

Dear Gordon

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 Tim Johnson, 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 24th 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

Lindsay Cole
Chair EANAB