



EDINBURGH AIRPORT WATCH

Edinburgh Airport Limited Consultation: A Draft Response Template.

This is the question which Edinburgh Airport Limited (EAL) has asked:

“What local factors should be taken into account when determining the position of the route within the design envelope given the potential impacts and why?”

Section 3.2 of the initial consultation document called *“We’re asking for your views on the potential impact of altering flight paths above Edinburgh”* limits the scope of topics which would be considered:

“The consultation is not related to air traffic growth or the airport’s growth in general. Government policy regarding the change to Performance Based Navigation (PBN) is outside the scope of this consultation.

The consultation is not about [EAL’s bold font]: *RNAV as a future tool; any other future development; any aspect of government airport or airspace policy; or the establishment of controlled airspace.*

Comments in response not directly related to this initial consultation will be discounted from the analysis.”

But there are two further questions posed on page 22 of the consultation document

1 *“Are there any local factors or characteristics that mean your area should have special consideration?”*

We think, given that you do respond, that every respondent should reflect deeply on this aspect of the consultation and make sure your area is special in as many ways as possible and at as much length as possible.

2 *“If you are an aircraft operator: Do you operate within the area in question? If yes, would the proposals benefit your operation now or in the future?”*

EAW think it is outrageous that even at this stage EAL is putting commercial needs high on its agenda. You should note that EAL should put communities first.

All respondents and community representatives have to decide themselves how this affects their response. The potential restrictions appear draconian. EAW feels that you should express your opinions on any aspects of Edinburgh Airport Limited and the consultation - noting that your response is as an affected resident, or business, school, or medical facility etc. or community representative within the democratic structure of Scotland and so your voice should be listened to; Community representatives should cover whatever topics they wish and should insist that Edinburgh Airport should listen and record all the views expressed.

As EAL may decide to ignore comments they deem to be irrelevant to the analysis, you should be clear, within your response, when you are describing the specific problems met by your community which are affected by aircraft noise.

EAL do not allow e-mail responses! EAL only allows postal or website responses (<http://www.letssofar.com/feedback>). So complete EAL’s template but In order to protect yourselves and let politicians know what your response was it is essential that the text of your response is e-mailed to the following people:

- Your Local councillors, MSPs and MPs,
- Minister of Transport MSP humza.yousaf.msp@parliament.scot.
- Secretary of State for Scotland. david.mundell.mp@parliament.uk

(Many issues are ‘reserved’ to the UK parliament so it is important to copy in

David Mundell).

- Chief Executive Officer of the Civil Aviation Authority, Andrew Haines andrew.haines@caa.co.uk
- Chair of the CAA, Deirdre Hutton deirdre.hutton@caa.co.uk
- Minister of Aviation, Lord Ahmed ahmadt@parliament.uk
- Edinburgh Airport Watch would also appreciate copies of e-mails so we can provide our own report on Edinburgh Airport's Consultation. We promise not to disregard your comments!
edinburghairportwatch@gmail.com

The Points to include

This is a bullet point list which needs to be fleshed to suit the relevant circumstances in your area, but which thereby make the responses more effective.

1. Timing:

- 1.1. Community Councils in recess July and August; Cannot easily fulfil their statutory role;
- 1.2. CAA is about to strengthen its guidance on consultations; EAL should wait until they are published in 2017.
- 1.3. The Department for Transport (DfT) is looking at the whole issue of aircraft noise and is also reviewing various options with regard to monitoring and specifying acceptable noise limits. The Airport should have waited until this review was complete.
- 1.4. Edinburgh Airport is not near capacity – there are about the same number of flights now as 2007: we estimate that it is at about 70% capacity. Better timetabling and ground management would remove EAL's bottlenecks; The consultation on the grounds of bottlenecks is therefore unnecessary now.
- 1.5. The airport is anxious to try and get community buy-in to allow new areas to be overflowed ahead of rules changes that will make it more difficult for the airport to change the airspace in future.
- 1.6. A key change in the revised CAA rules is that a clear "Statement of Need"

for any proposed change in airspace should be made available and published at the outset. No such statement or cogent argument for why these changes are necessary appears in the consultation document.

2. Flight path use:

- 2.1. The current airspace use is a change; the extra use of GOSAM and GRICE rather than TALLA is not an acceptable baseline from which to start a consultation. EAL should revert to the airspace as prevailed prior to the multiple changes reported by residents since summer 2015 and used by BAA without any problems. EAL should have consulted before it imposed this change of airspace use.
- 2.2. The Airport should not have instigated TUTUR without full consultation. While the trial had to be ended early due to the huge public outcry, the noise didn't all stop and aircraft continue to fly a very similar routing. More worrying is that the route is clearly back on the table, despite the enormous number of complaints that were generated.
- 2.3. The Airport should have stated in its report to the CAA on TUTUR that it failed to make any CO2 savings because of the extra mileage on the TUTUR route.
- 2.4. The airport is now regularly overflying areas not previously overflowed with large jets and should stop doing so now.
- 2.5. EAL must openly admit to the changes in airspace use, which community councillors from Kinghorn to Culross, Blackness to Polmont and Broxburn to Bathgate have all noted, before there is any possibility of community trust.
- 2.6. There is no detail whatsoever about actual routes, how many planes, frequency of flights or type of planes or when they might be flown (remember Edinburgh airport has no night time curfew, and once a route is licensed by the CAA, the airport is free to use it as much as it likes.). In part the proposals reflect other changes being introduced by the Air Traffic Controllers NATS En Route Ltd. But there are no quantified or stated proposals tabled for anyone to judge.

