAB is overly simplistic and focuses on the wrong areas, therefore, as previously discussed, we are happy to support the use of independent consultants to ensure we get the best answer for our communities. We have done this in the past when looking at noise and we are happy for that to happen again if it will help you understand the need for capacity growth.

I would suggest that in light of this the EANAB study is not published; rather we organise a workshop where we can work on your presentation with our team to get to either a presentation that works, or a brief for a consultancy.

Regards

[REDACTED]

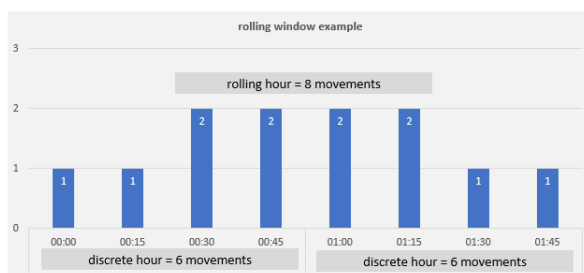
Here is a technical explanation of each concern:

**1. Misleading simplification on discrete hours instead of continuous hours**

EANAB's analysis is done considering discrete clock hours which is an oversimplification of the problem.

Runway data is usually summarized and reported by discrete clock hour because continuous rolling-hour windows are more complex and can be confusing to the layperson. When we consider capacity design however, the responsible approach is to design based on **continuous** rolling-hours and rolling-15 minute windows (i.e. design based on a continuous metric because this is a time-based capacity problem).

To illustrate: in the midnight – 2am example below we have discrete-hour demands of 6 but a rolling-hour demand of 8.



This is why we must consider rolling hours and not clock hours. For August 2019 EDI's peak rolling-hour movement was 37 (compared to the peak movement of 35 referenced by EANAB). Our peak rolling-hour is typically seen around 630-730, which will not be reflected in the discrete hour reports.

**2. Focus on movement capacity instead of the more imminent departure capacity problem**

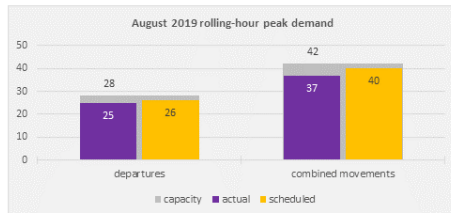
EANAB's focus is on total movement capacity – while this is something we are keeping an eye on, our more immediate concern is in **departure** capacity.

For August 2019:

- Peak rolling-hour departure was 25 compared to capacity of 28: we had a resilience buffer of 3 aircraft
- Peak rolling-hour movement was 37 compared to capacity of 42: we had a resilience buffer of 5 aircraft

**3. Only considers actual movements and does not consider scheduled demand**

Runway time is scheduled over 6 months in advance based on declared capacity. On actual day-of operations, things will go off schedule because of the weather, staffing issues, in-bound delays, etc. This graph shows the actual vs scheduled demand from August 2019. Our peak scheduled departure demand was 26.



**4. EANAB's analysis treats all operating hours as though they are the same; they are not.**

The expectation that EDI could continuously operate at high-intensity peak-capacity levels is unrealistic (slide 13 assumption of 744 1hr time slots where we can spread demand).

As a theoretical exercise it would be nice if we could operate at full capacity 24/7 and fill demand in the quiet periods, but there are reasons we cannot do this:

- There are no departing passenger flights from 0000 - 0600 due to passenger demand, airline/airport staffing rosters, and consideration for evening noise levels
- Airlines with based aircraft want to depart first thing in the morning to maximise utilisation of their aircraft. This drives a 630-730 peak departure demand. We have done some work to appease this via optimised sequencing, peak pricing, and slot facilitation, however we consistently see demand for morning departures increasing. If an airline is unable to depart during this window they are unlikely to bring an aircraft to EDI at all, so all growth at EDI is necessarily constrained by the AM peak-wave departure window.
- These trends aren't unique to EDI – this profile of peak departure demand is seen across the UK and Europe.

Instead of focusing on the 744 1-hour time slots in the month of August, it's more relevant to focus on the 31 morning departure peak hours in August (from ~630-730). Applying a similar approach as EANAB...

- The number of days when the volume of actual departures exceeded 21 (~80% of max departure capacity) was 17 which = 55% of days
- The number of days when the volume of scheduled departures exceeded 21 was 30 which = 97% of days
- There were 2 days when we were scheduled to 26 departures at first wave

**6. Focuses on what has happened in the past – does not consider forecasted growth**

Our aim to redesign airspace is in anticipation of expected growth; we are managing without airspace change right now by pricing demand into shoulder periods and optimising sequencing, but these measures will be exhausted and we will need airspace change for 2022.

**Email from EANAB representative – 23 November 2019**

From: [Redacted]  
Sent: 23 November 2019 19:10  
To: [Redacted]  
Cc: [Redacted]  
Subject: Re: Draft for [Redacted]

**WARNING:** This email did not originate within Edinburgh Airport. Please do not click on links or open attachments unless you're confident the email is legitimate. All suspicious emails should be reported.

[Redacted]

Thank you for your email of 15 November in response to the copy of the presentation on EDI Runway Capacity made to the Board meeting of 6 November that we sent you.

You advise, following feedback from your analysts, that EANAB's presentation is overly simplistic and focuses on the wrong areas. In our role as your advisers on community matters we thought it would be helpful for you to know our thoughts on your response. We therefore attach a copy of your email of 15 November with our comments highlighted in red.

From this you will see, amongst other relevant issues, we ask your analysts' help providing us with the following data:

graphs for every day of August 2019 showing continuous rolling hours and rolling-15 minute windows for

- actual departures
- actual total movements
- scheduled departures
- scheduled total movements

As you know, we have been making reasonable, clear and specific requests since August for data to help us understand the runway capacity issue. As you are also aware EANAB is fortunate to have members with suitable scientific/technical backgrounds, so you have no need to be concerned about our ability to understand even the most complex technical matters. Unfortunately, to date, you have not provided the data we have been requesting. As we have previously advised, the date is rapidly approaching for the CAP1616 Define gateway, when the Statement of Need (including EAL's claimed need for greater runway capacity) will be cast in stone. Can you therefore provide the above-noted data within a week, that is by Saturday 30 November. This will allow members a few days to consider it, to facilitate an informed discussion of this absolutely central issue at our EANAB meeting on Tuesday 3 December, which we are pleased to note will be attended by Anna and yourself along with other EAL staff.

We look forward to timeous receipt of the requested data.

Regards

[Redacted]  
for EANAB

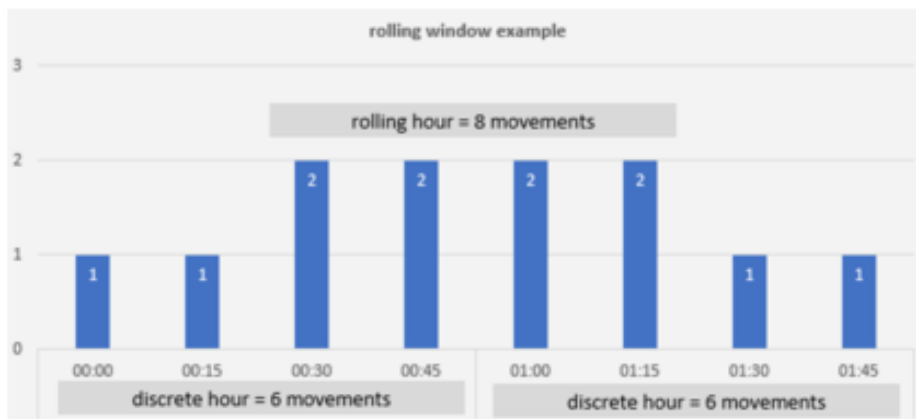
Attachment to the email of 23 November 2019

**1. Misleading simplification on discrete hours instead of continuous hours**

EANAB's analysis is done considering discrete clock hours which is an oversimplification of the problem.

Runway data is usually summarized and reported by discrete clock hour because continuous rolling-hour windows are more complex and can be confusing to the layperson. When we consider capacity design however, the responsible approach is to design based on continuous rolling-hours and rolling-15 minute windows (i.e. design based on a continuous metric because this is a time-based capacity problem).

To illustrate: in the midnight – 2am example below we have discrete-hour demands of 6 but a rolling-hour demand of 8.



This is why we must consider rolling hours and not clock hours. For August 2019 EDI's peak rolling-hour movement was 37 (compared to the peak movement of 35 referenced by EANAB). Our peak rolling-hour is typically seen around 630-730, which will not be reflected in the discrete hour reports.

The general public appreciates that this is a time-based capacity problem, in the same way it experiences increased noise impact at certain times of the day. The data presented in slides 4 to 6 (in our EANAB Board presentation of 6 November, which is attached for ease of reference) is a closer look at the data EAL provided. It is cumulative data over an extended period of 21 months. The only meaningful way to look at the data provided was to average it over the corresponding period to get a sense of the issue "on average". As we pointed out in slide 5 this data is not the most informative.

As you know we have repeatedly requested the data behind the "flights per hour" graphs on the Casper Noise Lab webpage in an effort to better understand the time component of the issue. Unfortunately, you have consistently not provided the requested data. At our last attempt we reduced the scope of our request to the last 12 months, in the hope that the data would then be forthcoming.

The only relevant data available to us had to be downloaded (as screenshots) from the Casper Noise Lab webpage. It presents the data in discrete clock hours which effectively limited us to a rolling 60 minute window. You will therefore appreciate it is difficult under these circumstances for us to accept any responsibility for "misleading over-simplification".

The example provided, disappointingly, does very little to illustrate the capacity issue we are seeking to better understand, particularly if the peak is around 6:30-7:30.

We would like to take you up on an earlier offer for your analysts to assist us and therefore ask that they provide the following data:  
graphs for every day of August 2019 showing continuous rolling hours and rolling-15 minute windows for

- actual departures
- actual total movements
- scheduled departures
- scheduled total movements

**2. Focus on movement capacity instead of the more imminent departure capacity problem**

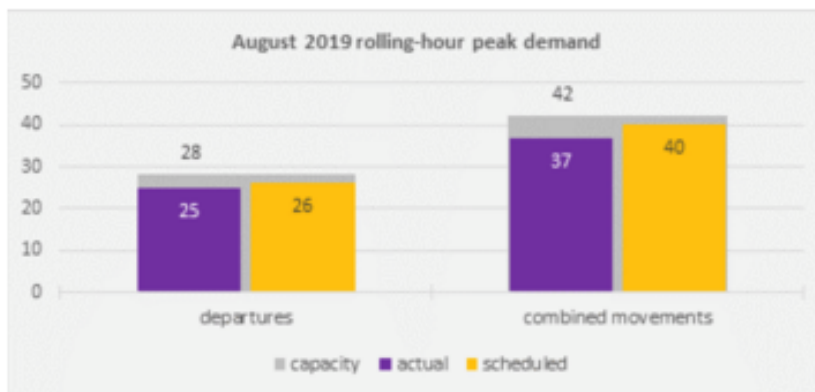
EANAB’s focus is on total movement capacity – while this is something we are keeping an eye on, our more immediate concern is in **departure** capacity.  
For August 2019:

- Peak rolling-hour departure was 25 compared to capacity of 28: we had a resilience buffer of 3 aircraft
- Peak rolling-hour movement was 37 compared to capacity of 42: we had a resilience buffer of 5 aircraft

This is the kind of constructive information we welcome. In the submitted versions of the ~~50N~~ for the current ACP, EAL illustrated the capacity issue using total movement capacity, both for the current maximum capacity and the originally targeted value. With the limited relevant data available to us, it was difficult to look closer at departure figures. The request for data above should allow us to make a distinction between departures capacity and total movements capacity.

**3. Only considers actual movements and does not consider scheduled demand**

Runway time is scheduled over 6 months in advance based on declared capacity. On actual day-of operations, things will go off schedule because of the weather, staffing issues, in-bound delays, etc. This graph shows the actual vs scheduled demand from August 2019. Our peak scheduled departure demand was 26.



We understand that EAL have to plan operations ahead, based on demand. It would therefore be very helpful if, alongside the actual usage data for August 2019, EAL provides the matching scheduled data.

**4. EANAB’s analysis treats all operating hours as though they are the same; they are not.**

The expectation that EDI could continuously operate at high-intensity peak-capacity levels is unrealistic (slide 13 assumption of 744 1hr time slots where we can spread demand).

As a theoretical exercise it would be nice if we could operate at full capacity 24/7 and fill demand in the quiet periods, but there are reasons we cannot do this:

- There are no departing passenger flights from 0000 - 0600 due to passenger demand, airline/airport staffing rosters, and consideration for evening noise levels
- Airlines with based aircraft want to depart first thing in the morning to maximise utilisation of their aircraft. This drives a 630-730 peak departure demand.
- We have done some work to appease this via optimised sequencing, peak pricing, and slot facilitation, however we consistently see demand for morning departures increasing. If an airline is unable to depart during this window they are unlikely to bring an aircraft to EDI at all, so all growth at EDI is necessarily constrained by the AM peak-wave departure window.
- These trends aren't unique to EDI – this profile of peak departure demand is seen across the UK and Europe.

Instead of focusing on the 744 1-hour time slots in the month of August, it's more relevant to focus on the 31 morning departure peak hours in August (from ~630-730).

Applying a similar approach as EANAB...

- The number of days when the volume of actual departures exceeded 21 (~80% of max departure capacity) was 17 which = 55% of days
- The number of days when the volume of scheduled departures exceeded 21 was 30 which = 97% of days
- There were 2 days when we were scheduled to 26 departures at first wave
- 

Again, we were simply trying to grasp how often the runway is used near its maximum capacity. In that context we calculated the percentage of time above a given usage level.

In this context, given the health impact of aircraft noise, we have to advise you the phrase "As a theoretical exercise it would be nice if we could operate at full capacity 24/7" would not be well received by our communities. While we appreciate it may have been intended to help lighten the tone of your response, it is really informative as it gives a simple, but fundamental example of the different positions EAL and EANAB have on potential noise-creating issues. That is, from an operational stance, being able to operate at full capacity 24/7 might indeed be a very desirable goal for EAL, but we can assure you on behalf of the communities that would have to suffer the resulting negative impacts of increased noised disturbance, they would definitely not consider it to be "nice".

The data requested should allow EAL to demonstrate the extent to which the runway is used, including the morning peak period.

#### **6. Focuses on what has happened in the past – does not consider forecasted growth**

Our aim to redesign airspace is in anticipation of expected growth; we are managing without airspace change right now by pricing demand into shoulder periods and optimising sequencing, but these measures will be exhausted and we will need airspace change for 2022.

What are EAL growth figures in terms of movements which have been used to come to this date? Surely, it is only reasonable that our communities who will ultimately will be the ones negatively impacted by any re-distribution of aircraft noise are informed of the current and anticipated runway usage. We therefore ask that you provide us with this information.

In conclusion and with all due respect, EAL has so far failed to make the case for flight path expansion to EANAB other than saying it is needed.

We refer again to CAP1616 paragraph 16 (see slide2).

Please show us the data.

### Email to the EANAB representative – 25 November 2019

On 25 Nov 2019, at 11:41, [REDACTED] wrote:

Hi [REDACTED]

In order that we get the most from next week's meeting, I wonder if we could arrange a call or meeting this week with you to discuss agenda and expectations.

[REDACTED]

### Email from the EANAB representative – 25 November 2019

From: [REDACTED]

Sent: 25 November 2019 14:10

To: [REDACTED]

Cc: [REDACTED]

Subject: Re: Draft for [REDACTED]

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[REDACTED]

Given the data we are requesting (highlighted in yellow in the tread below) is unambiguous and we have clearly explained the reason for our request - that is to understand EAL's need for additional runway capacity, there is little to be gained from a phone call. So, can you please send us the data by Saturday, to facilitate an informed and hopefully fruitful discussion of runway capacity at our Board meeting on 2 December?

Regards

[REDACTED]

for EANAB

### Email to the EANAB representative – 25 November 2019

On 25 Nov 2019, at 15:25, [REDACTED] wrote:

Hi [REDACTED]

Thanks for your quick response.

Your requirements are indeed clear.

What I was going to discuss with you ( I must say I think a call in these circumstances does make the meeting more productive) was a suggestion that we present on capacity and then discuss from there.

The August figures wouldn't show the whole picture, so wasn't going to base our whole discussion on them but we can still provide the charts.

Also [REDACTED] last letter to me asked for that we should:

1. Discuss and agree the level of active involvement of the Board in the ACP Process.
2. Agree a joint approach that meets the requirements.
3. Appoint a small Board SG to manage the interaction.
4. Review the Design Principles and agree priorities.
5. Report back to the Board and EAL including on areas of difference.
6. Agree any further action

I was keen to understand which set of requirements to prioritise given the time. I guess capacity is an 'area of difference'. Perhaps we can work to [REDACTED] agenda and add capacity on to the end?

Or would you like the core to be a capacity discussion?

I'll be guided by you.

[REDACTED]



## Email from the EANAB representative – 25 November 2019

From: [REDACTED]  
Sent: 25 November 2019 16:02  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: Re: Draft for [REDACTED]

**WARNING:** This email did not originate within Edinburgh Airport. Please do not click on links or open attachments unless you're confident the email is legitimate. All suspicious emails should be reported.

[REDACTED]  
From the post-EDI Capacity presentation discussion at the EANAB meeting on 6 November, it was clear the Board, as a whole, were concerned that the need for runway expansion had not been demonstrated. [REDACTED] who attended that meeting, will no doubt have advised you of that.

As runway capacity expansion is one of the main reasons for EAL's ACP, I am sure you will understand that we need to be able to explain to our communities the reason for the need. This is why, as your advisers on potential impacts on our communities of aviation noise, we have been requesting relevant data for over 3 months.

This is so fundamental that, with all due respect, it cannot, as far as the Board is concerned, be considered as an "Area of difference". So this needs to be item 1 on the agenda for our meeting on 2 December.

With the requested data being issued by next Saturday, Board members will have time assimilate its implications, to allow a time-efficient discussion at our meeting.

Regards

[REDACTED]  
for EANAB

## Email to the EANAB representative – 25 November 2019

From: [REDACTED]  
Sent: 25 November 2019 16:20  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: Draft for [REDACTED]

Ok – I'll provide the graphs, prepare a presentation on how we see the issue of capacity and explain why it is in the statement of need.

Anna will then give an update on where we are with ACP at the moment and what the next steps are.

In terms of explaining the need for extra capacity to communities, as we've said previously, that will be communicated fully to all at Stage 3 as per the CAP1616 process.

Regards

## Email to the EANAB representative – 30 November 2019

On 30 Nov 2019, at 10:45, [REDACTED] wrote:

Good morning [REDACTED]

I've attached some capacity information ahead of Tuesday night's presentation.

The attached shows a:

- summary of the **actual** rolling hour departures + arrivals for Aug 2019
- summary of the **scheduled** rolling hour departures + arrivals for Aug 2019
- 1 day actual vs. scheduled rolling hour departures + arrivals with departure capacity threshold lines.

Our analysis team has also looked at growth in flights before 7am over the past five years. They've found that since the peak pricing started in 2017 we have had a ~35% increase in the volume of flights scheduled before 7am. This is an illustrative indicator of the noise impact that is being created by our currently restricted capacity. Expanding airspace would allow us to narrow the window of noise into later times in the morning. See the big jump from 2016 to 2017 in hours 6 and 8 below:  
<image001.png>

Regarding your extra comments on the ACP questions you sent through separately, I'm unsure how much additional information, to that we've provided already, I can give you. I see your questions regarding your rolling hour data request and capacity, and these should be covered within Gordon's presentation. We can discuss those other questions that keep popping up and hopefully reach an understanding to allow us to move forward.

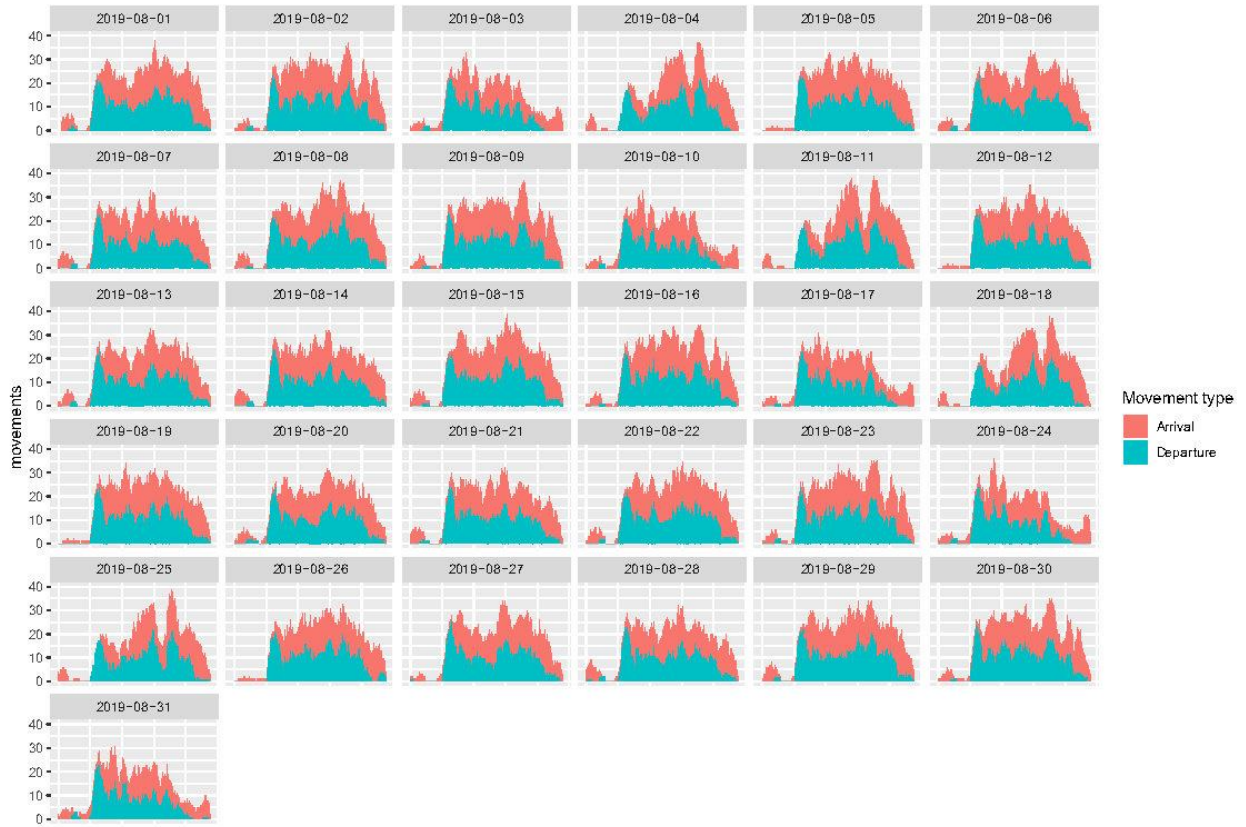
My ACP update will talk about the process we've been through so far, and what is next in the process. I'm keen to keep those not involved in the process so far up to date.

See you on Tuesday.

