Airspace Change Programme

Initial Consultation Report November 2016





	LODC Artwork			
	Client: Edinburgh Airport	Doc: 1-00102290.012 EDI ACP F	indings Report	A5 AW
Project: ACP Findings Report		Size: (210)mm x (148)mm	A/C: Chris	AW: RB
	СМҮК	Date: 24.11.16	Version: 3	

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Welcome from Gordon Dewar

A man wiser than I once told me that good conversations start with listening.

Over the course of this summer we've listened hard and I believe that this is the beginning of what will be a good conversation on how our airport grows.

This is important.

A good conversation means that we reach a better solution, a solution that balances the needs of the country, the airport and the communities that surround it.

We have treated this conversation as important from the outset of this process, going above and beyond what any other UK airport has done.

We've run an open and transparent process which has been independently assessed and audited.

I'm delighted with the response and it is this response that we detail in this report.

This report does not put forward our response to the consultation. Rather, it describes what we did and what people told us.

The analysis of the data and the use of that to inform the design of options for our airspace is ongoing and we will be presenting that work in early 2017.

Until then, I hope that you find this report useful.

Thank you for your contribution and your continued interest.

We look forward to continuing our conversation in the weeks and months to come.



Regards

Gordon Dewar Chief Executive

Every good conversation starts with listening

Edinburgh Airport is growing and at a fast pace. In 2014, we hit the historic 10 million passenger mark in a year – the first time for a Scottish airport. Since then, we have continued to grow, adding 1 million passengers per year. 2015 saw 11.1 million passengers pass through our doors and we are on track to have our busiest year yet in 2016. With passenger numbers forecast to continue to grow and more destinations and airline partnerships to come, we're investing in our airport to handle this growth, both on the ground in and in the sky.

In 2016, we launched our Airspace Change Programme – a two stage public consultation regarding our desire to modernise Edinburgh Airport's flight paths.

The initial consultation began on 6 June and was owned and managed by Edinburgh Airport supported by a number of independent consultants performing specialist roles.

The consultation followed the requirements documented in the Civil Aviation Authority's (CAA) guidance on airspace change (CAP725) and the consultation approach, timeline and methodology was approved by the CAA prior to launch. We also commissioned an independent Quality Assurance by the Consultation Institute (consultationinstitute.org).

Stakeholders across a wide spectrum of sectors were encouraged to engage with us and respond to the consultation.

We 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?" This simple question allowed us to gather information from stakeholders, communities and other interested groups so that we could build their voices into the design stage of our programme.

The initial consultation ran from 6 June – 19 September 2016 and we received a total of 5,880 responses:

- 89 from organisations and elected officials
- 5,791 from individuals

This report presents the findings of the initial consultation and provides information on the next steps in the programme.

5,880 responses

responses from organisations and elected officials

5,791

Background

Recent years have seen Edinburgh Airport change immeasurably based on passenger demand plus advances in technology, security and safety. Our international route network has grown to become the envy of many similar sized European airports and we offer more choice than any other airport in Scotland, with daily direct flights to the Middle East, North America and many cities across Europe, including London, which is served by more than 50 flights a day.

The benefits of this network to Scotland's position in world markets and therefore to our economy are substantial. The contribution to the Scottish economy of the current activity generated by the airport is worth almost £1 billion every year and supports 23,000 jobs across the country (Edinburgh Airport, Economic Study, Biggar Economics, 2016).

Our growth, in the main, is driven by visitors to Scotland. The appetite for people from across the globe to visit our country remains undiminished. This continued growth, assisted by progressive Scottish Government policies including the halving of Air Passenger Duty, will mean that Edinburgh Airport will continue to be one of the main drivers of the Scottish economy. We need to enable growth and we must update the technology we use to navigate. The existing routes used by aircraft rely on the 1950s technology of ground based radio beacons. A well established and much more accurate form of navigation is area navigation (RNAV) which uses a combination of satellite and ground-based navigation technology to permit aircraft to follow a precisely defined path. The CAA has issued a paper called the Future of Airspace Strategy for the United Kingdom 2011 to 2030 requiring all UK airports reliant on ground based navigation systems to move to RNAV technology in the next five years. The Civil Aviation Authority (CAA)'s website says. "Throughout Europe there is a move to simplify and harmonise the way airspace and air traffic control is used through the Single European Sky project. In the UK and Ireland we're meeting those and other issues through the Future Airspace Strategy (FAS) which sets out a plan to modernise airspace by 2020".

Our Airspace Change Programme is about the way in which we intend to grow, ensuring that we continue to be able to support Scotland's aspirations in a safe and effective way. It is a programme of work that will allow us to submit an Airspace Change Proposal to the CAA. If that proposal is accepted, it means we'll be able to make changes to our arriving and departing flight paths. This is not an easy process nor is it one to take lightly. We know that some people will have concerns and we will need to ensure that any change minimises noise and disruption whilst delivering a safe, effective and sustainable solution.

03 Background

We are committed to using the data collected during the initial consultation to influence the proposed flight path options which will be the subject of further consultation. There are a number of factors to be considered when determining the proposed flight paths – these include safety, can the route be flown by all aircraft, environmental factors, operational impacts and benefit to the economy, and feedback regarding the potential impact on stakeholders and local communities.

Departure and arrival design envelopes for our main runway were included in the initial consultation:



- West right turn out
- West left turn out
- West straight out
- East right turn out
- East left turn out



- West End from south
- West End from north
- East End from south
- East End from north

Programme mandate

As part of our commitment to a clear consultation, our mandates help to explain what we set out to achieve through our Airspace Change Programme and two public consultations.

Programme mandate

We, Edinburgh Airport, need to understand the views of stakeholders concerning the presentation of an airspace change proposal to the CAA that complies with the relevant regulatory requirements so that Edinburgh Airport can operate flight paths that maximise operational benefits and minimise community impact by 2018 so as to improve Edinburgh Airport's national transportation infrastructure to enable the economic, social and cultural growth of Scotland.

