

Edinburgh Airport: Airspace Change Proposal

ACP-2019-32

Remobilisation and Engagement

Appendix U

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1. Introduction

In July 2019 Edinburgh Airport commenced an Airspace Change Programme using the guidance set out in CAP 1616 (Now the Fourth Edition). This guidance was followed to enable a submission for the approval gateway for Stage 1: Define at year end 2019. This submission was sent back for review and clarification at the end of January 2020 after the CAA gateway meeting. Subsequently the submission was amended and resubmitted to the CAA at the end of March 2020 just as the Covid pandemic had forced a lockdown throughout the country. With the aviation industry badly affected by this lockdown and passenger numbers reduced to a very small percentage of the predicted amount Edinburgh Airport took action to rationalise its workforce and operations as every business did in these unforeseen circumstances. Instead of a period of growth the airport's business was reduced to having very little income against its fixed cost base. This resulted in the airport taking advantage of government financial assistance schemes such as furlough, and also an effect was to cancel or pause any project that was not essential to the ongoing operation of the airport even though aircraft movement numbers were reduced drastically.

One of these paused projects was the Airspace Change programme that was paused in mid-April 2020 after resubmission of our Stage 1: Define documentation but before the next CAA gateway meeting had taken place.

As the situation has improved recently with regard to lockdowns and the ability of people to travel then our Airspace Change Programme is now officially "In-Progress" as stated on the CAA Airspace Change Website Portal and this remobilisation process has been achieved with the assistance of the Airspace Change Organisation Group (ACOG).

2. Recommencing our Airspace Change (ACP-032-2019)

In October 2020 Safety and Airspace regulation Group (SARG) issued guidance for airspace sponsors currently progressing through the CAP1616 process on restarting an Airspace Change Proposal. This policy statement requires the sponsor to explain whether there have been changes to a number of contextual considerations including;

- any changes to the issue or opportunity in the Statement of Need, the operating environment or geographical area in which the ACP is being developed;
- changes to law, government policy or CAA requirements that would affect the development of an ACP, or parts of an ACP;
- changes to identified stakeholders.

Edinburgh Airport worked with ACOG on this restart guidance and submitted a restart guidance table to the CAA which has been accepted and contributed to the restart of Edinburgh's ACP.

This restart guidance document is included in this document at Annex A.

Airspace modernisation and the Masterplan

In May 2021 the CAA published updated guidance on Airspace modernisation which is available on the CAA's Airspace Modernisation website. This update describes how funding is available from the DfT for FASI airspace change sponsors to restart their airspace change proposals following the pause due to Covid and states;

" The [DfT recently announced](#) that funding will be made available to enable, FASI airspace change sponsors to restart their change proposals, following a pause due to Covid, through a grant administered by the CAA. As part of the government's commitment to supporting restart in the aviation sector and to

decarbonisation, this funding will enable change sponsors to continue developing their Stage 2 material for assessment by the CAA (in accordance with the airspace change process known as CAP1616). This is the vital next step in developing the masterplan.

The government funding announced will support the development of airspace change proposals within both the FASI-S and FASI-N programmes, and the masterplan commission has now been extended to cover a single UK masterplan. The masterplan should tell us whether there are interdependences between two or more change proposals and is intended to facilitate and evidence the coordination needed between change sponsors. We have decided the development of the masterplan should take this approach based on the advice provided in NERL's original feasibility assessment (2018), which advised that all change sponsors should proceed in a coordinated way, to ensure that any conflicts and interdependencies between changes proposals were understood, and consequently properly managed

Sponsors in both FASI-S and FASI-N are now expected to work in line with ACOG's iterative masterplan development timescales, unless ACOG justify, to the satisfaction of the co-sponsors, that delivery of a masterplan for the UK does not require the co-ordination of a particular sponsor or proposal."

This update means that Edinburgh Airport's ACP will be progressed in accordance with ACOG's masterplan timescales, and this masterplan is due to be published before the year end (2021).