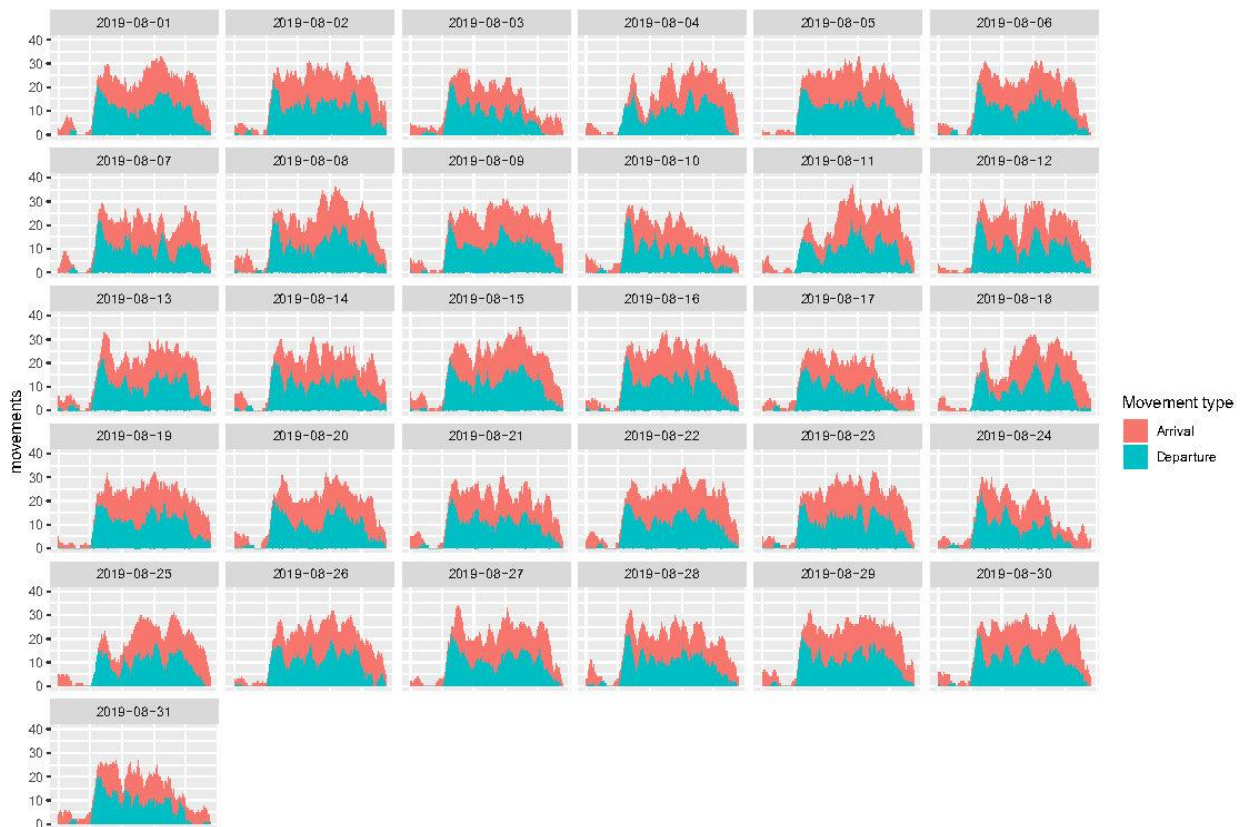
Regards, [REDACTED]

Attachment to the email of 30 November

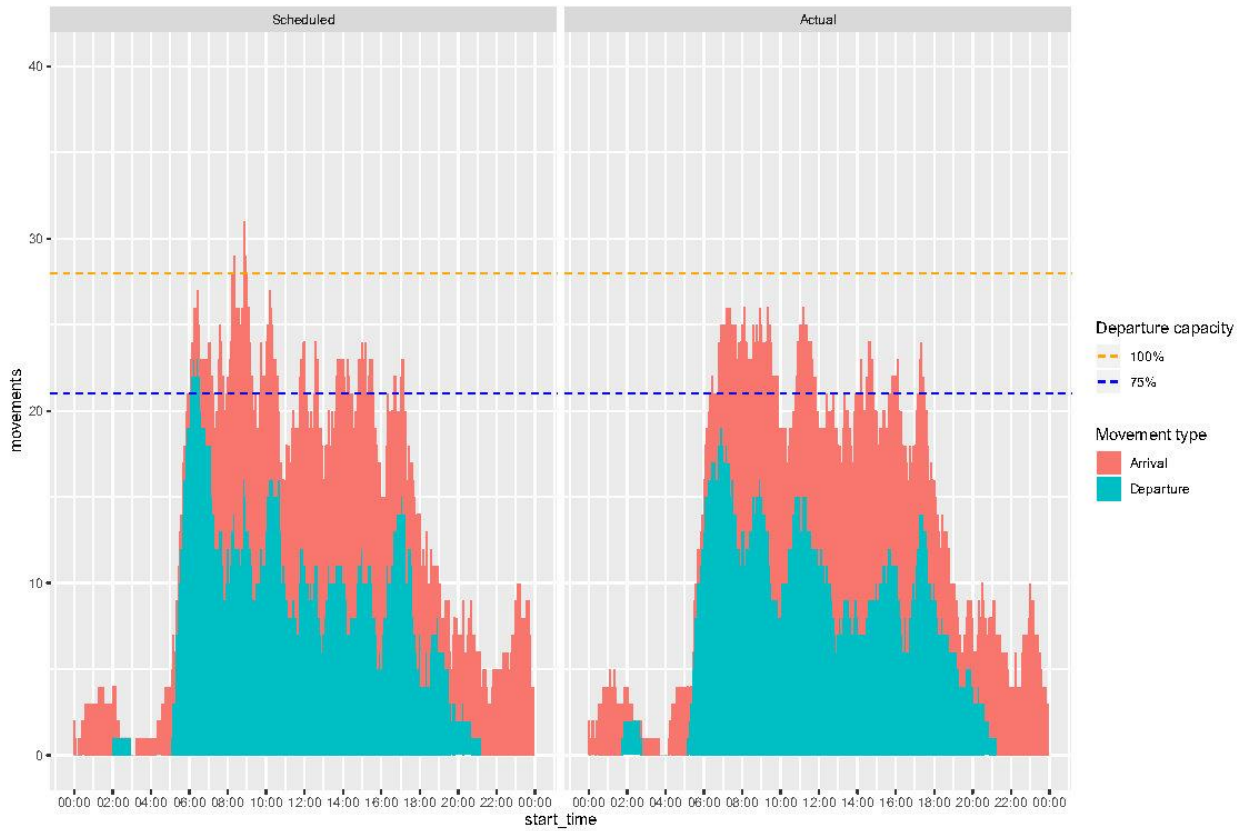
Scheduled airspace utilisation for arrivals and departures



Actual airspace utilisation for arrivals and departures



Scheduled vs actual airspace utilisation for 17-08-2019



**Email from the EANAB representative – 30 November 2019**

From: [REDACTED]  
Sent: 30 November 2019 17:03  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: Re: Capacity information and additional questions

**WARNING:** This email did not originate within Edinburgh Airport. Please do not click on links or open attachments unless you're confident the email is legitimate. All suspicious emails should be reported.

[REDACTED]

What you have provided is not quite what we were asking for. To help us understand the data could you provide a graph for every day as in page 3 for 17/8/19, so we can see the duration of the peak period.

Thanks

[REDACTED]  
for EANAB

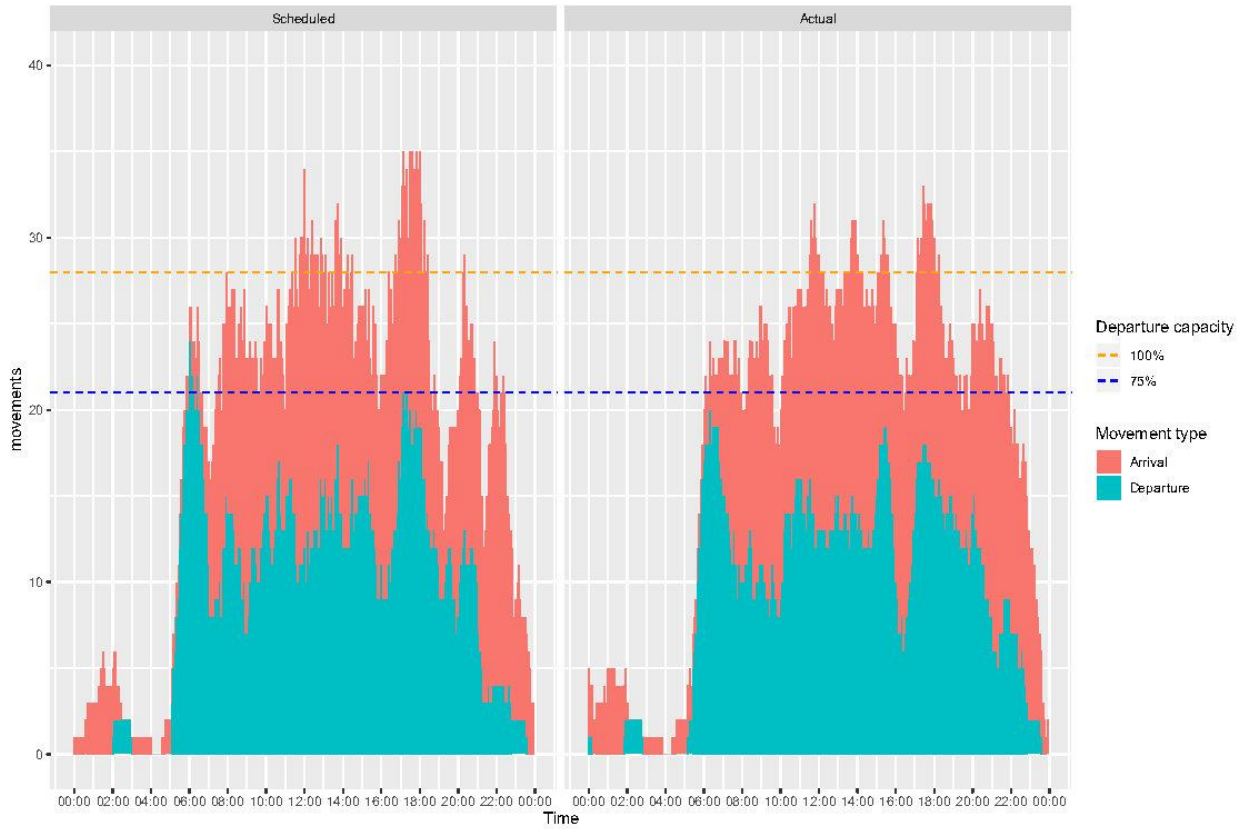
**Email to the EANAB representative – 2 December 2019**

From: [REDACTED]  
Sent: 02 December 2019 15:58  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: Capacity information and additional questions

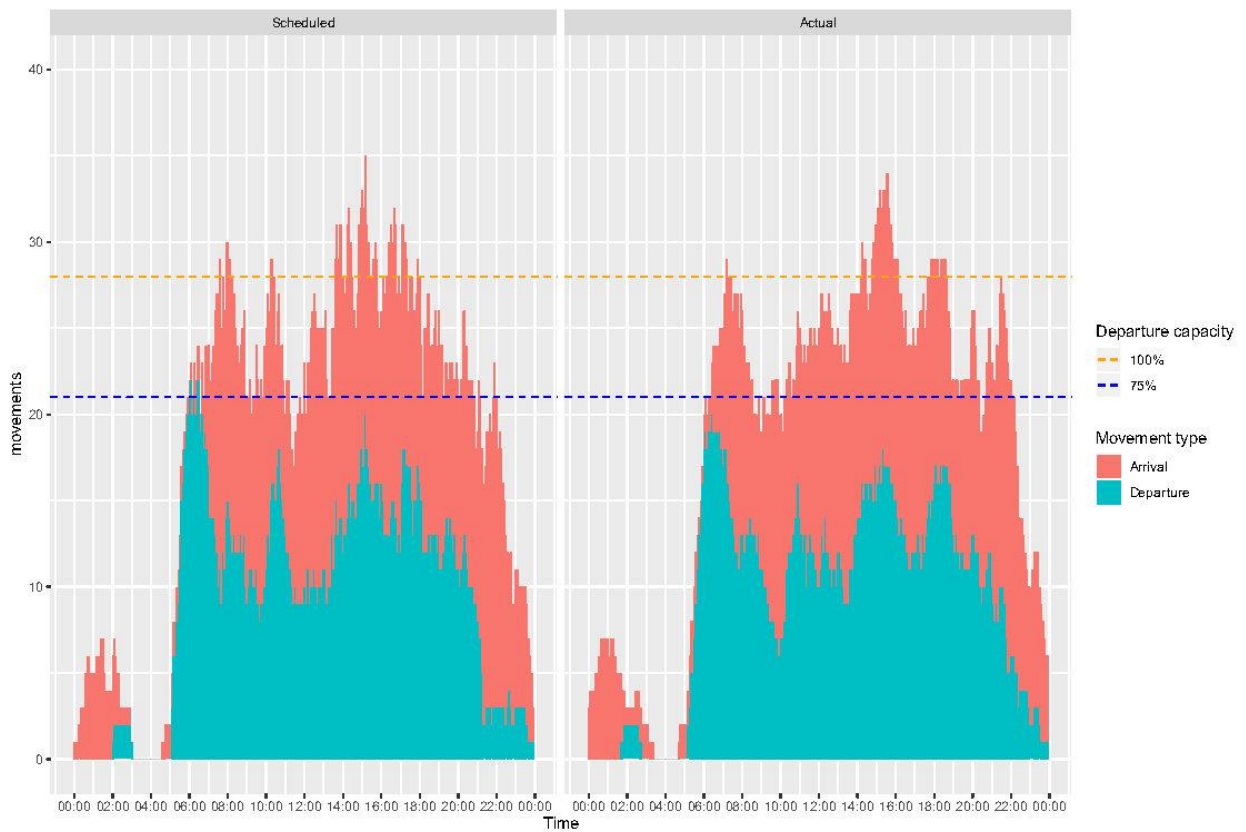
Hello [REDACTED]  
Updated as requested.  
Regards [REDACTED]

Attachment to the email of 2 December 2019

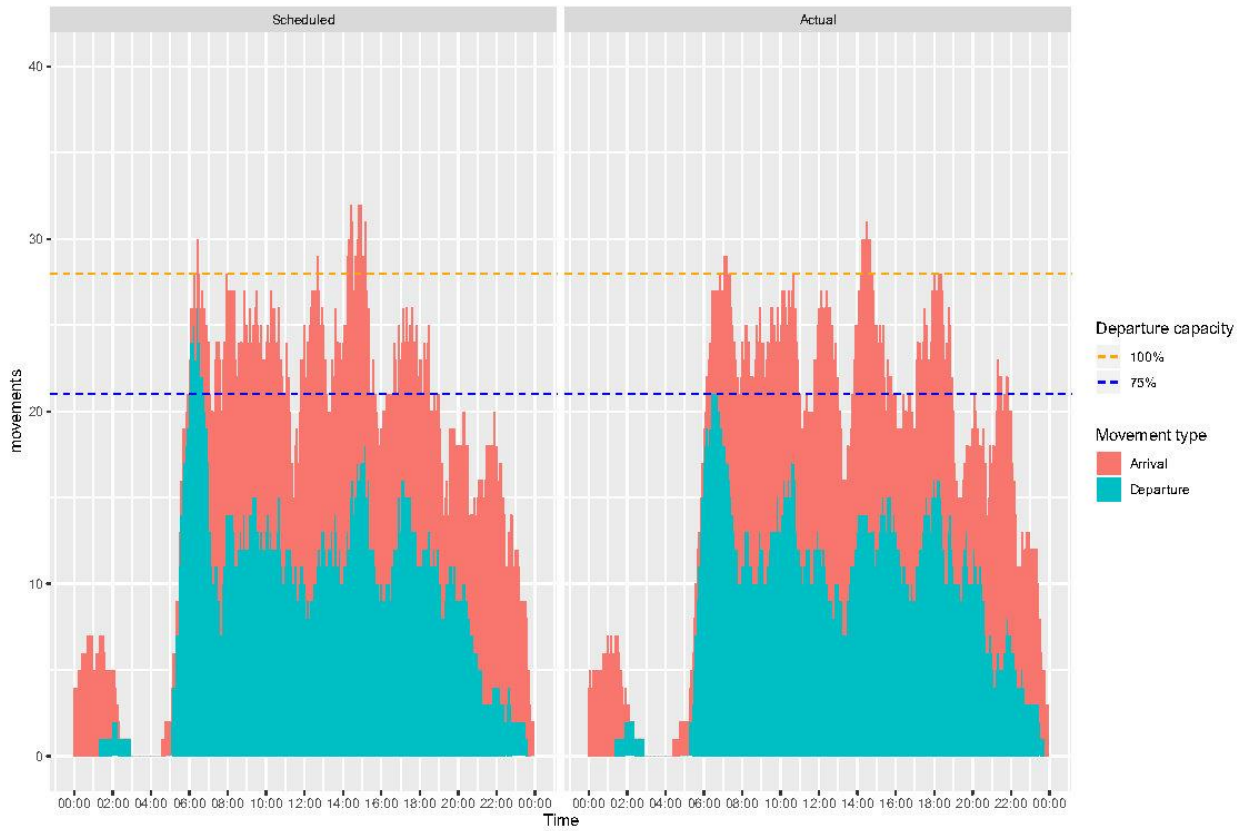
Scheduled vs actual airspace utilisation for 2019-08-23



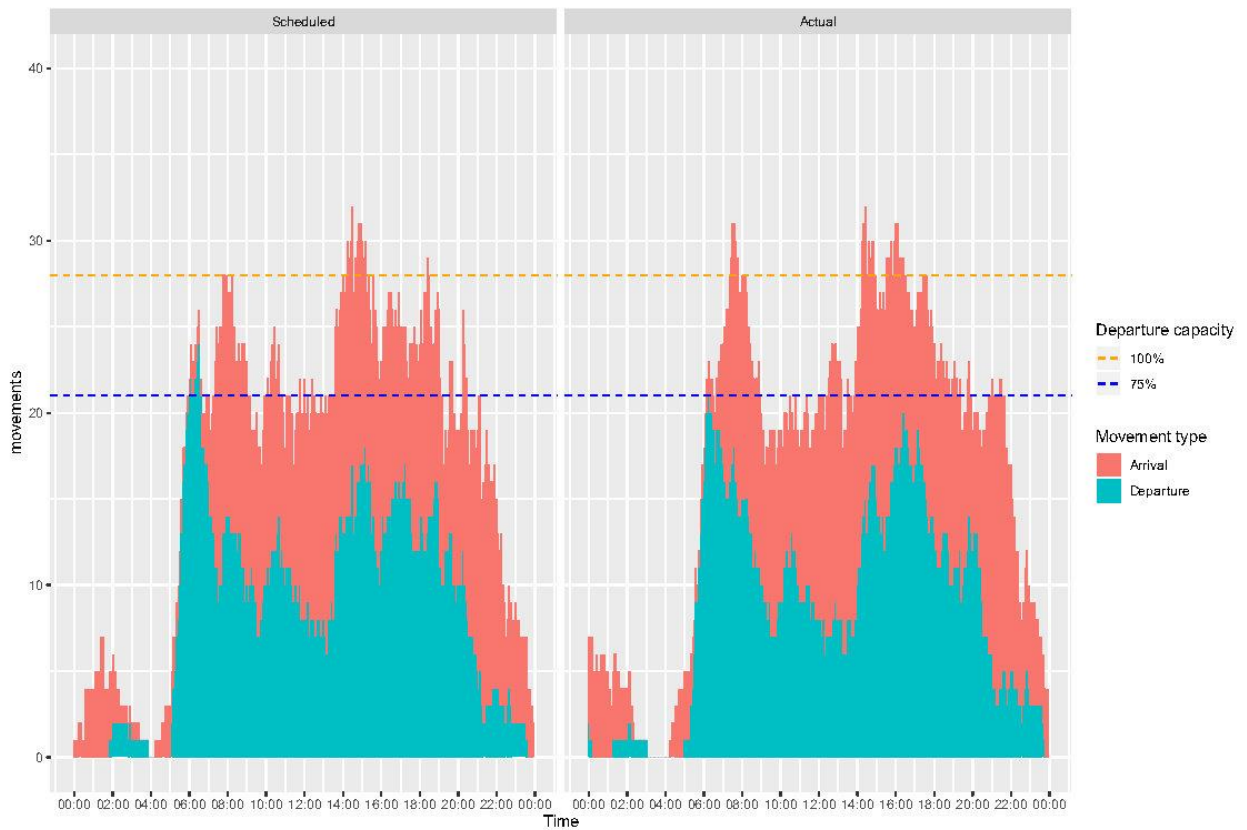
Scheduled vs actual airspace utilisation for 2019-08-22



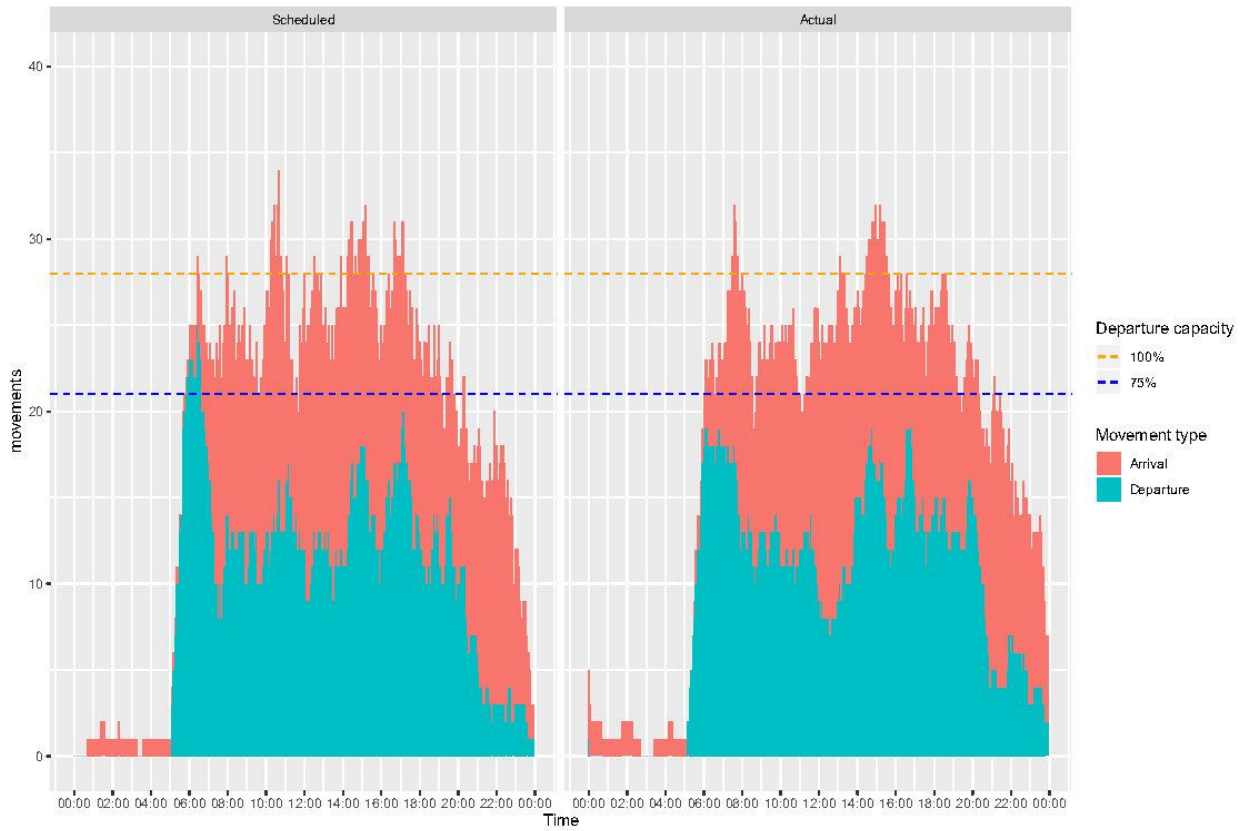
Scheduled vs actual airspace utilisation for 2019-08-21



