

DRAFT AVIATION POLICY FRAMEWORK CONSULTATION

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Summary

- 1 The Department for Transport published its long awaited consultation on the *Draft Aviation Policy Framework* in July 2012. The consultation runs until **31 October 2012**. The Government has expressed its intention to adopt the framework by March 2013.
- 2 The specific consultation questions are included in **Appendix 1**.

Introduction

- 3 The latest consultation document marks the second phase in the development of a new sustainable policy framework for UK aviation. It follows the *'Developing a Sustainable Framework for UK Aviation – Scoping Document'* consultation conducted in 2011 that sought to capture comments, ideas and opinions on both the benefits and impacts of aviation. The Borough submitted a comprehensive response in October 2011. (**Appendix 2**)
- 4 Following the Scoping consultation, the latest consultation document *'Draft Aviation Policy Framework'* sets out the government's objectives and policy in achieving a sustainable framework for UK aviation.
- 5 The stated aims of the Draft Aviation Policy Framework are to find measures to help increase UK connectivity to emerging markets and to compete successfully for economic growth in this sector. The government's vision is for *'dynamic, sustainable transport that drives economic growth and competitiveness...by securing investment to provide world class national and international connectivity; harnessing technology to ensure our transport system is smart and sustainable and ready for the future; and putting the customer and businesses at the heart of transport'*
- 6 Nearly all of the measures within this document are 'short term' (i.e. up to 2020), with the exception of the references to the development of a UK high speed rail network. The key priorities relate to working with stakeholders to make better use of existing runway capacity at all UK airports via a suite of measures to improve performance, resilience and the passenger experience; encourage new routes and services; support regional airports; and ensure better integration of airports within the wider transport network.
- 7 The government has also signalled its intention to follow this consultation with what it refers to as a 'Call for Evidence' on the UK's hub capacity. According to a statement by Justine Greening, the Call for Evidence will invite stakeholders to submit specific, evidence-based proposals for consideration in identifying the medium (2020-2030) and long term (2030 and beyond) steps needed to meet the Government's economic and environmental objectives for aviation i.e. maintaining the UK's international aviation connectivity.

Content

- 8 The framework is underpinned by two core principles, (i) 'collaboration' and (ii) 'transparency'. Collaboration refers to working with the aviation industry, regulators, experts, local communities and others at international, national and

local levels. It is also regarded as crucial to have clear and independent information and processes in place.

- 9 The Draft Aviation Policy Framework covers the following topic areas: Regional airports, noise, night flights and emissions and is structured around six chapters that focuses upon and discusses in quite significant detail:

- Benefits of aviation;
- Climate change impacts;
- Noise and other local environmental impacts;
- Working together; and
- Planning.

- 10 The document also contains several useful Annexes:

Annex A: Summary of consultation questions

Annex B: Noise metrics and controls

Annex C: Current EU noise proposal

Annex D: Noise descriptors

Annex E: Revised guidance on Master Plans, Airport Transport Forums (ATF) and Airport Surface Access Strategies (ASAS).

The Draft Aviation Policy Framework discusses measures to:

- 11 Liberalise further the UK aviation market to encourage foreign airlines to **develop routes from airports other than Heathrow** (notably Gatwick and Stansted);
- 12 **Economically liberalise the aviation market** by the future Civil Aviation Bill, citing in particular:
- a. replacing the current uniform approach to regulation – where designated airports are subject to mandatory five-year price caps – with a modern licensing regime where licence conditions can be tailored to the specific circumstances facing individual airports
 - b. enabling the Civil Aviation Authority (CAA) to take steps to reduce the degree or scope of economic regulation imposed on individual airports if they decide this would benefit passengers
- 13 **Improve reliability** and reduce delays at Heathrow:
- a. If operational freedoms show clear benefits in terms of resilience, reducing delays and allowing planes to land more effectively, thereby reducing the impact of noise for residents under the flight path, then the Government will consult on making these benefits permanent
- 14 Address the **environmental and local impacts** of aviation:
- a. pushing for international action on aviation emissions while continuing to support EU Emissions Trading Scheme;

