Response of East Herts Council to UK Airspace Policy: A Framework for Balanced Decisions on the Design and Use of Airspace Consultation, Department for Transport, February 2017

East Herts Council broadly welcomes the principle of airspace modernisation and generally supports the use of technological advances to reduce the impact of aviation on local communities and the environment.

For Tier 2 proposals, as there is currently no scrutiny of vectoring changes, this aspect is supported, along with the proposal that the CAA should have responsibility for that role.

However, there are a number of areas within the consultation document where further clarity is required or where there is currently an absence of guidance which the Council considers necessary to be addressed prior to the adoption of the strategy. These include:

1. A definition of 'significant/significantly' should be provided in order that there is no ambiguity for those parties assessing and/or providing mitigation to address impacts.

2. Linked to point 1, as an example, where there is a 3db increase or above it is proposed that the airspace change sponsor should consider both impact and compensation. However, the parameters for this have not been set and there appears to be no body identified to determine who should be awarded compensation where applicable. If the CAA is to be the determining body, then further guidance should be provided in this respect.

3. Currently, there appear to be no night time metrics linked to the compensation proposals. As it is not inconceivable that different people could potentially be affected to those impacted by daytime hours operations, measures should be included to ensure that all affected parties should be compensated.

4. In terms of implementation of compensation schemes, it is important that the polluter should pay at onset of annoyance and that there should be no artificial trigger points related to numbers of movements, etc, beyond that.

5. In terms of ICCAN's role in increasing trust in processes and decisions as an independent arm of the CAA, it is vital that for credibility purposes this body should be nationally and not industry funded.

6. It should be made clearer whether ICCAN's role will be purely advisory or whether there will be any adjudicatory role.

7. Appropriate local authorities already have considerable expertise in the aviation field and it is considered that ICCAN could draw on this knowledge base to feed into any developing best practice guidance issued. Consultation from the information gathering stage would be supported to make best use of such expertise and this approach should be incorporated into policy.

8. Regarding ongoing noise management and the implementation of European Regulations around noise operating restrictions, it should be ensured that the competent noise body should be the same body that makes planning decisions i.e. either the relevant local authority or the Planning Inspectorate.

9. It should be recognised that noise impact generated by aviation is not solely restricted to aircraft, but also by other modes of ground transport for servicing purposes in addition to passengers and employees travelling to and from airports. Such noise impacts, e.g. from access routes utilised, may have a detrimental impact on local communities and this should be reflected in policy.

10. If designated airports (including Stansted) are to have more control to tailor their operations to local circumstances then it is important that issues around the ability of local authorities to

respond to such responsibilities are recognised. This not only affects governance matters, but also in terms of ensuring that adequate resources are directed to local authorities to allow them to be able to manage the technical demands made of them and to enable informed responses to noise consultations in a timely manner. Therefore, it is suggested that a premium should be applied to airport applications in order to support such technical roles at a local authority level.