

## LCC Comments on East Midlands Airport Sustainable Development Plan consultation

Plan / page	Text	Comment
<b>Master Plan</b>		
Master Plan 01	Our vision is to develop the airport as a business that contributes to the competitiveness of the region, promotes inward investment, provides high quality jobs and meets the travel needs of local people.	We support the vision of EMA, which contributes to the strategic objectives of Leicestershire County Council.
Master Plan 07	We are committed to delivering a good quality and reliable transport infrastructure with improved sustainable travel choices for both passengers and site employees. We will increase business efficiency by combating the effects of congestion around the Airport and assist with the recruitment and retention of employment by making journeys easier, cheaper and more reliable ...	<p>Future population and economic growth will increase the number of vehicles on the network and, if nothing is done to address this issue, existing congestion on the strategic and local road network will increase.</p> <p>Traffic data can be used to estimate the predicted levels of future traffic, and its impact on the highway network and EMA. As definitive proposals come forward, the County Highway Authority would wish to work with EMA, so that we can understand the future impacts on the highway network (based on passenger/freight numbers etc) and identify mitigation measures, as necessary.</p> <p>We support EMAs work on sustainable travel choices, which contributes to the strategic objectives of Leicestershire County Council. We look forward to continuing to work with EMA to deliver transport solutions.</p>
<b>Land Use</b>		
Land Use 06	The 2006 Master Plan took as its base-line an annual throughput of <b>4.28</b> million, the actual passenger levels for 2004.	The 2006 draft report refers to <b>4.38</b> million.

Land use 07	The airport believes that there are important flaws in the model used by the Department for Transport to allocate traffic to individual airports and that East Midlands Airport can achieve stronger and faster growth than the Department for Transport predict.	It would be helpful to understand more about the differing methodologies and why EMA considers its approach to be more relevant, as this clearly has a major bearing on planning for the future
Land use 07	A review of the airport's cargo forecasts has also been carried out. This assumes growth in the UK's total air freight demand, doubling from 2012 levels (2.3 million tonnes) to 4.4 million tonnes by 2040 (Combined annual growth rate of 2.3%).	It would be useful to clarify whether this was based on DfT forecasts or EMA forecasts.
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Land Use 09	The airport's passenger throughput is particularly peaked, both on an annual basis and across the day. There is a substantial summer peak, and the daily traffic profile shows a concentration of passenger departures in the morning peak-hour (07:00 – 08:00). By spreading this peak, the airport will be able to make a greater and a more efficient use of its existing and future facilities. This will help contain the overall scale of the passenger facilities as well as minimising some of the environmental effects associated with the airport's growth.	If a further breakdown of the spread of passengers / traffic throughout the year could be provided this data could be used to estimate the predicted levels of future traffic and its impact on the highway.  We look forward to continuing to work with EMA to deliver transport solutions.
Land use 09	By spreading this peak, the airport will be able to make a greater and a more efficient use of its existing and future facilities.	How much of the ability to do this is in the direct control of EMA; to what extent does it rely on regulators, airlines, holiday companies, etc.
Land use 13	National Policy: The National Planning Policy Framework was published by the Government in March 2012 ...	I would have expected some reference to Government's HS2 'policy' here.