- b. incentivising noise reduction through higher landing fees for noisier aircraft at unsociable hours and higher penalties for breaching noise limits at any time
- 15 Improve **surface access** to airports:
- a. £500m towards a western rail link to Heathrow. The link will cut typically 30 minutes off the journey to Heathrow from the west of England and south Wales, with significant benefits for growing cities like Swindon, Bristol and Cardiff. The service could come into operation as early as 2021.
 - b. £1.4bn is already being invested to improve surface access to airports, including £44m towards upgrading Gatwick Airport station and a new fleet of thirty electric trains already improving services on the Stansted Express.
 - c. In addition the Government is pressing ahead with HS2 which will significantly improve access to airports such as Birmingham and Manchester
- 16 **Improve efficiency** at the UK's border:
- a. review of the UK's visa regime;
 - b. recruiting additional border control staff
 - c. working with the US authorities to look at the options for speeding up entry into the US
- 17 **Maximise airport capacity** by supporting the introduction of new rules by airport operators, for example through limiting access to smaller aircraft
- 18 Improve **customer experience**:
- a. Introducing airport performance charters which will set out the level of service that airlines and their passengers should expect from airport operators;
 - b. Improving the overall passenger experience through the Civil Aviation Bill which is expected to gain Royal Assent in 2013.

Consultation Timescales

- 19 Following consultation (deadline 31st October 2012) the Government intends to adopt the framework by March 2013.
- 20 A draft impact assessment of the aviation policy framework is included with the consultation publication but will be developed further to take account of responses to the consultation.

- 21 The Department for Transport will hold consultation events over the coming months.

Proposed RBWM Reporting Time Frame

- 22 A draft reporting timetable has been drawn up that can be summarised as follows:
- Outline Briefing to Aviation Forum (AF) **21st August 2012**
 - Technical working group of AF to agree content and scope of response – **early September 2012**
 - Inter-authority discussions and position statements – **Throughout September 2012**
 - Report to Cabinet **25th October 2012** (Overview & Scrutiny tbc)
 - Response to Consultation by **31st October 2012** deadline
 - Consider RBWM response to Call for Evidence once scope and content are known – **post October 2012** (likely)
- 23 Effective public relations and communications strategy arrangements will also need to be put into place to raise awareness and encourage public engagement in the consultation process. Detailed arrangements still to be confirmed.
- 24 The consultation on the draft framework was announced by the Transport Secretary Justine Greening in a written statement released on the 13th July 2012. <http://www.dft.gov.uk/news/statements/greening-20120712a/>

The consultation document is available on the DfT website:

<http://www.dft.gov.uk/consultations/dft-2012-35>

DRAFT AVIATION POLICY FRAMEWORK

SUMMARY OF CONSULTATION QUESTIONS

The DfT is seeking your views on the overall strategy set out in this draft Framework. Under the specific chapter headings, the DfT is also asking for views on particular proposals where specific policy changes are proposed.

Consultation Issue	RBWM Response
Chapter 2: The benefits of aviation	
Connectivity:	
Do you agree with our analysis of the meaning and value of connectivity, set out in Chapter 2?	
Fifth freedoms:	
Do you support the proposal to extend the UK's fifth freedom policy to Gatwick, Stansted and Luton? Please provide reasons if possible.	
Are there any other conditions that ought to be applied to any extension of the UK's fifth freedom policy to Gatwick, Stansted and	

APPENDIX 1

Consultation Issue	RBWM Response
Luton?	
Airports outside the South East:	
Do you agree that the Government should offer bilateral partners unilateral open access to UK airports outside the South East on a case-by-case basis?	

APPENDIX 1

Consultation Issue	RBWM Response
<p><i>Any other comments:</i> Do you have any other comments on the approach and evidence set out in Chapter 2?</p>	
<p>Chapter 3: Climate change impacts</p>	
<p>Do you have any further ideas on how the Government could incentivise the aviation and aerospace sectors to improve the performance of aircraft with the aim of reducing emissions?</p>	
<p><i>Any other comments:</i> Do you have any other comments on the approach and evidence set out in Chapter 3?</p>	
<p>Chapter 4: Noise and other local environmental impacts</p>	
<p>Do you agree that the Government should continue to designate the three largest London airports for noise management purposes? If not, please provide reasons.</p>	
<p>Do you agree with the Government's overall objective on aviation noise?</p>	
<p>Do you agree that the Government should retain the 57 dB LAeq,16h contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance?</p>	
<p>Do you think that the Government should map noise exposure around the noise designated airports to a lower level than 57 dBA? If so,</p>	

