

Edinburgh Airport - Consultation Responses

Question	Comments	Our Response
Q1	<p>Of the eleven responses received to the Edinburgh Airport consultation, three felt that BAA’s long-term goal to be in the top fifth of airport companies was ‘sufficiently challenging’, while five thought it ‘not very challenging’ and one ‘not at all challenging’ (two answered ‘don’t know’).</p> <p>One respondent who considered that the goal was ‘sufficiently challenging’ gave the explanation that:</p> <p style="text-align: center;"><i>"I believe it is necessary for Edinburgh Airport to be meeting the standards and challenges of comparable / larger airports within the UK and the Action Plan sets out to achieve that"</i></p> <p style="text-align: right;">Local resident/individual (answering ‘sufficiently challenging’)</p> <p>There was, however, some feeling that the target of being in the top fifth of airport companies was not challenging enough. In particular, two respondents commented that the target should be the top 10%.</p> <p style="text-align: center;"><i>"Targets should be more ambitious than that on the basis that they are usually just that. Top 10% should be targeted"</i></p> <p style="text-align: right;">Local resident/individual (answering ‘not very challenging’)</p>	<p>Goal</p> <p>At present there is no league table of airports with regard to noise management. However we have committed to doing some benchmarking to ascertain our present position and identify opportunities to enhance our noise management approach with comparable airports.</p> <p>There is expected to be around 30 airports of comparable size and scale of local population which could be compared against. Therefore a target of being in the top 20% would mean appearing 5th or 6th on the list. We believe that this is an appropriate goal, however when benchmarking has been carried out we may revise the goal as appropriate.</p> <p>Types of Aircraft</p> <p>We do not allow the noisiest types of aircraft to land at Edinburgh Airport. This means we only allow chapter 3 and above aircraft. We also fine aircraft which breach the noise limits we have set and differentially charge noisier aircraft for landing at the airport.</p> <p>Quieter Aircraft</p> <p>Corporate level BAA carries out a range of actions to influence aircraft manufactures and airlines. Please see section 10 of the plan.</p>

	<p><i>"This is a meaningless goal. I believe BAA manages 7 airports in the UK, and it is not therefore possible to compare Edinburgh with any other UK airport managed by BAA. I would suggest the test should be with other airports which should all be identified at the beginning of the period. I would also suggest the goal should be to have Edinburgh in the top 10%"</i></p> <p>Local resident/individual (answering 'not at all challenging')</p> <p><i>"The easier the target, the less likely a more positive result is achieved. To aim for a really tough target and narrowly miss delivers better results than aiming at an easier target and hitting it."</i></p> <p>Local resident/individual (answering 'not very challenging')</p> <p><i>"BAA do not dictate which type of aircraft use their airports. They may encourage quieter planes but they accept all. With newer aircraft automatically being quieter, what challenge is that for BAA, who will simply continue to accept all incoming and outgoing airlines/flights for the sake of expansion."</i></p> <p>Local resident/individual (answering 'not very challenging')</p>	<p>No new actions</p> <p>The aim of this plan is not to introduce completely new actions, but outline in one document all the measures we will adopt over the next 5 years to manage noise. A considerable new action which has been included is to publicly consult on a noise insulation scheme for our local communities. This is a significant step in mitigating the noise impact on the community which we have not undertaken in the past.</p>
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	<p>One respondent who felt that the goal was ‘not very challenging’ gave the reason that:</p> <p><i>"Most of the actions are already in place and the action plan is mainly monitoring of existing systems."</i></p> <p>Local resident/individual (answering ‘not very challenging’)</p>	
Q2	<p>Of the eleven respondents to the Edinburgh consultation, five considered that BAA’s noise strategies were ‘partially’ targeting the most important problems in relation to aircraft noise, while five respondents felt that they were not (two ‘not very’ and three ‘not at all’). One respondent answered ‘don’t know’.</p> <p>There were two respondents whose comments made reference to issuing fines for noisy aircraft. One respondent considered that while the hotline to report noisy aircraft is a good idea, fining the operator does not actually give any benefit to those affected by the noise. The second felt that fining aircraft for noise is like taxing cars for speed in that it's irrelevant and would not alter behaviour. There were also detailed mentions of the current flight paths used at Edinburgh airport made by three respondents.</p> <p><i>"As a lay person, in studying the noise pattern contour illustrations contained in the consultation document, I have great difficulty in understanding why no consideration is able to be given within the action plan to a</i></p>	<p>Aircraft Fines</p> <p>In May 2006, Edinburgh Airport chose to introduce a system of noise fining. Any aircraft that breaks the stated noise thresholds set down by the UK Government is now automatically fined, with the level of the fine dependent on the level of infringement. Two different noise thresholds are used, one for daytime and one for nighttime. The level of fines imposed were doubled in 2007 and since the introduction of this new system, Edinburgh Airport has seen a massive fall in the number of aircraft making excessive noise on departure from the airport. All money raised from noise fines is placed into the Edinburgh Airport Community Fund. The Fund was established in 2006 to contribute to local projects and good causes. The Fund is administered by the Community Forum, a group made up of airport staff. All applications for assistance are considered on a case by case basis but any projects must fit in with at least one of the Forum's three themes - education, environment or sport. Applications must also be for specific projects rather than base sponsorship and should be focused on the key communities around the airport.</p>

