

## Response ID ANON-GPGD-WCCZ-S

Submitted to **Draft procedure for reviewing the classification of airspace**  
Submitted on **2020-09-17 23:57:30**

### About you

#### A Are you responding in an official capacity on behalf of an organisation?

Yes

**If yes, please tell us its name:**

Edinburgh Airport Noise Advisory Board

#### B What is your name?

**Name:**

Andrew Watt

#### C What is your email address?

**If you enter your email address then you will automatically receive an acknowledgement email when you submit your response:**

andrew@andrewwatt.org.uk

#### D Are you answering as:

Local organisation e.g. community action group

**If you selected "member of the General Aviation community", which sub-category are you answering as? :**

**If you selected 'Other' for the General Aviation sub-category, please specify:**

#### E Where do you live or where is your organisation based?

Scotland

#### F Is there anything else that you would like us to know about you in connection with your response?

**Please provide your comments below:**

The Edinburgh Airport Noise Advisory Board is made up of elected Community Council representatives and other community organisations to work with Edinburgh Airport to mitigate the impact of noise on communities around the airport or overflow by arriving and departing flights, and to facilitate the two way transfer of information.

#### G Do you consent to your response being published?

Yes, with personal identifying information (name, organisation, respondent category, location, additional information - please note your email address will NOT be published if you choose this option)

### General

#### 1 Do you have any general comments about our proposed new procedure?

**Please provide your comments below:**

It would seem to be almost exclusively aimed at air space users. In very few places is there any opportunity for the interests of communities on the ground to be heard. We would agree that many of the potential changes to airspace classification will have no significant impact on those on the ground. But who is to decide what is a "significant impact". We would argue strongly that this where there needs to be engagement with community representatives, not those who work in any aviation related field.

### Consider stage

#### 2 Do you have any comments about our proposed approach for the Consider stage?

Some modifications needed

### Consider - some modifications

**Please provide your modifications below**

**modification comments:**

There must be some pathway by which communities can alert the CAA to situations where an airspace re-classification could be worthy of consideration, so that it can be looked at at the proposed CAA internal meeting.

**Review stage**

**3 Do you have any comments about our proposed approach for the Review stage?**

Some modifications needed

**Review - some modifications**

**Please provide your modifications below**

**modification comments:**

Again, the impact on ground communities should be included in the Technical Evidence drawn up to enable the Review to proceed, but section 5.10 only talks about feedback from airspace users. Of course that is important, but so is the health and well-being of those impacted by aviation activity. eg in section 5.11, among the possible technical reports there should be a noise impact assessment.

Section 5.22 indicates that this proposed re-classification procedure will not be pursued if there is found to be a "significant operational, safety or environmental impact". But, at the risk of sounding like a stuck gramophone record, who decides what is "significant"? What may seem insignificant to someone working in Aviation, keen to see a very sensible proposal implemented as speedily as possible, might be viewed quite differently by someone living on the ground.

**Amend stage**

**4 Do you have any comments about our proposed approach for the Amend stage?**

Some modifications needed

**Amend - some modifications**

**Please provide your modifications below**

**modification comments:**

Reference is made at various places in this stage, and indeed the preceding stages, to "stakeholders". It is important that included among these are representatives from communities on the ground. This is a role that a Noise Board such as ourselves is ideally placed to make a contribution, indeed it is gratifying to see that reference is indeed made to this in section 6.49. It is just disappointing that this comes so late in the process.

**Cost impacts**

**5 Please can you quantify the cost impacts of the new procedure on your organisation, or more broadly if possible, and how we might best minimise these?**

**Please provide your answer below:**

Cost impacts for us or any other noise board would be minimal as one of the unexpected benefits of Covid-19 is the rapid adoption of online meetings via Webex, Zoom, Teams etc. and thus there would be minimal cost to take part in meetings for any of the stages. Costs of gathering appropriate data are difficult to quantify. More and more communities are now acquiring and making use of their own monitoring equipment.

The CAA can help by setting up meetings in such a way that those participants who might have difficulties in making the physical meeting can join it on line.