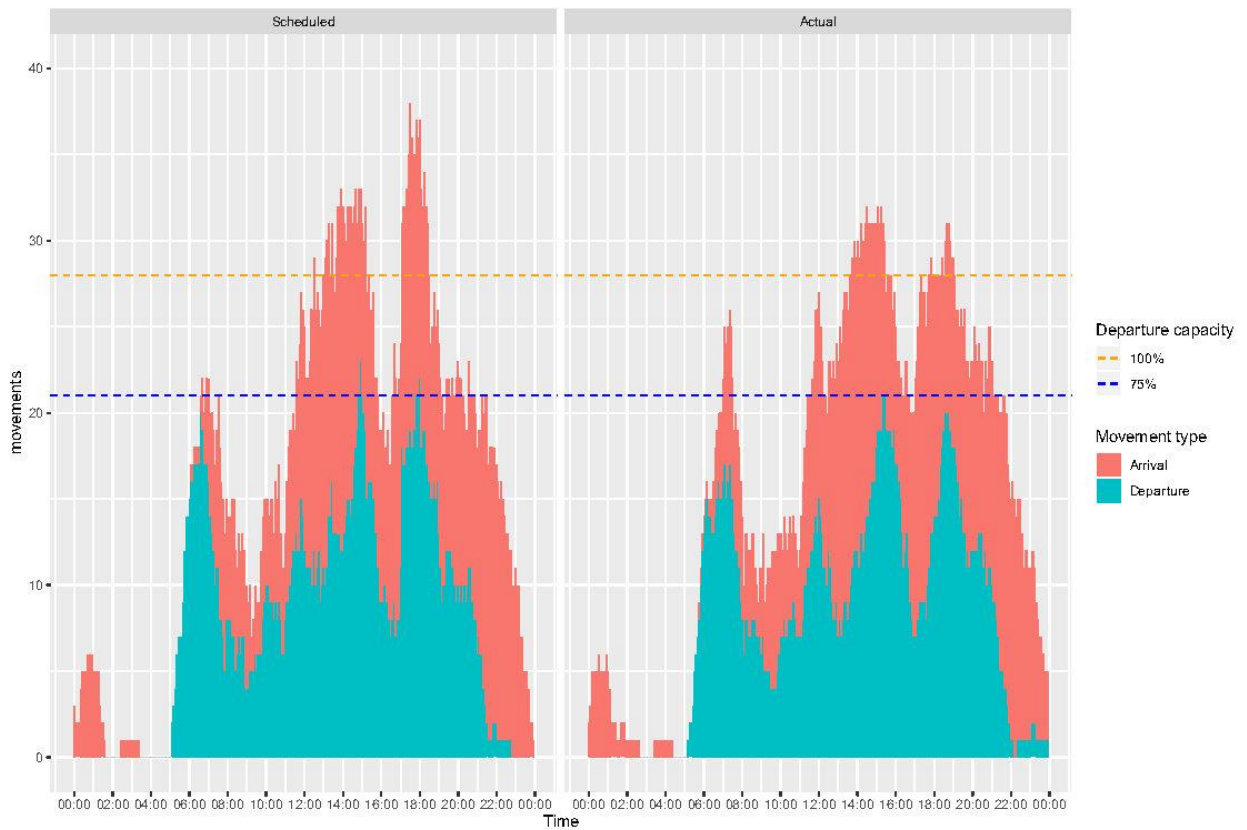
Scheduled vs actual airspace utilisation for 2019-08-20



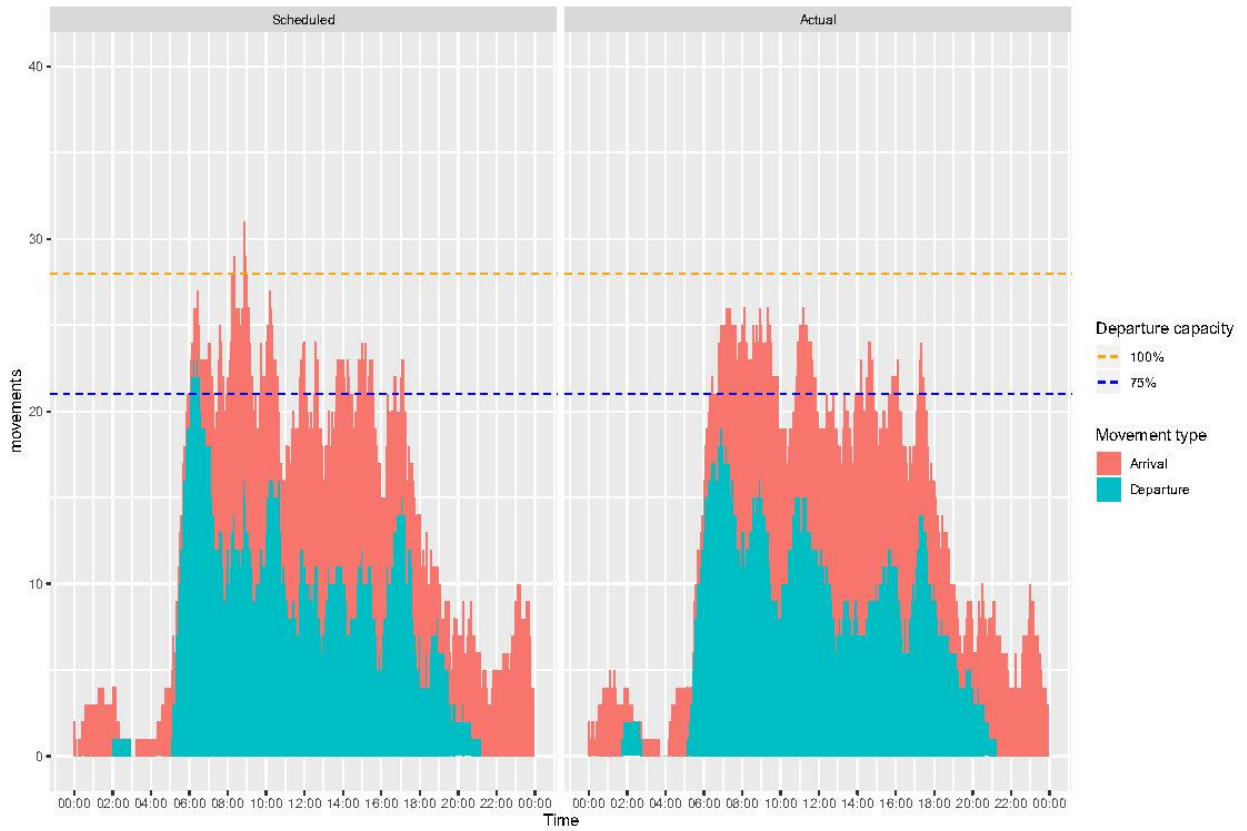
Scheduled vs actual airspace utilisation for 2019-08-19



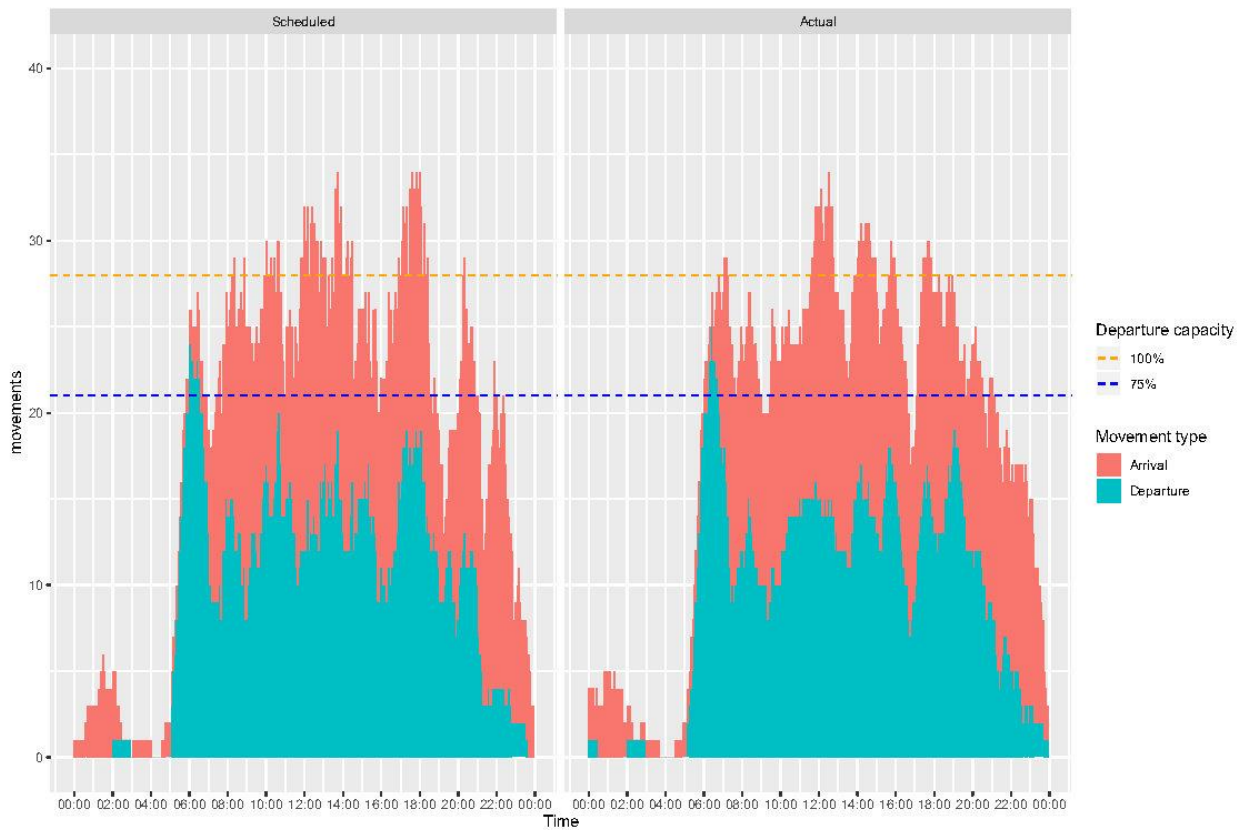
Scheduled vs actual airspace utilisation for 2019-08-18



Scheduled vs actual airspace utilisation for 2019-08-17

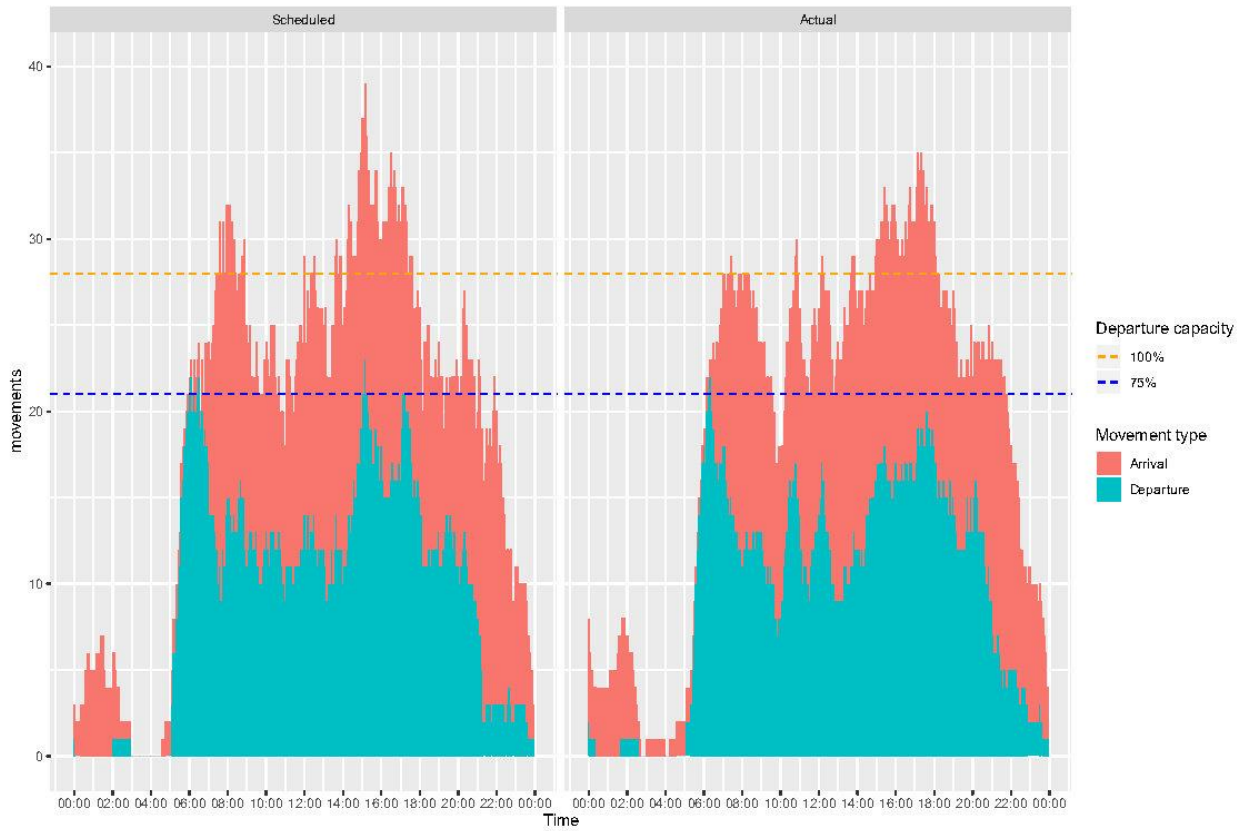


Scheduled vs actual airspace utilisation for 2019-08-16

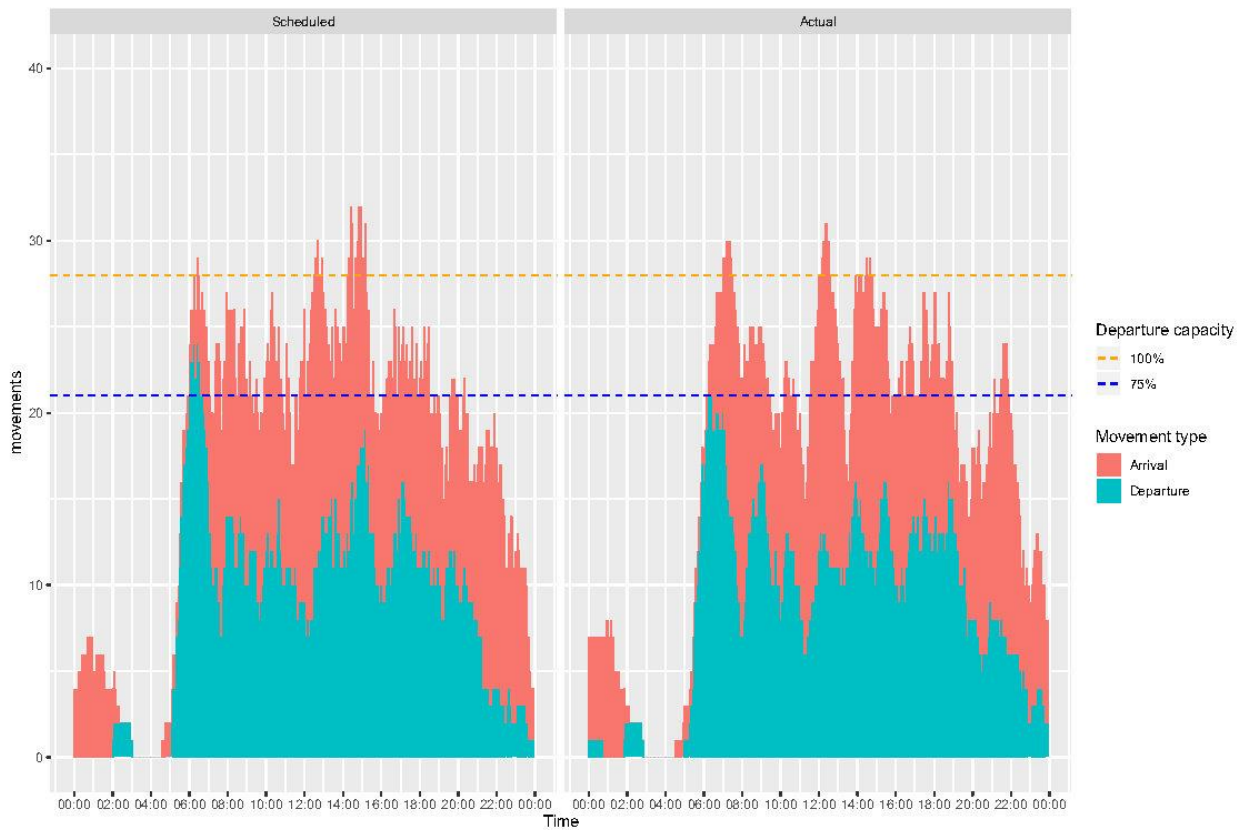




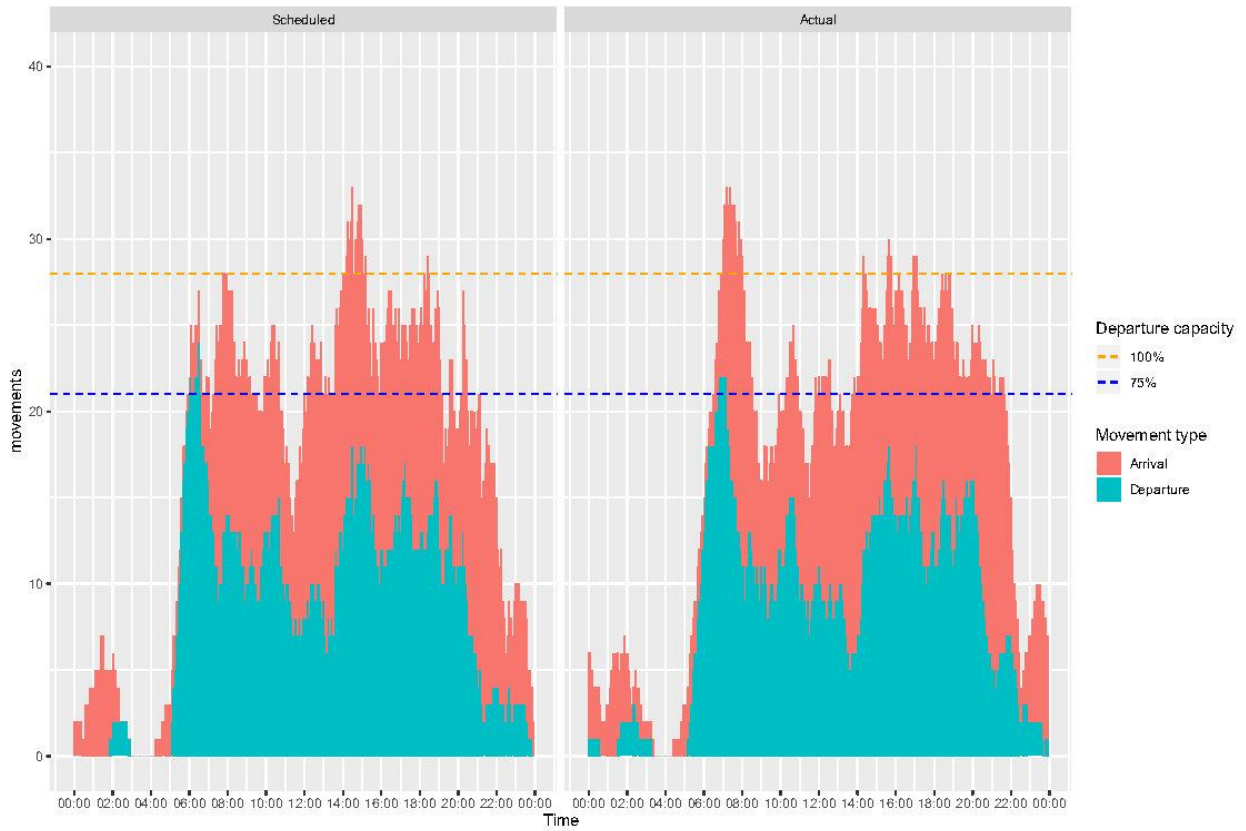
Scheduled vs actual airspace utilisation for 2019-08-15



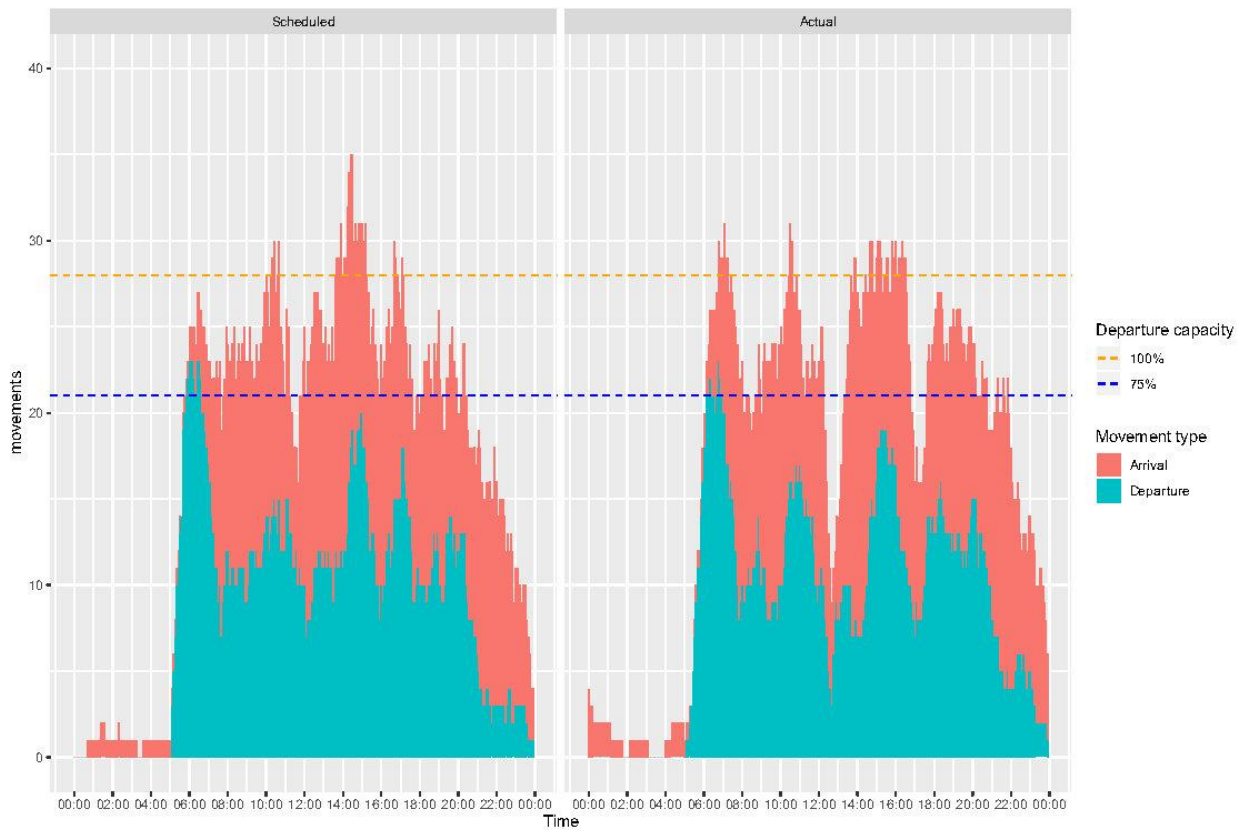
Scheduled vs actual airspace utilisation for 2019-08-14