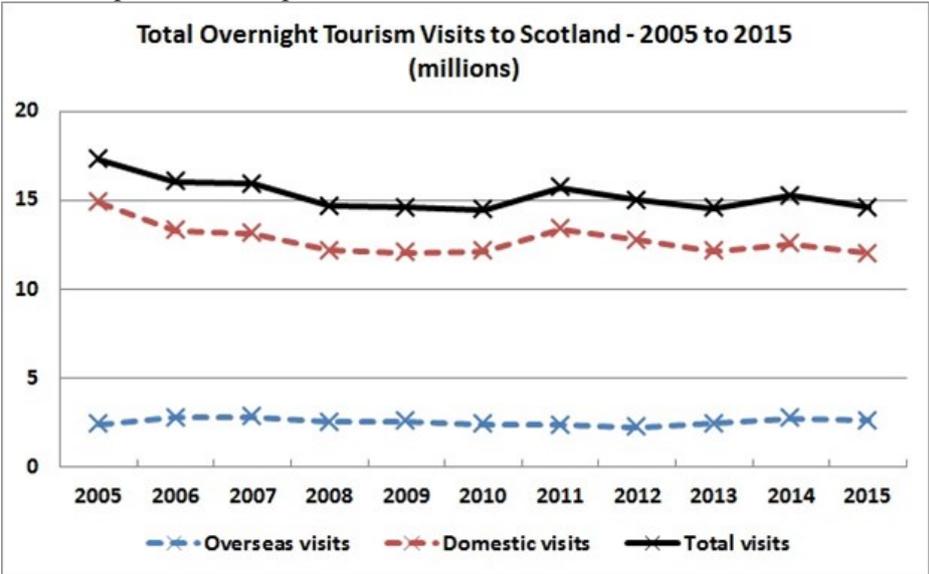
3. **Consultation** (See the Government guidelines for a brief outline of good consultation practice and then you can judge the EAL consultation process)
- 3.1. EAL distributed about 650,000 leaflets. Most of these went to areas not currently affected by the change in airspace use and will not be affected by future airspace use changes. Responses from those areas should be discounted. It is not standard consultation practice to include people and households unaffected by the proposals.
- 3.2. About 150,000 households are affected by current flight paths. It is unclear how the airport intends to analyse the responses, and whether areas with larger populations will be advantaged by carrying greater weight. Responses from residents, community representatives and business and other health and educational institutions in affected areas should be given added weight. Schools especially should have been consulted and listened to. There is a plethora of evidence that aircraft noise is bad for learning and mental health
- 3.3. Some areas badly affected by the current airspace change impositions do not have community councils. Edinburgh Airport should make it clear how they intend to address areas with a democratic deficit.
- 3.4. The use of the Postcode tool on the website to identify which flight paths will affect a property is divisive. Which community is going to be happy for aircraft to fly over them? This is likely to set one Community against another, rather than lead to rational debate about where planes should fly.
- 3.5. The airport is the change sponsor with very large resources available. In contrast, Community Councils and Groups are run by volunteers on shoestring budgets. Yet the airport expects Communities to organise public meetings, and communicate complex material to their residents in a very short period over the summer months. Compare this to the planning process, where any large developer would be required to make all arrangements for communicating their plans properly to members of the public.

A background note in case you think economic arguments demand an airport.

The airport is claiming that it puts £1b into the economy (page 6 of the consultation document). This claim is unsubstantiated. On the other hand Scotland had a net tourism deficit of £1.6b in 2015. About 80% of tourists come from other parts of the UK and most come by car. Every time a Scottish Resident flies abroad (beyond the UK) they spend more than £600 outside the Scottish economy.

We can *estimate* the overseas expenditure of Scottish Residents using Edinburgh Airport. Given that there are about 3 million overseas visitors to Scotland, and say all of them use Edinburgh Airport (and not Glasgow etc). Let us also say that generally people fly in and out of the same airport, so that of the 10,000,000 passengers there are 5 million people using the airport twice. This implies that 1.5 million passengers are from overseas and 3.5 million are from Scotland. The airport is therefore a direct drain on the economy of about £2b. Of course the picture is worse if not all overseas tourists fly in and out of Edinburgh Airport.

Also the Scottish Tourism Industry is not doing well according to the Scottish Government. It needs help – not the airport.



The airport facilitates overseas travel and is thereby, however much we all enjoy its benefits, a drain on our economy – not a benefit. Staycation and spending in the home economy are really important economic factors.