Our design principle 6

Our design principle number 6 states:

"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 FASI North programme. "

This design principle describes being part of a masterplan without actually containing the word itself. This is because no masterplan existed when engagement took place to finalise the 16 design principles at the conclusion of the Stage 1 process. This situation has now changed with an update to the Airspace Modernisation Strategy published on the AMS part of the CAA website in May 2021.

After discussion with our account officer at the CAA design principle 6 has been amended to now read:

"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 and accords with the CAA's published Airspace Modernisation Strategy (CAP 1711) and any current or future plans associated with it"

Our design principles including the amended design principle 6 are included in this document at Appendix B.

3. Airspace Classification

An airspace classification review was published in April 2021. (CAP 2132). The work looking at volumes of controlled airspace and the classification of these volumes of airspace is ongoing. Edinburgh Airport has received consultation responses from this project and will add this as stakeholder feedback through the CAP1616 process.

Our proposed design principle 14 states:

"Requirements of airspace users should be taken into account when designing flight paths. "

This stakeholder feedback will be applied as we move through our options appraisal and airspace developments at lower altitudes, we must consider the need to safely integrate other airspace users within the airport vicinity, including General Aviation and drones.

4. CAA Policy on Minimum Standards for noise modelling

In January 2021 the CAA published CAP 2091 the “CAA Policy on Minimum Standards for Noise Modelling”. Edinburgh Airport complies with the policy and is a category C airport with the intention to scale up to a category B airport when resources allow. The Airport has full transparency with noise monitoring and the public have access to a noise lab where they can monitor and check aircraft noise levels and look at flight specific information, such as flight position and altitude, in almost real time using our own radar data. There is also the ability to analyse historical flights and data and read the Noise Action Plan

5. Restart Engagement

Throughout the paused period EAL have continued to engage with the Airport Consultative Committee (ACC) the Edinburgh Airport Noise Advisory Board (EANAB) and the Flight Operations Committee (FLOPSC). Where updates for the ACP and developments such as the approval of DfT funding have been appropriate these have been discussed as agenda items at these virtual meetings. EAL will build on these virtual relationships as the ACP progresses and during the first half of 2021 a review of EANAB and its effectiveness has been progressed so that we can work with them and their communities to continue with effective engagement throughout the Stage 2 of the ACP and beyond. Indeed, as we move out of the pandemic period and have access to funding we intend to increase engagement and widen the knowledge of EANAB members by selective participation in CAAi training courses such as Noise Modelling, Noise Management and Aviation and the Environment where appropriate.

Just as an informative email was sent to stakeholders informing them of the ACP pause in April 2020, a similar email was also sent informing them of the restart to the ACP in June 2021 and the need to amend one of our design principles to include the UK wide masterplan as detailed in the Airspace Modernisation Update of May 2021 and this email is detailed below:

“Hello

Edinburgh Airport is restarting ACP-2019-32 after approval to do so from the CAA. We will be resubmitting “Stage 1 : Design Principles” and have amended one of our design principles to align with the updated Airspace Modernisation Strategy available to read [here](#).

In effect our design principle 6 which read

“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 FASI North programme. “

Has been amended to read

“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 and accords with the CAA's published Airspace Modernisation Strategy (CAP 1711) and any current or future plans associated with it”

If you have any comments on this then please feed them back to

airspace_change@edinburghairport.com

by Monday 28th June. “

We had two comments about a tight timescale for reply however these have been answered and the email was about restarting the ACP and the implementation of a UK wide masterplan. It was intended to politely inform rather than cause debate on issues that are for compliance purposes, and as previously stated, the ACC, EANAB and FLOPSC have been kept up to date with the restart and any issues that have arisen from this.

6' Conclusion

This document is intended to inform stakeholders that the Edinburgh ACP-032-2019 has restarted at the point where it was paused in April 2020 because of the Covid pandemic. Included is information on the restart process and also the intention that Edinburgh Airport will move forward with it's ACP as part of a masterplan that is due to be written and published before the end of 2021. We look forward to engaging with interested parties throughout the duration of the project and will look to implement the best solution possible for the modernisation of Edinburgh's airspace. The timescale for this implementation is dependent on a number of factors, not least of which is public consultation and CAA Approval but we intend to make the best of the opportunity that has arisen. Airspace Modernisation is intended to improve on the current situation through environmental and operational efficiencies.