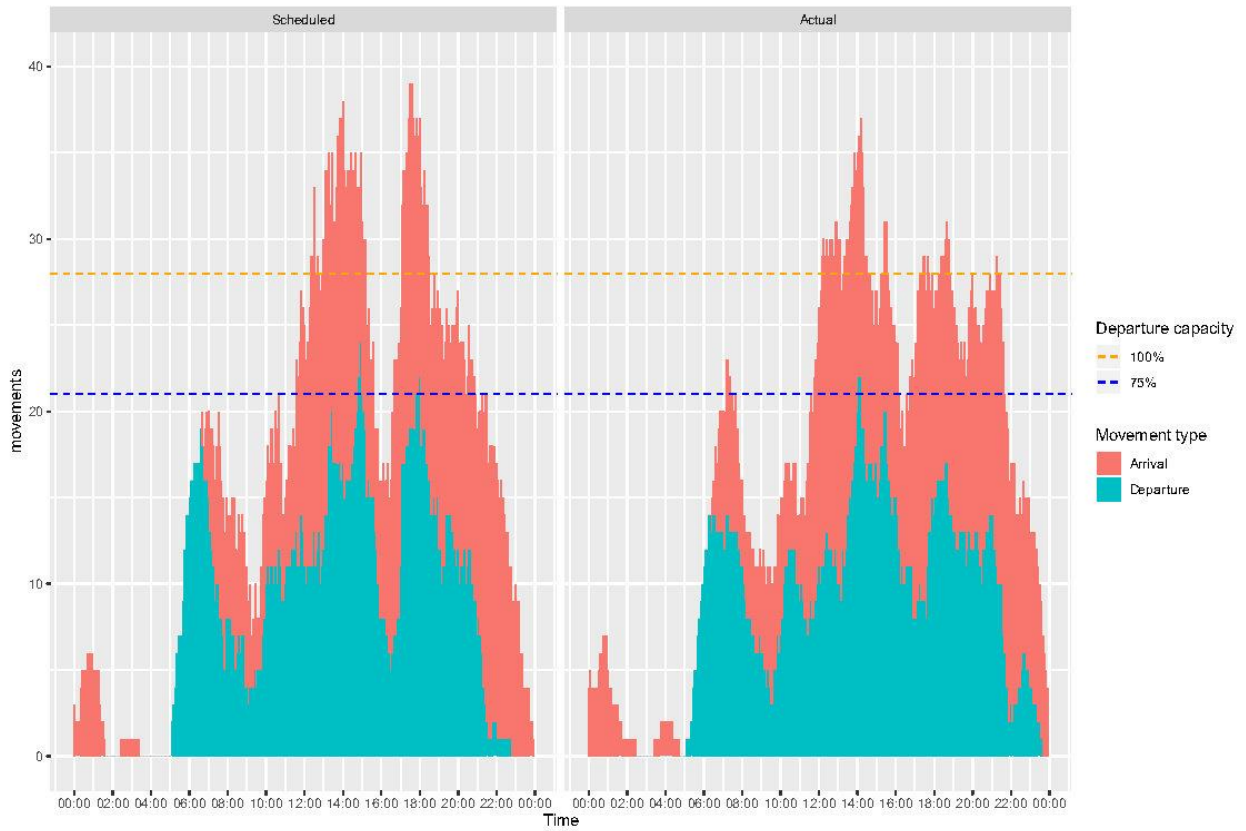
Scheduled vs actual airspace utilisation for 2019-08-13



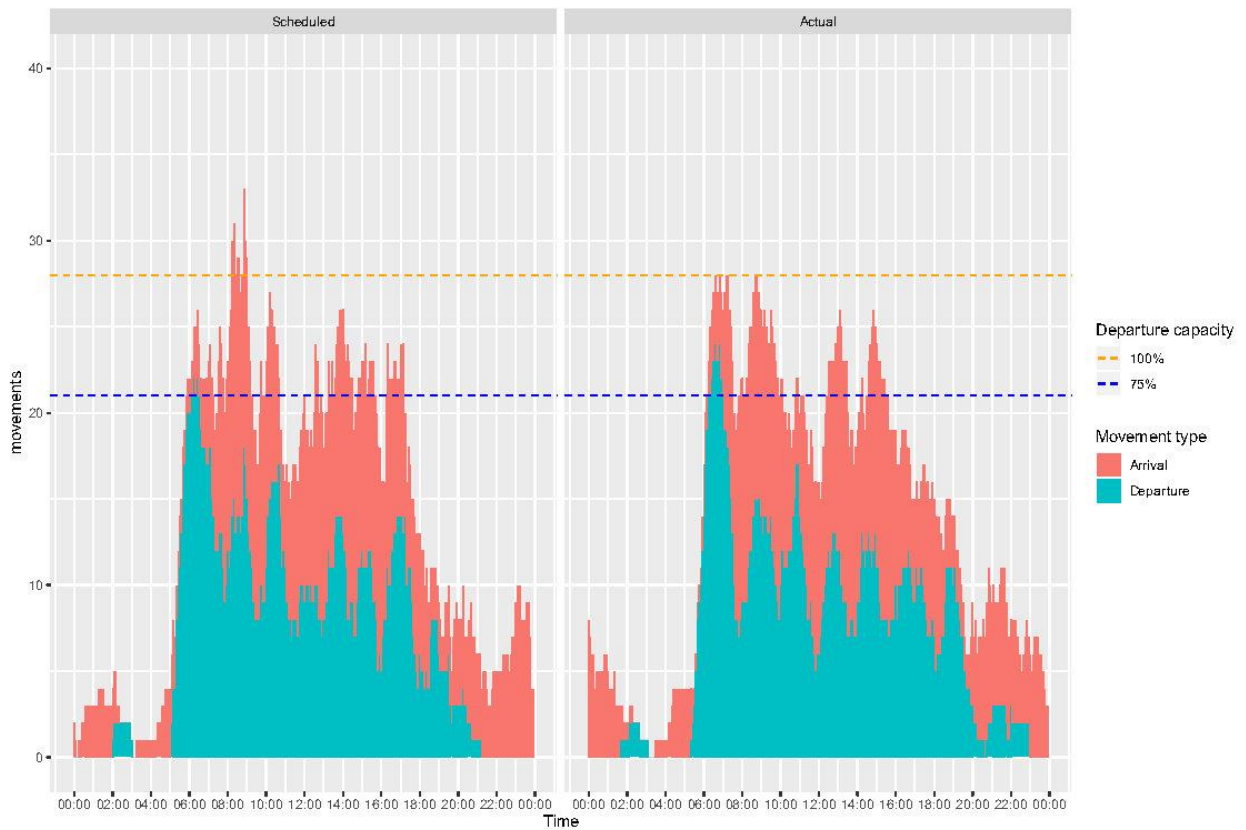
Scheduled vs actual airspace utilisation for 2019-08-12



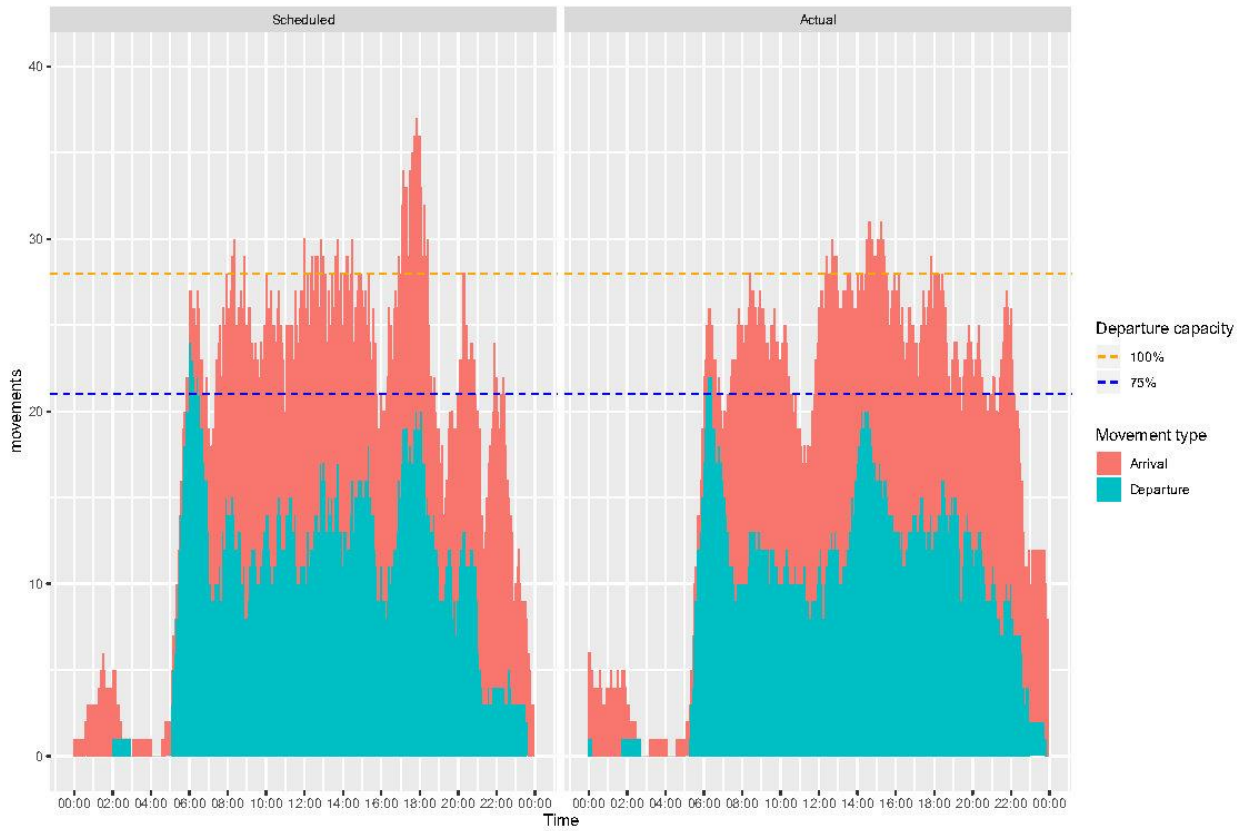
Scheduled vs actual airspace utilisation for 2019-08-11



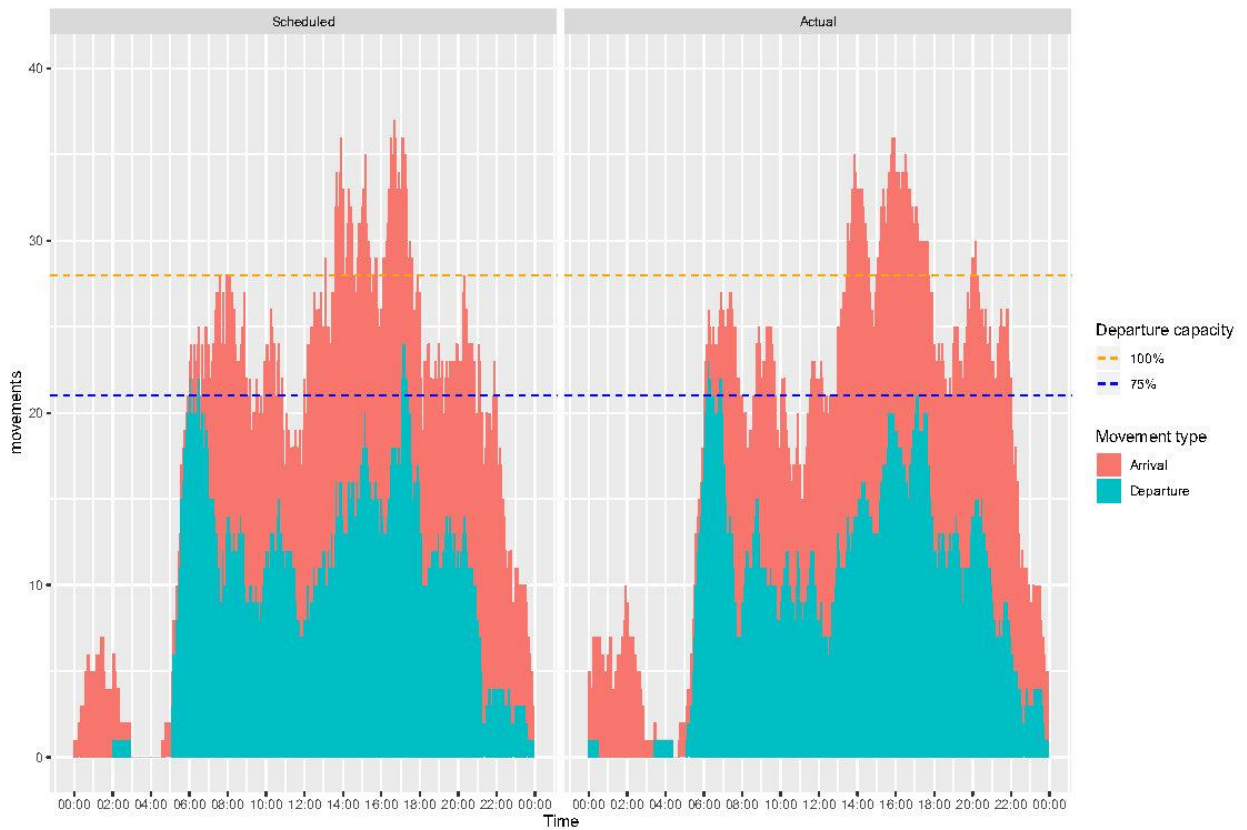
Scheduled vs actual airspace utilisation for 2019-08-10



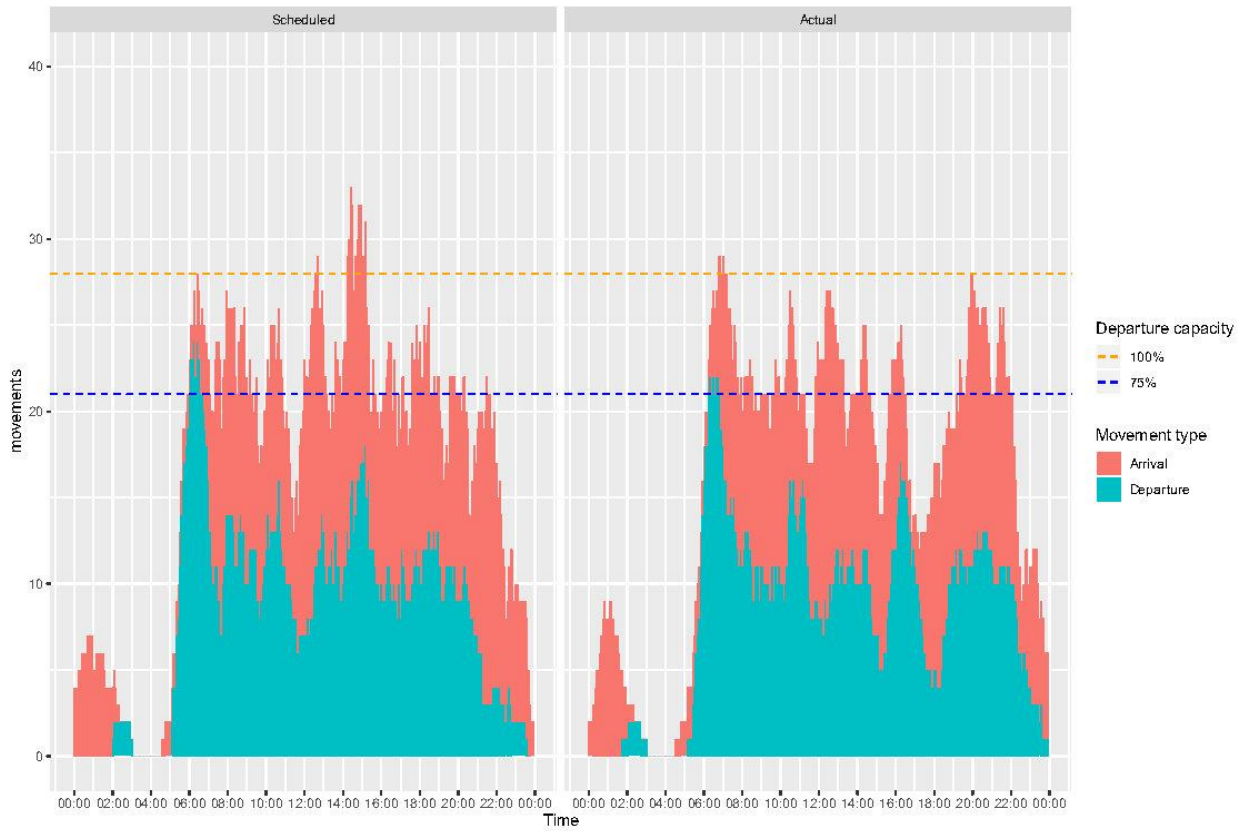
Scheduled vs actual airspace utilisation for 2019-08-09



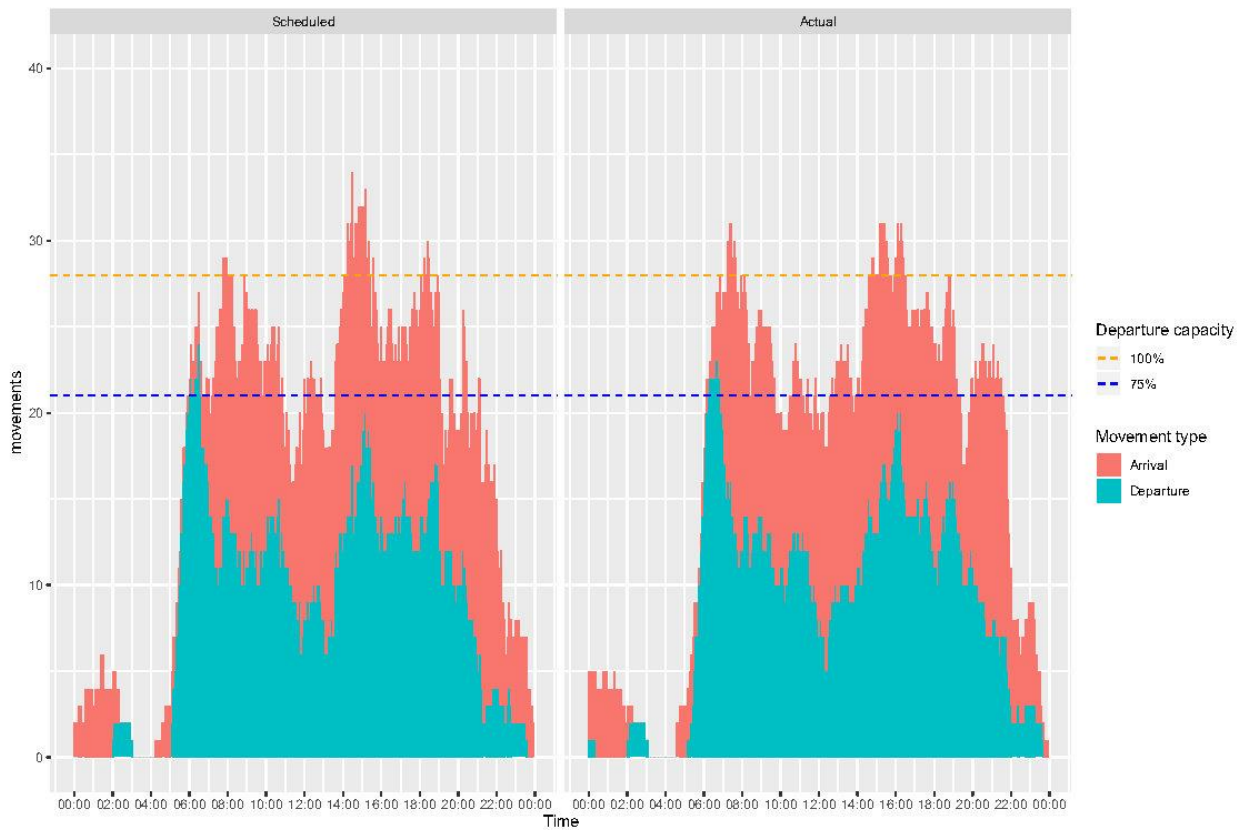
Scheduled vs actual airspace utilisation for 2019-08-08



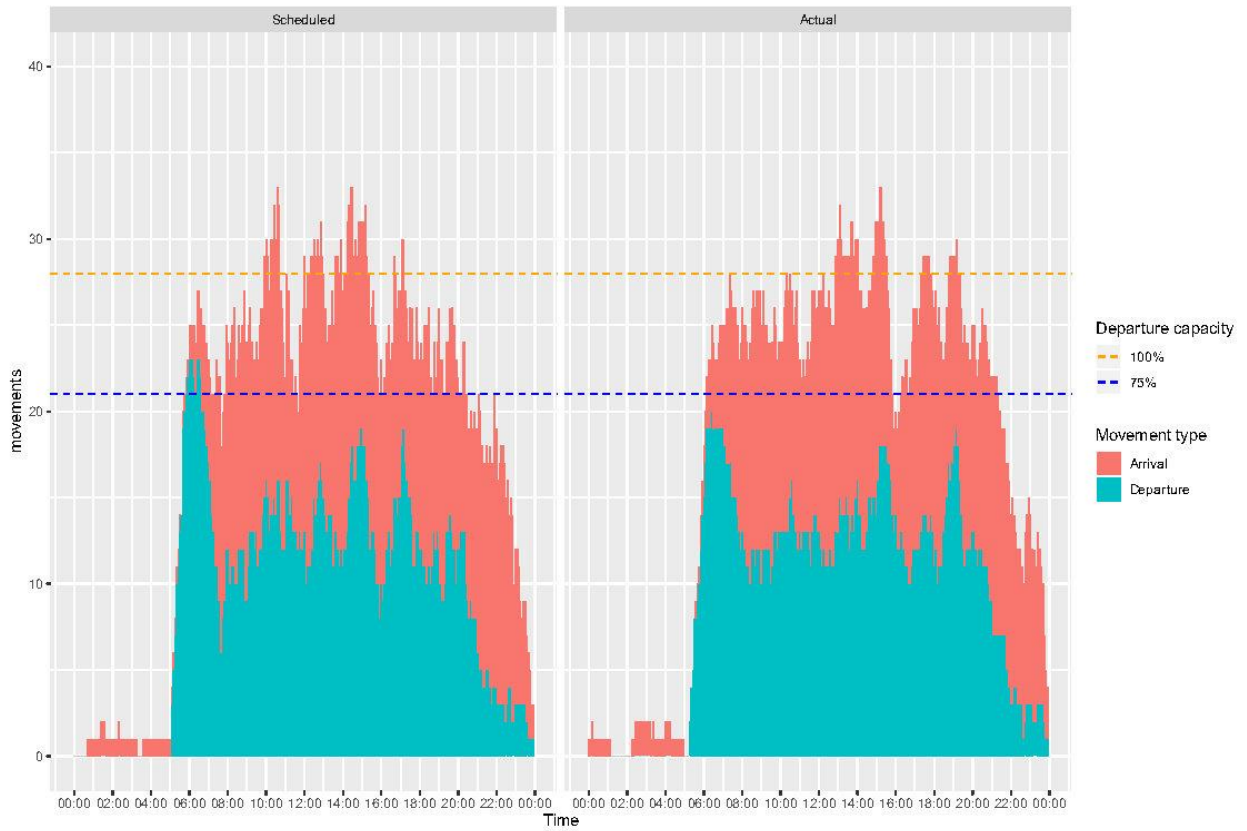
Scheduled vs actual airspace utilisation for 2019-08-07



