

Comments from the Netherlands

Regarding the conditions attached to the renewal of the diploma for the De Oostvaardersplassen Nature Reserve and National Park Weerribben-Wieden the comments from the Netherlands are two-fold:

1. The Comments by the site manager as presented last year.
2. The comments from the Ministry of Infrastructure and Water management and the Ministry of Agriculture Nature and Food Quality regarding the condition on Lelystad Airport. This condition is beyond the mandate of the site manager. On principle we cannot agree with a condition in the diploma addressed to the Dutch government. Especially as the Ministries were not included in the appraisal phase. If the wording "condition:" is changed into 'recommendation' it could be acceptable but then it is also necessary that the incorrect information is corrected. As the report is of 2018 there is also some more recent information. But most of the information was present during the appraisal.

Conditions regarding Lelystad Airport as mentioned in the Diploma.

Condition: Oostvaardersplassen

1. In the context of the development of the Lelystad airport ensure that the flight paths as determined in 2016 exclude overflights of the De Oostvaardersplassen Nature Reserve as well in case the airport is expanded for larger planes and intercontinental flights in the future, the same condition holds. T-PVS/DE (2019) 10 - 10 -

Condition: Weerribben-Wieden

Urge the responsible authorities to put the development of Lelystad Airport on hold until a solution for the long low flight path is found and that it is ascertained that flight movements above the De Weerribben-Wieden National Park is kept at the lowest possible level with only high flight routes and no holding tracks above the National Park.

First it is good to realize that the opening of the developed Airport Lelystad is postponed. At this moment there will be no further decisions on the opening of the Airport until a new government is in place, after the elections in March.

The conditions attached to the diploma refer to situations that do not exist in the agreed plans and decisions regarding the Lelystad Airport. Further it is not likely that there will be any chances to the agreed plan in the future.

Our detailed comments are:

In the condition for the Oostvaardersplassen it mentions overflight and intercontinental flights. However in the agreed plan for the Airport it is stated that the overflight is excluded for the Oostvaardersplassen. Also there shall be no intercontinental flights. This information can be found in the Alders report:

The Alders-akkoord is the basic agreement for developing Lelystad Airport. This agreement contains the condition that above Nature-2000 areas the minimal flight height should always be 3000 feet. Also it was agreed that there will be no flights over the Oostvaardersplassen.

https://www.alderstafellelystad.nl/uploads/1/4/1/3/14138220/20140522_briefadvies_alder_stafel_lelystad.pdf

The outcome of the Environmental Impact Assessment of Lelystad Airport is that the airport shall not lead to impact on the natural characteristics of any Natura-2000 area, including the Oostvaardersplassen, especially because of the agreed minimal flight heights. In 2017 this was also the outcome of a Council of State procedure.

- Geactualiseerd MER:
<https://www.rijksoverheid.nl/documenten/rapporten/2018/02/21/201833069-11-mer-actualisatie-hoofdrapport>
- Wegnemen belemmeringen ongehinderd doorklimmen:

<https://www.rijksoverheid.nl/documenten/kamerstukken/2020/07/01/voortgangsbrief-programma-luchtruimherziening>

- Raad van State
<https://www.raadvanstate.nl/@8994/luchthaven-lelystad/>

The condition for the Weerribben-Wieden refers to a low flightpath and holding stacks. The report mentions a holding stack in the airspace above the area. However, this idea was abandoned years ago and the anticipated holding stack area is 80 km south east of Weerribben-Wieden. For the Weerribben-Wieden applies that all land routes are above 6000ft min. This is laid out in a routeset and, when it will operational, this will be monitored.

- Routeset B+ lelystad
<https://luchtvaartindetoekomst.nl/luchthavens/lelystad+airport/documenten-lelystad+airport/default.aspx#folder=1302636>
- Monitoringprogramma
<https://luchtvaartindetoekomst.nl/luchthavens/lelystad+airport/documenten-lelystad+airport/HandlerDownloadFiles.ashx?idnv=1529425>

Last July 2020 the Minister of Infrastructure and Waterstate informed the Parliament that because of the new air-space program it was no longer necessary to have any low flights after the Lelystad Airport will be opened.

Regarding the Weerribben-Wieden the report mentions a holding stack in the airspace above the area. This idea was abandoned years ago and the anticipated holding stack area is 80 km south east of Weerribben-Wieden.

In both reports there is a mention that Lelystad Airport shall accommodate intercontinental flights later. This is an incorrect information. There will be no intercontinental flights, this is not foreseen and not part of any future planning.

I hope this information is sufficient to alter the mentioned conditions.