If there are any questions about our restart or any issues you wish to discuss about airspace change, please contact us at:

airspace-change@edinburghairport.com

Annex A Restart Guidance Table – Edinburgh

CAP1616 ACP Restart: Sponsor Evidence & Justification for Restart of a Paused ACP

Sponsor: Edinburgh Airport

ACP ID: ACP-2019-32

ACP Title: Edinburgh Airport Airspace Change Programme

Link to CAA Policy Statement: [Guidance for Sponsors](#)

Introduction and background

Given the impacts of the COVID-19 pandemic on the aviation sector and the uncertainty regarding the length of any recovery period, Edinburgh airport thought it was prudent to pause this Airspace Change Proposal (ACP). This ACP was paused in April 2020.

Following the announcement in March of this year, from The DfT and CAA of Government financial support for the FASI programme (see statements below), Edinburgh Airport requests to restart this ACP in April 2021.

DfT and CAA stated, “We are pleased to announce that we will be providing funding to enable FASI airspace change sponsors through a grant administrated by the CAA. This will enable sponsors to continue through Stage 2 of the airspace change process (ACP) known as CAP1616 as part of the government’s commitment to supporting restart in the aviation sector and decarbonisation”.

“The investment has been made available to airports involved in the Airspace Modernisation Strategy to ensure this vital project remains on track, reflecting the government’s commitment to modernising the airways while supporting the aviation sector as we recover from the pandemic”.

Sponsors ACP restart proposal

Q1) Have there been any changes to the issue or opportunity in the Statement of Need, the operating environment or geographical area in which the ACP is being developed?		
1A) Changes to the issue or opportunity in the Statement of Need	No	<p>Confirmation statement</p> <p>Edinburgh Airport believes that there is no change to the issue or opportunity as described in the SoN.</p> <p>Shortly after departure Edinburgh airport’s current route designs create a ‘bottle neck’ which due to vortex separation requirements causes inefficiencies in the airspace and limits runway capacity.</p> <p>This proposal, to introduce RNAV 1 SIDs and Arrival Transitions and RNAV 5 STARs will take advantage of these procedures improved navigational capabilities to improve airspace and runway efficiency and capacity and to minimise environmental impacts in terms of people overflown and by cutting average CO2 emissions.</p> <p>These improvements will also serve to make Edinburgh Airport compliant with the existing European PBN-IR and it is assumed any subsequent UK interpretation of that regulation.</p>

		<p>The SoN also references increases in traffic demand and capacity and whilst the current pandemic has seen traffic levels decrease, the expectation is for them to return to pre-Covid levels and beyond. Therefore, these issues remain to be addressed if the airspace is to be fit for the future.</p> <p>We feel these aims remain current in 2021.</p>
1B) Changes to the operating environment or geographical area	No	<p>Confirmation statement</p> <p>There is no change to the operating environment as set out at the start of this process.</p> <p>Any impacts of proposed changes will remain at 7000ft or below and within the area initially indicated.</p> <p>Neighbouring ANSPs with whom we have committed to undertake a collaborative approach to airspace change are expected to remobilise in the same time frame as Edinburgh airport although changes at Edinburgh are not contingent on changes at any other airport.</p>

Q2) Have there been any changes to law, government policy or CAA requirements that would affect the development of an ACP or parts of an ACP?

2A) Changes to law or government policy	No	<p>Confirmation statement</p> <p>Edinburgh airport believes that there have not been any changes to the law or government policy which impact the proposed change.</p> <p>In October 2020 the CAA released an airspace modernisation policy statement which outlined the following: “...as of October 2020, we do not believe there are any policy changes in the last 12 months that by themselves would require an airspace change sponsor to revisit materials submitted as part of an airspace change”.</p> <p>There has been no further communication from the CAA to affect the validity of this statement.</p> <p>With respect to the European PBN-IR which was an original driver for airspace change, but which is no longer applicable to UK aviation, the airport believes that there is still a need to remain compliant with the potential future UK embodiment of this policy.</p>
2B) Changes to CAA requirements	No	<p>Confirmation statement</p> <p>Edinburgh Airport is not aware of any changes to CAA requirements since this proposal has been paused which would impact the restart of this ACP.</p> <p>The CAP1616 process has recently been up-issued (Version 4, revised 1st March 2021) and Edinburgh Airport do not believe this impacts on the work carried out to date in reaching the Define Gateway.</p> <p>In addition, CAP2091, Policy on Minimum Standard for Noise Modelling, published in January 2021, will have no impact. Edinburgh Airport is already equipped to Cat C noise monitoring equipment as detailed in CAP2091 and is progressing to Cat B when time and money allow. This is well above the minimum standard for an airport of Edinburgh’s size.</p>