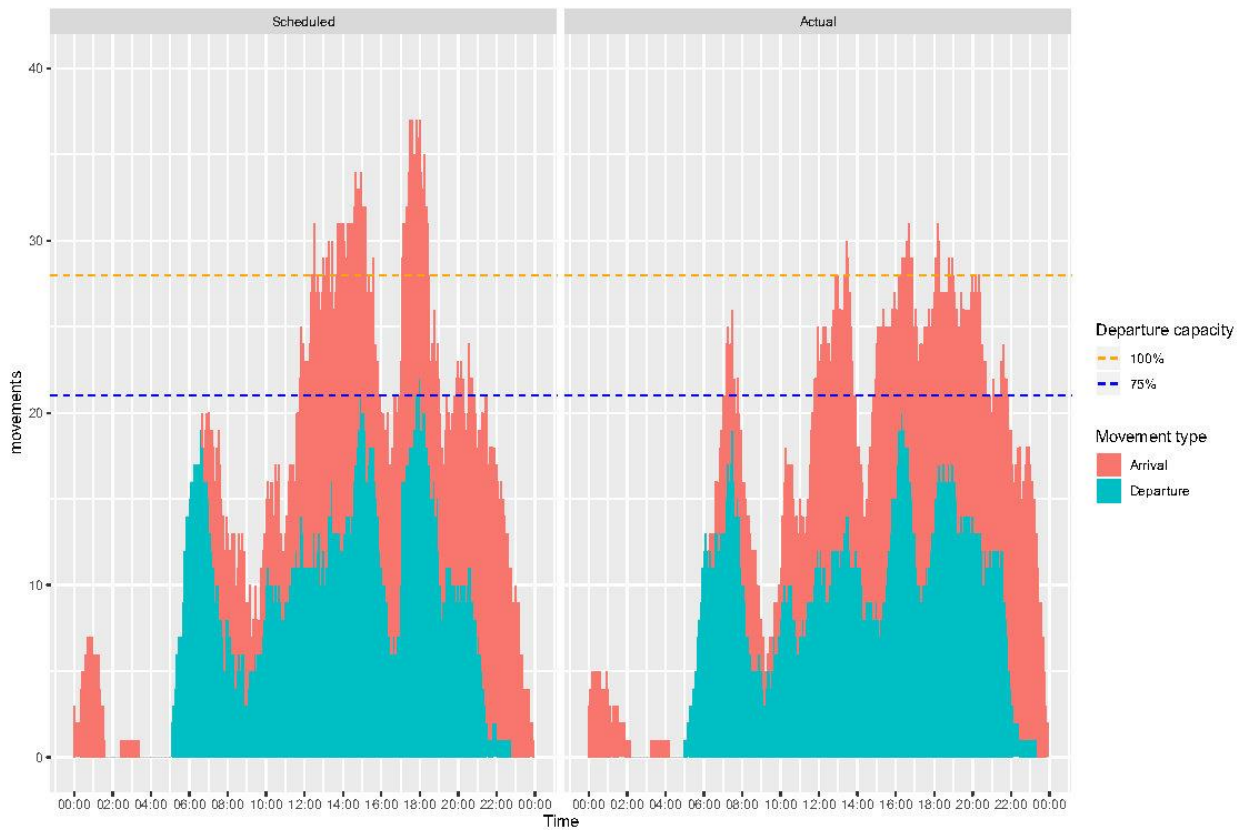
Scheduled vs actual airspace utilisation for 2019-08-06



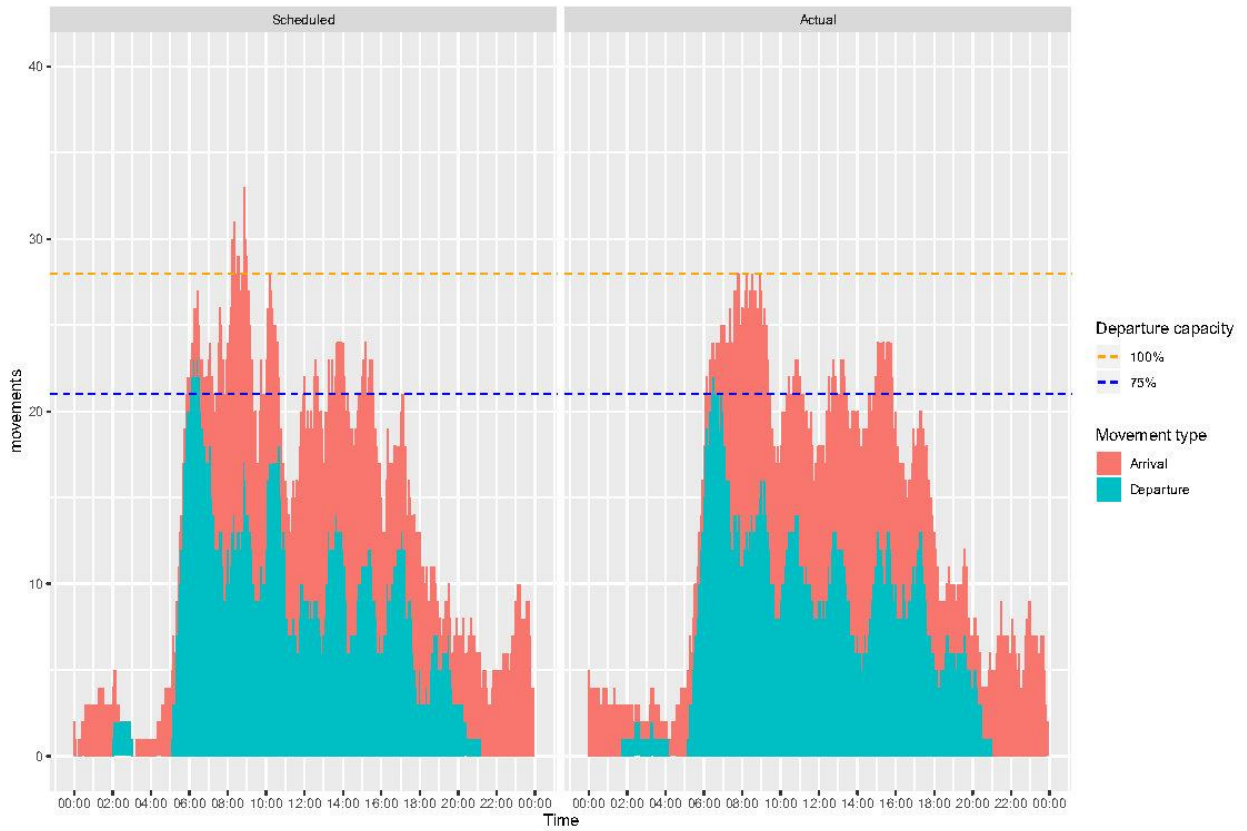
Scheduled vs actual airspace utilisation for 2019-08-05



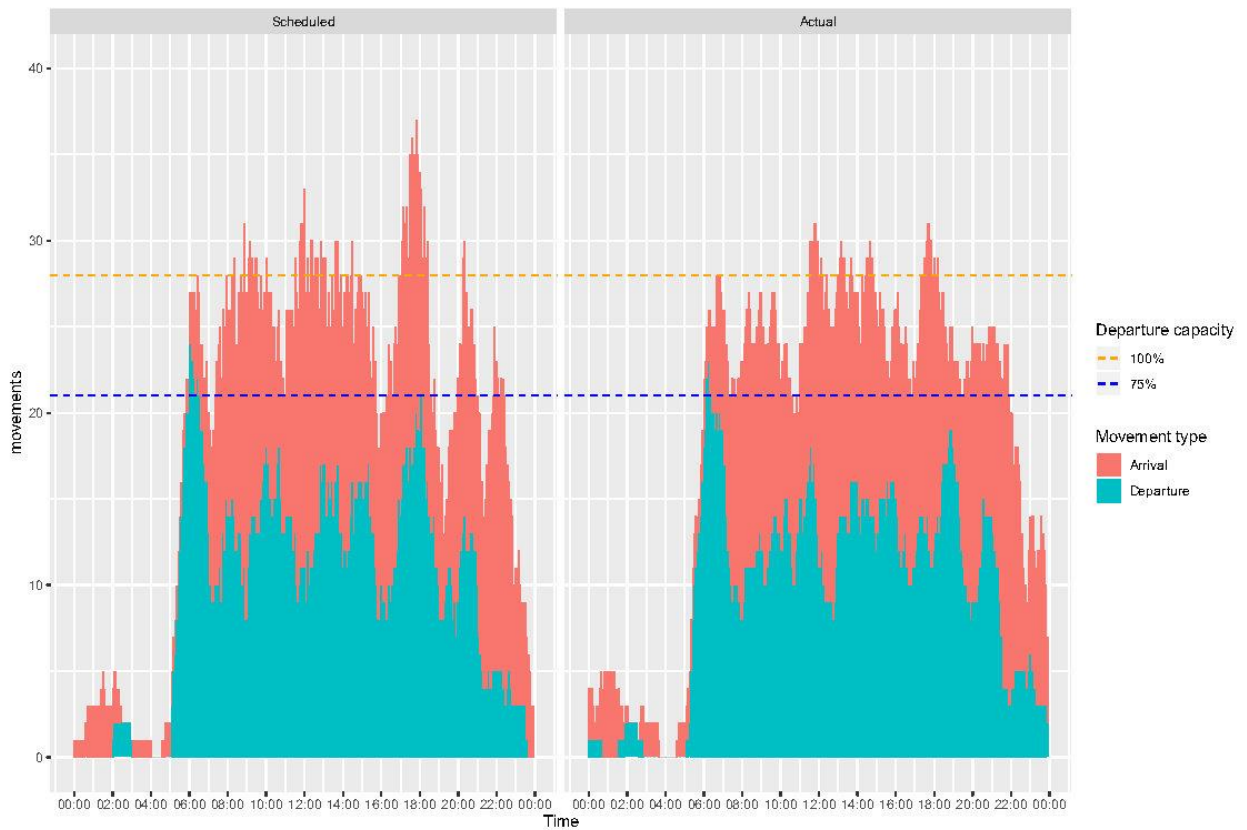
Scheduled vs actual airspace utilisation for 2019-08-04



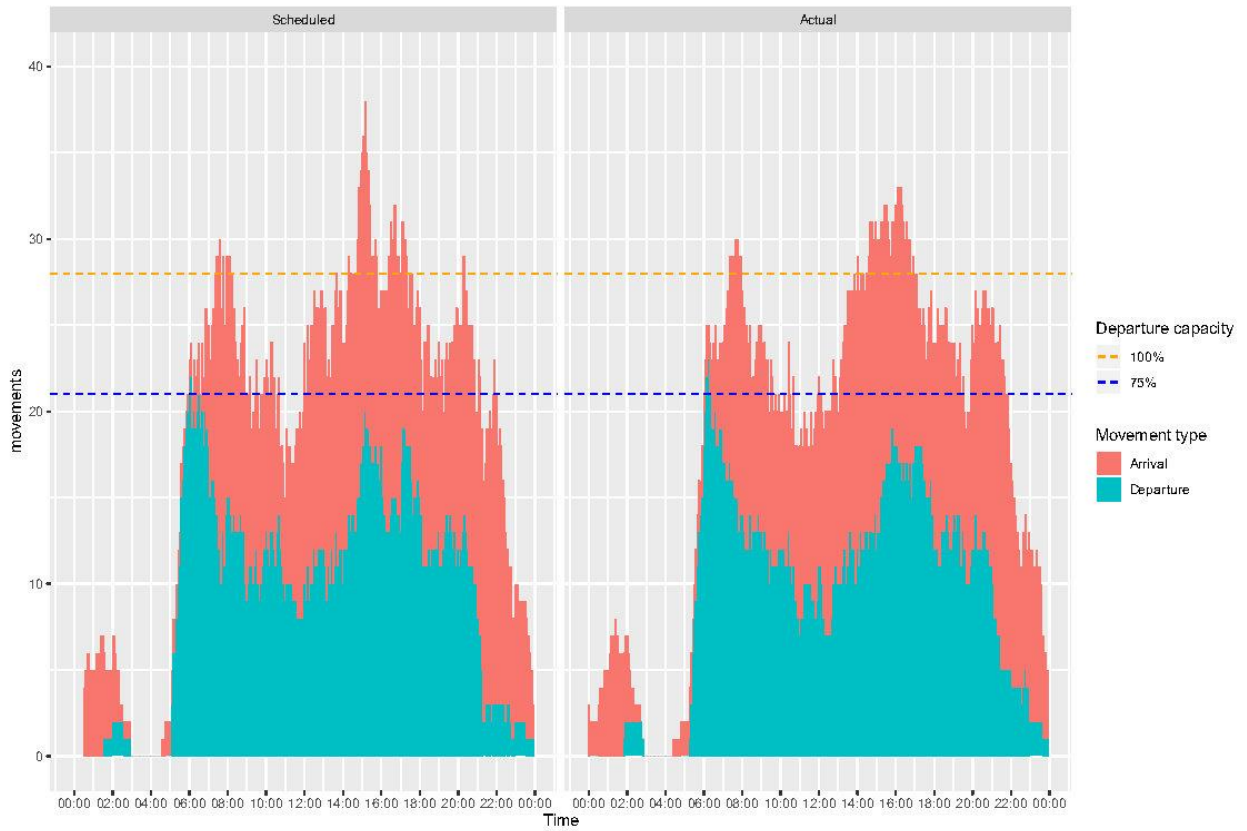
Scheduled vs actual airspace utilisation for 2019-08-03



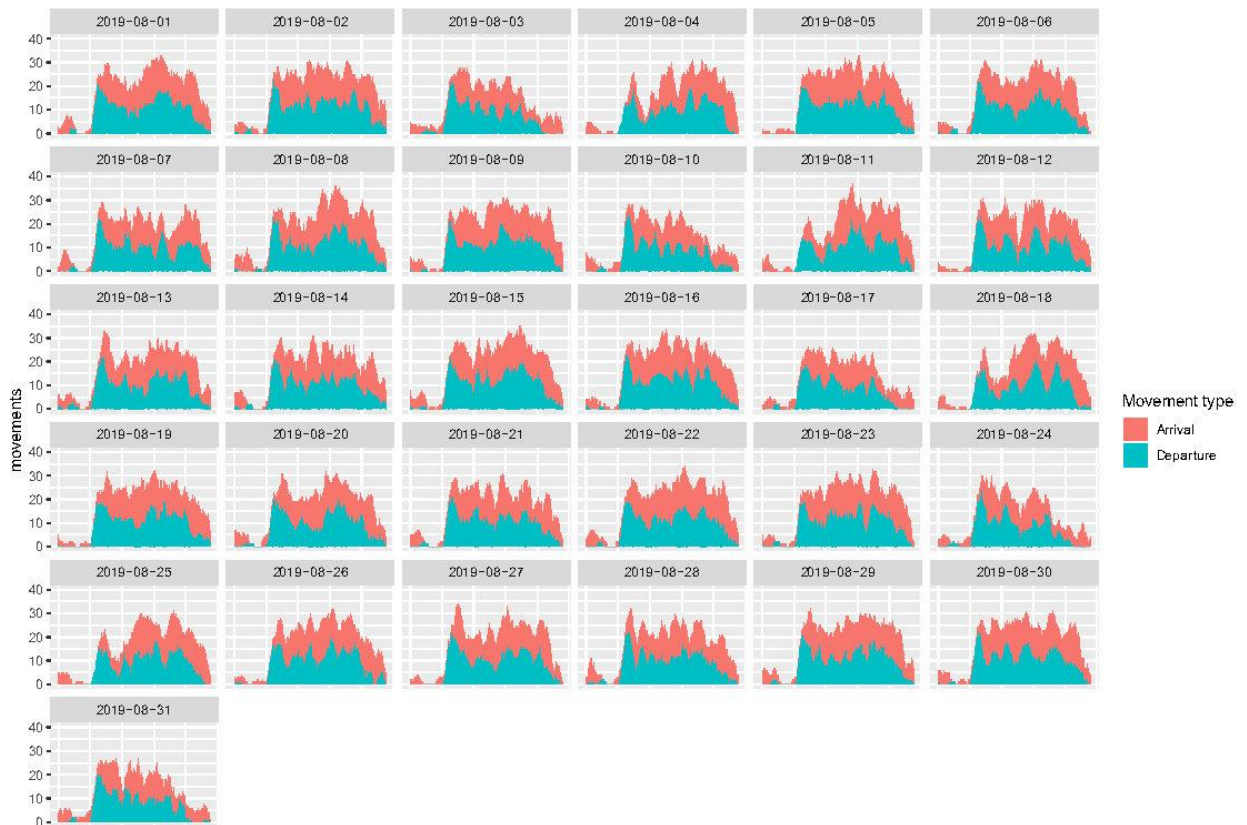
Scheduled vs actual airspace utilisation for 2019-08-02



Scheduled vs actual airspace utilisation for 2019-08-01

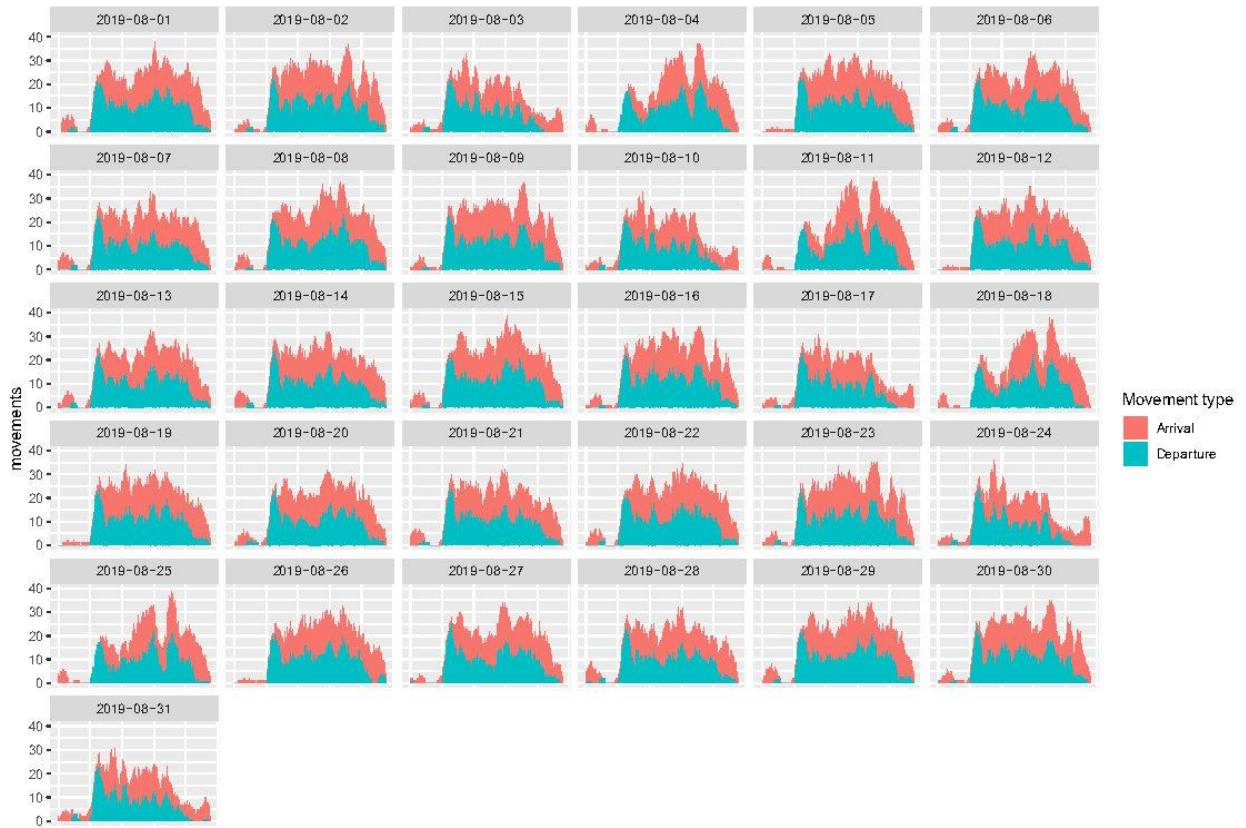


Actual airspace utilisation for arrivals and departures

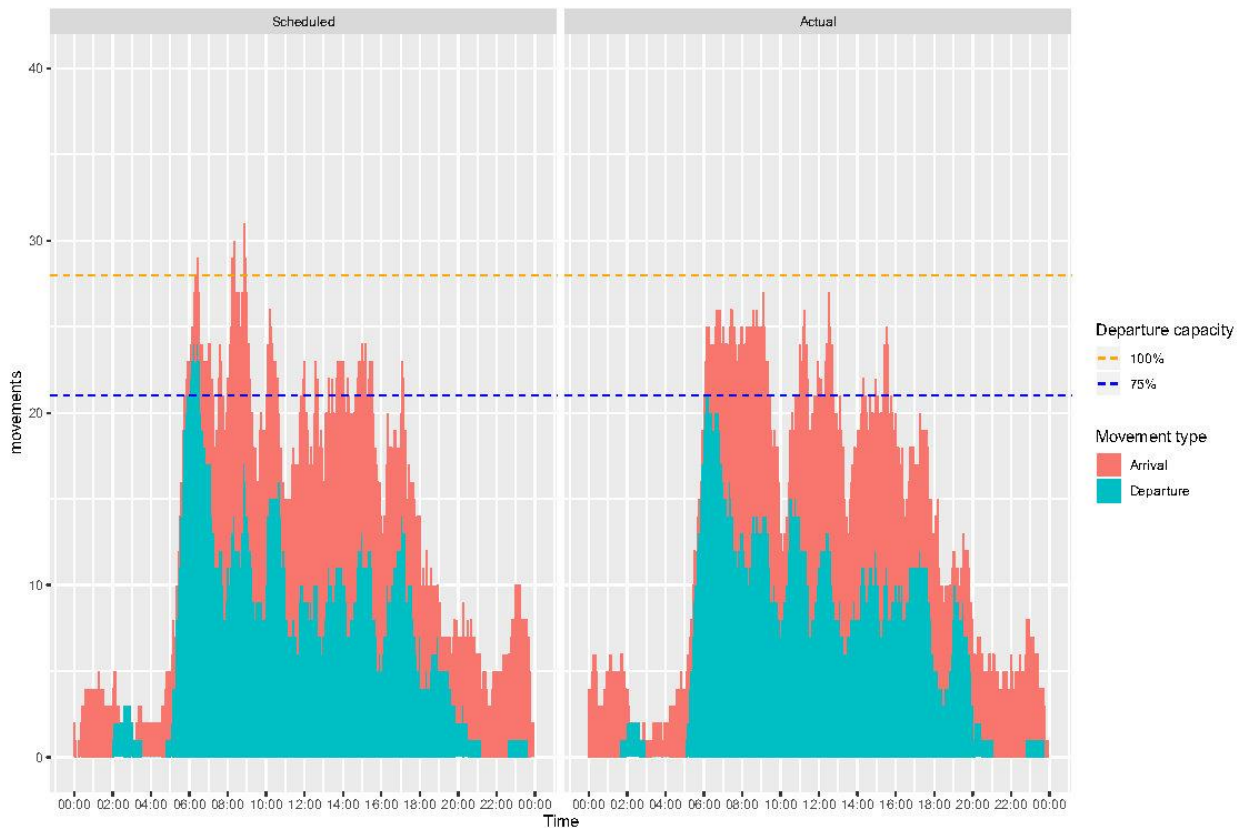




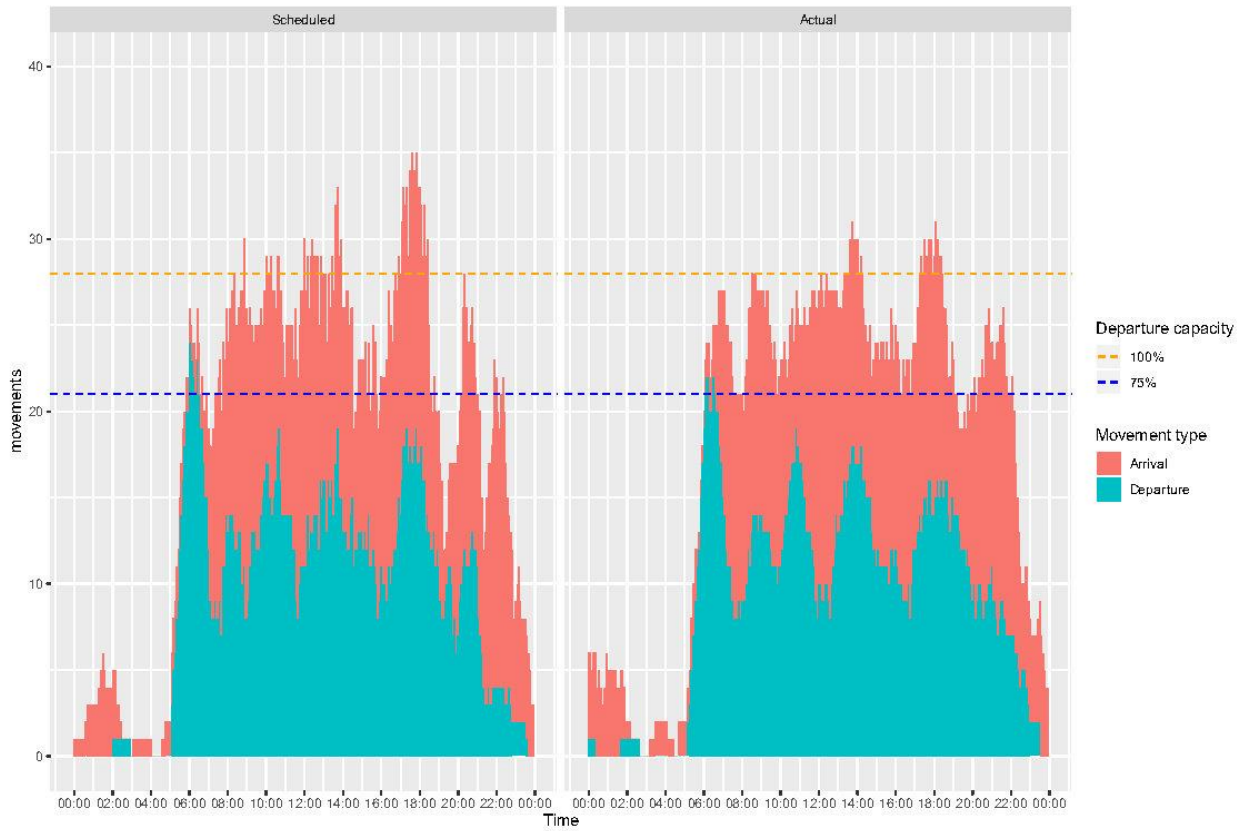
Scheduled airspace utilisation for arrivals and departures