APPENDIX 1

Consultation Issue	RBWM Response
which level would be appropriate?	
Do you agree with the proposed principles to which the Government would have regard when setting a noise envelope at any new national hub airport or any other airport development which is a nationally significant infrastructure project?	
Do you agree that noise should be given particular weight when balanced against other environmental factors affecting communities living near airports?	
What factors should the Government consider when deciding how to balance the benefits of respite with other environmental benefits?	
Do you agree with the Government's proposals in paragraph 4.68 on noise limits, monitoring and penalties?	
In what circumstances would it be appropriate for the Government to direct noise designated airports to establish and maintain a penalty scheme?	
In what circumstances would it be appropriate for the Government to make an order requiring designated airports to maintain and operate noise monitors and produce noise measurement reports?	
How could differential landing fees be better utilised to improve the noise environment around airports, particularly at night?	
Do you think airport compensation schemes are reasonable and	

APPENDIX 1

Consultation Issue	RBWM Response
proportionate?	
Do you agree with the approach to the management of noise from general aviation and helicopters, in particular to the use of the section 5 power?	
What other measures might be considered that would improve the management of noise from these sources?	
Do you have any further ideas on how the Government could incentivise the aviation and aerospace sector to deliver quieter planes?	
Do you believe that the regime for the regulation of other local environmental impacts at airports is effective?	
Do you think that noise regulation should be integrated into a broader regulatory framework which tackles the local environmental impacts from airports?	
Chapter 5: Working together	
Do you think Airport Consultative Committees should play a stronger role and if so, how could this be achieved?	
Is there a case for changing the list of airports currently designated to provide consultative facilities?	
Do you agree that the Civil Aviation Authority should have a role in	

APPENDIX 1

Consultation Issue	RBWM Response
providing independent oversight of airports' noise management?	
Do you agree with the Government's overall objective on working together?	
Is the high-level guidance provided in Annex E sufficient to allow airports to develop local solutions with local partners?	
Do you agree that master plans should incorporate airport surface access strategies?	
Do you agree that, where appropriate, the periods covered by master plans and noise action plans should be aligned?	

APPENDIX 2: Developing a Sustainable Framework for UK Aviation – Scoping Document – A Department for Transport Consultation.

<p>Please note: Some questions are beyond the remit of the Council or its officers to comment. They are aimed at the airline industry. In some cases suggestions have been received <i>via</i> consultees, including the Borough's Aviation Forum and its regular attendees.</p>	
<p>The aviation sector</p>	
<p>5.1 How does the aviation sector as a whole benefit the UK? Please consider the whole range of aviation activities including, for example, air freight, General Aviation and aerospace.</p>	<p>It allows high speed connectivity between economic regions and contributes to development of the global economy, thus being beneficial to employment. There are additional leisure benefits. However there are disbenefits to environment & amenity</p>
<p>5.2 What do you consider to be the aviation sector's most important contributions to economic growth and social well-being?</p>	<p>Employment in the vicinity of airports. Development of high technology e.g. aerospace industry Acts as a stimulus to the development of transport infrastructure with links to road and rail networks. Also important for business growth, location and development.</p>
<p>5.3 Are some sub-sectors of aviation more important than others? If so, which and why?</p>	<p>Data from 2009 shows that business travel accounted for 29% of passengers, leisure for 71%. It is important to note that the economic balance of leisure passengers shows revenue flowing out from the UK. It is questionable whether the use for leisure passengers is the best economic use of Heathrow Airport.</p>
<p>5.4 How do you think the global aviation sector will evolve in the medium and long term (twenty to fifty years)? What do you expect to be the most significant changes?</p>	<p>Short-medium term: expansion of short-haul use for leisure. Medium-long term: a significant expansion of leisure passengers due to passengers from the emerging economies in the East. Improved communications (e.g. teleconferencing may reduce the need for business passengers). Development of 'point-to-point' services</p>
<p>5.5 How, and within what constraints, can aviation growth occur as technological developments and improved operating procedures reduce CO₂, pollutant emissions and noise impacts?</p>	<p>Future growth should only occur if the benefits of technological progress can be shared with residential communities so as to achieve an actual improvement in such matters the noise climate and traffic management. A fresh 'attitudes to noise survey' is needed: the accepted survey</p>

