

NORTH QUEENSFERRY COMMUNITY COUNCIL

North Queensferry Community Centre
Brock Street
North Queensferry

3rd May, 2017

Edinburgh Airport Consultation,
Edinburgh Airport,
FREEPOST
Edinburgh.

Dear Sirs,

I write as Chairman of North Queensferry Community Council on behalf of the Council in response to the Edinburgh Airport Flightpath Consultation Document. You have previously received an emailed response by Mary Finlayson on behalf of the Community Council, to which I refer and which I support. This, however, is the definitive response.

The position of the North Queensferry Council is that it strongly disagrees with all of the options. It does so because the residents of North Queensferry have a number of concerns in relation to the risks to which North Queensferry is exposed by, in particular, routes D0 and E6 but is of the opinion that so deficient is the Consultation Document that it is impossible to discern any reliable evidential basis upon which any informed judgement of the risks attaching to any of the route options can be formed.

In particular, current CAA guidelines state that consultation materials are required to be 'clear, consistent and readily accessible.' The present consultation document satisfies none of these requirements.

First, its *purpose* is unclear.

Under 4.1 "What is this consultation about?", the consultation explains that the proposal seeks to replace existing radio beacon controlled conventional routes with more precisely controlled RNAV routes which have not yet been finalised. It goes on to present options for possible routes. It states "These changes are fundamental to Edinburgh Airport's continued development". There is no supporting information or data by which this statement may be tested.

In the next section, 4.2, the document states that "This consultation is not related to air traffic growth or the airports growth in general." Despite this assertion, under "operational" in 9.1.4, the comment "Our preferred option allows for future growth" is presented as a criterion for selection.

In its Master Plan, EAL indicates an intended expansion of Cargo capacity which must result in increased flight plan requirements. In light of this, the above statement on the purpose of the consultation appears to be at least veiled and disingenuous.

Publicly available figures indicate that while the number of passengers transiting Edinburgh Airport has grown substantially from 1m per year to more than 11m, the number of flights is now less than it was in 2007 due largely to the use of larger aircraft. In these circumstances, the document presents no clear rationale for the creation of new flight paths.

The consultation document in confining its purpose to the need to upgrade navigational standards hides the preference by EAL to increase flight frequency and hence capacity to the maximum allowed by the more precise flight path control technology, although this is obliquely referred to in statement that the new technology will allow EAL to more efficiently manage peak traffic to allow flights every minute rather than the present 3 minute interval.

Further, there are no current limits on airport capacity other than technical and flying hour restrictions. The latter is poorly regulated and night flights are not forbidden.

Taking all these matters together, it is difficult for those who respond to have any clarity as to the supposed purpose of the Consultation and, therefore, meaningfully to engage with it in an informed manner.

Second, the Consultation is not accessible (in both senses of that word) to residents in North Queensferry

In the first Consultation held in 2016, the community of North Queensferry was outside any of the routes indicated in that consultation. It is currently affected by overflights from runway 06 on approximately 70 days per year which flights do not directly overfly – the current operational flight path for traffic from runway 06 is to the north over Inverkeithing.

However, in the second consultation, Route D0 is now presented as EAL's preferred route out of runway 024. This directly overflies North Queensferry at a projected height of approximately 4000-7000ft. Also, in the second consultation, Route E6 is presented as EAL's preferred route out of runway 06. This, like D0, is a change to the flight corridor from the first consultation. This new route also directly overflies North Queensferry projected at 4000- 6000ft making North Queensferry subject to one of the largest changes in environmental impact of any of the overflowed communities. These are major changes between the first and second consultations, but they are changes the existence and significance of which to residents in North Queensferry is at best opaque in the second consultation document, not least because of the absence of any specific reference to North Queensferry in the document whereas much smaller communities which are potentially affected by proposed changes are named.

Furthermore, there is no record in Council minutes of any notification from EAL to the village of either of these changes until 4th April, 2017. No presentations were given to the village to which the affected residents were invited. The residents have therefore not been "consulted" in a time frame that could reasonably allow an informed response, even if the available consultation documentation were fit for that purpose.

Fundamentally there is an unreasonable expectation in this second consultation that members of the general public will have been alerted to the risks to which they are potentially exposed, and then to have had time and resources to access technical expertise in order to be able to

fully understand the health, environmental and economic impacts of the flightpath options presented and to develop an informed and considered response.

In these circumstances, the first and necessary condition for consultation has not been met, either for the public generally or, particularly for residents of North Queensferry

Third, there is a number of issues in the second consultation which are not at all clear or consistent.

The information on which to assess those routes which affect North Queensferry most directly, is neither clear nor accessible. The consultation document is phrased in jargon and makes extensive use of acronyms. As a Community Council we have very limited resources which do not extend to professional fees to interpret this poorly presented technical consultation document. This is even more the case in respect of members of the general public.