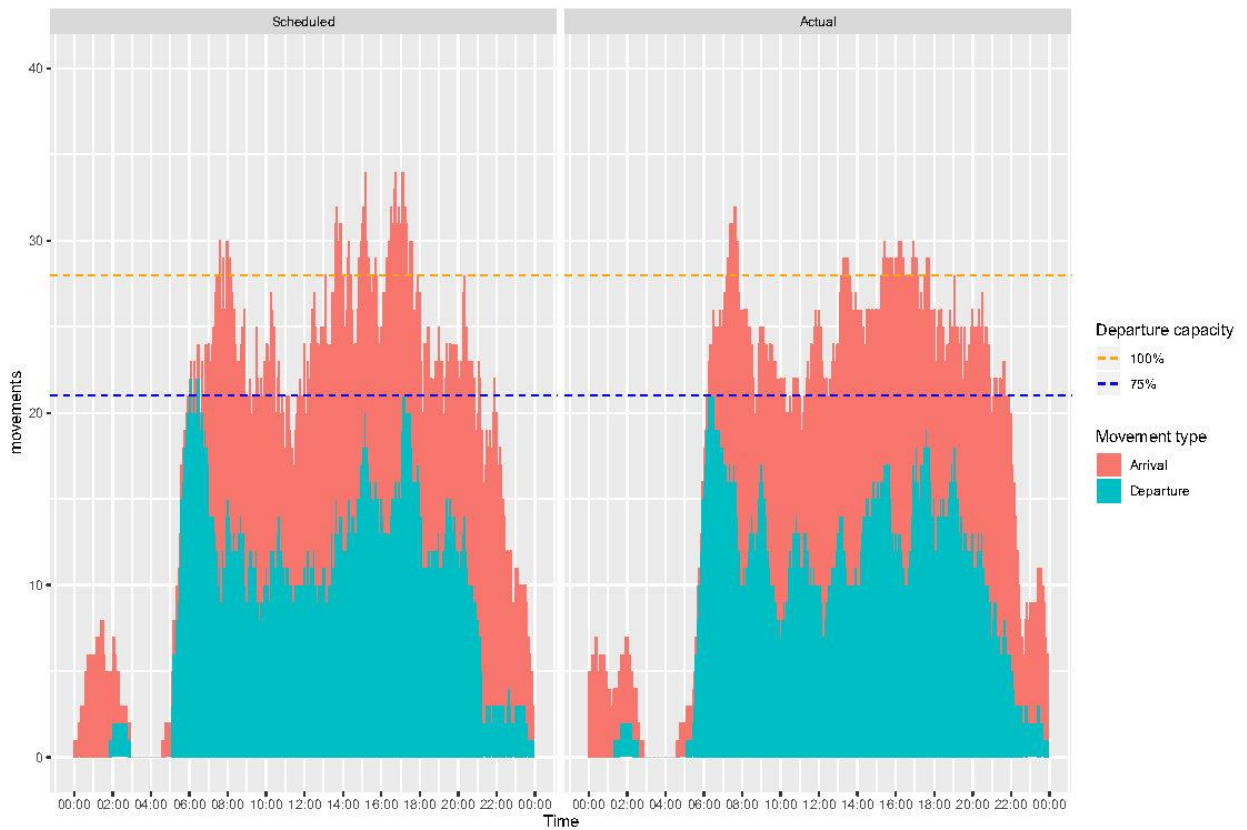
Scheduled vs actual airspace utilisation for 2019-08-31



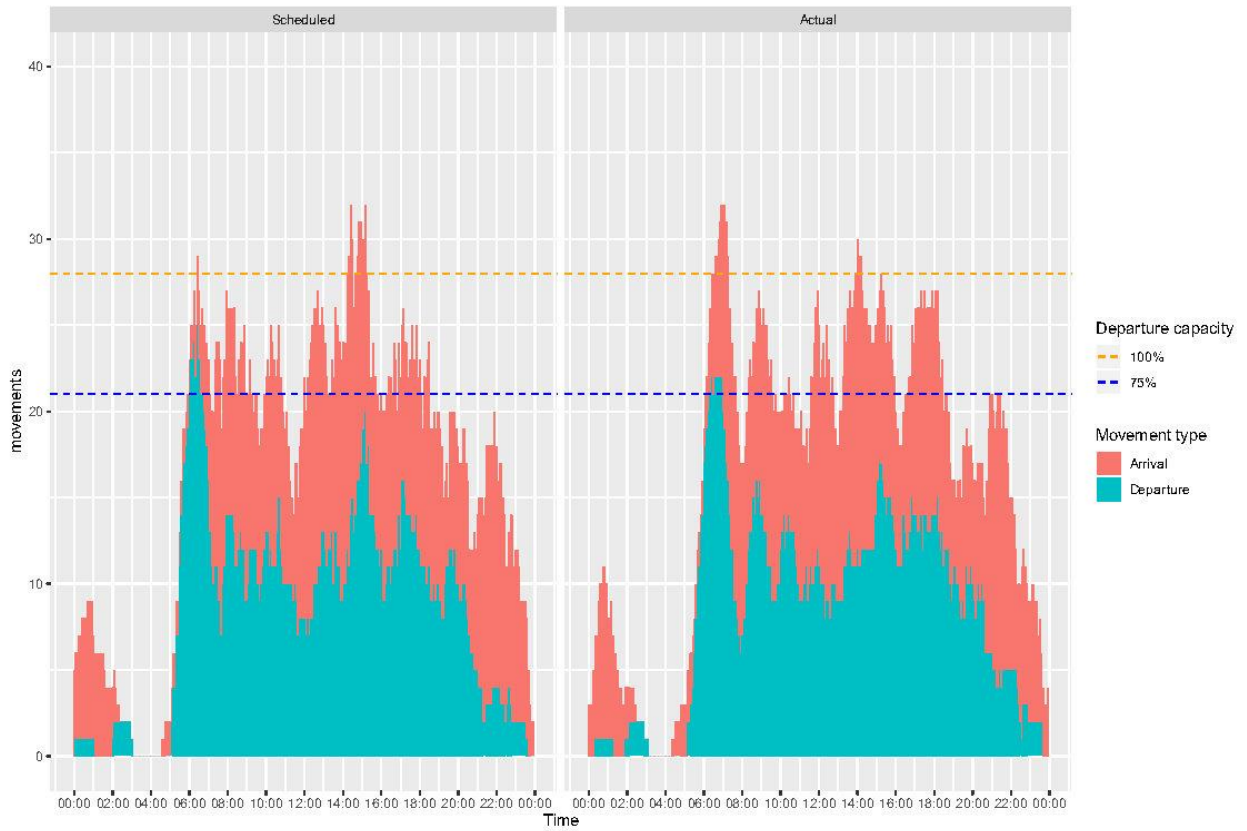
Scheduled vs actual airspace utilisation for 2019-08-30



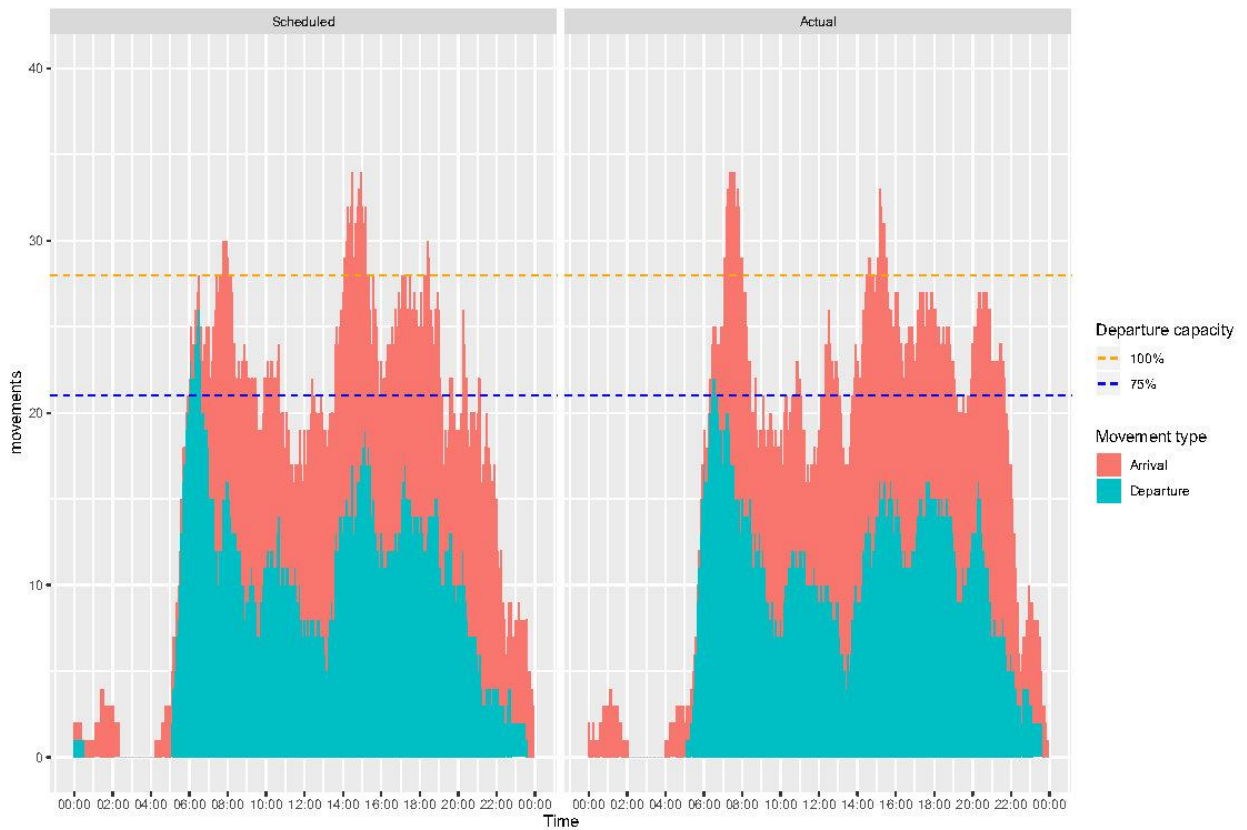
Scheduled vs actual airspace utilisation for 2019-08-29



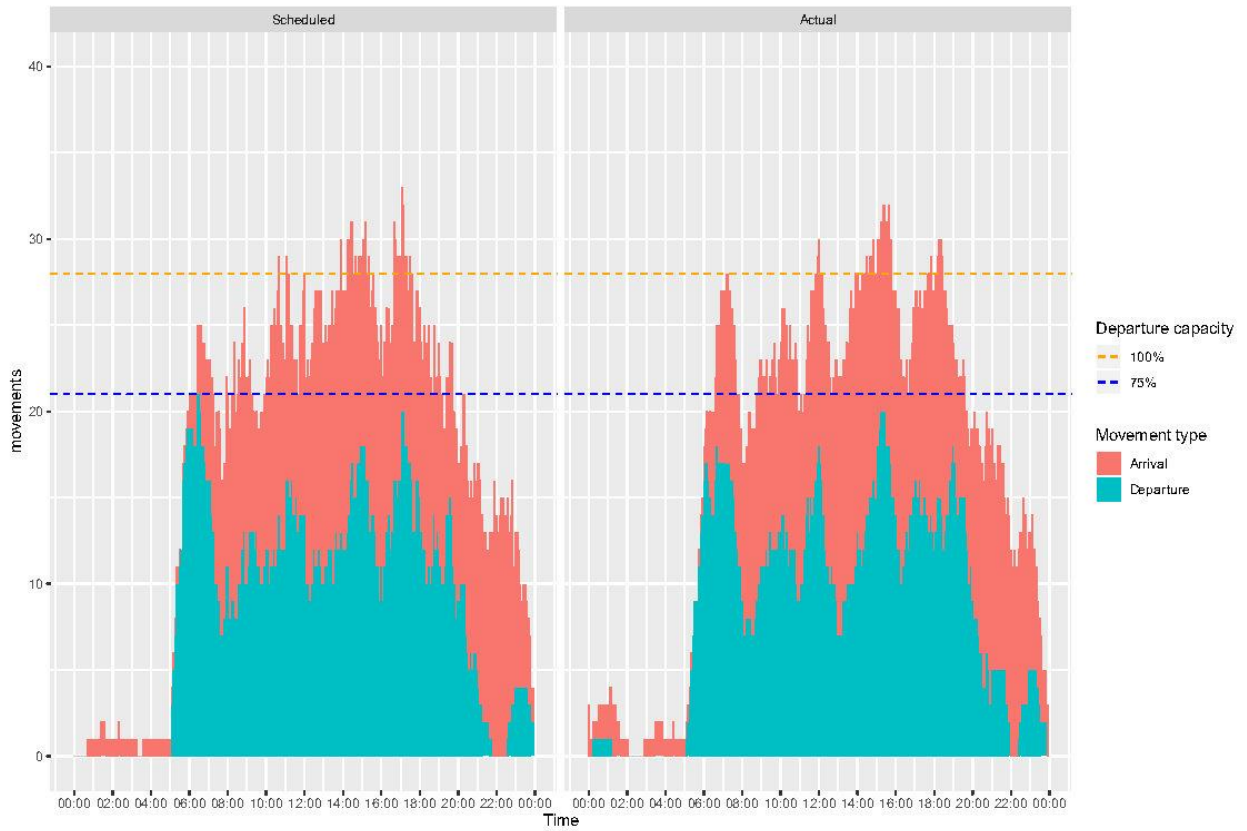
Scheduled vs actual airspace utilisation for 2019-08-28



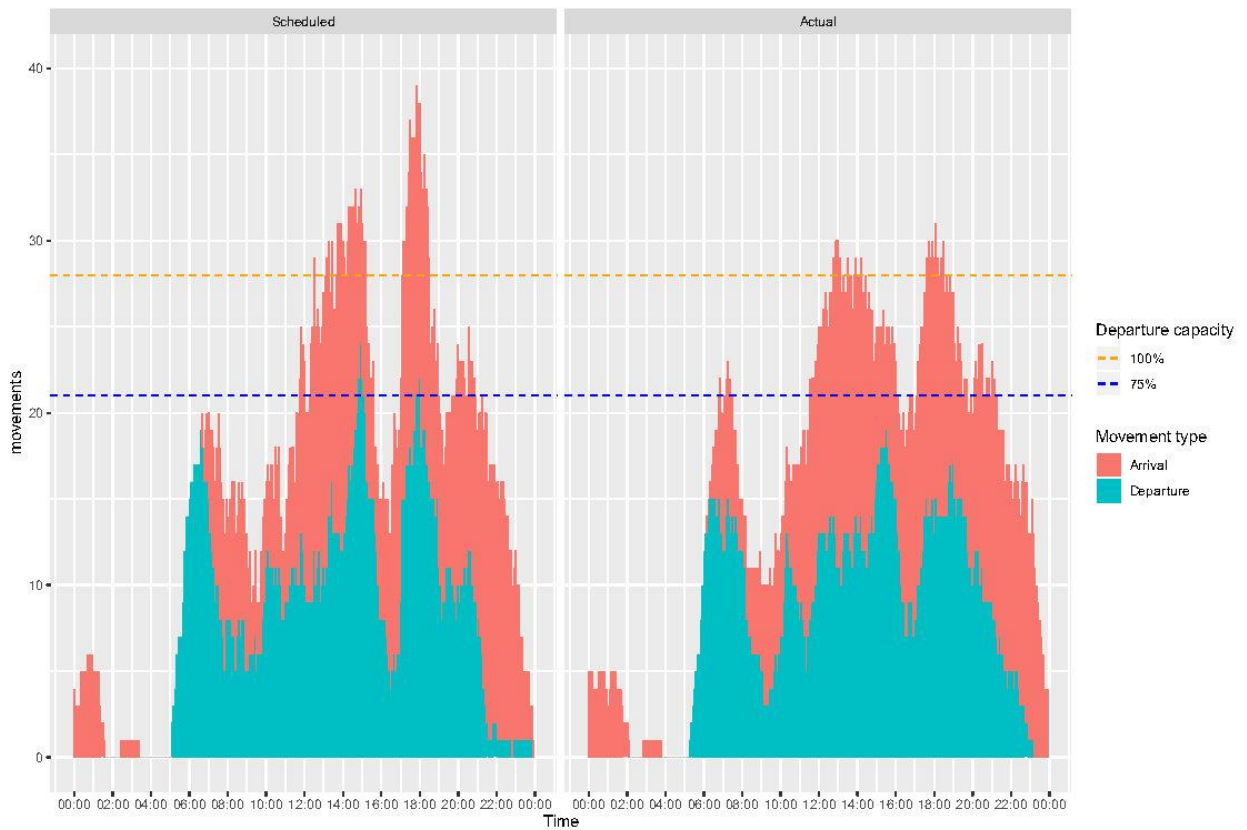
Scheduled vs actual airspace utilisation for 2019-08-27



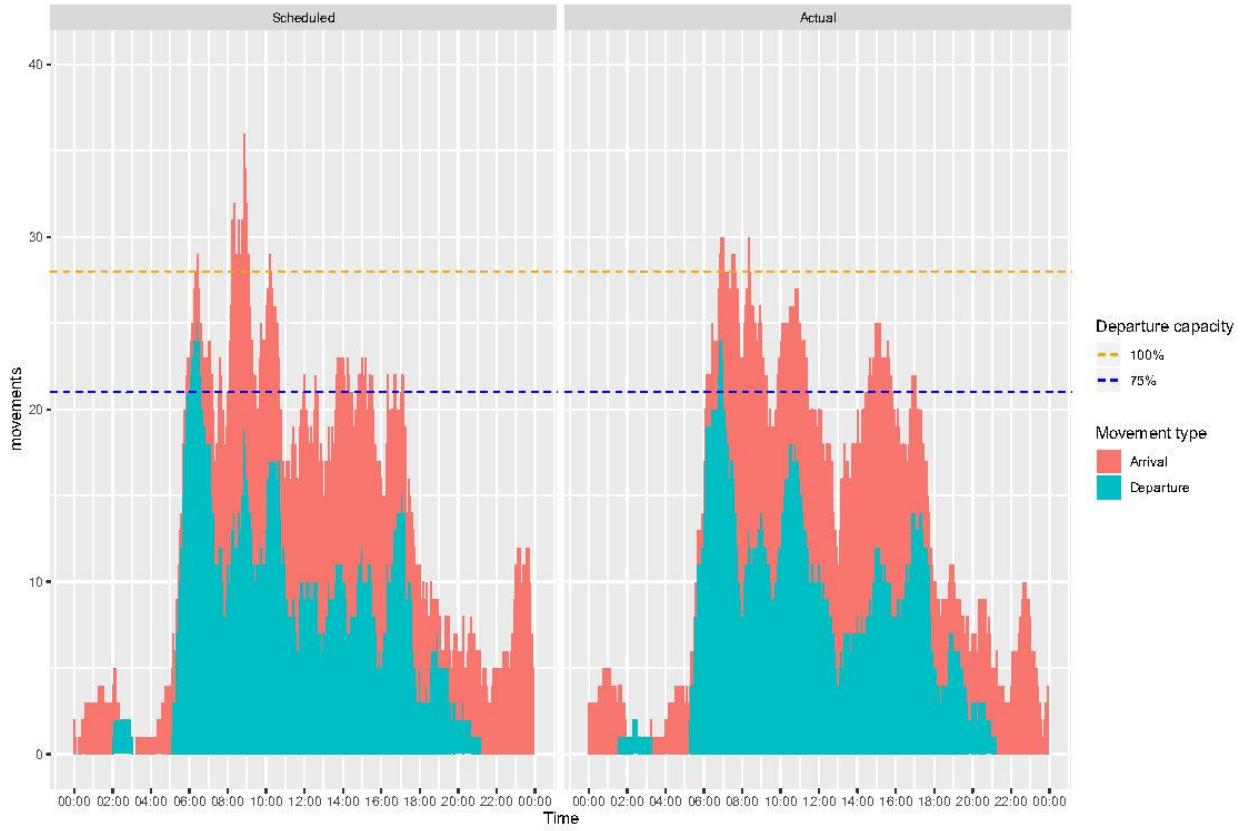
Scheduled vs actual airspace utilisation for 2019-08-26



Scheduled vs actual airspace utilisation for 2019-08-25



Scheduled vs actual airspace utilisation for 2019-08-24

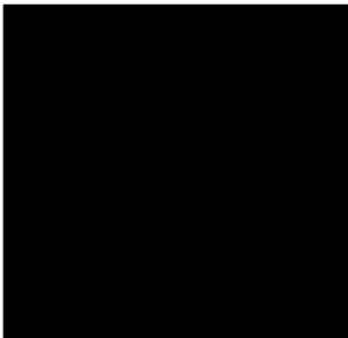


## Communications from North Queensferry Community Council

Letter from NQCC to the CAA – 1 October 2019

### NORTH QUEENSFERRY COMMUNITY COUNCIL

North Queensferry Community Centre, Brock Street, North Queensferry



Dear 

I write to you in relation to the recently commenced Edinburgh Airport ACP (SCP-2019-32) which is presently at stage 1b, Design Principles, in a seven step process.

I write to note concern at a number of omissions and changes of circumstance since commencement which significantly impact consideration of the ACP.

1 The ACP has commenced at a time when the entire UK Airspace is under a major [review](#), [Airspace Modernisation Strategy \(AMS\)](#); reference CAP 1711. All airports in the area under consideration under the previous Future Airspace Strategy, FASI S have been required to and appear to have put forward ACPs in an integrated manner to allow proper management of the total UK airspace and beyond. As CAP 1711 states "This (AMS) itself will require a timeline of airspace change proposals needed as part of a modernisation effort, and a critical path outlining the deadlines for individual airspace change proposals within it.

