



Edinburgh Airport Noise Advisory Board

Annual Report

August 2020

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1. Chairman's report

This EANAB 2020 Annual Review of 2019 activities has been constructed specifically to fulfil two functions. The first section of the Review examines what activities EANAB has been involved with in the last year and for what purpose. This takes into consideration the Aims and Objectives featured in the previous Review, which were derived from the EANAB Terms of Reference (TOR) and which confirmed that EANAB was indisputably fulfilling its express function. Whilst there have been minor amendments made to the TOR since the last review, I am happy to declare that all of our 2019 Aims and Objectives are being met. 2019 has been a year for EANAB in which progress has been made in several areas related to communities' concerns on aircraft noise. The Board has further developed subgroups focused on identified issues and has continued to pursue engagement with EAL. Despite these developments, 2019 has not however seen progress on reducing noise levels in communities and further work is required.

Secondly, the Review highlights those areas to which we believe we should be lending our expertise on noise issues in the coming year. It concludes with a summary of EANAB representation from Community Councils and the process of both informing and receiving feedback from the airport's communities.

2. Work of the Board during the year

There has been a wide range of work carried out by the board in the past 12 months covering a variety of topics. However, for the purposes of this review, the principal areas of engagement and debate have focused on the following (further detail on work undertaken by the various sub-groups is given in section 3):

- **Detailed analysis of the operating parameters of aircraft** flying out of Edinburgh Airport, to establish altitude, speed and position baselines and spread of SID (Standard Instrument Departures) flights.
- **Debate over the EAL Statement of Need for the forthcoming ACP**, particularly on the subject of runway capacity.
- **Participation in workshops** organised by an external consultancy to seek public opinion on the design principles to be used in the ACP. EANAB members took part in some of these as Community Councillors as well as a general EANAB-only group.
- **Analysis of the noise modelling used by EAL** and included in documentation to the CAA and to the public.
- **Planning research into the health impacts** of sustained aircraft noise upon the communities overflown. The impact of significant noise on public health has become an area of substantial interest to the Board.
- **Arrival and departure routings** and value of utilising the Firth of Forth as an arrivals and departure corridor.
- **Responses to planning applications** in the vicinity of the airport regarding potential noise impact on residential dwellings either directly or through advice to CCs and response to the National Planning Framework 4. Responses were also made to DfT and CAA consultations; Aviation 2050 and the Criteria for Accepting the Airspace Change Masterplan respectively.
- **Requests to EAL for a plan for noise monitor locations**, however there has been no opportunity for Board input to this, which is regrettable.

3. Sub-group reports

a) Aviation Consultancy,

Perceived changes over time in the use of Airspace

Under EANAB's direction and funded by EAL, an analysis was undertaken by To70 (independent aviation consultants) of the way aircraft operate in terms altitude, speed and position to establish a (pre-ACP) 2018 baseline and detect historical changes impacting populations.

In addition to confirming the baseline, which will be fundamental when reviewing the impact of any future changes, the study demonstrated significant deviations from proposed departure routes. It also established there had been a 15% increase in flights (2012 -2017), along with the use of larger and heavier aircraft. This could explain some of our local communities' perception of increasing aviation noise. However, further work is required to establish why many communities now experience issues with aircraft noise that they did not previously.

Validity of Noise Maps

EANAB observed the noise maps produced for EDI are based on two flawed assumptions regarding the way aircraft operate:

- That LGW profiles of height/speed are representative of operations at EDI and
- Dispersal is not taken into account.

Consequently, EANAB advised that, in order to establish contour maps that reflect reality, the input to the ANCON noise model for EDI should instead use radar-based measurement, as is commonly used at other major UK airports.

Analysis of this was incorporated into the above-noted To70 work. In their Findings Report, To70 “*confirmed suggestions made by the sub-group that there are deviations between the ANCON model (route and profile) and the flightpaths and profile as measured by radar. These deviations increase further away from the airport.*”

Based on To70’s study the sub-group’s preliminary findings on noise mapping uncertainty concluded that “*these findings appear to call into question the validity of:*

- *The 2016 strategic noise maps for EDI supplied to the Scottish Government*
- *The noise and footprint maps, which were presented to the public during the ACP consultation for the existing and proposed SIDs*
- *The population impact analysis carried out by the CAA for the ACO, looking at the number of people exposed to various aircraft noise levels”*

As a result of this work, at EANAB’S request, EAL commissioned the CAA’s ERCD to produce new noise maps based on radar data. These new maps indicate the previous ones significantly underestimated the noise levels associated with EDI fights. These maps will provide our communities with a significantly more realistic representation of aviation noise.

