

**18. To what extent does the proposed partnership for sustainable growth balance realising the benefits of aviation with addressing environmental and community impacts?**

We consider detail on the proposed partnership is lacking and it is therefore difficult to comment on its potential effectiveness. Although there are many different elements outlined in the partnership diagram and it is understood any system will require a level of flexibility, it is unclear how the partnership would work in practice.

There is a need for a clear and robust framework to provide direction to the aviation industry, decision makers and communities/other stakeholders as to what level of environmental impact will be acceptable and to guide decisions, some of which will be extremely difficult. A truly fair, sustainable balance between unconstrained growth in aviation and concerns of communities regarding noise (and other environmental issues) will be extremely hard to find and may in fact be impossible.

In line with the principle of the 'polluter pays' the Government should ensure the industry is required to bear all costs it imposes on society, including the impacts of aviation noise on public health. It is currently unclear how demand will be managed to ensure these costs are not excessive, particularly when levels of aviation noise are already at, or beyond, acceptable levels in many communities.

Reference is made in section 3.10 to planning approvals. As the system is current configured in Scotland, where airports have extremely generous permitted development rights, local authorities are largely unable to impose noise-related operating restrictions through the planning system and this issue needs to be addressed. Compounding this problem is the fact airports are the competent authority under the Environmental Noise Regulations, leading to a poor level of independent scrutiny of environmental noise around airports.

**19. How regularly should reviews of progress in implementing the partnership for sustainable growth take place?**

This depends which part of the partnership is being reviewed – if noise caps are being introduced these should be reviewed annually, or more frequently.

In terms of the remainder of the partnership, a review process should only be established when clear outcomes and targets to achieve truly sustainable growth have been agreed.

**21. How could the policy proposals be improved to maximise their impact and effectiveness in addressing the issues that have been identified?**

Overall, we consider that the strategy is very focused on the south east of England and that there needs to be sufficient attention given to problems across the whole of the UK. Whilst it is recognised that Heathrow is many times busier, and therefore has greater environmental impacts, than other airports, airports such as Edinburgh have grown to an extent where there is an urgent need to manage noise and other impacts affecting the health and quality of life of neighbouring populations. In addition, Edinburgh Airport has ambitious expansion plans yet, in our opinion, this is not being planned as strategically as possible in order to ensure

environmental noise can be reduced as far as possible. Changes to airspace in the south east will have impacts on Scottish airspace and vice versa and there is an urgent need to ensure changes are coordinated to ensure the benefits of noise reduction can be realised.

Clear and fairly balanced policies are essential to ensure the interests of all stakeholders are taken into account in decisions and to improve trust and accountability in the system. We consider the Government's proposed new noise objective, namely *"to limit, and where possible, reduce total adverse effects on health and quality of life from aviation noise"* is not clear enough and does not offer the same level of protection as set out in the EU's Environmental Noise Directive, which states *"to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise"*. It is also unclear whether this objective relates only to those communities within certain noise contours such as 51 dB LAeq whereas in reality many more communities are affected by high levels of aircraft noise outwith these contours. Policies should include clear, enforceable, airport-specific noise reduction targets against which progress can be measured and reported.

We also have the following comments related to specific parts of the Aviation Strategy which relate to noise:

An earlier section of the strategy (1.26) states people are becoming more sensitive to aircraft noise. We suggest that this may be because as well as noise increasing significantly in some locations, there is more awareness around environmental impact of development in general and that people have recognised these impacts are not something which merely have to be accepted. Environmental standards have increased significantly in other areas, such as water quality and air quality, and the aviation industry must set similarly high standards in terms of noise control.

3.106 - We consider the UK-specific evidence should be referenced and that costs should not be seen as a block to the protection of public health. Government should instigate a full review of the health impacts of aviation noise. In some cases, airspace modernisation may lead to increased, not reduced noise impacts where poorly planned.

3.107 - Steeper departure angles are not necessarily an answer to reduce noise levels – EANAB has demonstrated that increasing the angle of departure may reduce noise for some, but increase it for others. The switch to RNAV technology must not be used as an excuse for increasing noise levels when reasonable alternatives for flight paths are available.

3.108 – We welcome these new measures and hope that these will be employed at Edinburgh, where to date transparent assessment of noise over a wider area, assessment of different options to avoid concentration, and changes to airspace without consultation have all been issues.

We welcome the establishment of ICCAN and are reviewing the consultation on their corporate strategy separately.