	(ANIS) is 25 years out of date. A later survey (ANASE) has been ignored by DfT. Comments of the Borough's Aviation Forum firmly held view.
5.6 How should decision-makers address trade-offs or competing interests, where these occur both (a) between different aviation objectives, e.g. CO2 emissions versus local noise reduction, and (b) between aviation and other sectors, e.g. airspace use versus renewable energy objectives, or the use of land for maintaining a viable network of smaller airfields versus housing development?	At a local level noise continues to be the priority issue for local communities. It follows, noise levels needs to be reduced in line with a higher level of community expectation. Compliance with statutory air quality standards is important and given the two objectives of improving both air quality and noise are often contradictory, there is a need for a balance to be struck relating to standards compliance and acceptability issues.
5.7 Should some aspects of UK aviation be considered to be of strategic national interest (e.g. certain airports, air traffic control)? If so, based on what criteria?	Congestion at south-east airports indicates the critical importance of optimising strategic use in support of the overall UK economy rather than merely focusing on the development aspirations of individual airports.
5.8 How might the cost of regulation to the aviation sector be reduced, while achieving the Government's objectives of promoting sustainable aviation, improving the passenger experience at airports, and maintaining high standards of safety and security for passengers and freight?	This is a matter for the aviation industry & its regulators with perhaps better public consultation beforehand. Air Passenger Duty modifications (a recent Government consultation) are yet to be announced, The question of excise duty and VAT on aviation fuel has been raised by the Borough's Aviation Forum.
International connectivity and hub airports	
5.9 How important are air transport connections – both international and domestic – to the UK at both national and regional levels?	The priority should be for business travel and may require a review of airport take-off slots.
5.10 As long as people and goods can easily reach their desired destination from the UK, does it matter if they use a foreign rather than a UK hub airport?	This suggestion ignores the (admittedly marginal) benefits to the local economy of the direct and indirect business and employment generation by UK hub airports. Primary consideration should be for point-to-point services for major business centres. A foreign hub for less critical destinations

	would benefit utilisation of Heathrow.
5.11 Are direct connections from the UK to some international destinations more important than others? If so, which and why?	Significant is emphasis on the UK's most important trading partners. These will vary with time. Flexibility of slots is paramount. There is a need for priority to be given to greater strategic importance of the UK economy rather than individual airline or airport needs.
5.12 How will the UK's connectivity needs change in the light of global developments in the medium and long term (twenty to fifty years)?	Greater cognisance of the need to respond to the rapidly developing economies of China, India, Brazil and a number of Far - East countries.
5.13 What are the benefits of maintaining a hub airport in the UK?	The benefit is to the airport operator and the airline industry. Any benefits of transit passengers to the local economy are at best, marginal. It is only passengers whose flights originate or terminate at Heathrow that contribute to the local and regional economy.
5.14 How important are transfer and transit passengers to the UK economy?	<p>Transit and transfer passengers only contribute to Airport operator's revenue and not significantly to the local economy.</p> <p>There are concerns that transfer passengers, who add insignificantly to the UK economy, have increased considerably in the past 20 years. This causes 'peaking' of demand at hub airports (leading to congestion) rather than dispersal at regional airports where development is stifled. Whilst it has been argued that Heathrow needs transfer passengers, Heathrow now offers 20% fewer destinations than Gatwick (1990-2006) (Source: Civil Aviation Authority Passenger Surveys Reports for Heathrow Airport).</p>
5.15 What are the relative merits of a hub versus a point-to-point airport?	<p>The focus should be on point-to-point flights. Hubs are important mainly to airlines for scheduling purposes and not the UK economy or sustainability.</p> <p>Disruptions at the hub, such as bad weather or security problems create knock-on delays throughout the system. The overall operating efficiency of the UK network becomes limited by the operations and capacity of the hub airport. This is at the focus of the SE Airports Task Force Trial Scheme at Heathrow: the results of which</p>