A Findings Report of the To70 studies, along with the sub-group’s commentary and preliminary findings were uploaded to the EANAB website in May, to assist members of our communities in understanding the report.

b) **Mitigation and Compensation,**

Questions raised with EAL and elsewhere. Will depend on the modelling and resultant noise contours development. Indications of some changes but unclear at present.

c) **Board Governance,**

In 2019 a Memorandum of Understanding (MoU) on how EANAB and EAL will work together for mutual benefit was negotiated and was concluded with the signing of the final MoU in August 2019. This was partially informed by the ongoing realities of the relationship. We continue to make some progress in

bringing better understanding of the fundamental purpose of the Board to both our represented communities and to EAL. An issues file which can be referred to as a record of activities undertaken and commitments made has been created. This has led to improvements in reaching more conclusive outcomes for the many activities that the Board addresses to further its aims. The subgroup also is responsible for any changes to the Terms of Reference, the MoU and the Code of Conduct.

d) **Health Impact,**

The impact of significant noise on public health has become an area of substantial interest to the Board. Currently this has engendered considerable interest from NHS Lothian, who are very interested in examining this with us in more depth, right across the public health spectrum in Scotland. This approach, which will be independent and authoritative, is being developed.

e) **Noise Complaints and Breaches,**

EANAB worked constructively with EAL to substantially revise and add to the quarterly noise report produced by EAL. Reports using the revised template were produced for Q3 2019 and Q4 2019. It was agreed that once we have a full year's-worth of reports, then we will jointly re-assess the appropriateness of the new template. As well as more complete complaints details, the first two reports provided useful insights to peak noise at the permanent monitoring sites and how these peaks compared with the noise levels at which the airport may impose fines on exceedances.

In line with data requests from EANAB, a template for the reporting of noise as measured by the airport's mobile noise monitoring equipment was also produced, and the first report based on this template was circulated.

f) **Airport Designation,**

The objective of this sub-group is to assess the potential implications of proposed "Airport Designation" in terms of noise monitoring, modelling and practical mitigation however the work of this group is currently in abeyance following resignation of the group champion.

g) **Airspace Change Programme,**

New Airspace Change process

The objective of this sub-group is to form a meaningful liaison with EAL, so as to realise the full potential of the EAL ACP in terms of mitigating noise issues for local communities.

CAP1616

In 2017 the CAA created CAP1616, its new regulatory guidance for the Airspace Change Process. In April 2019 EAL submitted a second ACP. EAL advised the full 7 stage process could take around 3 years to complete, starting with the "Define" stage comprising 2 steps: Statement of Need (SoN) and Design Principles.

One of CAP1616's aims is to *"to ensure that the needs of all stakeholders are met, the process emphasises the importance of engagement."* With this in mind the sub-group instigated and maintained during the rest of the year several iterative question and response dialogues with EAL. They concerned:

- ACP questions
- Statement of Need (SoN) and
- Design Principles

ACP Questions

On behalf of our communities, the sub-group queried the following aspects: runway capacity, growth assumptions, airspace issues/opportunities, Environmental Impact Assessment, Design Principles and engagement. This ongoing EANAB/EAL exchange led to a special meeting on 21 August when EAL made a presentation to the Board. Due to the meeting's time constraints those questions that could not be addressed, were to be responded to at the Board's routine 4 September meeting. However, they were not addressed until the November meeting, resulting in an unfortunate 2 month pause in the dialogue.

Statement of Need (SoN)

The Statement of Need given by EAL to the CAA had two parts:

- To upgrade routes to take account of new navigational technology. This is a Government requirement and
- To increase runway capacity because EAL claimed they were approaching full capacity.

EANAB agreed with the first of these, so that operations in and out of EDI can be carried out safely and efficiently. But it was felt the second was not fully supported by the data. EAL had stated that their difficulties arose when more planes were wishing to depart than the runway could accommodate, because of the two-minute safety interval required between departures. (The two-minute interval can only be reduced if planes can fly on a variety of departure routes, thus flying over communities not previously affected.) An analysis of departures was undertaken, concentrating on August 2019 which had been the busiest month in the airport's history. This showed clearly that for 45% of the days in August, departure capacity required never exceeded 75% of the runway's total capacity. On the other days, there was a short period around 7.00am when the required capacity was greater than 75% but the rest of the day presented no problems. The sub-group met with EAL's statistician in December to try and arrive at some agreement over how the data should be interpreted, but, while there was no disputing the figures that had been arrived at, EAL still maintained there was a capacity issue at EDI. The sub-group's work in this area was not helped by EAL's refusal to provide data in a form that made analysis easier and refusing to provide data that was already in the public domain because of claimed "commercial confidentiality". The sub-group continues to believe its interpretation of the data demonstrates there is not the urgent need for runway expansion proposed by EAL.