Land Use 14 15	The North West Leicestershire Local Plan was adopted in August 2002 ... The North West Leicestershire Core Strategy ... was submitted in June 2013 ... and was <b>withdrawn</b> in October 2013 ... The policy sets out the <b>withdrawn Core Strategies</b> strategic objectives that the operation and the development of the airport would relate to ... The <b>emerging Core Strategy</b> provides for the airport's growth in Policy CS3 ...	Clarification should be provided regarding the appropriate terminology to use in the Plan (if different to the red text).  Reference should be made to the Local Plan <i>Schedule of Saved Policies</i> which relate to EMA (see <u>Local Plan</u> Saved Policies Schedule <i>T18, T19 and T20</i> ).
Land Use 15	Other surrounding local authorities are at different stages in the preparation of their local plans. <b>These authorities include the counties of Leicestershire</b> , Nottinghamshire and Derbyshire, the city councils of Nottingham, Derby and Leicester and the local district authorities of South Derbyshire, Erewash, Broxtowe, Rushcliffe, Melton and Charnwood. <b>The airport looks to contribute to the preparation of the plans of these authorities</b> , promoting the economic development and transport opportunities that the airport brings ...	Clarification needed – does this refer to the Minerals & Waste Local Plan (if yes, this needs to be referred to in the text).  Otherwise we don't produce Local Plans – the text should refer to the Districts/Borough's Local Plans.
Land Use 16	It is envisaged that the extent of the Public Safety Zones may be reviewed to reflect changes in aircraft technology and changes in the numbers of aircraft movements.	It would be helpful if more detail could be provided i.e. does this impact on size, location or both.
<b>Plan / page</b>	<b>Text</b>	<b>Comment</b>
Land use 17	The National Planning Policy Framework outlines the considerations that Local Planning Authorities should take into account when making planning policy or determining applications for noise sensitive developments.	It would be helpful to understand what impacts future changes in aircraft types using the airport might have on future noise levels.
Land use 18	The airport will work with North West Leicestershire to extend the life of the planning consent [for the construction of a 190m extension of the runway] so that the requirement can be fully considered when the economic conditions have improved.	Given the potential environmental benefits, the County Council would support the earliest possible implementation of the runway extension.  We would also encourage early liaison with us on development / expansion plans (i.e. frequency of planes, times and flight paths). This

		will provide the opportunity to explore the potential impact on residents and to consider the impact when undertaking long term planning (i.e. the possible location of new settlements).
Land use 20	Additional apron can also be provided as a southern extension of the Central West Apron on land that is currently used for passenger car parking.	It is presumed that the car parking would be replaced elsewhere on the site; it would be helpful for the Sustainable Development Plan to make this clear, including in the apron proposal policy (P21).
Land use 23	As the terminal development works are undertaken consideration will be given to the internal road network to ensure that it meets the needs of passengers, visitors and public transport operators.	This comment is welcomed and supported. It would be helpful if it could also be reflected in the passenger terminal policy.
Land use 25	Cargo terminal policies	It would be helpful if this could include the reference to relocation of parking (as set out in the penultimate paragraph on P24)
Land use 37 onwards	Surface access and car parking  We are committed to delivering a good quality and reliable transport infrastructure with improved sustainable travel choices for both passengers and site employees. We will increase business efficiency by combatting the effects of congestion around the airport and assist with the recruitment and retention of employment by making journeys easier, cheaper and more reliable ...	We support the objective of the Surface Access Strategy and note the good progress being made towards achieving the sustainable transport targets. It would be useful if the Plan could say more about: <ul style="list-style-type: none"> <li>• the possible opportunities that the East Midlands Gateway Project might present, particularly in terms of public transport accessibility to the area and opportunities for improved walking and cycling facilities</li> <li>• the HS2 policy and opportunities for promoting accessibility between the proposed station at Toton and EMA</li> <li>• any need to upgrade access to the site, in the light of increasing passenger numbers (we note reference to offsite road schemes and internal road improvements)</li> </ul>
Land Use 38	Targeted and focussed local improvements to the strategic road network are the main areas for development. This is to protect access to the airport and also to manage the growth in non-airport traffic. The Surface Access Strategy seeks to manage the growth in airport-related road traffic in a responsible and in a sustainable way.	Data is used to identify those areas most in need of improvements, and which would provide the greatest benefit to the network and economy. Improvements that area already proposed include the M1 J24 (part of the Highways Agency pinch point programme). We encourage early engagement on issues affecting the local road network and EMA. It should be noted that the airport is represented on the Leicester & Leicestershire Transport Advisors Group, which also includes representation from the Highways Agency, who manage the strategic road network.
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Land use 40	Airport road traffic is a relatively small percentage of the overall traffic on the local road system and the adjacent motorway, particularly at peak times.	It would be useful if the Plan could provide some general indication of traffic levels generated by EMA.
Land use 40	As the passenger terminal and the cargo capacity grows, the internal road network will be improved to ensure the free flow of vehicles, buses and HGV's around the site. Facilities for cyclists and pedestrians will also be improved.	This statement is welcomed and supported, but it would be helpful if it could also be reflected in the 'policy' panel on P41
Land Use 41 42	... This is to be coupled with a car parking strategy to make long-term car parking attractive and also to alleviate flyparking on local roads and in local villages. ... To provide for an airport with the capacity and the capability to handle 10 million passengers a year, it is expected that the number of on-site car parking spaces will need to double.	We support the proposals, so long as the overall proportion of journeys to EMA by car does not increase in the future, i.e. they maintain or improve their current modal split.
<b>Environment</b>		
Envir. 05 16	Local Air Quality - We will: <ul style="list-style-type: none"> <li>• develop a Surface Access Strategy that promotes a modal change away from the private car to less environmentally damaging forms of travel;</li> <li>• adopt operational practices that seek to minimise the polluting emissions from airport operations;</li> <li>• undertake regular monitoring for key pollutants, within the wider context of the Air Quality Strategy ...; and</li> <li>• make the results of air quality monitoring publicly available</li> </ul>	We support these actions. Where appropriate we encourage close working with the district council, who monitor air quality in their area.
Envir. 07	As part of the Sustainable Development Plan and the Land Use Plan, the airport (and its development partners) will undertake environmental assessment of all major developments in order to effectively understand and mitigate impacts and to ensure that we incorporate environmental standards into the design.	We would encourage early liaison with us on development / expansion plans for EMA (i.e. frequency of planes, times and flight paths). This will provide the opportunity to explore the potential impact on residents and to consider the impact when undertaking long term planning (i.e. the possible location of new settlements).
Envir. 20	<b>Road transport emissions contribute most significantly to air quality in the UK.</b> Our Surface Access Plan outlines our commitments	It would be useful to reference the source of statistics / statements etc.