	will make interesting reading.
5.16 Would it be possible to establish a new 'virtual' hub airport in the UK with better connectivity between existing London and / or major regional airports? Could another UK airport take on a limited hub role? What would be the benefits and other impacts?	Connectivity is the key here. All London airports should be considered as the hub and not individual airports. This is to avoid duplication. Charter and other non-scheduled flights are poor use of London's airport capacity, especially Gatwick. High speed rail is particularly relevant in this context. The scoping document needs to instigate and explore the merits of reviewing the role of alternative airports e.g. Lyneham/Manston that offer opportunities for under utilised existing airports (ex-MOD) for freight or charter operations and that are situated within easy reach of existing infrastructure networks i.e. road and/or rail.
Regional connectivity and regional airports	
5.17 Can regional airports absorb some of the demand pressures from constrained airports in the south-east? What conditions would facilitate this?	Whilst this may seem an option to relieve pressures from some of the airports in the region and hence the local environment, the infrastructure needs to be in place to provide access to and from these regional airports to the required destinations- see Para 5.16 above. Presently the south east is still the focus of economic growth. There are concerns that transfer passengers currently attract no Aviation Passenger Duty. The 3m transit passengers and 2m passengers from regional airports terminating at Heathrow (2009) would have a significant impact upon revenue streams and airport capacities. As a part of the 2M Group, the Borough supports the view that integration of smaller regional airports within a national integrated transport strategy is appropriate.
5.18 What more can be done – and by whom – to encourage a switch from domestic air travel to rail?	Consultees have expressed concerns about rail fare structures which will inhibit rail use. The high costs of rail travel: the subject of a recent comment by the Secretary of State for Transport does little to reduce demand for air travel. It is concerned that 2million people flew from regional airports to use Heathrow in 2009.
5.19 How could the benefits from any future high	Some consultees feel the answer is interrelated with previous questions: this

speed rail network be maximised for aviation?	could deter direct flights. High-speed rail should be provided for domestic and European air connections, essentially substituting those short-haul flights.
5.20 How can regional airports and the aviation sector as a whole support the rebalancing of the economy across the UK?	Many regions accept a second league position to the south-east and so accept the <i>status quo</i> . Regional point to point services are needed.
Making better use of existing capacity	
5.21 To what extent do UK airports meet the needs of their customers? How might those needs be more effectively met within existing capacity? What is the right balance between competition and regulation?	Some flights could be redirected to minor London airports e.g. Northolt, Biggin Hill, Lyneham or Manston to increase capacity at Heathrow. Any new aviation strategy should seriously consider addressing the issue of capacity enhancement at these airports
5.22 Can we extract more capacity out of the UK's existing airport infrastructure? Can we do this in a way which is environmentally acceptable? To what extent might demand management measures help achieve this?	If capacity is increased this must be to improve resilience - not to increase air traffic movements with consequent disruption to local communities. Secondly the Terminal 5 Inquiry received evidence that Heathrow needed capacity for 98million passengers yet with 68 million passengers Heathrow Airport Ltd. Is claiming 98% capacity – there is a misalignment of data here.
5.23 How can we support Heathrow's hub status within the constraints of its existing capacity? Can we do this in a way which is environmentally acceptable?	Resilience to deal with unanticipated disruption is the foremost issue here. There are a number of options, some included in the trial system announced by the Secretary of State recently – see below.
5.24 How important is increased resilience at the UK's major airports to reduce delays? How best could resilience be improved with existing capacity, e.g. how might trade-offs between existing capacity and resilience play a role in this?	Resilience improvements have been covered in the Ministerial statement in July 2011 following the report of the South East Airports Review. The trial at Heathrow starting on 1 st November and again in 2012 promises to provide a useful insight of options to increase the resilience of UK airports <u>without an associated need for mixed mode operations.</u>
5.25 Could resilience become an issue at regional airports? If so, how might this be avoided?	No comment.

