

ANNEXE A

Connectivity:

- 1) Do you agree with our analysis of the meaning and value of connectivity, set out in Chapter 2?

Yes

Fifth freedoms:

- 2) Do you support the proposal to extend the UK's fifth freedom policy to Gatwick, Stansted and Luton? Please provide reasons if possible. (This concerns existing arrangements allowing airlines of one country to land at UK airports, other than those in the South East, pick up passengers and carry them on to a third country. The Draft Strategy reflects the view that allowing such activity is beneficial to the economy as it extends UK connectivity to a wider range of origins and destinations across the globe than would otherwise be the case).

The Council would not wish the extension of this policy to be to the detriment of connectivity from regional airports.

- 3) Are there any other conditions that ought to be applied to any extension of the UK's fifth freedom policy to Gatwick, Stansted and Luton?

No comments.

Airports outside the South East:

- 4) Do you agree that the Government should offer bilateral partners unilateral open access to UK airports outside the South East on a case-by-case basis?

No comments.

Any other comments:

- 5) Do you have any other comments on the approach and evidence set out in Chapter 2?

It is proposed that the future of individual airports will be determined through the production of Master Plans, Noise Action Plans and through the planning system. It is considered that, in the absence of a national strategy indicating the limits of growth at individual airports, the measures proposed in the Draft Strategy will be insufficiently effective in limiting the environmental impacts of non-noise designated airports and that a greater degree of direction must be provided from

the national level to protect people against detrimental health and amenity impacts of airport activity.

Chapter 3: Climate change impacts

- 6) Do you have any further ideas on how the Government could incentivise the aviation and aerospace sectors to improve the performance of aircraft with the aim of reducing emissions?

No comments.

Any other comments:

- 7) Do you have any other comments on the approach and evidence set out in Chapter 3? (This concerns controls on the emission of greenhouse gases by the aviation sector).

The EU Emissions Trading Scheme is supported. It is considered that the UK Government should seek to ensure that the overall cap on emissions is set at a sufficiently challenging level to be effective in meeting climate change targets.

Chapter 4: Noise and other local environmental impacts

- 8) Do you agree that the Government should continue to designate the three largest London airports for noise management purposes? If not, please provide reasons.

No comments.

- 9) Do you agree with the Government's overall objective on aviation noise?

The objective to “limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise” is considered to be ineffective as there is no indication as to what the upper limit of numbers of people affected should be. Given ongoing reductions in the levels of noise emitted by individual aircraft, it is considered that a more appropriate objective would be to “limit to current levels and, where possible, reduce the number of people significantly affected by aircraft noise”. This would allow continued moderate growth in air traffic movements whilst affording strong protection to potentially affected people.

- 10) Do you agree that the Government should retain the 57 dB LAeq,16h contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance?

Although the consultation document indicates that there is scientific uncertainty as to the appropriate level, it is considered that this

should be reduced to 54 dB (A) to facilitate monitoring to allow more information to be gathered about noise impacts.

- 11) Do you think that the Government should map noise exposure around the noise designated airports to a lower level than 57 dBA? If so, which level would be appropriate?

No comments.

- 12) Do you agree with the proposed principles to which the Government would have regard when setting a noise envelope at any new national hub airport or any other airport development which is a nationally significant infrastructure project?

It is considered that the proposed principles are insufficiently strong and should embody the principle of not allowing the numbers of people significantly affected by aircraft noise to grow and to reduce the numbers affected where possible.

- 13) Do you agree that noise should be given particular weight when balanced against other environmental factors affecting communities living near airports?

Yes. Excessive noise can be significantly harmful to both amenity and health, particularly at night.

- 14) What factors should the Government consider when deciding how to balance the benefits of respite with other environmental benefits?

No comments.

- 15) Do you agree with the Government's proposals in paragraph 4.68 on noise limits, monitoring and penalties? (see para 3.6, main report).

These are supported, particularly in regard to higher penalties and independent noise management.

- 16) In what circumstances would it be appropriate for the Government to direct noise designated airports to establish and maintain a penalty scheme?

No comments.

- 17) In what circumstances would it be appropriate for the Government to make an order requiring designated airports to maintain and operate noise monitors and produce noise measurement reports?

In order to allow the measurement of progress in relation to any objective to limit or reduce numbers of people affected by aircraft noise, it is considered that all designated airports should be required by Government to maintain and operate noise monitors and produce

noise measurement reports. As part of this, airports should be required to measure and report on the numbers of people significantly affected by aircraft noise.

- 18) How could differential landing fees be better utilised to improve the noise environment around airports, particularly at night?

It is considered that the difference between daytime and nighttime charges should be sufficiently significant to influence the timing decisions of airlines. However, it should be noted that the effect of differential charges is more limited where the business model of aircraft operators requires night time flights, as in the case of the express freight industry.

- 19) Do you think airport compensation schemes are reasonable and proportionate?

The World Health Organisation has investigated the health impacts of noise at night and has concluded that the population should not be exposed to night noise levels greater than 40 dB of $L_{night, outside}$ during the part of the night when most people are in bed (“Night Noise Guidelines for Europe”, World Health Organisation, 2009). The Council strongly advocates that the Government take action to ensure that airport sound insulation compensation schemes be extended to include all dwellings within this noise contour.

- 20) Do you agree with the approach to the management of noise from general aviation and helicopters, in particular to the use of the section 5 power?

No comments.

- 21) What other measures might be considered that would improve the management of noise from these sources?

No comments.

- 22) Do you have any further ideas on how the Government could incentivise the aviation and aerospace sector to deliver quieter planes?

No comments.

- 23) Do you believe that the regime for the regulation of other local environmental impacts at airports is effective?

No comments.

- 24) Do you think that noise regulation should be integrated into a broader regulatory framework which tackles the local environmental impacts from airports?

There is concern that this may lead to a lower priority being applied to noise reduction in pursuit of other goals. Noise minimisation and mitigation should be regarded as absolute requirements and not subject to trade-off against other environmental objectives.

Chapter 5: Working together

- 25) Do you think Airport Consultative Committees should play a stronger role and if so, how could this be achieved?

It is considered that the East Midlands Airport Independent Consultative Committee exhibits an attitude of appreciating and acting upon the concerns of the local community. However, in the absence of a greater degree of direction from the national level, it is not considered that affording a stronger role to such committees would in itself be sufficient to protect the health and amenity of residents currently or potentially affected by aircraft noise.

- 26) Is there a case for changing the list of airports currently designated to provide consultative facilities?

No comments.

- 27) Do you agree that the Civil Aviation Authority should have a role in providing independent oversight of airports' noise management?

It is considered that it would be useful for the Civil Aviation Authority to adopt such a role and to provide feedback to Ministers on compliance with good practice and assessing airport implementation of noise penalty schemes.

28) Do you agree with the Government's overall objective on working together?

Yes, but it is considered that these arrangements will not, in themselves, be sufficiently effective in limiting the environmental impacts of non-designated airports (see answer to question 5).

29) Is the high-level guidance provided in Annex E sufficient to allow airports to develop local solutions with local partners?

See answer to question 5.

30) Do you agree that master plans should incorporate airport surface access strategies?

Yes. In order to maximise their effectiveness, measures intended to minimise the number of trips to and from the airport by private motor vehicle, encourage access by more sustainable means and minimise congestion on the transport network must form part of the overall strategy for the development and operation of an airport.

31) Do you agree that, where appropriate, the periods covered by master plans and noise action plans should be aligned?

Yes. Alignment is necessary to ensure on-going compatibility between the two documents.