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Andrew Haines Esq
Chief Executive
Civil Aviation Authority
By email: andrew.haines@caa.co.uk

Dear Mr Haines

Aviation Noise Impacts Consultation

I am writing on behalf of Stop Stansted Expansion ('SSE') in relation to the CAA's Aviation Noise Impacts consultation. SSE welcomes the CAA's initiative of seeking how it can influence the aviation industry's noise performance. SSE is not responding using the online survey form and we therefore ask that this letter be marked and taken into consideration as our submission and that we are informed of all subsequent outputs of the consultation.

SSE represents some 7,500 members and registered online supporters including 150 parish and town councils and local residents' groups and national and local environmental organisations. Our objective is to contain the development of Stansted Airport within tight limits that are truly sustainable and, in this way, to protect the quality of life of residents over wide areas of Cambridgeshire, Essex, Hertfordshire and Suffolk, to preserve our heritage and to protect the natural environment.

Noise is the principal concern to communities living around Stansted Airport and under flight paths often many miles from the airport. Stansted Airport is situated in rural surroundings with low background noise levels and noise complaints have increased dramatically over the last three years by a factor of more than ten-fold. This is particularly the case at night where about 35% of Stansted's night flights are large noisy cargo aircraft; many of which are very old. Unsurprisingly, these give rise to a disproportionately high level of noise complaints.

SSE wishes to see CAA tackle all forms of aviation noise nuisance with the objective of reducing the overall adverse noise and health impacts. It is SSE's belief that this can only be achieved by a combination of a large number of operational, technical and fiscal measures coupled with improved communication.

SSE considers that all the noise issues listed in the CAA survey need to be tackled since each one to a greater or lesser extent has an adverse effect on health and wellbeing and cumulatively blights the noise environment and/or is a source of dissatisfaction amongst communities living around Stansted Airport. In this respect, the proposition that *"If the CAA was to tackle just three of the aviation noise issues that concern you, which would you like to see us focus on?"* is not considered adequate.

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The principal objective must be to ensure that no aviation growth is permitted unless there is a corresponding reduction in noise. The government specifically linked growth in the industry to noise reduction when it said:

*“We want to strike a fair balance between the negative impacts of noise (on health, amenity (quality of life) and productivity) and the positive economic impacts of flights. As a general principle, the Government therefore expects that future growth in aviation should ensure that benefits are shared between the aviation industry and local communities. **This means that the industry must continue to reduce and mitigate noise as airport capacity grows.** As noise levels fall with technology improvements the aviation industry should be expected to share the benefits from these”. [our emphasis]¹.*

This principle has clearly failed to have been delivered at Stansted Airport based upon the dramatic rise in complaints. SSE wishes to see the following measures put into practice:

- Set ambitious, unambiguous targets for aircraft noise reduction at each major UK airport and make any growth in flight numbers conditional on achieving these targets.
- Establish the impacts on communities living under Performance Based Navigation ('PBN') flight paths, introduce mitigation measures and set noise reduction targets.
- An unequivocal commitment to progressively phase out all night flights, leading to a complete ban at Stansted Airport by 2030 except in the case of genuine emergencies.
- Create an independent aviation noise regulator with the duty and powers to enforce achievement of those policy goals. Historic regulatory arrangements have failed. A new or newly empowered regulator is needed to drive noise reduction.
- Establish a general principle that where aviation noise cannot be brought below acceptable thresholds, people will be fully compensated for its effects in line with the widely accepted polluter-pays principle.

Yours sincerely



Peter Sanders
Chairman

cc Mrs Kemi Badenoch MP

¹ *Aviation Policy Framework*, DfT, March 2013, para 3.3.