Mandate 1: Initial consultation

We, Edinburgh Airport, need to understand the views of stakeholders concerning issues that may arise from altering arrival and departure flight paths so that we can analyse concerns gathered during the initial consultation (June – September 2016) and develop viable options by December 2016 so as to develop a flight path change consultation on options to effectively maximise operational benefits and minimise community impacts.

Mandate 2: Consultation 2

We, Edinburgh Airport, need to understand the views of stakeholders concerning viable options for arrival and departure flight paths so we can alter flight paths to maximise operational benefits and minimise community impacts by Summer 2017 so as to produce an airspace change proposal to the CAA which complies with relevant regulatory requirements and responds to consultee concerns.



Airspace Change Programme Process



Methodology

We have committed to an open and transparent Airspace Change Programme. Instead of putting new flight path options on a map and telling our stakeholders and community this is what we want, we defined an area that flight paths could safely go (called a design envelope), and asked a wide range of people to tell us what we should be aware of in that area, so that we are able to develop the best viable route options that balance operational, regulatory and community requirements.

Stakeholder mapping

We conducted a full stakeholder mapping exercise before the project was launched and updated this continually throughout the initial consultation. We based this on information provided by NATS (used during previously similar consultations), our own experiences on the previous trials, general community and political engagement as well as further community stakeholder work following the creation of the design envelopes.

The consultation was open to anyone who wanted to participate and included a postcode checker which allowed individuals to assess the potential impact (if any) on them.

We considered the following criteria to determine who may be a stakeholder, specifically:

- who may be impacted directly by the potential flight path options
- who may be indirectly impacted by these changes?
- who do we need help from to make the potential changes work?

- who is knowledgeable about the subject of the consultation?
- others who may have an interest.

The main stakeholder group for this consultation was the residents in the communities under the design envelopes. We wrote directly to over 640,000 households, supported by TV advertising, print advertising, social media and PR. The focus behind all communication was to explain the Airspace Change Programme and to encourage participation in the initial consultation.

Based on previous experience, and discussions with a range of stakeholders, we are confident we identified key issues and areas of concern. These include:

- Regulatory requirements
- Economic growth
- New technological, security and safety advances
- Noise and other environmental concerns
- Impact on people underneath any potential flight path
- Businesses neighbouring the airport
- Satisfying increased demand
- Reducing peak demand waiting times delays.

Identified stakeholders include:

- local residents under the design envelopes
- UK government
- Scottish government
- Scottish parliament
- local government
- airport air related organisations
- airport ground related organisations
- business organisations
- tourism organisations
- transport organisations



- environmental organisations
- community organisations
- known campaigner organisations
- any others with an interest.

We emailed and wrote to a range of stakeholders at the beginning of the consultation to give them all the information they required and offered the opportunity for an airport representative to attend a meeting to discuss the consultation. We also held staff drop-in sessions to increase awareness and knowledge of staff on campus about the consultation process and content.

We recognise the need to enhance the involvement of local communities and were in continual discussion with community councils with regards to the most appropriate methods to enable meaningful participation. We were flexible in providing any materials that were requested such as pop up banners and printed information. We also offered community councils funding assistance to ensure that communication methods suited them.

One element of this open and listening approach is the Stakeholder Reference Group (SRG) which is run through The Consultation Institute. The SRG's remit is to contribute to The Consultation Institute's quality assurance process by:

- analysing our methodology on the initial consultation
- considering feedback analysis process on initial consultation
- providing feedback as part of the pre-consultation period for the further consultation
- considering methodologies for the further consultation
- analysing the further consultation process.

The group is independent to Edinburgh Airport and reports to The Consultation Institute. It is chaired by Dame Sue Bruce and secretariat is provided by The Consultation Institute.

Equalities

It was important for us to make it as easy as possible for those who wanted to participate to have a voice. We worked with Young Scot and Diversity Dynamics to create opportunities for young people and those within the protected characteristics (Age, Disability, Religion and belief, Gender, Sexual orientation, Pregnancy and maternity, Race and Transgender) to participate. We also met with Edinburgh and Lothians Regional Equality Council to discuss their views. Within the responses to the consultation, there were 399 mentions of issues related to the protected characteristics, and 92 young people who participated in consultation activity through Young Scot.

Communication materials

The consultation book was developed to provide more detail and information for those who were interested. We provided printed copies of the book to those who requested it.

The interactive website that we created provided electronic copies of the consultation book, fact sheets and background information, frequently asked questions and a postcode search facility that allowed individuals to check how their properties were affected by the design envelopes. The website was also the primary way in which consultation feedback could be submitted.

We developed a Privacy Policy to treat consultation responses in line with UK privacy law and the Data Protection Act 1998.



We produced a consultation book to accommodate those who wanted hard copy and not web-based information.



We had **85,342** visits to letsgofurther.com

Advertising

During the first week of the initial consultation we distributed leaflets to **643,655 households** across the EH, KY and FK postcodes. The aim of these leaflets was to raise awareness of the Airspace Change Programme and to encourage response to the consultation. To support this leaflet drop we ran a three week TV advertising campaign, **451,111 people** saw the commercial at least once over this period.

We also ran an outdoor digital campaign in Edinburgh city centre, over four weeks. On the airport campus, we displayed three large format advertising displays in key footfall arrivals and departures areas; the pick up zone, drop off zone and public transport and car rental walkways.

In week seven and week thirteen of the campaign we ran advertising in local press; Dunfermline Press, Edinburgh Evening News, West Lothian Courier and the Linlithgow Journal and Gazette.

Media and PR

We issued press releases during the initial consultation period on 6 June, 10 June, 28 June, 11 July, 6 September and 12 September. These press releases were issued to local, national and industry news outlets. These were picked up and used extensively across all traditional media formats. The general trend was for positive, neutral and balanced coverage from national papers and TV, and more negative coverage from local newspapers and news websites.

We received a degree of negative coverage immediately after we proactively press released on the data loss in early September. However, our transparent approach enabled us to generate interest and demand attention resulting in a spike in public responses to overcome the challenges we initially encountered from this.