1.34 it is important to recognise that, for example, a change to the airspace at a particular airport may be completely dependent on linked changes to the lower airspace in the immediate vicinity, and cannot be implemented without it. An airspace change masterplan will therefore be a crucial element in airspace modernisation. "

The Edinburgh Airport ACP has been allowed to proceed in an isolated manner from AMS which risks strategies that have been identified by Edinburgh Airport's Noise Advisory Board which could bring significant operational and environmental benefits including shorter journey times, significant CO2 emissions and noise reductions. These suggested proposals include changes to lower airspace which have been brought to the attention of and discussed with Edinburgh Airport, NATS, and EDIs ATC. Although EAL have indicated they are in discussions with NERL it appears that the ACP has been launched without due care to conform with CAP 1711.

I therefore ask you to pause EALs ACP until it meets the requirements of CAP 1711.

As a second separate point I would ask you to not allow Edinburgh Airport Limited's ACP to proceed beyond Step 1b until there has been compliance with the requirements for process indicated in CAP 1616.

CAP 1616 Appendix C sets out the requirements for Consultation and Engagement including "Communication with all affected stakeholders throughout the formal airspace change process." and "Best practice ongoing engagement to ensure that airspace change proposals are received by an informed, engaged audience able to effectively feed-in their views" and indicates that Step 1a (Statement of Need) requires such engagement. Further, CAP 1616 C22 states:

"Initial contact with stakeholders is likely to be crucial in all change proposals, as transparently communicating what need is being met through the considered change will set the tone for ongoing engagement and will also help sponsors to develop the materials required in subsequent stages."

We have been informed by EAL that CAA has "passed" Step 1a and they will not consider discussion of their Statement of Need. We are therefore greatly concerned that in moving to Step 1b CAA has already moved to approve EALs "Statement of Need" and has moved to Step 1b Design Principles to manage that need without an opportunity for stakeholders to challenge or engage with the Need as put forward by EAL. I further note that there is no evidence in support of Step 1a available as might be expected on the CAAs ACP portal. This would put the use of CAP1616 by both EAL and CAA in contradiction to "The Gunning Principles" which are the accepted legal basis of consultation process in UK.

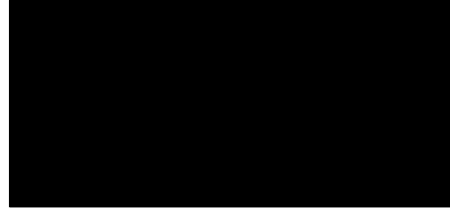
I would request that you therefore clarify the extent to which you have approved Step 1a and ask that you not allow EAL to proceed beyond the Step 1 Gateway without fulfilling the requirements to engage with all affected stakeholders.

Thirdly, the UK Government and the Scottish Governments have both outlined significant policy changes in relation to Climate Change that significantly impact on Aviation and in particular the recent Committee on Climate Change has made strong recommendations that in order to comply with UK legally binding commitments, Aviation must reduce its forecast capacity expansion projections from 50% to 25% and that if Heathrow expansion proceeds it will be at the expense of expansion of capacity elsewhere in the UK.

This development has a major overbearing impact on the Statement of Need produced by EAL. We would therefore ask you to for this reason alone place the EALs ACP on pause for EAL to reconsider their need for an ACP ~~outwith~~ those changes required solely to meet changes to navigational standards.

Regards

**CCA's response to NQCC – 29 October 2019**



29th October 2019

By email

Dear 

Thank you for your letter dated 1 October 2019 concerning ACP-2019-32 (the Proposed Airspace Change).

We note that you reference the Airspace Modernisation Strategy (CAP 1711) (AMS) and specifically the need for coordination among sponsors of Airspace Change Proposals (ACPs). It is important to recognise that work under the AMS sets out a number of initiatives for the modernisation of UK airspace. Two of initiatives are 'Future Airspace Strategy South' (FASI-S) and 'Future Airspace Strategy North' (FASI-N). The Proposed Airspace Change falls under FASI-N.

By way of background, the AMS fulfils the statutory duty placed upon the CAA by the Department for Transport (DfT), to have a strategy and a plan for modernising airspace (as required by the Air Navigation Directions 2017 (the Directions)). The AMS sets out the work that industry and other entities are required to carry out in order to achieve the desired modernisation of UK airspace (the Initiatives).

In accordance with AMS, the CAA and DfT (the Co-Sponsors) have commissioned NERL to develop a single coordination plan for airspace change in southern England (the South East airspace change Masterplan, or, the Masterplan for short). In time, further work will be carried out to enable the creation of masterplans which will facilitate modernisation of other aspects UK airspace. As such, at this time, references to the Masterplan (and subsequent need for coordination and collaboration amongst ACP sponsors) only relate to the coordinated plan for airspace change in southern England (i.e. FASI-S) and not FASI-N. Whilst the CAA does not, at this time, mandate coordination between FASI-N sponsors we do endorse FASI-N ACP sponsors ensuring that they align their ACPs with the



concepts of the AMS. The CAA does however, at the relevant stages of the CAP 1616 process, require FASI-N sponsors to engage with stakeholders regarding the relevant policy and regulatory framework (i.e. the AMS).

We are satisfied that the sponsor has provided sufficient assurance in its Statement of Need (SoN) that this Proposed Airspace Change recognises the need to meet the requirements of the AMS. We will assess the sponsor against the requirement to ensure sufficient engagement with stakeholders

Turning to your second point, the Proposed Airspace Change has passed only Stage 1A of the CAP 1616 process. The Proposed Airspace Change has not passed Stage 1B. The Statement of Need sets out the issue or opportunity a sponsor is looking to resolve or address. The requirements of Stage 1A do not prescribe that consultation on a sponsor's Statement of Need should be carried out. The CAA would expect engagement to occur from Stage 1B onwards and the Proposed Airspace Change sponsor should evidence this at the Stage 1B Gateway.

In addressing your third point, the CAA welcomes the UK government's commitment to net zero emissions by 2050 and the recent Committee on Climate Change advice on aviation and recommendations. It is however important to note that whilst the UK government's commitments are binding in international law, they have not been adopted into UK law and do not give rise to any domestic legal rights or obligations. The relevant legal framework remains the Air Navigation Guidance 2017 (ANG 2017) and the Climate Change Act 2008. Under the ANG 2017, the CAA has a duty to continue to remain informed of the government's policies and objectives on climate change. Specifically, the ANG 2017 also sets out the government's environmental objectives with respect to air navigation:

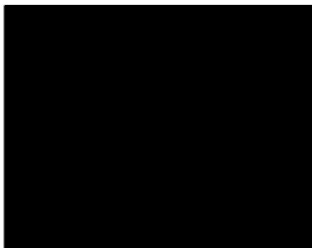
- a. limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise;
- b. ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions; and
- c. minimise local air quality emissions and in particular ensure that the UK complies with its international obligations on air quality.

Please be assured that the CAA, as regulator, takes into account the above objectives when making airspace change decisions. The Proposed Airspace Change will be treated no differently and the same standards of scrutiny will apply to this ACP as for any other.

For the above reasons, I consider that it is not necessary to recommend that the Proposed Airspace Change be paused. By copy, I have informed the sponsor of the CAA's response to your letter.

Please do contact me should you have any queries concerning this or any other ACP.

Yours sincerely,



## Communications from Dalgety Bay & Hillend Community Council

### Correspondence pertaining to the recruitment of recall sessions – 16 to 17 October 2019

#### Email from a DB&H CC representative to Progressive Partnership - 16 October 2019

**From:** [REDACTED]  
**Sent:** 16 October 2019 14:41  
**To:** [REDACTED]  
**Subject:** Re: 10402 Recall workshop for ACP Edinburgh Airport

Hi [REDACTED]

I note that [REDACTED] was asked if he would like to nominate someone else if he could not make the workshop. Can you please advise if Dalgety Bay and Hillend Community Council are allowed to nominate a substitute for [REDACTED]?

Many thanks

[REDACTED]

#### Email from Progressive Partnership to the DB&H CC representative – 16 October 2019

**From:** [REDACTED]  
**Sent:** 16 October 2019 15:28  
**To:** [REDACTED]  
**Subject:** RE: 10402 Recall workshop for ACP Edinburgh Airport

Hi [REDACTED]

We now have 17 organisations represented We have achieved this by limiting places to one person per organisation and offering the remaining places on a first-come-first served basis. The invitation has been issued to representatives from a very broad range of interests and we now have representation from:

- Overflown within contours
- Overflown outwith contours
- Not overflown
- Environmental protection
- Environment Health
- Community councilors
- EANAB
- Environmental activists
- Property development
- Equalities

I'm afraid we are up to capacity now and not accepting any more registrations. If we get any cancellations I will let you know.

Kind regards

[REDACTED]

**Email from the DB&H CC representative to Progressive Partnership – 16 October 2019**

From: [REDACTED]  
Sent: 16 October 2019 16:46  
To: [REDACTED]  
Subject: Re: 10402 Recall workshop for ACP Edinburgh Airport

Thank you [REDACTED]. Can you please send me a list of the organisations who will be represented? Could you please also confirm the reason DB&HCC were not offered the opportunity to nominate a replacement?

Many thanks

[REDACTED]

**Email from Progressive Partnership to the DB&H CC representative – 16 October 2019**

From: [REDACTED]  
Date: 16/10/2019 20:37 (GMT+00:00)  
To: [REDACTED]  
Subject: RE: 10402 Recall workshop for ACP Edinburgh Airport

Hi [REDACTED]

No I'm sorry I can't give you a list of organisations that are coming.  
As stated before I'm afraid we are up to capacity now and not accepting any more registrations.

This has been organised on a first come first served basis and hit full capacity when [REDACTED] accepted the invite which was made at the request of the client.

As previously stated if we get any cancellations I will let you know.

Best

[REDACTED]

**Email from the DB&H CC representative to Progressive Partnership – 16 October 2019**

From: [REDACTED]  
Sent: 16 October 2019 21:14  
To: [REDACTED]  
Subject: Re: 10402 Recall workshop for ACP Edinburgh Airport

Thank you. Can I please ask why you cannot provide a list of organisations who will be attending? Can you please confirm which bodies from Fife will be represented? As you are aware the process is meant to be open and transparent.

Thank you

[REDACTED]

Sent from my Samsung Galaxy smartphone.

**Email from Edinburgh Airport to the DB&H CC representative – 17 October 2019**

**From:** [REDACTED]  
**Sent:** 17 October 2019 16:31  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: 10402 Recall workshop for ACP Edinburgh Airport

Hi [REDACTED]

Progressive has been commissioned by Edinburgh Airport to conduct elements of engagement process during this 1B stage of CAP 1616.

We have chosen this external agency model, to ensure its professionalism and objectivity, separated from the Airport team. We shall consider their reports as evidence fed in to our 1B process. As such, I would request that any further queries you have in relation to the process should be directed to Edinburgh Airport as the owners of the process. The best point of contact for this is [REDACTED]. Any further correspondence to Progressive will be forwarded to [REDACTED].

We assure you that we have a thorough and robust process in place to meet the engagement requirements of CAP1616, regularly reported to CAA and assured independently by the Consultation Institute. The aim of the second round of workshops is to test the understanding and interpretation of all of the information and insights we gathered during the initial round of workshops of stakeholders, and focus groups drawn from the general public.

In compiling the invitation lists for the workshops we ensured there will be broad and varied representation of different stakeholder perspectives. At this stage we are not seeking to discover the views of individual communities; there will be ample opportunity for that in Stage 3, i.e. the public Consultation. Rather, we want to ensure the different types of stakeholder are represented, geographically and sectorally, including currently overflowed, and not-overflowed areas.

Merv from EANAB has accepted the invitation to attend, so EANAB views will be represented.

We cannot release the invitee list to the workshops as this would breach GDPR. In addition, we are not prepared to release information (including redacted transcripts) relating to our implementation of CAP 1616, to some stakeholders before others, or mid-way during a CAP 1616 Stage; this would not meet best practice advice (lest it privilege certain groupings and enable influence to be exercised); this advice comes both from TCI and from the CAA.

In due course however, our commitment to transparency will be demonstrated through full publication of all appropriate data.

Regards

[REDACTED]

**Email from the Vice-Chair of the Community Council regarding the Stage 1B process – 7 November 2019**

**From:** [REDACTED]  
**Date:** 7 November 2019 at 08:32:32 GMT  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Fwd: Edinburgh Airport Airspace Change Programme

**WARNING:** This email did not originate within Edinburgh Airport. Please do not click on links or open attachments unless you're confident the email is legitimate. All suspicious emails should be reported.

Dear [REDACTED]

Although Dalgety Bay and Hillend Community Council are not able to attend the second round of Design Principle workshops (only one of our original attendees was invited back and we were told we could not nominate a substitute), we have been made aware of the Proposed Design Principles (PDPs) and wish to make the following comments which we trust can be taken into account in the "sanity check" exercise which is shortly to take place.

You have stated that you are not seeking the views of individual communities at Stage 1b however it is obvious that communities within a certain height band (of overflying aircraft altitude) will be affected in different ways, and are governed by different policy criteria than other height bands. Impacts could therefore vary very significantly by specific location. Furthermore, finalisation of design principles is a crucial stage which governs the options appraisal stage and it is not clear to us whether any communities in this affected height band are to be present at the workshops (despite us having requested this information), or that any of the other community organisations which will be attending are aware of relevant Government policy in relation to airspace change.

Our comments on the PDPs are as follows:

- Almost all the health and noise PDPs have a caveat i.e. include the phrase 'where possible', whereas most of the others don't (such as track miles and fuel burn). **We ask that these caveats are removed, or caveats added into the others as well, so that the environmental and health protection PDPs are less likely to be compromised.**

- PDP6 does not appear to be in line with the Air Navigation Guidance 2017 (ANG 17) as the emphasis is on CO2 minimisation - although this seems to be an emissions-related PDP it is misleading in relation to the balance between CO2 emissions and noise at this height. None of the PDPs reflect the fact that, as per the ANG 17, the environmental priority should be minimising the impact of aviation noise between 4-7,000ft, with CO2 being taken into account if the effects are disproportionate. **We therefore ask that PDP6 is reworded to read:**

**Flight paths should be designed to minimise CO2 emissions above an altitude of 7000ft. The priority between 4000ft and 7000ft is to design flight paths to minimise aviation noise unless this would disproportionately increase CO2 emissions.**

- PDP11 also does not appear to be in line with ANG 17 (assuming the main reason to minimise noise is to minimise health impacts). If the population overflown between 4-7,000 feet is not minimised, is it highly unlikely to meet the requirement of the ANG 17 to prioritise minimisation of noise at this height. **We ask that PDP11 is reworded to read:**

**Flight paths should be designed to minimise population overflown below 4000ft and to minimise aviation noise between 4000ft and 7000ft, taking into account any potential adverse impact due to those overflown having protected characteristics as defined by the Equalities Act 2010.**

We also wish to ensure that specific mention of 'protected characteristics' as per the Equalities Act 2010 doesn't preclude protection for everyone.

- PDP12 does not take into account noise sensitive buildings as per the ANG 17. The ANG 17 states:

"The CAA should also, where practicable, take into account the desirability of minimising noise impacts for noise sensitive buildings of which the CAA is aware, such as hospitals, schools and places of religious worship" (paragraph 3.37).

We wish to ensure that the schools in the Dalgety Bay area (with around 2,500 pupils) are protected by this design principle and at the moment it is not clear what is meant by "sensitive locations" and "noise sensitive receptors" in PDP12. **We ask that PDP12 is reworded to read:**

**Flight paths should be designed to minimise overflying sensitive locations, noise sensitive receptors and noise sensitive buildings (including schools).**

We recognise that these design principles have been selected by EAL for their own ACP however there seems little merit in finalising design principles which may lead to development of proposed flight paths which ultimately do not comply with the Government policy which the CAA must take into account in airspace change decisions. We therefore ask that the changes are outlined above are made to the PDPs.

Yours sincerely



Vice-Chair  
Dalgety Bay and Hillend Community Council

\*\*\*\*\*

## Email to the Vice-Chair of the Community Council 7 November 2019

From: [REDACTED]  
Sent: 07 November 2019 15:36  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: Edinburgh Airport Airspace Change Programme

Hello

Thank you for your very useful email and I'll answer the points you raise in turn.

First, however, I do have to note that your comments are based on an incomplete document and not one that originated from Edinburgh Airport.

I'm certain that if you'd seen our actual Design Principle list that was debated at the recall workshop, you would be reassured that the issues raised in your letter have already been considered and are incorporated in our design principles.

Maybe it is worth at this point laying out our approach to the recall workshop. The aim of the second round of workshops is to test our understanding and interpretation of all of the information and insights we gathered during the initial round of workshops of stakeholders and focus groups drawn from the general public. As you say – it was important to reflect samples from the many different communities (currently overflowed, overflowed within a wider range, and not currently overflowed) and we were glad Dalgety Bay CC could communicate its views at that stage.

In compiling the invitation lists for the workshops we ensured there will be broad and varied representation of different stakeholder perspectives. The recall workshop was designed to test our thinking – had we understood what all of the different groups were telling us? Had we struck the correct balances between competing positions?

That's why it was important that we had people who had participated in the first sessions scrutinising our thinking. This part isn't meant to discover the views of individual communities; there will be ample opportunity for that in Stage 3, i.e. the Public Consultation. Rather, we want to ensure the different types of stakeholder are represented, geographically and sectorally, including currently overflowed, and not-overflowed areas.

Fife communities and overflowed residents played a role in that group. I can understand that you might want to scrutinise those that attended. We will not be releasing the list of names of individuals or organisations involved in the Stage 1B process until the process is finished, but I can confirm that 28% of attendees were from Fife.

When we do, it will be made public as part of a full methodological statement in the CAA submission. This not only protects the individuals and organisations involved, but the integrity of the process.

We're committed to being as open and transparent as possible as we move through the CAP1616 process and I believe that this approach does that in a way that is fair to all.

It's also important I think to see this as a long process of discussion. Clearly, as I mentioned earlier, the consultation in Stage 3 of the CAP1616 process will be the opportunity for individual communities to put forward their views. We'll be engaging throughout Stage 2 and prior to Stage 3 so there will be many opportunities for communities to give us your feedback on options etc. as we progress; we have to convince the CAA our Regulator at each Gateway to let us proceed.

Your contribution is valued and considered.

Turning to the main points you make below.

One key point you raise is the relevant legal framework in which we are operating – CAP1616 which includes key legislation we need to meet including Air Navigation Guidance 2017 (ANG 2017) and the Climate Change Act 2008. These are linked because under the ANG 2017, our regulator, the CAA, has a duty to continue to remain informed of the government's policies and objectives on climate change. Specifically, the ANG 2017 also sets out the government's environmental objectives with respect to air navigation:

- a. limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise;
- b. ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions; and
- c. minimise local air quality emissions and in particular ensure that the UK complies with its international obligations on air quality.

We are very clear that we as ACP sponsors must take into account the above objectives when making airspace change proposals as they are key decision making factors for the CAA.

In terms of other criteria, we understand our responsibilities under equality law and have consultants in this area assessing our approach at every stage to ensure compliance with the Public Sector Equality Duty. At our design principle meeting there was a good discussion on this point and other design principles regarding adverse impacts of noise and it had been noted that some people had extra needs in this area and this needed to be reflected.

It remains an important principle that the DPs shall not pre-determine any options by which any community may be impacted – they are principles that guide us at the options stage.

We're confident that any design principles we take forward to the CAA will comply with government policy.

Thanks again for your constructive input.

Regards

[REDACTED]

**Email from the Vice-Chair of the Community Council regarding the Stage 1B process – 8 November 2019**

**From:** [REDACTED]  
**Sent:** 08 November 2019 11:56  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Fwd: Edinburgh Airport Airspace Change Programme

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Dear [REDACTED]

Thank you for your response and in particular your clarification that this was an incomplete document to which we responded. Unfortunately, this was the only option open to our Community Council in responding, having been denied the opportunity to send a replacement to the recall workshop, and with only one of our original invitees having been afforded the chance to participate. It is unfortunate only a select number were given the opportunity to fully participate at the recall stage, when others clearly continue to have useful points to make. We continue to believe that finalisation of the Design Principles (DP) stage is crucial in that it will 'set the scene' for future options development and appraisal, and once this stage is passed communities will presumably not have a chance to question or make changes to the DPs. Dalgety Bay is one of the largest communities currently, and potentially, affected by aircraft noise from Edinburgh Airport in the 4-7,000 feet bracket. We remain extremely concerned about Edinburgh Airport Limited's desire for an early turn (as set out at Stage 1a) and the potential for greater numbers of aircraft to be concentrated through the heart of our community, including over several large schools (see attached 'position paper' which the Community Council has produced and which has the support of our elected members and Local Authority). As you will see, we are also extremely concerned about the potential for significant cumulative impacts from several different routes crossing in the vicinity of our town. As previously stated, impacts could vary significantly by particular geographic location.

Thank you for confirming that the issues we have highlighted have been considered and incorporated in the DPs, however we have not had sight of the final list so cannot be entirely reassured. For the avoidance of doubt, it is the 'altitude-based priorities' as set out in the ANG 17 which we believe were not reflected correctly in the draft list which we were originally made aware of, with none of the DPs reflecting clearly that the environmental priority between 4-7,000 feet is minimising the impact of aviation noise as per the ANG.

Yours sincerely,

[REDACTED]  
Vice-Chair  
Dalgety Bay & Hillend Community Council

Attachment to the email of 8 November 2019

## Dalgety Bay & Hillend Community Council – Edinburgh Airport Flight Paths Position Paper

### Summary:

The factors set out below mean that concentrating new flight paths over, or close to, a town of over 10,000 residents such as Dalgety Bay is not a long-term sustainable option and should not be considered in any ACP. Flights should avoid densely populated areas until at least 7,000 feet where there are clear alternatives, such as using the Firth of Forth.

- The number of flights over Dalgety Bay<sup>1</sup> have increased hugely since the current flight (GOSAM 1-D, previously Dean Cross) path's inception and are set to increase further in coming years<sup>2</sup>
- The population of Dalgety Bay has increased enormously since the inception of the current flight path
- Insufficient account has been taken of the cumulative impact of concentrating several different routes over the Dalgety Bay area, resulting in aircraft noise all year round
- Dalgety Bay is the largest town along this section of the Fife coast and many alternatives which could vastly reduce the number of people overflown have not been considered
- Knowledge and understanding of the negative health and environmental impacts of aircraft noise and emissions has increased greatly. There are no advantages for communities living under flight paths

### Why is it important to get the location of new flight paths right?

Noise, and other pollutants, from aircraft can have many negative effects on communities under flight paths including those on health, educational development and environmental quality. The World Health Organisation (WHO) have highlighted the physical and mental health conditions linked to exposure to aircraft noise<sup>3</sup>.

### Existing flight path over Dalgety Bay and Hillend

There has been a flight path over Dalgety Bay and Hillend since the 1970s. However, the volume of air traffic has increased vastly since then and is predicted to increase further in coming years. In addition, the population of Dalgety Bay has also increased greatly since the 1970s (the population was around 6,000 in 1980 and is currently over 10,000). Noise levels monitored by a resident using a Class 2 monitor and data show that aircraft noise levels from existing flight paths vary from 50-80dB against a background noise level of around 40-45dB, which means most flights are extremely disturbing, particularly in the early morning and late evening.