	to promote the use of sustainable transport by airport staff and passengers. Our work in establishing public transport routes to the airport, and promoting their use by both staff and passengers is particularly important. We welcome the recent success of airport bus services, including the Skylink routes to Nottingham, Leicester and Derby, and continue to facilitate sustainable transportation not only to and from the airport site, but also to the surrounding areas which without airport links may not benefit from such services.	We support the work that EMA is undertaking to promote the use of sustainable transport.
<b>Plan / page</b>	<b>Text</b>	<b>Comment</b>
<b>Economy &amp; Surface Access</b>		
Econ & Surface Access 02	Whilst improving public transport remains a key priority, the need for accessibility through the highway network continues to be important, particularly for cargo and freight distribution. Targeted and focussed local improvements to the strategic road network are important areas for development, both to protect access to the airport and also to manage the growth in non-airport traffic.	Data is used to identify those areas most in need of improvements, and which would provide the greatest benefit to the network and economy. Improvements that area already proposed include the M1 J24 (part of the Highways Agency pinch point programme). We encourage early engagement on issues affecting the local road network and EMA.
Econ & Surface Access 03	Overview	It would be useful if the Masterplan could provide some general indication of traffic levels generated by EMA
Econ & Surface Access 08	Market research undertaken by the Civil Aviation Authority (CAA), as part of its consultation on Information Powers, found that the cost and convenience of getting to an airport was selected as a key reason for choosing an airport over other local options by 55% of respondents. This makes surface access a crucial part of the consumer journey, ranked second in the CAA poll (by only 1%) to the availability of flight routes which was chosen by 56% of respondents. People need to be connected to infrastructure in order to use it and for the economic benefits of	Future population and economic growth will increase the number of vehicles on the network and, if nothing is done to address this issue, existing congestion on the strategic and local road network will increase, impacting on journey time reliability and convenience of getting to the airport.  Traffic data can be used to estimate the predicted levels of future traffic, and its impact on the highway network and EMA.