For both the D0 and E6 routes which are presented by EAL in the second consultation as being preferred, there are significant omissions, including information on timing and frequency of flights; there are no given criteria for allocation of flights either inward or outward to these routes; and inward flights seem to be completely missing from information regarding the preferred options. All of this leaves residents of the potentially affected communities, including North Queensferry, to have to rely on guesswork as to the extent of the impact upon them. This is of particular concern to North Queensferry as it would be exposed to the effects of overflying almost all the time as, when the D0 route is not used, it would be replaced by the E6 route and *vice-versa*.

Fourth, Residents have a number of specific concerns which are inadequately addressed in the Consultation document.

(a) Under heading 9.1.4, *Community*, **noise** is presented as the primary issue raised by communities. Noise and its impact on health, the environment and the local economy remains the main concern of North Queensferry residents.

In the second consultation, EAL defers to a “Noise Consultant” who has been engaged, but who is not there identified, nor is his or her report presented in full. This makes it extremely difficult to test his advice which is presented as “to minimise residential exposure through population density mapping and fly over less-populated communities”.

It is meaningless to have these bland, untestable assurances. The Consultation states that “Once a decision has been made and approved by the CAA regarding a preferred route to be implemented, we will engage with the communities impacted regarding an update to our Noise Action Plan and Insulation Scheme.” Such post event consideration is meaningless to any consultative process.

The reports on noise are very technical and not translated into real personal or socially understandable language. There is a referenced report from the Environmental Research and Consultancy Department of the CAA on noise for the flight path proposals. In this technical document there are three different technical measures of noise and the measure used in figures in the main consultation document is Lmax, supposedly maximum noise levels, but in

that report, Lmax predictions over North Queensferry are stated as being no more than 75db whereas in another map SEL noise exposure levels are shown as being greater than 80db.

The db scale is a geometric progression and 80db is more than twice as loud as 75db. Current background levels of noise in North Queensferry away from the rail bridge are less than 65db. A noise level of 80db is more than 16 times greater than local background levels. Noise is also cumulative. The models used for the predictions used in the consultation have not been compared to actual noise levels recorded under various cloud and weather conditions and so are based on guesswork. Spot checks in the Livingston area have indicated that actual levels may be higher than predicted.

For North Queensferry, these considerations make evaluation of noise and its consequent impacts fraught.

Furthermore, noise levels contribute to stress and health risks. There is no reference in the consultation to any of the widely available studies on health, environmental or economic outcomes from airport noise such as *S. Stansfield & C. Clark Current Environmental Health Report, June 2015*. These widely available and respected studies show that, within the studied areas, there is a measurably increased risk of heart disease, stroke, depression and retardation of learning in school children. North Queensferry residents cannot expect to escape comparable impacts, nor does the Consultation document provide any credible basis for suggesting that they will so escape.

North Queensferry has a primary school of which it is proud. The school will be directly under the preferred flight paths. From analogy with the above study, it can be concluded that Pupils can be expected to suffer from lower attainment levels.

North Queensferry also hosts the start of the Fife Coastal path and the Pilgrims Way. The Fife Coastal Path is a well used recreational path along which walkers seek to explore in quiet surroundings the unique birdlife, the littoral environment and the mixed rural and village landscapes available to them in this area. Introduction of overhead flights is likely to severely diminish this community resource forever. Likewise with the Pilgrims Way. This pilgrimage route has been put in place to celebrate Scotland's historic religious infrastructure of Abbeys, Universities and religious pilgrimage for over 1000 years. Additional noise levels from overhead flights is incompatible with such a contemplative experience.

(b) Thus noise shades over into issues of adverse effect of **health, education**, and also in terms of **adverse economic consequences**, including not only an adverse effect on property prices but a wider effect on the economic wellbeing of the village, including an adverse effect on tourism - the effect on the Fife Coastal Path and the Pilgrims Way, but also on the **Forth Bridge World Heritage Site**.

(c) A balanced analysis of risk requires that there is consideration not only of the likelihood of an adverse event, but also the consequences should such an event occur. **Bird strike** is such a possible adverse event. That may be a risk inherent in any flight path, but the problem with routes D0 and E6 is that they overfly transport links (the road and rail bridges and the Queensferry Crossing) which are critical to the National Economy. What appears to be missing from the Consultation document is any reasoned assessment of this risk as to the

gravity of its consequences as well as its probability of occurrence, for these flightpaths, as, indeed, for any of the other proposed flightpaths.

In Conclusion, we are aware that a large number of individual responses has been submitted. They may well canvass these issues or other matters of concern. The point is, that for a meaningful Consultation, there should be a proper, clear, accessible, reasoned evidential base for discussion without which it will remain unclear whether concerns are fully justified or may be allayed. Members of the public, and, indeed, Community Councils cannot be expected to be able to gather and digest that evidence by themselves. EAL, which does, or which ought to have, access to that information, has a heavy onus upon it to make it available to enable informed responses and reasoned discussion. It has failed to discharge that onus.

For these reasons, at this stage and until a meaningful consultation is provided by EAL, North Queensferry Community Council cannot support any of the proposed options for flight path changes.

Yours faithfully,



Iain G. Mitchell QC
Chairman,
North Queensferry Community Council.