

**Proposed Council Responses to the consultation document
“Aviation 2050: The future of UK Aviation**

Ensure Aviation Can Grow Sustainably

1. *The Council accepts the continued growth in air freight volumes and passenger numbers, recognising the economic and employment benefits it brings, but objects to further growth in noise at ground level, particularly at night, within existing limits. In the case of East Midlands Airport, night-time noise limits were established as a condition attached to a planning consent granted in 2011, but encompass a broad area which is capable of accommodating substantial growth in noise above current levels.*
2. *There has been much progress in regard to the potential for reducing noise at source in recent years through such measures as the introduction of newer, quieter aircraft; the remodelling of airspace and the employment of appropriate operational practices. These opportunities mean that growth in freight volumes and passenger numbers need not necessarily translate into growth in noise at ground level. It is therefore considered that the Strategy should inextricably link any further expansion in passenger and freight throughput to no further growth in noise levels, particularly at night.*
3. *In pursuance of the above it is considered that the Strategy should seek to end flights using older, noisier aircraft, by setting firm targets for the early withdrawal of air traffic movements using non-Chapter 4 compliant aircraft, particularly at night. Self-imposed targets for withdrawal of such aircraft from night-time use at East Midlands Airport have been repeatedly missed and flights are now expected to continue at least until 2025.*
4. *The Council is broadly supportive of the following proposals for minimising noise at source, but considers that they should be clarified or strengthened as follows:*
 - (i) *“Setting a new objective to limit, and where possible, reduce total adverse effects on health and quality of life from aviation noise” (para 3.115). As explained in para. 2 of this representation, the Council believes that the objective should be more ambitious, linking further expansion in passenger and freight throughput to no growth in noise levels. It is further considered that the Strategy should seek to eliminate, rather than reduce, adverse health and quality of life impacts.*
 - (ii) *“Developing a new national indicator to track the long term performance of the sector in reducing noise” (para 3.115). It is stated that this should be based on the largest airports and it is considered*

that this definition should encompass the regional airports, including East Midlands Airport, in order to provide a representative picture.

- (iii) “Routinely setting noise caps as part of planning approvals (for increases in passengers or flights).” (para 3.115) It is considered that this should relate to planning approvals resulting in growth in freight throughput, as well as passengers and flights, and that the Strategy should be explicit as to the types of development that could attract a noise cap, including new passenger and freight terminal capacity, as well as additional runway infrastructure.*
- (iv) “Requiring all major airports to set out a plan which commits to future noise reduction, and to review this periodically” (para 3.115). The consultation paper states that this requirement should only apply to airports that do not have a noise cap applied through the planning system. It is considered that it should be a requirement for noise reduction plans to be incorporated within Noise Action Plans (NAPs), for all airports, regardless of whether a cap is in place. It is agreed that the noise reduction plans should be reviewed periodically. It is considered that this should take place at five yearly intervals, as currently required in regard to NAPs, to take account of new technology, but also new operational practices with noise reduction benefits, allowing for the adoption of more ambitious noise reduction targets.*

5. The Council is broadly supportive of new measures for people moving near to airports (para. 3.118):

- “developing tailored guidance for housebuilding in noise sensitive areas near airports*
- improving flight path information for prospective home buyers so that they can make better informed decisions”*

It is noted that the latter initiative may be of limited value if ongoing airspace modernisation leads to significant changes in flight path alignments over time.

6. The Council is broadly supportive of the proposed new measures to ensure better noise outcomes from the way aircraft operate, by increasing uptake of best practice operating procedures and improving compliance with mandatory controls (para 3.119). It is the Council’s view that compliance targets of 100% should be set, reflecting the greater degree of accuracy made possible by advances in navigation technology, and that any sanctions should be set at a level sufficiently high to fulfil their intended purpose as a deterrent.

7. *With particular regard to the proposal to define maximum departure noise limits by aircraft type (para 3.119), this omits to take account of the fact that the weight of payload also has a bearing on noise generation. It is therefore considered that maximum departure noise limits should target individual air traffic movements, taking account of both aircraft type and payload.*
8. *The proposal to “look into creating a new statutory enforcement power for the Independent Commission on Civil Aviation Noise or Civil Aviation Authority (ICCAN) if other measures prove insufficient” (para 3.120) is supported and it is considered that this should be brought forward at an early stage if evidence demonstrates significant levels of non-compliance with noise controls.*
9. *The proposal to introduce new measures “to improve noise insulation schemes for existing properties, particularly where noise exposure may increase in the short term or to mitigate against sleep disturbance”(para. 3.121) is supported. It is considered that any mitigation should be sufficient to meet the most up to date World Health Organisation environmental noise guidelines and that thresholds for eligibility should be based upon LAeq 8hr (night-time) noise contours, as well as LAeq 16hr (daytime) noise contours, bearing in mind that aerodromes handling large volumes of freight, such as East Midlands Airport, accommodate significant numbers of air traffic movements between the hours of 11.00pm and 7.00am.*
10. *The proposal to require all airports to review the effectiveness of their noise insulation schemes and for the government or ICCAN to issue new best practice guidance on noise insulation to airports (para. 3.122) is supported.*
11. *The proposed measures to address air quality issues around airports (para. 3.127) are broadly supported. However, whilst the Council is pleased to note the policy commitment requiring all major airports to develop air quality plans to manage emissions within local air quality targets, it is considered that there is some ambiguity in this statement which implies that if air quality targets are being achieved in the locality of the airport, then no air quality plan needs to be produced. As was highlighted in stark terms in the Royal College of Physicians report “Every Breath We Take – The Lifelong Impact of Air Pollution” (2016), there is no safe exposure level to ultrafine particulates and it therefore needs to be clear in the Strategy that every airport should produce an air quality plan irrespective of the prevailing local air quality in its immediate surroundings.*

Support Regional Growth and Connectivity

12. *The Council supports the government intention “to ensure aviation enables all regions of the UK to prosper and grow, providing jobs and economic opportunities and a meaningful contribution to the life of communities up and down the country” (para 1.35).*

13. *The Council supports the proposal to establish “a duty to co-operate with local government in the development of surface access strategies; to update national guidance to provide consistency in requirements and structures that align with future regional and national transport strategies and to work with transport service providers to assist Air Transport Forums in understanding and working within existing surface transport planning processes” (para. 4.37). The provision of convenient, sustainable transport options to airport sites, both for passengers and workers, is of key importance in sharing the benefits of aviation growth, in terms of enabling access to employment opportunities from surrounding areas.*

Support General Aviation

14. *The proposal for the mandatory identification of all aircraft (para. 7.34) and the facilitation of safe access to airspace for all legitimate classes of user, is supported, particularly bearing in mind the rising incidence of drones coming into unsafe proximity with airlines and helicopters.*
15. *The proposal to “investigate potential for reducing the costs of pilot training through the greater use of technological alternatives, such as simulators and virtual reality” (para. 7.46) is supported, insofar as it may reduce the need for training flights and thereby reduce noise generated by such activity in the vicinity of airports.*