<p>5.26 Could existing airport capacity be more efficiently used by changing the slot allocation process, for example, if the European Commission were to alter grandfather rights? If so, what process of slot allocation should replace it?</p>	<p>Capacity could be enhanced by prioritising charter flights and non-scheduled services away from Heathrow together with use of the minor London airports for business flights (mainly private aircraft).</p>
<p>5.27 What provision, if any, should be made for regional access into congested airports?</p>	<p>Regional airports encouraging more direct point-to-point travel would help if accompanied by better surface access e.g. High Speed rail travel.</p>
<p>5.28 What provision, if any, should be made for General and Business Aviation access into congested airports?</p>	<p>This is a commercial decision but a review of other London airports and surface access would serve as good starting points</p>
<p>5.29 What is the role of airspace design and air traffic management in making better use of existing capacity?</p>	<p>This is the subject of a separate consultation and decision on airspace strategy and is yet to be effectively resolved for the foreseeable future. Such factors as ensuring continuous descent alignment, precision navigation techniques and the fruits of the Civil Aviation Authority developments in aircraft dispersion will assist.</p>
<p>Climate change impacts</p>	
<p>5.30 What do you consider to be the most significant impacts of aviation, including its non-CO2 emissions, on climate change? How can these impacts best be addressed?</p>	<p>The effect on the upper atmosphere is most significant. This is still not recognised in the EU ETS scheme.</p> <p>There must be an understanding that if the UK is to keep to its carbon reduction goals aviation growth may need to be restrained. It is inequitable that the aviation industry should be permitted to expand unrestrained at the expense of every other UK industry and transport mode.</p>
<p>5.31 What role should aviation play relative to other sectors of the economy in reducing greenhouse gas emissions in the medium and long term?</p>	<ul style="list-style-type: none"> • Play an equitable role without favour. • Assume responsibility for local transport emissions connected to airport activities. • Accountability for funding local transport policy initiatives • Use of alternative energy for ground operations and aircraft when on the ground. • Audit waste production and minimise.
<p>5.32 How effective do you believe the EU ETS</p>	<p>There is a need for an urgent review of</p>

will be in addressing the climate impacts of aviation? Should the UK consider unilateral measures in addition to the EU ETS? If so, what?	existing and future international agreements on this issue.
5.33 What is the best way to define and quantify the UK's share of the CO ₂ emissions generated from international aviation?	Any flight which has an origin and destination in the UK should be part of the UK's CO ₂ emissions. The use of many different carbon calculators is currently confusing. This matter requires rationalisation.
5.34 What is the potential for increased use of sustainable biofuels in aviation and over what timeframe? What are the barriers to bringing this about?	Significant potential - but this should not be at the expense of food production. Processing sites and the necessary infrastructure, together with community acceptance of such facilities. Increased support for R&D into the use and development of bio-fuels in the first instance.
5.35 What mechanisms could the Government use to increase the rate of uptake of sustainable biofuels in the aviation sector? In particular, how can we accelerate the successful development of second generation biofuels?	No comment.
5.36 Which technologies (e.g. for aircraft and air traffic management) have the most potential to help reduce aviation's CO ₂ emissions (noting potential trade-offs with local environmental impacts)?	Flight optimisation techniques - which will enable individual flights to be optimised for speed, height and emissions. Acceptance of the future airspace strategy (FAS) now completed.
5.37 What more could be done to encourage the aviation industry to adopt new technology to reduce its climate change impacts?	The cost of fuel is already providing the main incentive. Anticipated further rises will compound the effect.
5.38 What more can the UK aviation industry do to reduce the climate change impact of its ground operations and surface access to and from the airport (which can also help reduce local environmental impacts)?	Maximise usage of ground power and plug in devices e.g. air conditioning/auxiliary power plants when aircraft are loading and unloading
5.39 What scope is there to influence people and industry to make choices aimed at reducing aviation's climate change impacts, e.g. modal shift, alternatives to travel, better information for passengers, better use of aircraft capacity, airspace management (which can also help reduce local environmental impacts)?	Improvements in surface access, efficiency of aircraft loading (%age filled) and direct flights are needed. Others might include; <ul style="list-style-type: none"> • Better utilisation of existing capacities • Greater efficiency of operations • Incentivisation to increase loading • Technology development