### What does Government legislation and guidance say about new flight paths?

Airspace Change is a reserved matter and is dealt with by the UK Government. The Department for Transport's 'Air Navigation Guidance 2017'<sup>4</sup> sets out 'altitude-based priorities' which advise the Civil Aviation Authority (CAA) when making decisions on new flight paths. These state that:

"...in the airspace at or above 4,000 feet to below 7,000 feet, the environmental priority should continue to be minimising the impact of aviation noise in a manner consistent with the government's overall policy on aviation noise, unless the CAA is satisfied that the evidence presented by the sponsor demonstrates

<sup>1</sup> The majority of references to 'Dalgety Bay' are also relevant to the village of Hillend

<sup>2</sup> <https://www.caa.co.uk/Data-and-analysis/UK-aviation-market/Airports/Datasets/UK-Airport-data/Airport-and-airline-combined-1973---1982/>

<sup>3</sup> [http://www.euro.who.int/\\_\\_data/assets/pdf\\_file/0008/383921/noise-guidelines-eng.pdf](http://www.euro.who.int/__data/assets/pdf_file/0008/383921/noise-guidelines-eng.pdf)

<sup>4</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/653978/air-navigation-guidance-2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/653978/air-navigation-guidance-2017.pdf)



this would disproportionately increase CO<sub>2</sub> emissions". It is clear therefore that airports should be seeking to minimise the impact of aviation noise in the first instance. Flights over Dalgety Bay and Hillend are currently between 4-7,000 feet although some can be lower.

#### What needs to be taken into account? Noise Sensitive Buildings

There are four schools, three primaries and one secondary, within the proposed swathe of the former E7a flight path, proposed as part of Edinburgh Airport Limited's (EAL) 2018 Airspace Change Programme (ACP) application (see Figure 1 below). In addition, there are 4 nurseries in the area of the swathe and this is the largest concentration of schools along this part of the Fife coast. The current number of pupils at the schools affected are:

- Inverkeithing High School = 1,181 (planning capacity 1,470)
- Inverkeithing Primary School = 353
- Donibristle Primary School = 451
- Dalgety Bay Primary School = 322

This gives a total of 2,307 pupils (increasing to over 2,500 with planned changes to IHS catchments). It appeared not all of these schools were shown in EAL's application to the CAA in August 2018<sup>5</sup>.

There are also two doctors' surgeries, a care home, sheltered housing, several churches, two libraries and several leisure facilities, all within the swathe of the former route E7a.

The Airspace Navigation Guidance 2017 requires noise minimisation for noise sensitive buildings to be taken into account. Route E7a actually maximised the number of noise sensitive buildings overflown in Fife under 7,000 feet. Under the last ACP over 2,500 pupils would have been needlessly exposed to significant levels of aircraft noise every single day of their school career.



Figure 1 - Schools within the swathe of former flight path E7a (Base map from EAL Consultation 2)

<sup>5</sup>

[https://www.caa.co.uk/uploadedFiles/CAA/Content/Standard\\_Content/Commercial\\_industry/Airspace/Airspace\\_change/EDI-ACP-Issue-2\\_1\(redacted\).pdf](https://www.caa.co.uk/uploadedFiles/CAA/Content/Standard_Content/Commercial_industry/Airspace/Airspace_change/EDI-ACP-Issue-2_1(redacted).pdf)

What needs to be taken into account? Cumulative impact

It was previously stated that the proposed route D from the previous ACP would have no impact on Dalgety Bay. However, the centreline of the proposed route D was only around 1 mile from the town and any deviation off the centreline would have seen aircraft directly over the town. It was also stated that flights would be 7-8,000 feet whilst ‘passing’ Dalgety Bay, however this was based on an assumption that aircraft would be at 2,000 feet around the Newbridge Roundabout during take-off and, in fact, any aircraft climbing slower than average would result in flight heights far lower than 7,000 feet at Dalgety Bay. Figure 2 below shows that under the last ACP three routes, D, E and F, were to be concentrated over one small area, leading to high levels of aircraft noise no matter whether the wind direction was east or west. It was decided to pursue routes with the tightest possible turns over the Dalgety Bay area from either direction. The Forth is too narrow at this point to provide sufficient distance from centres of population to protect them from the negative impacts of aircraft noise and the wider part of the Estuary should be used.

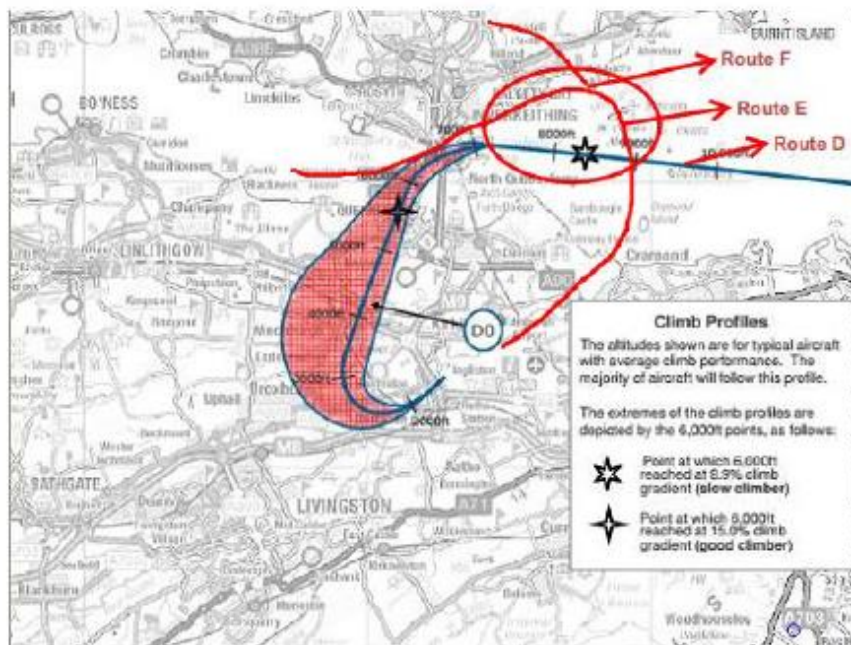


Figure 2 – Three routes concentrated in the vicinity of Dalgety Bay (Base map from EAL consultation 2)

What needs to be taken into account? Alternatives

As can be seen from the options map below (Figure 3), the options of flying further east up the Forth (until at least 7,000 feet) before turning back west or using far less densely populated areas (as shown white on the map), were not considered as part of the last ACP. Routing E7a over Dalgety Bay and surrounds did not in any way minimise the population overflown, and it would be difficult to fly over a more densely populated area at this height, other than a sharp right turn flying over Edinburgh. It is not the case that, as there is an existing route, the impact of any new route(s) is not significant. As traffic numbers are set to grow greatly, Dalgety Bay is far larger than it was in the 1970s, there are cumulative effects of various routes and there are many alternative options, flying over Dalgety Bay cannot be considered the most sustainable long-term option and should not be considered an option in any ACP. Impacts on areas of high population density under 7,000 feet should be avoided, particularly where an

airport has clear alternatives such as using the Forth to the east. There are no advantages to being overflown and it is considered EAL's proposals did not provide a 'balance' for communities, with less than an 8-hour break from flights (from the east) over night and being overflown year-round, despite the town not being located at either end of the runway.

Whilst any route(s) using the Forth to avoid Dalgety Bay may result in slightly increased CO<sub>2</sub>, this would be minimal in comparison to that generated by the increasing number of new flights, and technological advances and operating procedures would likely be able to compensate for much of this<sup>6</sup>. Route H, which was proposed as part of the ACP, was to fly right around the east of Edinburgh, generating much greater additional mileage than avoiding Dalgety Bay would. For the most part, flights using routes D and E would be travelling south, so to have aircraft travelling north over Fife does not reduce track mileage in any case. It is clear that minimising noise is a key consideration in current policy, and it would be extremely difficult to justify flying through the most densely populated area along the Fife coast under 7,000 feet when clear alternatives are available.

At a more strategic level, Kinghorn Community Council have put forward two papers<sup>7</sup> regarding making more use of the wider parts of the Forth and areas of the North Sea to take air traffic away from land. Dalgety Bay and Hillend Community Council have supported these proposals (along with several other Community Councils and the Edinburgh Airport Noise Advisory Board).

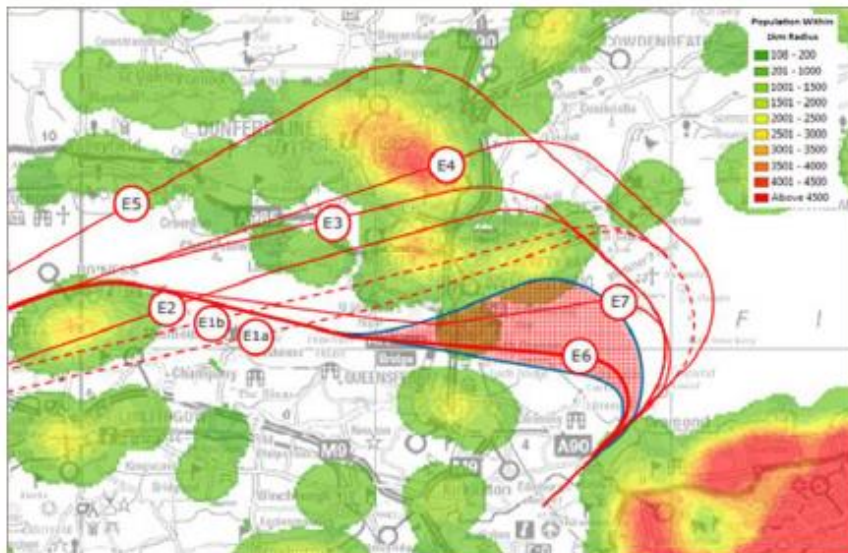


Figure 3 - Alternatives considered by EAL during their ACP (Source EAL consultation 2)

April 2019

<sup>6</sup> <https://www.gov.uk/government/consultations/aviation-2050-the-future-of-uk-aviation>

<sup>7</sup> 'Airspace Change Proposals - Edinburgh Airport, Early Approval Requested for Route G5 Trial' 7/11/18 & 'New East Coast Air Corridor & Forth Hold Area for Planes Flying to/from Edinburgh Airport' 7/11/18 both Royal Burgh of Kinghorn Community Council

## Email to the Vice-Chair of the Community Council – 12 November 2019

To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: Edinburgh Airport Airspace Change Programme

Dear [REDACTED]

Thank you for your continued engagement with our Airspace Change Programme. I note your concerns regarding the absence of Dalgety Bay in design principle recall workshops and want again to reiterate the process was to recall a representative group of initial participants - not all participants from the initial workshops.

The CAA asks us to ensure that we have a strong evidence base for any decisions we make, and our methodology for the participants in the workshops also has to be strong. The recall workshops are an extremely important part of our process in this Airspace Change Programme.

I wanted to reassure you that these sessions weren't to discuss individual community needs but to determine criteria that could be applied to any community. I can let you know that 28% of the respondents were from Fife and fell into the category you describe Dalgety Bay – currently overflowed and could be in the future. As I said previously, we're pleased that Dalgety Bay could contribute in the initial sessions.

I would like to again confirm the process for Stage 1 is to engage with stakeholders to determine criteria, not identify solutions. Talking early turns or positions routes at this stage is pre-determining the outcome of a optioneering and a public consultation. No decisions have been made on any options.

I wanted to let you know what's next in our process. After we receive the outputs report from our market research agency who have been hosting the workshops and recall workshops, Edinburgh Airport will finalise these design principles and submit them with an application to the CAA to pass CAP1616's Stage 1: Define. It is at this stage that the design principles will be made public as part of that submission.

Thank you for your continued input.

Regards

[REDACTED]

## Communications with Edinburgh Airport Watch (EAW)

### Email to the EAW representative – 14 November 2019

**From:** [REDACTED]

**Sent:** 14 November 2019 20:46

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Letter regarding event on 13th November

Hello [REDACTED]

Please see the attached letter regarding the recall workshop on 13<sup>th</sup> November.

Regards, [REDACTED]

[REDACTED]



Edge | Empower | Expertise | Energy | Execute | External focus

Attachment to the email of 14 November 2019



Edinburgh Airport Limited  
Edinburgh  
EH12 9DN  
[communications@edinburghairport.com](mailto:communications@edinburghairport.com)

14 November 2019

[Redacted]

Dear [Redacted]

I am writing to you regarding the issue I spoke to you about at 5.15pm on 13th November regarding our concern that you covertly recorded the workshop run as part of Edinburgh Airport's Airspace Change Programme (ACP) engagement.

You were invited and attended the workshop on Wednesday as a representative of Edinburgh Airport Watch. The workshop was held at the Intercontinental Hotel, George Street, Edinburgh and started at 2pm. I note that you didn't arrive until 2.18pm.

This meeting was hosted by our appointed third-party consultant Progressive Partnership, led by [Redacted] and was the second workshop you'd attended as part of this stage of the ACP.

This meeting was also attended by seven other participants, plus four expert consultants of Edinburgh Airport (environmental, consultation, technical and equality), plus [Redacted] and myself from Edinburgh Airport.

After the meeting concluded, one of our consultants advised me that they believed you may have recorded the session on your phone. I spoke to [Redacted] to ask if you'd been given permission to do this, and she advised you hadn't. Both [Redacted] and I approached you regarding this.

I said that someone may have witnessed you recording the session to which you didn't respond. I then asked you outright if you had recorded this session to which you replied: "No comment".

Sarah then proceeded to let you know that we believed you were recording the session without the permission of those in the session, and without advising them beforehand of this, or the reasons for doing so, or for what any recording may be used; and that she believed this was in breach of "GDPR" regulations.

Today I have raised this with our Data Protection Officer and our Legal Director. Their advice is that covertly recording meetings is subject to privacy rights and regulations such as the Data Protection Act 2018, and it is the responsibility of those who undertake a recording and any reporting to ensure compliance.

I want to let you know we take full adherence to data privacy legislation and our ACP process very seriously. Progressive had fully informed people attending this workshop (and other sessions) that they would be recorded, including what would be done with the recording and subsequent transcripts. We are clear that no such permission had been sought by you and that the participants of the meeting would have been completely unaware if you were recording it and would not be aware of what you may do with such a recording.

.../2

-2-

I ask that you please delete any recording and confirm this in writing, or confirm in writing that no such recording was made. If a recording was made, please also confirm in writing that it has not been shared, or if it has, with whom.

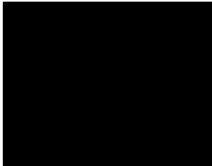
Depending on your response (or any lack of a response) we will have to consider the following as part of our responsibilities:

- advising the other participants in this workshop that this did or may have happened, and providing them with a redacted copy of this letter and any response
- reviewing your and Edinburgh Airport Watch's participation in any further engagement in this process
- contacting Edinburgh Airport Noise Advisory Board to inform it of this issue
- including this correspondence in our summary as part of the Stage 1 submission to the CAA.

We find this behaviour disappointing (both the possibility of a covert recording and your evasive response when questioned), particularly considering comments you made throughout the workshop regarding trust and transparency.

I hope that we can reach a satisfactory conclusion that will allow us to continue working with you in this area and I look forward to your response.

Yours sincerely



**Email from the EAW representative – 17 November 2019**

**From:** [REDACTED]  
**Sent:** 17 November 2019 12:49  
**To:** [REDACTED]  
**Subject:** Re: Letter regarding event on 13th November

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Your email is acknowledged and will be responded to in due course.  
[REDACTED]

**Email to the EAW representative – 20 November 2019**

**From:** [REDACTED]  
**Sent:** 20 November 2019 14:41  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Letter regarding event on 13th November

Thank you [REDACTED]  
As you know, we are taking this potential breach very seriously.  
Can you please confirm if you did or didn't record the recall workshop last week?  
If we don't hear from you by 12 noon Friday, we will need to begin our actions and advise the recall workshop attendees of this matter.  
Regards, [REDACTED]

**Email from the EAW representative – 22 November 2019**

**From:** [REDACTED]  
**Sent:** 22 November 2019 11:30  
**To:** [REDACTED]  
**Subject:** Re: Letter regarding event on 13th November

**WARNING:** This email did not originate within Edinburgh Airport. Please do not click on links or open attachments unless you're confident the email is legitimate. All suspicious emails should be reported.

Dear [REDACTED]  
Please find attached my response to your letter of 14th November 2019.  
Regards  
[REDACTED]



Attachment to the email of 22 November

22nd November 2019

Dear [REDACTED]

I refer to your letter to me of 14<sup>th</sup> November. With regret, I feel I must tell you that I find the tone of both your letter and your confrontation of me after the meeting on 13th November to be both threatening and intimidating. I further note your subsequent email of 20<sup>th</sup> November giving me a deadline to respond to matters of 12 noon on 22<sup>nd</sup> November.

1. I did make an audio recording of the meeting using my phone, for my own personal records only and to ensure accuracy in my record keeping. I have since deleted the audio recording. Usually I would advise a meeting at the start of any intention to record, however, as you rightly point out, I arrived slightly late, having rushed from a previous appointment and, rather flustered, unfortunately forgot to seek clear permission on this occasion, for which I offer an apology.
2. I had noted that a condition of attending the meeting was an explicit agreement from participants that the meeting would be audio recorded and a transcript made of it and sent to the CAA. It is therefore clear that everyone attending already had an expectation of their comments being audio recorded for onward transmission to a third party.
3. Your recall of events during your confrontation of me at the end of the meeting of 13<sup>th</sup> November is not entirely accurate. There were three rather tall people ranged around me, one of whom I did not know, firing questions as I was putting my coat on to leave. I found this to be most intimidating and physically threatening.

You do not reference in your letter my request at that point for the transcripts from the initial meeting of 26<sup>th</sup> September. Your response to me was that "*we are not going to publish the transcripts*". This directly contradicts the undertaking made by [REDACTED] of Progressive Partnership at the first Design Principles meeting I attended of 26<sup>th</sup> September. In response to a participant asking for a copy of the transcript to "*ensure accuracy before it was sent to the CAA*", [REDACTED] asked the meeting for their agreement, which was readily given, and then agreed that a written transcript of the audio recording of that meeting of 26<sup>th</sup> September would be shared with participants, and the document would be available within around 10 days. No such transcript has been received.

I note that the Design Principles workshops, as with the entirety of the ACP, is governed by the CAA regulation CAP1616. The requirements of CAP1616 seem clear and I have copied and pasted below the relevant sections directly from the document CAP1616E2 on the CAA website (with my emphasis in bold):

CAP1616E2 page22:

Transparency

66. A prime objective of the airspace change process is that it is as transparent as possible throughout. Those potentially affected by a change in airspace design should feel confident that their voice has a formal place in the process, if trust is not to be eroded. Openness also allows change sponsors to see more clearly what is expected from them.

67. The default position is therefore that all required documents in relation to a proposal are published, including documents from and notes of meetings, and the CAA monitors that this is happening.

We [ie the CAA] will consider withholding material:

- for reasons of national security
- which the CAA has agreed with the change sponsor should not be made public, in order to protect the legitimate commercial interests of a person or business (in the same way that we are obliged to apply the Freedom of Information Act to any information held by the CAA)
- containing personal information, in accordance with data protection law.

68. However, we [ie the CAA] do not anticipate agreeing to withhold large amounts of information and would only accept redaction of the minimum information necessary to comply with our [ie the CAA's] obligations.

#### Appendix C

##### DEFINE gateway

At the 'Define' gateway, for all changes the CAA will require evidence from the change sponsor that demonstrates that design principles were arrived at following two-way conversations. This must set out what engagement activity was undertaken (i), and what has happened as a result of that activity (ii).

- (i) This will normally include records and minutes of workshops and meetings, with identification of those present and the context and nature of the discussion, and it must cover the range of stakeholders who may be impacted by the potential change. As stakeholders will often require information to aid their understanding of airspace design so as to play a part in development, evidence of how sponsors achieved this should be provided.
- (ii) Sponsors must make clear where stakeholders have agreed the principles applied (and which have not if universal agreement is not achieved). Where design principles have not been agreed, objections must be clearly set out and attributed to relevant parties, as well as a clear rationale for the change sponsor's decision in light of this feedback.

Having attended two meetings to discuss Design Principles on 26<sup>th</sup> September and 13<sup>th</sup> November, and noted that all participants were advised that a condition of attending was that a transcript of the audio recording made of the meeting would be sent to the CAA, I am struggling to understand what information contained in either meeting could possibly be reasonably withheld in the context of CAP1616 regulations.

I would therefore request that a copy of the relevant transcripts is provided to all meeting participants without further delay.

4. In relation to CAP1616, I have a number of concerns about how the Design Principles process was conducted *inter alia*:
  - Meetings scheduled being cancelled at less than 24 hours notice

- Sequence of meetings being altered so that the Aviation Stakeholder's second meeting took place last on 13<sup>th</sup> November, allowing that meeting to discuss and alter the output from previous meetings, without the benefit of hearing the original discussions of other stakeholders, or previous stakeholders being aware their comments are being discussed in this way
- The meeting of 13<sup>th</sup> November (Aviation Stakeholders) going ahead with only 7 participants, almost outnumbered by the consultants and EAL staff in the room, with some of the participants not having attended the previous meeting
- Lack of clarity on how participants for meetings were selected, which may have allowed the sponsor to weight participation towards those with views more likely to be supportive of the airport
- Reports that some participants who were invited but could not attend were not allowed to nominate an alternate from their organisation in their place, leaving some stakeholder groups unrepresented at the meetings
- Material being presented for the first time at the meetings, without any opportunity for review, reflection or discussion with colleagues
- Lack of time allowed during meetings for full discussion of issues arising
- Powerpoint slide presentations not being shared with participants other than briefly during the meeting itself
- Binary choices being offered to participants to define preferences which failed to properly take account of nuanced factors
- Lack of clarity on how feedback from different stakeholders would be weighted, which could lead to feedback favourable to the sponsor being given undue precedence over other feedback
- Dissenting views being dismissed as simply "anti-airport", which is not conducive to a consultation process that should properly be impartial
- Reasonable comments and questions relating to the Statement of Need being shut down, with a refusal to engage with requests for evidence in support of the Airport's key objective of growth.
- Compliance with National Policy appears to have been an afterthought, rather than "baked in" to the process from the beginning, with one consultant noting he had read the ANG2017 guidance the night before the meeting in response to feedback from a previous stakeholder meeting citing ANG2017
- The position of the Edinburgh Airport Noise Advisory Board (EANAB) in relation to Noise Monitoring appears to have been misrepresented at one meeting
- While I did not attend either meeting in my capacity as a member of EANAB, nevertheless, as a member of the EANAB, I would also note the apparent difficulty the Board has had in ensuring that members could be properly represented during the Design Principles stage. At the EANAB meeting on 21<sup>st</sup> August, you advised that it would not be possible for all members of the Board to attend meetings, mentioning a limit on the number of members who could attend. I further note that a special additional initial Design Principles workshop meeting had to be arranged at short notice to accommodate Board members' desire for involvement. Prior to then we were collectively given a binary choice of either an "advisory" or "participatory" role in the process. The approach to Noise Board member's involvement seems curiously at odds with paragraph 164 of CAP1616:

164. Where stakeholders include specific communities, the change sponsor must prepare a strategy as to whether or not any properties need to be contacted individually, or set out other reasonable methods of reaching communities (such as through local media, social media, local authority communications, or advertising). The change sponsor must use Appendix C to consider which other organisations, groups or communities should be consulted. For example, where a change may impact on General Aviation's access to airspace, the change sponsor may need to communicate directly with local flying clubs and schools, as well as with the national bodies representing these types of activity. An airport may find it useful to use the airport consultative committee, or its local noise management body, as one initial basis for a focus group.

While I did not attend the meetings as an EANAB representative, you make reference to the EANAB in your letter and as such I will be sharing both your letter to me and this response with the EANAB. Given the concerns I have noted regarding compliance with CAP1616, I also intend to send this correspondence to the CAA for their consideration.

Regards  


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