	<p>The airport intends to continue working with ACOG in the development of further iterations of the Masterplan ensuring it meets the requirements of the CAA criteria for assessing and accepting the Airspace Change Masterplan when it is published.</p>
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Q3) Have there been any changes to the list of identified stakeholders?		
3A) Stakeholder changes	No	<p>Confirmation statement</p> <p>Edinburgh Airport have not identified any changes to external stakeholders that have been engaged on this ACP to date however a review will be conducted to determine if the stakeholder list requires updating considering changes in the aviation sector.</p> <p>It would be prudent to undertake re-engagement activities with stakeholders at the earliest opportunity, in preparation for the programme restarting and the airport expects this to include emails and workshops with community groups and local and industry stakeholders, including the Airport Consultative Committee.</p> <p>During the time that Edinburgh's ACP has been paused there has been regular engagement with NATS, ANS, AGS and the MoD regarding Airspace Change in the Edinburgh Airport vicinity (to the East of the Airport over the North Sea). Also, regular meetings have been held with the Airport Consultative Committee as well as EANAB (the Edinburgh Airport Noise Advisory Board). EANAB is currently undergoing a review process to look at its effectiveness in engagement with local communities and the focus of its work. The GA community have also been informed of Edinburgh Airport's plans to restart the ACP.</p>

Annex B Design Principles (Amended)

Category	Number	Design principle
Safety (core)	FDP1	The airspace design and its operation must be as safe or safer than it is today.
Safety (core)	FDP2	Flight paths must be flyable and technically supported by air traffic control and airport technical management systems.
Operational (core)	FDP3	Flight paths must be designed to allow modern aircraft to use performance-based navigation (PBN) in line with CAA's modernisation strategy
Operational (core)	FDP4	Routes to/from Glasgow and Edinburgh airports must be procedurally deconflicted from the ground to a preferred level in coordination with NATS Prestwick.
Operational (core)	FDP5	The predictability of flight tracks must be maximised for consistency of operations.
Operational (core)	FDP6	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 and accords with the CAA's published Airspace Modernisation Strategy (CAP 1711) and any current or future plans associated with it.
Health and wellbeing	FDP7	Flight paths should be designed to minimise the total adverse effect on health and quality of life created by aircraft noise and emissions.
Health and wellbeing	FDP8	For flightpaths at or above 4,000ft to below 7,000ft, 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 this would disproportionately increase CO ₂ emissions.
Health and wellbeing	FDP9	Flight paths should be designed to minimise population overflown below 4,000ft and, between 4,000ft and 7,000ft, taking into account any potential adverse impact, due to those overflown having protected characteristics, as defined by the Equalities Act 2010.
Health and wellbeing	FDP10	Flight paths should be designed to minimise overflying sensitive locations and noise-sensitive receptors (for example, the zoo, retirement complexes, green spaces, historic heritage sites, and others).
Health and wellbeing	FDP11	Flight paths should be designed to include track concentration and/or track dispersal options to provide noise respite.
Operational	FDP12	Flight paths should be designed with routes that minimise track miles and fuel burn.
Operational	FDP13	Flight paths should be designed to ensure efficient and effective route management.
Technical	FDP14	Requirements of airspace users should be taken into account when designing flight paths.

Environment	FDP15	Flight paths should be designed to minimise adverse local air quality impacts.
Economy	FDP16	Airspace should be designed to maximise capacity in order to contribute economic benefits to Scotland, including tourism.