Social media

We widely advertised and messaged our Airspace Change Programme across our social media channels throughout the consultation. We achieved an organic reach of 248,591 and we ran a targeted advertising campaign from week six of the initial consultation for an eight-week period. This paid for campaign had a reach of 256,639 people across our social media channels giving a total reach of 505,230.



132,769

was the combined readership of press advertising

4 weeks

Outdoor billboards showed digital ads for four weeks in Edinburgh city centre





visits to letsgofurther.com



News covered in publications with a readership of







people viewed the

social media campaign



451,111

viewers saw the commercial at least once over the three week period



Initial consultation responses

Response sentiment

Consultation responses were coded as positive, neutral or negative sentiment.

- Positive responses showed support for change e.g. support for growth, increased routes, benefits to the economy.
- Neutral responses expressed no opinion, requested more information, or expressed both positive and negative comments.
- Negative responses were against change e.g. possible negative impacts around growth and new flight paths.

Coding responses

The initial analysis broke responses into 23 key categories such as noise, health, local pollution and environmental issues. Responses were then further analysed and broken down into sub themes e.g. within the noise category there were many concerns including general comments around potential increased noise pollution and concerns specifically over night and early morning flights. It is important to note that the number of mentions may exceed the number of responses received by area as many respondents commented on more than one category and sub theme in their response.

Lost data incident

On 29 August we made a change to letsgofurther.com in order to add translation functionality and to add subtitles to our video.

An error caused by making this change resulted in 199 feedback submissions received between 29 August and 2 September failing to be saved.

We immediately issued a press release, wrote to our key stakeholders and added a message to our website to request that anyone who may have submitted feedback during this time resubmit it. We also extended the consultation period by one week to allow sufficient time for this.

Following this error we made improvements to our internal processes and testing procedures. We appreciate that this is an embarrassing error and caused inconvenience for those who had submitted feedback during this time. Through investigation of the incident and steps taken to rectify the situation, we have confidence in the information gathered, our processes and our technology. We have taken action to improve our testing and approvals processes after this incident.

Organisations and elected official responses

We contacted **226 community Councils**, of those contacted **33** responded to the consultation **(15%)**.

- 1) Aberdour Community Council
- 2) Airth Community Council
- 3) Balerno Community Council
- 4) Bathgate Community Council
- 5) Blackness Community Council
- 6) Bo'ness Community Council
- 7) Burntisland Community Council
- 8) Charlestown, Limekilns and Pattiesmuir Community Council
- 9) Craigshill Community Council
- **10)** Cramond and Barnton Community Council
- **11)** Crossford Community Council

- 12) Culross Community Council
- **13)** Dalgety Bay and Hillend Community Council
- **14)** Dalkeith and District Community Council
- **15)** East Calder and District Community Council
- **16)** Ecclesmachan and Threemiletown Community Council
- **17)** Fossoway and District Community Council
- **18)** Hill of Beath Community Council
- **19)** Kirkliston Community Council
- **20)** Larbert Community Council
- **21)** Linlithgow and Linlithgow Bridge Community Council

- 22) Maddiston Community Council
- 23) Milesmark and Baldridge Community Council
- 24) Muckhart Community Council
- **25)** Newton Community Council
- **26)** Oakley and Comrie Community Council
- 27) Philpstoun Community Council

Of these there were:

- 9% positive
- 21% neutral
- 70% negative

responses to the consultation

- **28)** Polmont Community Council
- 29) Portmoak Community Council
- **30)** Rosyth Community Council
- **31)** Royal Burgh of Kinghorn Community Council
- 32) Southside Community Council
- 33) Uphall Community Council

The top themes identified were:

- 1 Noise concerns
- 2 Local impact issues
- 3 Flight planning

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O Initial Consultation responses

We contacted **334 Councillors**, of those contacted **3** responded to the consultation **(1%)**

We contacted **188 MPs/MSPs**, of those contacted **11** responded to the consultation **(6%)**

We contacted **916 stakeholder organisations** of those contacted **34** responded to the consultation **(4%)**

- **1)** British Gliding Association
- 2) British Hang Gliding and Paragliding Association
- 3) Cramond Boat Club
- 4) Cramond Medical Practice
- 5) Cramond Noise Action Group
- 6) Cramond Primary Parent Council
- 7) Cramond Primary School
- 8) Edinburgh Airport Watch
- 9) Falkirk Council
- **10)** Fife Council

- **11)** Friends of the Earth Scotland
- **12)** Friends of the River Almond Walkway
- **13)** Hopetoun House and Hopetoun Estate
- 14) Light Aircraft Association
- **15)** Linlithgow Civic Trust
- **16)** London Luton Airport Operations Ltd
- **17)** MoD
- **18)** NATS
- **19)** Noise Vibration Action Group

- **20)** Ogilvie Ross LLP
- 21) Pentland Hills Icelandics
- 22) Pettycur Bay Holiday Park
- 23) RSPB Scotland
- **24)** Scottish Environment Protection Agency
- **25)** Scottish Gliding Union
- 26) Scottish Natural Heritage
- Of these there were:
- 15% positive
- 26% neutral
- 59% negative

responses to the consultation

- **27)** Scottish Passenger Agents' Association
- **28)** House of the Binns
- **29)** The Cramond Association
- **30)** The Ecology Centre
- 31) Transform Scotland
- **32)** UK Flight Safety Committee
- 33) West Lothian Council
- 34) Wilsons Park Residents

The top themes identified were:

1 Noise concerns

- 2 Local impact issues
- **3** Proposed alternative flight paths

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Meetings

During the initial consultation period we met with a number of stakeholders:

- Alan Mitchell, Fife Chamber of Commerce
- Alex Cole Hamilton, MSP
- Alison Johnson, MSP
- Almond Neighbourhood
 Partnership
- Andrew Kerr, CEO City
 of Edinburgh Council
- Andy Wightman, MSP
- Angela Constance, MSP
- Angus McDonald, MSP
- Cllr David Tait
- Cllr Diane Calder
- Cllr Frank Ross
- David Torrance, MSP
- Edinburgh Airport Flight Operations and Safety Group

