

Linlithgow and Linlithgow Bridge Community Council (LLBCC)

This replaces our first submission Ref: W6422 New feedback number the same!

We have answered the question “what local factors should be taken into account when determining the position of the route within the design envelop, the potential impacts and the reasons why this factor should be taken into account?” We have made 8 general points and 10 specific points.

First we acknowledge those non-discretionary factors which have to be satisfied before subjecting a flightpath option to the examination implied by the above question. These factors are:

1. Is it safe for all aircraft to use the flightpath now and in the future?
2. Is it technically feasible for all aircraft to use the flightpath now and in the future?
3. Can the current runway, taxiways, stands, gates, etc. accommodate the increase in traffic consequent on the new flightpaths?

If the answer to any of the above is “no” then we consider that the flightpath option should not be considered further.

The local factors which should be included in a decision model which are discretionary in nature and explicitly influence the position of the proposed flightpath within the design envelop are as follows. The potential impacts and the reasons why this factor should be taken into account are also given.

General

1. The review should be open and objective with all decisions taken in a manner which is conducive to audit. It is an important local factor for everyone to be confident that all issues have been assimilated and addressed and that a proper auditable decision model/process has been used. Independent audit is a fundamental part of a democratic process.
2. The proposed models used to assess flightpaths should be subject to independent scrutiny before their use and the report of the independent scrutineer be made publically available. Independent validation of each step of the process will ensure public confidence.
3. The cost of public consultation and independent technical scrutiny should be factored in as a cost to the process. Public organisations such as Community Councils do not have the funding or technical support for a sustained consultation. A scheme must be established which allows those properly constituted organisations representing the community, such as Local Authorities and Community Councils, to share data, its processing and results without bearing unreasonable cost.
4. The management of aircraft on the ground to smooth departures. The smoothing of departures will allow maximum use of the particular flightpath which affects the least number of people.
5. Noise should be used in decision planning not height. Noise is only partly correlated with height. The planning envelopes should be redrawn indicating noise. Height is an operational factor relating to *inter alia* the handover point of air traffic control. Height of itself is not a major factor of concern.

6. Noise contour maps to $50\text{dBa}_{\text{max}}$ should be provided for the existing flightpaths and for the proposed flightpaths. It is important to have a noise contour map of the existing flightpaths to act as a baseline when assessing proposed new flightpaths.
7. Assuming a weighted and scored decision model is used then the scores for existing flightpaths should be made available. It is important to have these scores/assessments as a baseline.
8. Ambient noise contour maps should be made available for all areas to be consulted. This is important as a baseline for judging the impact of the proposed new flightpaths.

Local Factors to be taken into account

1. The ambient noise level experienced by the majority of people living in the community to be overflown. It is not just the level of noise which has an impact but the level over and above the ambient noise. The noise level over the ambient noise should feature on maps.
2. The number of residents who will be affected by noise above $50\text{dBa}_{\text{max}}$ that have lived under the TALLA flightpath (dBa_{max} to be used **not** dBa_{Leq} or dBa_{Lden} as both these measures are averages). The TALLA flightpath is the flightpath most used by jet aircraft since the establishment of the flightpaths in 1977. Those living under this flightpath have in the main **chosen to do so**.
3. The number of residents who will be affected by noise above $50\text{dBa}_{\text{max}}$ who have not lived under the TALLA flightpath. The TALLA flightpath is the flightpath most used by jet aircraft since the establishment of the flightpaths in 1977. Many people surveyed by LLBCC have **chosen not to live under the TALLA flightpath**.
4. The frequency of aircraft using the flightpath under review now and in the future. Infrequent noise is more tolerable than continuous noise. People require and are entitled to certainty that the usage of a flightpath will not change.
5. The number of schools which will be affected by noise above $50\text{dBa}_{\text{max}}$. Noise impacts children's listening, memory and reading skills. Plans for mitigating this have to be a part of flightpath planning and have to be explicitly described.
6. The number of people who have bought houses in the expectation that they will not be affected by aircraft noise who will be under the proposed flightpath. Those who have chosen not to live with noise value their tranquillity.
7. The impact on house prices of property affected by the flightpath. A reduction of house values attributable to a change in flightpaths is an explicit cost of the decision to change. This has been a major concern of those surveyed by LLBCC.
8. The number of houses and schools proposed in the current Local Development Plan which will be affected by noise above 50dBa actual. A change in flightpaths will affect future developments as well as communities presently existing. The life of a flightpath must have a direct relationship with communities established by Strategic and Local Development Plans. Ideally, flightpath planning should be a part of the Strategic Development Plan process.
9. The extent to which the proposed flightpath geometry would lead to increased NO_x and/or other pollutants. The generation of aircraft pollutants is related to course and climb. Flightpaths should be designed to minimise airborne pollutants.

10. Whether the proposed flightpath could be subject to a curfew. There is considerable opposition to night flights (between 22.00 and 07.00). Impact of certain flightpaths might be mitigated by a curfew on those flightpaths.

John Kelly
Vice Chair
9th September 2016