detailed examination of the flight entry path from the east to mitigate the considerable impact both in noise and pollution terms over the highly (and increasingly) populated area of Cramond. I do understand that the planes have to 'lock on' some 8 miles out but that is to an existing flight path - why can that flight path not be marginally adjusted north to avoid the population density?"

Local
resident/individual (answering 'partially')

"BAA is not interested in curbing noise... [The landing flight path should be moved] away from Edinburgh where the people are to fly over the Forth Estuary - where there are no people. This is a simple solution which is

** cheap - it would cost nothing to move the landing flight paths a few hundred metres*

** effective*

** and long term.*

...The simplest and quickest solution would be to JUST MOVE THE FLIGHT PATH over the FORTH."

Local
resident/individual (answering 'not at all')

"The problem is inappropriate usage of runway running north/south. This aligns

Fines are part of a whole programme of measures to engage airlines to reduce their noise impact. Regular meetings are held with airlines to discuss if aircraft are coming close to the noise limits, so in effect the fine is the last resort if all other methods have failed. In fact only two aircraft have been fined suggesting that fining as a deterrent is working.

Aircraft Routes

It is a matter for National Air Traffic Services (NATS) to make any amendment to standard arrival routes or standard departure routes at Edinburgh Airport, changes that would have to put out for full public consultation. Such a consultation would be run by the Civil Aviation Authority Directorate of Airspace Policy, could last for two years because of the likely implications and may even require a full public inquiry. Safeguarding issues in relation to departure and approach paths would have to be carefully considered to ensure there were no obstacles of sufficient height that would cause concern.

The main runway at Edinburgh Airport is currently equipped with an instrument landing system (ILS), which sends out a signal for aircraft to use to arrive at a steady three degree angle of approach. This ILS system requires aircraft to lock into the signal at least eight miles from the end of the runway, over the Firth of Forth for arrivals from the east. As a result of this technology, it is not possible for aircraft to avoid passing over areas of population such as Cramond when arriving from the east.

Aircraft Safety

aircraft landing and taking off over heavily populated areas of the City and the Gyle centre. The consequences of a crash on landing or take off will be devastating.

The runway should be closed permanently.

The main runway is aligned mainly over the Firth of Forth or thinly populated moorland in West Lothian and does not carry the same threat."

Local
resident/individual (answering 'not at all')

Three respondents made reference to the number of flights being the biggest issue in terms of aircraft noise. One respondent commented that the plan made no reference to limiting the number of flights, which they saw as making the biggest difference to reducing noise. Another considered that an increase in the air traffic passing their house would be more of an annoyance than the occasional loud passing aircraft. This view was repeated by another respondent who stated that:

"...while mention is made of increasing numbers of flights, the impact is not given higher priority in terms of the dBLAeq measures - ie if only 5 flights a day created 69 dBLAeq each surely 50 flights a day (and increasing) must have a much greater environmental and noise impact - I believe insufficient weight is being given to this important issue in the action plan."

Safety is paramount to the airport and we are regulated by the CAA to ensure all operations are carried out to the highest standards of safety.

Noise Measurement

It is not the role of this plan to challenge government policy on noise measurement. The measure we use is what is set out in the government white paper on aviation. The white paper went through a lengthy public consultation to determine the most appropriate measure for noise.

The noise footprint maps produced by CAA demonstrate that noise is in decline around the airport despite increase in movements. In order to assure the local community that we aim to continue this reduction in noise we will add a new target into the plan which will be to aim to maintain or decrease the square meter area which falls within the 57db leaq contour line as determined by the CAA.