- Fiona Hyslop, MSP
- Graham Hope, CEO West Lothian Council
- Hannah Bardell, MP
- Humza Yusaf, MSP
- Jenny Gilruth, MSP
- John McNairney, Chief Planner, Scottish Government
- Liz McAreavey, Edinburgh Chamber of Commerce
- Martyn Day, MP
- Neil Findlay, MSP
- Ruth Davidson, MSP
- Shirley Anne Sommerville, MSP

We attended a number of community meetings and drop in sessions:

- Almond Neighbourhood Partnership
- Bo'ness Community Council
- Charlestown, Limekilns and Pattiesmuir Community Council
- Cramond Community Council
- Ecclesmachan Community Council
- Edinburgh Airport Watch
 meeting
- Falkirk District Community Councils' meeting
- Fife Council meeting
- Forth Neighbourhood
 Patnership
- Kinghorn Community Council

- Kirknewton Community Council
- Larbert, Stenhousemuir and Torwood Community Council
- Rosyth Community Council
- Uphall Community Council
- Winchburgh Community Council



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Responses by area

WEST LOTHIAN



The top themes identified were:

- 1 Noise concerns
- 2 Miscellaneous negative
- 3 Health issues
- 4 Local pollution and environmental issues

Top themes	Number of mentions	Illustrative quote
Noise concerns		
General noise disturbance concerns.	660	"The overriding factor for deciding upon the position of routes must be the minimisation of disturbance to local residents by the noise."
Concerns around sleep disturbance, being kept up late and woken by early morning flights.	434	"The level of disturbance due to aircraft noise significantly impacts on my sleep."
Negative sentiment based on experience during the TUTUR trial.	254	"Having experienced the initial trial of the TUTUR route, I am extremely concerned about the impact of permanent changes on both noise levels and the value of my property."
Impact on rural areas with low ambient noise.	93	"West Lothian is a rural area and there are many unpopulated parts of it where flight paths could be directed."
Already a noisy area with lots of flight paths, it's not fair to add more.	78	"I can see from the new plans that there will be even more aircraft flying over Pumpherston, it is ridiculous the amount of flights that fly over this area at present."

Health issues		
Concerns around the impact on sleep patterns and the health impacts associated with this.	214	"I do not wish my kids sleep to be disturbed or that of my partner who works night shift."
General concerns around the impact on health.	52	"The health effects from noise and the resultant reduction in property values must be taken into account and the proposals re- examined and revised."
The impact on wellbeing due to no longer being able to spend time outdoors, in garden etc.	28	"I was unable to enjoy spending time outside in the garden as there were planes overhead every few minutes."
Concerns around the noise of aircraft when turning.	15	"There were specific concerns raised over the width of the air corridor especially when turning noise was very disturbing this caused problems and distress for some residents."
Mention of hospitals/ hospices/care homes.	6	"Included in Livingston North is St Johns hospital, Carmondean Ability Centre and Delta House, none of these community groups should be subjected to the proposed air pollution."
Miscellaneous negative		
Concerns around current operations and noise complaints about existing flights.	221	"I have counted the number of aircraft going over in an hour and it is average 15-20 an hour."

Concerns over the impact on current airport infrastructure and capacity.	7	"I am concerned that the infrastructure that currently exists cannot support additional passenger numbers."
Complaints about current airport operations and processes e.g. security, arrivals.	7	"The security hall is a shambles with long queues often out into the retail area."
Complaints around parking charges and costs.	6	"Parking charges at the airport are extortionate and require review."
Concerns over the impact on current infrastructure e.g. road and transport networks.	3	"This will increase the burden on local infrastructure in particular transport systems."
Local pollution and environmental issues		
General increase in pollution over the local area.	136	"General increase in pollution over the local area and concerns around reduced air quality."
Fuel smells, concerns of aircraft dumping fuel in the local area.	9	"I am really angry about both the noise and the smell."

Responses by area – Edinburgh City

EDINBURGH CITY

8



The top themes identified were:

- 1 Noise concerns
- 2 Proposed alternative flight path
- 3 Miscellaneous negative
- 4 Local pollution and environmental issues

Top themes	Number of mentions	Illustrative quote
Noise concerns		
General noise disturbance and concerns about increase noise impact.	661	"We have lived in Cramond for just over a year and the only serious downside to life is the flight paths and all that goes with the noise and air pollution from the aircraft."
Disruption caused by early morning and late night flights is a particular concern.	98	"Late night and early morning flights are a particular concern in the Summer and should not be allowed to cause noise pollution at such unsocial hours."
Noise from aircraft flying at low altitudes.	18	"The significant increase in the number of flights across Cramond is of great concern in terms of noise and environmental impact. The fact that they are flying in much lower is also highly disturbing."
Noise caused by departing aircraft.	15	"I want arriving and departing flight paths over the Cramond district to be positioned at the most northerly limits of the design envelopes."

Proposed alternative flight path		
Comments around flying over water e.g. Firth of Forth to avoid overflying land where possible or towards River Almond.	211	"R24 southern I think this route envelope is too wide and too close to the centre of town, it could co further down to the Firth of Forth before turning south."
Comments that suggested specific areas within the design envelopes to avoid or try and fly over.	128	"I request that the outgoing flight path to the East is rerouted further North to protect Cramond and Barnton from noise pollution."
Comments around avoiding residential areas and built up areas.	103	"Loud aircraft noise is offensive and a massive nuisance. Flight paths should keep away from residential areas."
Miscellaneous negative		
Noise complaints about current aircraft operations.	94	"I am already disturbed by aircraft noise all through the night, every night."
Comments around runway realignment, increasing use of the second runway and building additional runways.	50	"We request the realignment of the existing runway."
Complaints about current airport operations e.g. security processes, car parking and surface access.	34	"You do need to get the airport much better organised, especially the security area before contemplating more flights."