	that use to be realised. A relation between the quantity and quality of transport infrastructure and the level of economic development is apparent. When transport systems are efficient, they provide economic and social opportunities and benefits that result in positive multiplier effects such as better accessibility to markets, employment and additional investments. When transport systems are deficient in terms of capacity or reliability, they can have an economic cost such as reduced or missed opportunities and lower quality of life.	
Econ & Surface Access 11 to 15	Modal share	We support the objective of the Surface Access Strategy and note the good progress being made towards achieving the sustainable transport targets.  It would be useful if the Plan could say more about the possible opportunities that the East Midlands Gateway Project might present, particularly in terms of public transport accessibility to the area and opportunities for improved walking and cycling facilities.
<b>Plan / page</b>	<b>Text</b>	<b>Comment</b>
Econ & Surface Access 17	Airport road traffic is a relatively small percentage of the overall traffic on the local road network and the adjacent motorway, particularly at peak times.	See previous comment (Land Use page 40) i.e. <i>'It would be useful if the Plan could provide some general indication of traffic levels generated by EMA'</i> .
Econ & Surface Access 17	Traffic flows on the A453 Ashby Road are likely to be within available link capacity at peak times. The DHL Roundabout, EMA access junction and Pegasus roundabout are likely to be operating without significant delays.	It would be helpful to clarify these comments e.g. timeframe / traffic flows.
Econ & Surface Access 17	Junction 24 of the M1 experiences congestion at peak times, and the Highway Agency recognises that there are no meaningful improvements that are possible within the existing junction	This should reference the Highway Agency's proposed Pinch Point scheme (improvements are already proposed for M1 J24, as part of the Highways Agency pinch point programme).

	constraints	
Econ & Surface Access 18	Given the very time-critical nature of the type of freight being moved, there is a strong dependency by the cargo carriers on the reliability of journey time on the strategic network. <b>As such the airport works very closely with the Highways Agency and their maintenance contractors (A_one+)</b> to ensure that <b>overnight closures of key roads</b> due to essential maintenance works are minimised as much as possible. Route diversions caused by overnight road closures can have a very detrimental effect on the freight integrators' ability to meet their contracted delivery times and adversely impact upon their and their client's businesses.	We would also encourage close working with us (the Local Highway Authority) to ensure that use of the local road network (for instance as the result of strategic road closures) is as efficient as possible.
Econ & Surface Access 19 to 20	Road – Future developments	As per other parts of the Plan, it would be useful if this section could also cover internal road improvements. Also this section should also include reference to any need to upgrade access to the site in the light of increasing passenger numbers.
Econ & Surface Access 20	The airport will continue to work with the Highways Agency and other transport authorities to develop solutions that continue to provide excellent access to East Midlands Airport. As part of the wider network improvements taking place, <b>a strategic review of airport signing on the highway network is to be promoted.</b>	We would encourage early liaison and close working with us (the Local Highway Authority) to ensure that a strategic review of airport signing on the local road network can be investigated.
<b>Plan / page</b>	<b>Text</b>	<b>Comment</b>
Econ & Surface	The following targets for bus routes and improvements have been identified as being of highest importance for both	There is an aspiration to improve bus links to Coalville. Our Local Bus Service review, which went to Cabinet on 6.5.14,

<p>Access 24</p>	<p>employment catchment and passenger access. Should the airport grow sufficiently in the future, and should the economic conditions be such that the below improvements to the network show sufficient signs of becoming commercially viable or pump-priming funds become available. The enhancements below should be seen as a 'wish-list' and is in order of priority for the airport</p> <ul style="list-style-type: none"> <li>• Increase in frequency for Derby, Nottingham, Leicester, Loughborough and Long Eaton</li> <li>• Airport to Ilkeston via an extension of the No 15</li> <li>• <b>Airport to Coalville – increase in operational hours to include 3-4am start and midnight finish</b></li> <li>• Airport to Clifton and Tram via East Midlands Parkway</li> <li>• Airport to Ashby-de-la-Zouch and a possible extension to either Swadlincote or Burton-upon-Trent</li> <li>• Coach links to Birmingham</li> </ul>	<p>recommended a reduction in service 155 frequency (from hourly to two hourly). This will impact on the aspiration to improve links between Coalville and EMA.</p>
<p>Econ &amp; Surface Access 24</p>	<p>Bus – Future development</p>	<p>It would be useful if the Plan could say more about the possible opportunities that the East Midlands Gateway Project might present</p>
<p>Econ &amp; Surface Access 33</p>	<p>Airport car parking There are also around 3,000 spaces provided for staff car parking</p>	<p>The 2006 report indicated that the staff parking was 3,300 spaces. Clarification required.</p>