Value of Work

We are challenged to responsibly manage the impact of noise on local residents while maintaining a safe and efficient operation of the airport and we will implement the actions in the plan. A key element in the plan which we have committed to, is to consult with the local residents on a noise mitigation scheme

In order to assure the local community that we aim to continue this reduction in noise we will add a new target into the plan which will be to aim to maintain or decrease the square meter area which falls within the 57db leaq contour line as determined by the CAA.

	<p style="text-align: center;">Local resident/individual (answering ‘partially’)</p> <p>One respondent who considered that the noise strategies outlined were ‘not at all’ targeting the most important problems in relation to aircraft noise offered the following explanation:</p> <p style="text-align: center;"><i>"I have read the Action Plan and it appears to me to be in the main, just talk. 'We will continue to engage...'; 'We will continue to lobby...'; 'We will consult....'. There is no goal that will actually reduce the noise level for those people living directly under the flight path."</i></p> <p style="text-align: center;">Local resident/individual</p>	
Q3	<p>Of the eleven responses to the consultation, six considered the draft noise action plan to provide a ‘partially’ suitable framework to manage aircraft noise, whilst four stated that it did not provide a suitable framework (three ‘not very’ and one ‘not at all’). One responded ‘don’t know’.</p> <p style="text-align: center;"><i>"The noise action plan has taken into account the contour lines and other properties if outwith these countours are not considered as valid complainers however I think that all complaints should be</i></p>	<p>Complaints All complaints received are investigated fully irrelevant of the origin location of the complaint. Complaints are discussed at the airport consultative committee and data published in the newsletter.</p> <p>Limiting Flights As a business, Edinburgh Airport contributes significantly to the regional economy, supporting more than 4,000 jobs and contributes £287 million to the economy, underpinning the</p>

<p><i>investigated even if the property lies outwith the current contour lines."</i></p> <p>Local resident/individual (answering 'partially')</p> <p><i>"The noise strategies make no reference to limiting the number of flights, which clearly would make the biggest difference to reducing noise. This also relates to the reduction of CO² emissions."</i></p> <p>Local resident/individual (answering 'not very')</p> <p>A third respondent also commented at this question, explaining why they felt the noise action plan provided a 'not at all' suitable framework for managing aircraft noise as follows:</p> <p><i>"Noise reduction' is simply a corporate fig-leaf (aka 'corporate social responsibility')</i></p> <p><i>You fly the noisiest planes at night (the old twin-prop turbo jets from the Highlands) and monopolise slots and opportunities against other airports which would reduce noise and prices.</i></p> <p><i>'Fining' noisy planes is like taxing speeding cars - ineffective, irrelevant and futile."</i></p> <p>Local resident/individual (answering 'not at all')</p>	<p>area's tourist industry. Limiting flights would limit this role in the economy. Nevertheless, the airport does take its responsibility to local residents seriously, and we continue to work to the international standards with regard to banning noisier aircraft.</p> <p>Aircraft Fines</p> <p>Aircraft are fined if the breach noise levels set by the airport. The money from these fines are put into the community fund. The Fund was established in 2006 to contribute to local projects and good causes. The Fund is administered by the Community Forum, a group made up of airport staff. All applications for assistance are considered on a case by case basis but any projects must fit in with at least one of the Forum's three themes - education, environment or sport. Applications must also be for specific projects rather than base sponsorship and should be focused on the key communities around the airport.</p> <p>Fines are part of a whole programme of measures to engage airlines to reduce their noise impact. Regular meetings are held with airlines to discuss if aircraft are coming close to the noise limits, so in effect the fine is the last resort if all other methods have failed. In fact only two aircraft have been fined suggesting that fining as a deterrent is working.</p>
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Q4	<p>Of the eleven respondents to the consultation, two felt that the performance indicators proposed by the action plan were ‘fairly sufficient’, six considered that they were ‘not very sufficient’ and one responded that they were ‘not at all sufficient’ (two responded ‘don’t know’). From those who considered that the performance indicators were insufficient, the accompanying comments were:</p> <p style="text-align: center;"><i>"There are no clearly stated goals and the performance indicators are a meaningless wish list"</i></p> <p style="text-align: right;">Local resident/individual (answering ‘not very sufficient’)</p> <p style="text-align: center;"><i>"Noise' tax is irrelevant, specious and sleekit. It is not possible to make jet engines sufficiently quiet to prevent disturbance. The only solution is to NOT fly at night (at or least not land at night) and - where possible and practical - to alter landing flight paths and descent/ ascent gradients. Everything else is simply corporate fig-leaferly."</i></p> <p style="text-align: right;">Local resident/individual (answering ‘not at all sufficient’)</p>	<p>Effectiveness of plan We believe that the actions in the plan are appropriate considering the challenge of operating a safe, successful and realistic operation of the airport We will continue to develop the plan in future years and build on actions within our control.</p> <p>Night Flights Edinburgh Airport has always operated on a 24 hour basis, though the number of night time flights is relatively low. A certain number of these night flights are necessary in order to correspond with schedules and time differences around the world. Most night flights, including flights to the highlands, are for mail and special delivery. 93% of Royal Mail First Class post and 99% of Special Delivery arrives into Edinburgh Airport with a destination in Scotland. However, we are mindful of the inconvenience this can sometimes cause local residents, and Edinburgh Airport therefore voluntarily adopts Department for Transport night-time noise restrictions, which limit noise levels between the hours of 23.30 and 06.00. Edinburgh Airport has no obligation to impose night time limits, but does so on an entirely voluntary basis.</p>
Q5	<p>Three respondents to the consultation made further comments on Edinburgh airport’s draft noise action plan. One local resident/individual raised specific concerns</p>	<p>Ground noise and engine running We will update the plan to explain more about current practices. Engine running is an essential part of airport operations. Engines</p>