Local pollution and environmental issues		
Concerns over air quality and the impacts of increased pollution.	225	"I am concerned at noise and air pollution."
The impact on the city's natural environment and landscape e.g. Holyrood Park, Portobello Beach.	31	"Arthur seat is a beautiful sanctuary within the city to have that ruined by frequent noisy air traffic would be awful for this lovely protected area."



Responses by area - Fife

8



The top themes identified were:

- 1 Noise concerns
- 2 Proposed alternative flight path
- 3 Miscellaneous negative
- 4 Local pollution and environmental issues

Top themes	Number of mentions	Illustrative quote
Noise concerns		
Concerns around general noise and increase in noise levels.	302	"I do not want the flight path in or out to be over Burntisland as the extra noise would make my life unbearable."
Concerns around noise at unsociable hours, including early morning and late evening.	130	"What effect is this going to have on noise pollution, especially at night."
Concerns around aircraft noise on departure.	127	"The noise level from aircraft currently departing over Dalgety Bay is fairly intrusive. This is not presently a huge issue as the number of flights is fairly limited however I would not wish to see a major increase as the noise pollution would not be acceptable to me."
The noise impact of low flying aircraft and aircraft flying at low altitudes above Fife.	79	"Surely it is possible to gain more height out over the Firth of Forth before crossing to Fife and flying at fairly low altitude over Aberdour, Dalgety Bay, Inverkeithing and Rosyth"
Concerns around increased noise in quiet, rural areas.	74	"Why push the flight path over quiet, rural areas when already noisy city space could more easily absorb additional noise."
Concerns around aircraft noise when landing or approach to land.	13	"Arrivals and departures over the Forth estuary should be maximised instead, reducing the disturbance to communities."

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Proposed alternative flight paths		
Flights should make use of the Forth Estuary and overfly water for as long as possible.	149	"The routes for both operations should be relocated to pass over the Forth and not over populated areas."
Aircraft should avoid overflying towns and residential areas as far as possible.	67	"There should be less overflying residential areas."
Flight paths should be located over Edinburgh.	18	"I would be against any such proposal. This is Edinburgh Airport so fly over Edinburgh not Fife."
Miscellaneous negative comments		
Complaints about noise from current operations, belief that there has already been changes to the flight paths.	114	"The changes already made and on trial mean we have flights roaring above us as they take off and land throughout the whole day."
Complaints about the airport in general e.g. security procedures, capacity issues.	17	"This has turned into the worst airport in Scotland. Herded like cattle. Poor access. Rip off charges."
Complaints about current noise from other sources e.g. Forth Crossing, road traffic.	10	"We have enough road traffic without having planes above causing more noise & pollution."
Information was difficult to understand, could be made clearer.	2	"Think you have missed a trick with your approach and could have made this a lot simpler and easy to understand."

Local pollution and environment issues		
Concerns over increased pollution and reduced air quality.	150	"I oppose the changes to flight path as will have a direct input on noise levels in Dalgety Bay, air quality and potential negative impact on house value."
The impact of flights on natural areas and local beauty spots e.g. beaches and coastal paths.	31	"I object to increased flights over Fife due to the impact it will have on the residents health, the many tourist attractions, such as the Fife Coastal Path and Inchcolm Abbey."
Concerns over the impact on wildlife.	26	"Increased noise and air pollution could affect local wildlife, birds etc. in this area."

Responses by area – Falkirk

FALKIRK

8



The top themes identified were:

- 1 Noise concerns
- 2 More information requested
- **3** Local pollution and environmental issues
- 4 Safety issues

Top themes	Number of mentions	Illustrative quote
Noise concerns		
Night noise and disturbance to sleep caused by aircraft at unsociable hours e.g. late night and early morning.	149	"The noise created early morning and late evening is unacceptable."
TUTUR trial caused distress, concerns this will be how things are permanently after the changes.	98	"The consultation doesn't seem to acknowledge the levels of concern raised during the TUTOR trials last year so it is unclear if the misery that was created at that time may be back in our future."
General negative impacts and disturbance caused by aircraft noise.	94	"I do not want noise pollution as I chose to stay here for that very reason."
Disruption to quiet and rural areas with little background noise.	16	"It is really important when there is local heavy industry (Grangemouth) and road traffic noise (M9) that people have access to unspoilt, quiet countryside."
This area is noisy enough, do not want additional noise caused by overflights.	7	"We're all for supporting air transport expansion however not if this results in an increased number of flights and noise over where we live."

More information requested		
Specific information around use of the routes and specific design routes.	36	"How many aircraft per day will fly over this postcode."
Request for consultation book.	14	"Please could I have a copy of the consultation book as I do not have access to the website."
What would the changes be compared to current operations.	6	"Will the flight times alter from present to longer and more night flights."
Local pollution and environmental issues		
General concerns around increased pollution and reduced air quality.	32	"By having low flying aircraft you disrupt this with noise pollution and pollution in general."
Concerns around increased fuel smells and possible fuel dumping over the area.	2	"I think we have enough air pollution from Grangemouth without adding to it. I did work in Livingston and on days you could actually smell the fuel, and we had complaints on a daily basis."
Safety issues		
Concerns around flights overflying the petrochemical plant and oil refinery at Grangemouth.	48	"What will happen if an aircraft flying over Grangemouth blows up and crashes into the oil refinery or the chemical works, you would have an absolute disaster on your hands."



Responses by area - Midlothian

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Top themes	Number of mentions	Illustrative quote
Noise concerns		
General concerns about increase in noise pollution and the increased noise that may be generated.	68	"Concerned about increased noise problems."
Concern around flights at unsociable hours, late at night and early in the morning.	35	"Flights pass over my house already which we aren't too bothered with but obviously we'd be seriously concerned if this was to increase or happen late at nights or in the early hours of the morning."
Concern around the noise from landing aircraft, due to altitude and deploying flaps and undercarriage.	8	"Of particular concern is the noise created when an aircraft suddenly deploys its flaps and this can have a very negative effect on many members of our local community."

