

EDINBURGH AIRPORT - ANOTHER JOURNEY BEGINS

Sadly, this is not a fun one!!

Edinburgh Airport Limited (EAL) has applied to the Civil Aviation Authority (CAA) - again - for approval of a permanent Airspace Change Proposal (ACP) with the potential to adversely affect residents in the Broxburn/Uphall/Winchburgh locality (Ward 2) and East Livingston and East Calder locality (Ward 5) of the West Lothian Council area given the proximity of these Ward areas to the runway at Edinburgh Airport.

The ACP involves a seven-stage process as set out in a CAA document [CAP1616: Airspace Design: Guidance on the regulatory process for changing airspace design including community engagement requirements](#)

The process begins with the change sponsor Edinburgh Airport (EAL) preparing a *Statement of Need* setting out what issue or opportunity it is seeking to address and then meeting with the CAA to discuss the *Statement of Need*. **(Step 1a)**

The CAA has assessed EAL's *Statement of Need* and authorised EAL to progress to **Step 1b** which involves "engagement by EAL (as the change sponsor) with those potentially affected by the proposed change on the underlying design principles". At present, EAL is in the process of formulating the design principles.

In the *Statement of Need*, EAL made the following statements/claims.

The comments shown in red above are extracted from the Minutes of the Edinburgh Airport Consultative Committee (EACC) meeting held on 13th May 2019 - i.e. prior to EAL receiving approval from the CAA to pass **Step 1a** and proceed to **Step 1b** - and the comments made in green are additional preliminary observations made by local residents in response to the claims made on behalf of EAL :-

- "passenger growth is projected to grow to 20 million by 2035" - "because of [the] attractiveness [of Scotland as a destination for visitors] and [EAL's] global reputation";

In the context of Brexit, Gordon Dewar commented on the "softening of the leisure market as people had no confidence and were not booking flights".

- "this growth, assisted by progressive Scottish Government policies including the halving of Air Passenger Duty, will mean that aviation and Edinburgh Airport will continue to be one of the main drivers of the Scottish economy".

At the May meeting of the EACC, Gordon Dewar commented that "the recent reversal of [the Scottish Government's] previous commitment to reduce ADT would indeed have an affect and this was visible with the fact that Ryanair would be ceasing their Stansted service. This will result in negative growth at the Airport for the first time in 12 years." Gordon Dewar talked further about the decision re ADT and stated that this had been "misleading for airlines who

had started up operations on the basis of the promise, and stated that, "The delay in and now scrapping of the reduction could have serious implications on traffic figures". With regard to climate change, Gordon Dewar stated, "It is recognised that there is a climate crisis but there has been no consultation and that there is an urgent need for a review on the huge progress made on carbon reductions already and a way forward". It was also observed that "this policy will have a detrimental impact on the Scottish economy and stop the progress of tourism in Scotland".

- There is a "need to increase the capacity of the airspace and runway, particularly in peak times" and to avoid delays at busy times - "especially during the first wave of departures in the morning usually between 06:00 -07:00".

At this time (06:00 - 07:00) there are few if any incoming flights - thus it is more than likely that any delays re the first wave of departures arise as a result of factors on the ground rather than the "initial portion of the departure routes [being] a bottleneck which limits the runway [+/-or airspace] capacity and causes delays". Delays of 15 minutes or more are regularly scheduled into the departures from Edinburgh Airport between 07:30 - 08:30 - undermining claims of bottlenecks and delays.

- The "current declared runway capacity is a maximum of 42 movements [arrivals and departures] per hour".

This is one of a number of matters noted by Edinburgh Airport Noise Advisory Board (EANAB) which has been set up to represent the concerns of local communities who are affected by aircraft noise associated with operations around Edinburgh Airport (EAL). EANAB will ensure such concerns are understood and will report back to local communities on actions intended to improve the situation for those affected. The ultimate aim is to reduce the impact of noise on the local community.

See their website www.eanab.org.uk:

This webpage has been setup to provide clear and transparent information for our local communities who want to find out more about EANAB and be kept up to date with discussions and actions.

- The "target runway capacity is 50 movements per hour".

CAP 1616 and Air Navigation Guidance 2017 (issued by the DfT) require the aviation industry to "proactively engage with local communities to inform them on relevant air operations - including, where practicable, the tracks flown by aircraft; the numbers of flights, and altitude data (para 353 - 354 of CAP 1616)".

- EAL propose to introduce new routes which, along with perceived technical benefits, will increase the runway/airspace capacity thus, according to EAL, "**may** [emphasis added!] also minimise the environmental impacts of flights in terms of the **total** [emphasis added!] number of people overflown, as well as when and how often they are overflown - whilst also cutting CO2 emissions".

Perhaps somewhat surprisingly, the vagueness of these claims appear to have been sufficient to enable the CAA to permit EAL to progress to Step 1b and preparation of Design Principles for the ACP.

- It will ensure that the proposal will comply with ICAO design and CAA requirements - and that they work within the broader aviation framework in Scotland and Northern England.

Notably EAL omits specific reference to Air Navigation Guidance 2017 which sets out the Government's priorities for consideration of the environmental impacts arising from airspace change proposals - in particular, for the purposes of assessing environmental impacts of airspace change proposals, "...the CAA should apply the following altitude based priorities of the Government: 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 AND 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".**

All of the ACP documents can be found on the [Edinburgh Airport Airspace Change Programme portal](#), slide left/right the number at the top to find the stage you want to see.

Edinburgh Airport Noise Complaints phone line (0800 731 3397)

As the ACP is scheduled to last for months, regular updates will be issued by EANAB.