<p>about receiving notification when ground engine testing takes place, as follows:</p> <p><i>"[I] appreciate airport doing best to reduce noise but as an immediate neighbour I would like notification when ground engine testing takes place. Once every few weeks is fine but when it is continuous one after the other then I feel we should be notified. This is very noisy and often have fuel smells in the house. Prior notification would be helpful and noise detection results could be emailed to immediate neighbours too. Must say have phoned noise line from this house and previous house in Cramond and have NEVER had a phone call back from them with an explanation. Kevin Lang from BAA Edinburgh is very good at emailing me when I write to him but notification of engine testing would be appreciated."</i></p> <p>Local resident/individual</p> <p>Comments made by two other respondents were more critical of the Noise Action Plan overall:</p> <p><i>"This all appears to be some sort of PR exercise on the part of BAA when in fact it does nothing to actually reduce aircraft noise for local residents. With the airport expanding, how is BAA going to reduce or manage aircraft noise when its ultimate goal is to increase the number of flights in and out</i></p>	<p>need to be tested for safety reasons and are part of the maintenance of aircraft. We understand that this noise can cause disturbance to local residents and therefore do not allow engine testing during sensitive times such as the night. We will add into the plan a new action on engine testing to report on the frequency and times of engine running to the local community and the airport consultative committee. We hope by reporting on engine testing we will assure residents that we are managing engine testing as responsibly as possible.</p> <p>Expansion and Monitoring The noise footprint maps produced by CAA demonstrate that noise is in decline around the airport despite increase in movements. In order to assure the local community that we aim to continue this reduction in noise we will add a new target into the plan which will be to aim to maintain or decrease the square meter area which falls within the 57db leaq contour line as determined by the CAA.</p> <p>Aircraft Routes It is a matter for National Air Traffic Services (NATS) to make any amendment to standard arrival routes or standard departure routes at Edinburgh Airport, changes that would have to put out for full public consultation. Such a consultation would be run by the Civil Aviation Authority Directorate of Airspace Policy, could last for two years because of the likely implications and may even require a full public inquiry. Safeguarding issues in relation to departure and approach paths would have to be carefully considered to ensure there were no obstacles of sufficient height that would cause concern.</p>
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	<p><i>of the airport over a longer period of time?"</i></p> <p>resident/individual</p> <p><i>"The whole context of the draft noise action plan is inappropriate. The foreword by the airport MD attests 'every day, our local community sees the benefits of a successful Edinburgh Airport'. This statement is not justified by independent evidence. (refer to Scottish Planning of Environmental Law, October 2007 Transport Noise Possible Solutions) I understand the noise disturbance is less when aircraft land from the west and with modern aircraft I think it may be possible to route a higher proportion of aircraft landing from the west. Finally there is no reference to the effect of the proposed second runway."</i></p> <p>resident/individual</p>	<p>Local</p> <p>The main runway at Edinburgh Airport is currently equipped with an instrument landing system (ILS), which sends out a signal for aircraft to use to arrive at a steady three degree angle of approach. This ILS system requires aircraft to lock into the signal at least eight miles from the end of the runway, over the Firth of Forth for arrivals from the east. As a result of this technology, it is not possible for aircraft to avoid passing over areas of population such as Cramond when arriving from the east.</p> <p>The noise action plan is a 5 year plan which runs to 2013. The proposed second runway will not be required until after this time. If a second runway is built, the action plan will cover this as well.</p> <p>Local</p>
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