The top themes identified were:

- 1 Noise concerns
- 2 Miscellaneous negative
- 3 Impact on economy and tourism
- 4 Proposed alternative flight path

8

MIDLOTHIAN

Miscellaneous negative		
Noise complaints about current aircraft operations.	15	"Last night my new baby daughter was woken on several occasions during the night by incredibly loud aircraft noise."
Complaints about current airport facilities and cost of flights.	9	"Flights from Edinburgh being ridiculously expensive which makes me really annoyed as Edinburgh airport should have much more reasonably priced flights available to local residents."
Concerns around surface access and increased future problems.	8	"A major concern I do have relates to access to the airport. On my way to the airport I have experienced considerable delays on the Edinburgh City By pass due to breakdowns, accidents and sheer volume of traffic."
Impact on economy and tourism		
Benefits to the economy e.g. improved financially, growth, new jobs.	25	"I fully support the expansion and re-routing of flight paths to and from Edinburgh Airport. It is the backbone of the local economy and we cannot afford to fall behind and let rival cities take the lead."
New routes opening up new destinations.	16	"Edinburgh airport should be given the opportunity of providing more flight paths to destinations that cannot be reached without the hassle of travelling down south to connect for flight."

Proposed alternative flight path		
Mentions of avoiding built up or residential areas.	15	"Why can the new route not go further over the A701 Pentland hills where there would be little effect to home owners."
Suggestions to routes flying over water to avoid land as far as possible.	5	"It would seem logical to move the envelope some 40 miles east therefore flying along the sea into the Firth of Forth beyond Dunbar to land in Edinburgh."



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Responses by area - East Lothian

29% 27% 27% 27%

Top themes	Number of mentions	Illustrative quote
Noise concerns		
General negative impacts and disturbance caused by aircraft noise.	19	"As an individual I am extremely concerned about the amount of noise."
Night noise and disturbance to sleep caused by aircraft at unsociable hours e.g. late night and early morning.	17	"We are concerned that flights don't continue after 11 pm and before 7 am in the morning as it may cause sleep disturbance."
Noise would have a negative impact as this is a quiet, rural area with low levels of background noise.	13	"As one of the people who have chosen to live in the peace of the countryside I am very unhappy that this choice is being compromised."
Noise disruption from landing aircraft.	3	"Where I live has in recent times been subject to much more frequent air traffic and lower flying traffic in towards the airport."

The top themes identified were:

1 Noise concerns

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- 2 More information requested/Miscellaneous negative comments (*joint 2nd place*)
- **3** Proposed alternative flight path

$\underline{08}$ Responses by area – East Lothian

More information requested:		
Additional information requested on the specific flight paths proposed e.g. altitudes, the impact of the flight paths on their area.	12	"I am requesting more in depth details of how this will affect me and the intended flight details of are these flights going to be taking off over my house."
Requests for consultation books.	8	
Miscellaneous negative comments		
Surface access to the airport is poor, growth would add further traffic congestion.	7	"I'm all for expansion my only concern is the access road. The continued growth is great but the one small road is already insufficient."
Proposed alternative flight paths	27	
Alternative flight paths over water suggested.	15	"I would like to see the planes diverted further out from Musselburgh over the sea and then when at height coming in over the land."



Responses by area – Perth and Kinross



Top themes	Number of mentions	Illustrative quote
Noise concerns		
General concerns that there would be an increase in noise disturbance.	11	"My wife and I do not wish that our peace and tranquillity be interrupted by any noise or air interruption caused by any aircraft flying overhead."
Low background and ambient noise in a rural setting so noise would have a greater impact.	9	"We live in a very rural peaceful environment and I would prefer it to remain that way."
The effect of noise on natural areas.	8	"Increased pollution from air traffic would be destructive in one of the few pockets of peace easily accessible to people living in Central Scotland."

The top themes identified were:

1 Noise concerns

18

- 2 Local impact issues
- **3** Local pollution and environmental issues

$\underline{08}$ Responses by area – Perth and Kinross

Local impact issues		
Concerns around bird sanctuaries.	29	"Loch Leven is a nature sanctuary for thousands of migrating birds."
Concerns around the impact on Gliding Centre or air sports in the area.	14	"The Scottish Gliding Centre. This is based at Portmoak on the shores of Loch Leven and is the largest gliding club in Scotland providing year round flying to members and visitors."
Local pollution and environmental issues		
Impact on wildlife, particularly around the Loch Leven area.	14	"One of the proposed flight paths goes over Loch Leven and the RSPB nature reserve. The area is home to dozens of species of birds and other wildlife. It's a haven for migrating birds."



Responses by area – Scottish Borders

SCOTTISH BORDERS

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Top themes	Number of mentions	Illustrative quote
Noise concerns		
Noise would have a negative impact as this is a quiet, rural area with low levels of background noise.	13	"The south of the Pentland Hills range is a quiet and peaceful space and I believe increased air traffic overhead would significantly impact on the public enjoyment of the area."
General negative impacts and disturbance caused by aircraft noise.	8	"We don't want additional aircraft noise polluting our area."
Night noise and disturbance to sleep caused by aircraft at unsociable hours.	5	"Of most concern at this moment would be flights during the night."
Increased noise due to aircraft flying at low altitudes.	3	"Incoming flights would be well on the way to descending in preparation for landing at the airport and so will be very low in the sky."

The top themes identified were:

- 1 Noise concerns
- 2 Local pollution and environmental issues/More information requested (*joint 2nd place*)
- **3** Proposed alternative flight path, Negative about consultation process (*joint 3rd place*)

Local pollution and environment issues		
Concerns over increased greenhouse gas emissions.	4	"The increased air traffic, greenhouse gas emissions, noise pollution over a rural area just seems wrong."
Flight paths would have a damaging impact on the local environment.	2	"I consider there would be irreparable damage caused to the Pentland Hills environment and Regional Park status."
More information requested		
Additional information requested on the specific flight paths proposed.	8	"There is no information on the vertical profiles of the proposed flight paths."
Proposed alternative flight path		
Alternative flight paths suggested avoiding towns and more populated areas.	8	"Why do planes have to fly direct over West Linton when there is plenty of open air space either side of the village."
Alternative flight paths over water suggested.	4	"Could the new path be moved nearer the water of the Forth."
Negative consultation process		
More information on proposed changes and detailed flight paths should be provided.	6	"It's pretty difficult to understand exactly what you're asking us to comment on."
Information was difficult to understand, could be made clearer.	2	"Think you have missed a trick with your approach and could have made this a lot simpler and easy to understand."