Local impacts	
<p>5.40 What do you consider to be the most significant impacts – positive and negative - of aviation for local communities? Can more be done to enhance and / or mitigate those impacts? If so, what and by whom?</p>	<p><u>Positive:</u> employment and business opportunities.</p> <p><u>Negative:</u> noise (particularly at anti-social hours), air quality (mainly road transport associated), congestion, overheating of the region's economy, pressure on schools, housing provision etc.</p> <p>Conduct urgent follow up research in relation to the ANASE Study to ensure that current public reaction to noise is accounted for: the ANIS study is 25 years out of date.</p>
<p>5.41 Do you think that current arrangements for local engagement on aviation issues, e.g. through airport consultative committees and the development of airport master plans, are effective? Could more be done to improve community engagement on issues such as noise and air quality? If so, what and by whom?</p>	<p>No! – For example The Heathrow Master Plan is still in draft form (and well overdue), although the Noise Action Plan for the airport has finally been published. There is ample scope to improve local representation and community engagement e.g. some over-flown communities were not consulted and even refused sight of the final Noise Action Plan that was submitted to DEFRA. This pays lip service to conducting authentic community/stakeholder engagement.</p> <p>Current systems are biased heavily in favour of the airline industry.</p> <p>There are many improvements which need to be made including better representation of community stakeholders.</p>
<p>5.42 Do you think that current arrangements for ensuring sustainable surface access to and from airports, e.g. Airport Transport Forums and airport surface access strategies, are effective? Could more be done to improve surface access and reduce its environmental impacts? If so, what and by whom?</p>	<p>No. More could and should be done to improve connectivity between London/SE airports and to reduce the pollution burden (noise & air quality issues).</p>
<p>5.43 What are your views on the idea of setting a 'noise envelope' within which aviation growth would be possible, as technology and operations reduce noise impacts per plane? What do you consider to be the advantages and disadvantages of such an approach?</p>	<p>Assuming the concept is defined properly and has a reducing basis, it is possible that it might be acceptable once individual aircraft have become less noisy and the overall burden of noise is reduced. At Heathrow the noise burden remains unacceptable. The 480k ATM cap must be retained.</p>

	<p>Concerns have been expressed by the Royal Borough and other stakeholders, on a number of occasions that the impact of landing noise is dismissed as an issue (on the grounds of approach safety priority) by airports whereas, in reality, it is of increasing significance to communities as take-off noise is increasingly controlled and monitored. Noise infringement policies (mandatory or voluntary) to cater for landing noise needs to be considered.</p> <p>The matter of glide path angles should be researched fully to ascertain the probable benefits to the noise climate of increasing the angle for CDA (continuous descent alignment) from 3 degrees to 4 degrees. However, safety is the paramount consideration in any potential change.</p>
<p>5.44 Is it better to minimise the total number of people affected by aircraft noise (e.g. through noise preferential routes) or to share the burden more evenly (e.g. through wider flight path dispersion) so that a greater number of people are affected by noise less frequently?</p>	<p>Yes. Burden sharing is only likely to be effective if combined with an absolute cap on numbers – such as the 480,000 ATM cap. Noise preferential routes are a useful tool in reducing the burden on communities. Where guarantees cannot be given space created by the use of new navigation aides will be filled in time.</p>
<p>5.45 What is the best way to encourage aircraft manufacturers and airlines to continue to strive to achieve further reductions in noise and air pollutant emissions (notably particulate matter and NOx) through the implementation of new technology?</p>	<p>Tax breaks and other financial incentives (e.g. landing fees for environmentally compliant aircraft with penalties for less compliant machines.</p>
<p>5.46 What are the economic benefits of night flights? How should the economic benefits be assessed against social and environmental costs?</p>	<p>Please refer to the recent CE Delft report which disagrees with any supposed economic benefits of night flights. The report demonstrates that there are economic disbenefits.</p> <p>In the absence of a ban, additional night restrictions leading to a ban are indicated.</p>
<p>5.47 How can the night flying regime be improved to deliver better outcomes for residents living close to airports and other stakeholders, including businesses that use night flights?</p>	<p>Night flying is unsustainable and unacceptable for local communities living under the flight paths: it should be phased out except in real emergencies. The commitment in the ATWP (2003) to meet World Health Organisation noise targets by 2030 must be reiterated in any new strategy and wherever possible require earlier</p>

	<p>compliance with WHO standards.</p> <p>Some of the suggestions relating to airport resilience could have a beneficial impact towards reducing the need to conduct night time operations.</p> <p>A review of the current night flight regimes is due in 2012. An opportunity exists to trade off night movements for increased daytime movements. The cessation of night flights would significantly fill the 'trust gap' that exists and continues to hamper progress and relationships between the airport operators and local communities.</p> <p>The scoping review should consider the merits and de-merits of European operating times.</p>
<p>5.48 Should extended periods of respite from night noise be considered, even if this resulted in increased frequency of flights before or after those respite periods.</p>	<p>No – see above. The period after the night flying times end is already sufficiently congested.</p>