While the ultimately inconclusive EANAB/EAL debate on runway capacity continued throughout the year, the early January 2020 deadline for the CAA's consideration of EAL's SoN remained unchanged. This prompted the Board to write to EAL with copies to the CAA and ICCAN, including *"In your email on 16 December you queried the Board's "haste" on the capacity issue and considered the correct time for community discussion of this is at CAP1616 Stage 3, which will not occur until the latter part of this year(2020). In the meantime, EAL are committed to making their Step 1b submission to the CAA on 3 January for determination on 30 January. On this issue CAP1616 paragraph 59 (Key Principles) explains "to progress an ACP the Change Sponsor (EAL) must demonstrate a genuine need for the airspace change." It goes on in paragraph 61 (Gateway Sign off) to state the "CAA applies a series of 4 Gateway Sign-offs.... the purpose is to minimise work having to be repeated". So why run the risk of leaving serious consideration of this issue until stage 3? If the CAA approve the Define Gateway later this month (January 2020) and we then eventually progress to consider the capacity issue from a community viewpoint in stage 3, there is a risk that many months of EAL's, the CAA's and EANAB's efforts will be to no avail, in the event that the stage 3 discussions lead to the CAA rejecting the need for greater runway capacity."*

Design Principles

Design principles form a framework against which ACP options can be evaluated. From October the Board started an exchange of letters with EAL, querying on behalf of our communities, amongst other matters, the running of the engagement workshops by EAL's external consultant. While this led to a special EANAB-only event being set up, for which the Board is grateful, EANAB continued to have concerns, particularly over the way the consultation parts of the process were being conducted. The sub-group therefore made recommendations to assist in allaying these issues, which, given their content, were copied to the CAA for information.

h) [Outer Airways.](#)

This group was set up to explore the potential use of airspace further from the airport for alternative routes to cause less community disturbance, especially the use of East Coast/Forth Estuary, for flights to and from EDI. The objectives are, in co-operation with EAL, ANS and NATS, to identify potential additional flightpaths that pass over unpopulated land areas or the sea, in order to mitigate aircraft noise by amending routes under local control and suggest additions to the framework of routes under NATS control.

The first stage was meetings with ANS at Edinburgh Tower and then with NATS at Prestwick Centre. Both these meetings gave invaluable insights into the complex process of controlling where aircraft fly so they take off and land safely, and do not collide while in the air. Armed with this information, in the next stage the group drew up some suggestions for arrivals pathways and for departures down the Forth estuary for flights going to northern European destinations. These were presented to the full EANAB meeting in September 2019 and the sub-group was given the Board's approval to continue its work. The third stage was to discuss these suggestions with ANS and NATS but attempts to arrange a meeting with ANS have so far been unsuccessful.

4. Next steps

To set this Annual Review in its proper context, the EANAB membership were asked to consider what they felt were the five most pressing areas for the noise board to concentrate upon throughout the forthcoming year. Each topic was counted and the cumulative result was derived. Each takes EANAB forward towards closer cooperation with EAL, while constantly referring back to community concerns about aircraft noise which is the core of our purpose. The most requested and recurrent issues are shown below:

1. A reduction in night flights
2. Increase the EANAB profile
3. Ensuring the accuracy of noise and other data provided
4. Health impacts
5. Developing wider rapport with EAL, CAA, EACC, NATS/ACS, ICCAN and other airport noise boards
6. Being aware that addressing noise concerns is our core purpose and avoiding mission creep
7. Continued ACP involvement
8. Persisting in examining alternative routes
9. Develop a rolling plan in line with Government policies
10. Reassess the noise complaint procedure

Continual evolution and development of the Board management and governance will be necessary to maintain its relevance to changing needs. In terms of the relationship between EANAB and EAL, EANAB is grateful to EAL for facilitating the monthly meetings and for funding the secretarial support for these meetings (prior to Covid-19). At the monthly meetings representatives from EAL usually attend to answer queries on the monthly statistics produced and to take away any further requests for information and data. On occasions information is withheld for privacy reasons and on other occasions information requested is very slow at being produced which can lead to a level of frustration with members of the Board. EANAB would therefore like to work with EAL to speed up the flow of information being requested by the Board. EANAB have not been able to agree an annual budget with EAL for use as an independent Board.

Covid-19

We cannot consider any of the above longer-term activities without considering the implications of the Covid-19 pandemic on aviation. Any previously anticipated growth both in terms of capacity and actual passenger numbers, have now been effectively suspended. We are also reassured that the current ACP process has similarly been halted and that EANAB will be advised of any recommencement. However, we cannot know what form this new 'normal' will look like when life eventually resumes and the work of EANAB itself may have to change as a result of these changes.

A list of represented Community Councils and other similar bodies are noted on the EANAB website <http://www.eanab.org.uk>

Signed: Lindsay Cole, Chair

Date: 5th August 2020