LANARKSHIRE (NORTH AND SOUTH)

8



Top themes	Number of mentions	Illustrative quote
Noise concerns		
General concerns around the effects of increased noise pollution.	6	"This can not happen it will cause to much noise pollution."
Concerns around flights at unsociable hours e.g. early morning and at night.	4	"Is there likely to be an increase in the number of daily flights over Biggar surrounding area, an increase in the number of night time flights (23.30hrs until 06.00hrs."
Local pollution and environment issues		
General concerns around the effects of increased pollution.	2	"This is a terrible idea. We need less pollution not more. Flying produces horrendous amounts of pollution and you are subjecting Scotland to huge amounts already."

The top themes identified were:

- 1 Noise concerns
- 2 Local pollution and environmental issues
- **3** Positive impact on the economy and tourism, Climate change and carbon, Local impact issues, More information requested, Flight efficiency, Flight planning, Proposed alternative flight path, Miscellaneous negative comments (*all joint 3rd place*)





RESPONDENTS WHO DID NOT GIVE LOCATION

The top themes identified were:

- 1 Noise concerns, Consultation process and related issues concerns (*joint 1st place*)
- 2 Local pollution and environmental issues, Operational and aircraft issues – other, Proposed alternative flight path, Miscellaneous negative comment

REGIONS WHERE TEN OR FEWER RESPONSES WERE RECEIVED



The top themes identified were:

- **1** Flight planning
- 2 Noise, concerns around increased noise
- 3 Consultation process and related issues, local impact issues, out of scope comments and proposed alternative flight paths

Overall data analysis

Noise (3370 responses)

Top issues raised	Number raising this issue	Areas with the highest number of mentions of this issue	Illustrative quote
Concerns over the general impacts that increase noise caused by aircraft operations and over flights may have.	1830	West Lothian Edinburgh Fife	"I am supportive of continual review of flight routes and all operational matters within the airport however a review of flight routes probably only makes sense in connection with other factors such as the safety and environmental record of the airlines you are allowing the land, the aircraft efficiency and noise and operational procedures (e.g. when landing gear is deployed). I hope the consultation makes flying to and from Edinburgh and easier and safer experience."
Concern over flights at unsociable hours e.g. late nights and early mornings sleep deprivation may have on health.	872	West Lothian Edinburgh Fife Midlothian	"A Sunday night between 8pm and midnight is especially bad. Quite why you have to use Livingston, one of the most densely populated areas in West Lothian as a flight path is beyond me."

Top issues raised	Number raising this issue	Areas with the highest number of mentions of this issue	Illustrative quote
			"There are more flights flying over the Village late into the evening, after 11.00pm and some in the middle of the night between 1.00 am and 2.00am. We are woken up at very unsociable hours with very early flights arriving or departing between 5.00a.m and 6.30am." "The operational hours of the airport should be reduced to ensure there is no flying in unsociable hours." "Noise is normally an acceptable background noise during the day but either due to lower altitudes or greater contrast against the overnight quiet hours it has become quite disturbing and I wouldn't wish this to get any worse."
Worries over the TUTUR trial and the impact of the trial on communities, concerns that TUTUR will become permanent.	260	West Lothian	"Having suffered the terrible increase of noise last summer when the TUTUR flight path was being trialled. I totally oppose the plans of the airport to alter the fight paths over what have been previously peaceful and tranquil areas of countryside."

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Health (878 responses)

Top issues raised	Number raising this issue	Areas with the highest number of mentions of this issue	Illustrative quote
General health concerns.	358	West Lothian	"The health effects from noise must be taken into account and the proposals re-examined and revised.
Concerns over the impact on sleep patterns.	200		"We have only just recently moved into the area and very happy but concerned how the change to flight paths will have an affect on the noise in the area. We have a young baby and second child on the way and unaware how noisy this will be and if this will affect their and our sleep."
The impact of noise and increased operations on stress and mental health.	88		"Please consider alternative routes which avoids domestic dwellings."
Concerns around breathing and respiratory problems.	27		"The impact on health can be wide ranging and particularly affect those who suffer from respiratory illnesses."

Miscellaneous negative comments (1303 responses)

Top issues raised	Number raising this issue	Areas with the highest number of mentions of this issue	Illustrative quote
Concerns about current operations and noise complaints about existing flights, belief that changes to flight paths have already been introduced.	689	West Lothian Edinburgh Fife	"I am aware of significant changes in the eastern flight arrivals activity (overhead) and am therefore keen to participate in this consultation."
General concerns around the introduction of new flight paths.	103		"I am alarmed having looked at the proposed flight paths, that the envelope of all new proposed routes are expected to come past and impact my home life and personal well-being."

Local pollution and environment issues (444 responses)

Top issues raised	Number raising this issue	Areas that raised this issue	Illustrative quote
Concerns over reduced air quality and general pollution due to increase in flights.	226	West Lothian Edinburgh Fife	 "I am really angry about both the noise and the smell. I have, on numerous times, smelt aviation fuel while walking my dog in the local area. I am worried about the effect this has on the environment and my health. My area was a quite one before the planes and now we have roaring planes overhead." "I am FULLY AGAINST the proposed flight path over EH8. I lived by Gatwick for many years and the resultant dirt, for e.g. on clothes hanging on the line, the smell, they are all 'tasted' and 'seen'. The pollution over my home, my garden It's not healthy." "Any jettison of fuel from incoming flights over Aberdour will pollute the local environment."