3.110 - The definition of 'night' should be revisited and brought into line with that of the World Health Organisation and other bodies. We agree that night flights are generally the most disturbing for people but do not agree that 6.5 hours is enough time to give people proper respite.

3.111 – These examples are positive however they highlight that measures are currently ad hoc and inconsistent across the UK.

3.114 – Any changes to airports or airspace should follow the ‘mitigation hierarchy’, that is that mitigation should only be used where impacts absolutely cannot be avoided and compensation is a last resort which should rarely be required.

3.115 – As stated previously, we consider the Government’s proposed new noise objective, namely *“to limit, and where possible, reduce total adverse effects on health and quality of life from aviation noise”* is not clear enough and does not offer the same level of protection as set out in the EU’s Environmental Noise Directive, which states *“to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise”*. It is also unclear whether this objective relates only to those communities within certain noise contours such as 51 dB LAeq whereas in reality many more communities are affected by high levels of aircraft noise outwith these contours. Policies should include clear, enforceable, airport-specific noise reduction targets against which progress can be measured and reported.

Tracking long-term performance is fine but does not address the immediate problems. Any contours must take into account that some areas have high levels of aircraft noise at certain times and that averaging does not capture these impacts.

The planning system in Scotland is currently largely unable to control noise at airports. It is considered it is not desirable to have compensation as a result of breaching limits, airports should employ the mitigation hierarchy and avoid impacts – to allow airports to ‘pay for’ damage to communities is not a sustainable long-term solution which respects the public health impacts of aviation noise and will not encourage compliance.

We welcome Noise Reduction Plans for all airports. The current Noise Action Plan process must be improved greatly as it is currently not delivering meaningful noise reduction or mitigation for affected communities. Noise monitoring urgently needs improved.

3.116 – Yes, avoidance should be key in line with the mitigation hierarchy. The planning system must be used effectively to avoid new homes being built in the areas worst affected by airport noise, in the interests of public health. There are some recent examples of applications for housing around Edinburgh Airport which we consider are in inappropriate locations.

3.117 – We agree information must be provided and this must also include proposed increases to existing noise levels including the cumulative impact of different new routes.

3.118 – These measures are welcome but local development plans around airports must ensure unsuitable sites are not allocated in the first instance and development management decisions must work effectively to ensure unallocated, unsuitable, sites are not granted consent.

3.119 – We support these measures particularly on changes to flight path traffic.

3.120 – ‘Reasonable’ compliance is not enough when public health is at risk and in many cases the standards are set too low to ensure compliance. ICCAN should be given statutory enforcement powers and there must be a review of noise limits.

3.121 – Avoidance should be pursued in the first instance rather than noise insulation being seen as a solution. Where noise insulation is being provided, maximum noise levels not average values should be used to mitigate sleep disturbance.

3.122 – As previously stated there are issues with only using LAeq 16hr as a measure to determine disturbance, Lmax values should be used. Occasional detrimental high Lmax events in otherwise quiet areas can be averaged out to appear misleadingly reasonable on an LAeq basis, on a day and/or night basis. Increases in overflight should be avoided and cumulative effects taken into account. This proposal will not address adverse effects on public health as a result of increased overflight.

In addition to the issues related to noise above, as many members of EANAB are also concerned about the environmental impact of aviation growth from a carbon emissions perspective, we wish to take the opportunity to highlight that we agree with many of the points raised by others at

<http://www.airportwatch.org.uk/2019/06/aviation-strategy-green-paper-airportwatch-position-on-aviation-carbon-emissions/>

## **22. How should the proposals described be prioritised, based on their importance and urgency?**

Efforts to coordinate airspace changes across the UK should be prioritised to maximise the opportunities for reducing noise. The mitigation hierarchy should be employed, with avoidance taking priority. Addressing the impact of night flights (including a review of the definition of night) should also be a priority in order to address the health implications of sleep disturbance.

## **26. Are there any options or policy approaches that have not been included in this chapter that should be considered for inclusion in the Aviation Strategy?**

Methodology for measuring noise needs to be urgently reviewed, in particular the assumption that 7000ft is an appropriate altitude beyond which aviation noise is no longer considered to be an issue. It appears there is no evidence for this specific altitude figure to have been selected. Actual noise levels based on WHO guidelines should be used to determine the noise burden for communities. A baseline of current noise levels must be established expeditiously and ahead of any further airspace change and will require a national programme of independent and robust on-going monitoring of actual noise levels being experienced on the ground.