Proposed alternative flight paths

(1198 responses)

Top issues raised	Number raising this issue	Areas that raised this issue	Illustrative quote
Aircraft should overfly water to avoid residential areas e.g. Firth of Forth, River Almond.	384	Edinburgh Fife	"Please use noise preferential route when planes take off over Cramond so they bank to the left over the Forth to at least spare Cramond some noise. Would definitely prefer no night flights between 12pm and 6am. If realignment of runway for incoming flights impossible, then higher descent path of aircraft might be beneficial" "We support the broad principle that flights paths should be as far as possible over the Firth of Forth and not over surrounding communities."
Suggested routes to avoid overflying built up residential areas and towns.	188	Edinburgh	"Would it not be better to move the airspace a little further to the west to avoid more of Edinburgh's built up area."

09

Next steps

Our Airspace Change Programme is a two year programme that includes two public consultations. This report shows the response to the initial consultation. It shows the high level themes and issues in the council areas in Scotland. Due to our privacy policy and protecting the data of those who responded, individual comments will not be publicly available but will be submitted to the CAA as part of the Airspace Change Programme application process. Themes and issues raised in this consultation and set out in this report will be used to inform proposed design options where possible. Data will be shared with experts in the fields of noise, environment, community, equalities, operations and air traffic control to provide advice regarding the individual responses.

These will form part of a matrix, combined with criteria around population, community institutions such as education facilities and hospitals, emissions and track miles flown.

Draft flight path options will be evaluated against this criteria and matrices to determine the proposed flight path options.

We will then run a second public consultation on our proposed routes. Information regarding the positioning of the proposed route options will be available as part of the second consultation which will begin in January 2017.

Airspace Change Programme timetable*

Phase			
06/06/2016	14 weeks	19/09/2016	Initial consultation
19/09/2016	16 weeks	09/01/2017	Data analysis and route development
January 2017	12 weeks	April 2017	Consultation 2
April 2017	10 weeks	June 2017	Data analysis and route refinement
July 2017	14 days	July 2017	Application development and lodge with CAA
July 2017	17 weeks	November 2017	CAA review of application
December 2017	4 months	April 2018	NATS implementation

*This timetable is provisional and may be subject to change.

The Consultation Institute's commentary

The Institute, founded in 2003, is a not-for-profit, best practice body dedicated to improving public and stakeholder consultation. Part of its work is to undertake a formal Quality Assurance of high-profile exercises where the integrity of the process is considered to be important. On this occasion, and in the light of public reactions to the TUTUR flight path trial in 2015, Edinburgh Airport commissioned the Institute to provide a Quality Assurance service in respect of the formal consultation planned for the summer of 2016.

We appointed Quintin Oliver to act as Adviser to the Airport and Rhion Jones LL.B to act as Assessor. In line with best practice, the Institute reviewed the actions and activities undertaken by the Airport in preparation for the consultation. As a consequence, it recommended the establishment of an independent Stakeholder Reference Group, so that the Airport's conduct of the consultation be subject not just to the Institute's QA process but to the opinions and views of a forum of well-informed local stakeholders. The Institute assisted in organising such a Group and is pleased that Dame Sue Bruce accepted the role of Chair. The QA process requires the Institute to sign off each of six separate 'interventions', each of which places onerous requirements upon the consultor:

- The Institute signed off the Scope of the consultation noting that this was heavily prescribed by Guidelines from the CAA (themselves under review);
- The Institute examined the **Project Plan** in detail, and required improvements to it concerning Equalities Analysis, and clarification of the post-consultation timetable before it was signed off;
- Although much of the published **Documentation**, including broadcast adverts, had been prepared before the Institute's involvement began, we were able to review most and approve it for 'sign-off';
- On 12 August, we conducted a full Mid-Review of the consultation, and identified limitations to the data emerging from the single-question format, and from the absence of complete demographic information on consultees. We also required a more active programme of contacts with specific communities of interest, and steps to mitigate the over-reliance upon the online survey as a response mechanism. The Mid-Review was therefore given a conditional sign-off;

- In the week commencing 29 August, the Airport suffered a failure of its website resulting in the loss of significant numbers (up to 200) of respondent data. The Institute had to decide the extent to which this would compromise the consultation and its Quality Assurance. We held detailed discussions with the consultor, and considered the range of actions taken in response to this failure, including the week's extension to the consultation timetable. Uppermost in our minds was the need to be sure that overall, those affected by the Airport's future plans and other interested stakeholders would still have had a reasonable opportunity to express their views as part of the consultation. As this is a preliminary exercise, and that specific route options will be consulted upon in 2017, the Institute decided that, notwithstanding this failure, it was possible to 'sign off' the **Closing Date** intervention on 23rd September 2016. Edinburgh Airport has been advised that this failure will make it impossible to record the consultation as having been 'best practice', and detailed recommendations have been made to reduce the risk of any similar recurrence:
- The Institute reviewed the draft report, sought the views of the Stakeholder Reference Group and signed off the final report on 22nd November 2016.

The Institute takes into account the overall context of a public consultation. In this case, it recognises the high levels of public interest in any changes to flight paths, and the anxieties of some residents who worry about the impact upon them and their neighbours. We have been impressed by the Airport's programme of dialogue with local communities, and its working relations with local Councillors, MSPs and business leaders. The Institute requires the Airport to give 'conscientious consideration' to all respondent views and to ensure that they are taken into account in the forthcoming task of developing options for further consultation on specific routes; we are confident that this will occur.

Having looked at all the available information, and noted the views of the Stakeholder Reference Group, the Institute is satisfied that, overall, the public consultation has been conducted in accordance with current GOOD PRACTICE, and where aspects of the exercise fell short of the required standards, that Edinburgh Airport is fully aware of improvements it should seek to implement in the next phase of the Flight Paths change programme.

Quintin Oliver – Adviser

Rhion H Jones LL.B - Assessor

22nd November 2016

Appendices

Appendix 1: Statistics

Our overall social media advertising campaign delivered the following stats:



And the following engagement:



Notes

Notes

