

Report for: ACTION
Item Number:



<b>Contains Confidential or Exempt Information</b>	NO
<b>Title</b>	DRAFT AVIATION POLICY FRAMEWORK
<b>Responsible Officer(s)</b>	Terry Gould – Head of Public Protection
<b>Contact officer, job title and phone number</b>	Terry Gould – Head of Public Protection 01628 683501
<b>Member reporting</b>	Cllr Phillip Bicknell
<b>For Consideration By</b>	Cabinet
<b>Date to be Considered</b>	24 <sup>th</sup> October 2012
<b>Implementation Date if Not Called In</b>	Response to the Consultation is required by 31 <sup>st</sup> October 2012
<b>Affected Wards</b>	All
<b>Keywords/Index</b>	Aviation; Heathrow airport; Regional airports; Connectivity; Surface access; Noise; Air quality; European Noise Directive; Night flights; Cranford Agreement.

### Report Summary

1. This report deals with a Department for Transport consultation document entitled: *Draft Aviation Policy Framework (July 2012)*. It is the second stage in the government's original proposal to replace the Aviation White Paper (ATWP) of 2003 following up the earlier scoping exercise towards developing a sustainable policy framework for UK aviation. Response to the first stage consultation was reported, considered and endorsed by Cabinet in 2011.
2. This latest document represents the government's draft sustainable framework for UK aviation. It focuses heavily on the benefits of aviation; airport and runway capacity, stressing the importance of internal and global connectivity. It also seeks views on a number of further issues in the search for a sustainable solution for development of the UK aviation industry.
3. The document raises a number of contentious issues including: the future growth and expansion of airports in the south-east and regions, including references to Heathrow Airport; Climate change impacts; Noise and other environmental impacts; and the importance of greater collaborative working between the various stakeholders.
4. This report recommends that the Borough responds on behalf of local residents to the specific questions raised in the consultation document. The questions and suggested responses are as outlined in Appendix 1.
5. These recommendations are being made because the Borough has always adopted a community leadership role to represent views of local

communities. The deadline for responses is **31<sup>st</sup> October 2012**.

6. There are no identified financial implications for the Council arising out of the consultation report at this stage.

**If recommendations are adopted, how will residents benefit?**

Benefits to residents and reasons why they will benefit	Dates by which residents can expect to notice a difference
1. Responding to Department for Transport will ensure the Borough's views are made known to Government so they may be included in the formulation of future aviation policy.	This will depend ultimately on the government's programme for taking forward a future long term aviation policy.
2. Comments will contribute to a greater understanding and opinion of local issues arising from the consultation.	Through raising existing issues, whilst there is no guarantee of success, it is more likely to result in earlier intervention and mitigation of more local concerns in the short term that will be of benefit to local residents.

**1. Details of Recommendations**

**RECOMMENDATION: That:**

- a. **The subject matter and implications arising out of the Department for Transport (DfT) public consultation entitled: 'Draft Aviation Policy Framework' be noted;**
- b. **The Head of Public Protection, in consultation with the Lead Member for Highways, Transport and Environment be authorised to submit a response on behalf of the Council based on the details set out in Appendix 1 of this report, together with any additional concerns highlighted by Cabinet.**

**2. Reason for Recommendation(s) and Options Considered**

<b>Option</b>	<b>Comments</b>
1 Respond as outlined in the report	The Borough's views will be represented to Government.
2 Do not respond	An opportunity would be lost to highlight national, regional and local issues that are of significant importance to our communities

## Background

- 2.1 Historically, the Borough has adopted a robust position on the more negative aspects arising from local operations at Heathrow Airport, taking up a strong community advocacy and leadership role and adopting influential positions on several inter-local authority consortia that are committed to balancing the competing interests in seeking to secure sustainable airport development and operations. Recent examples include:
- Opposition to night flights;
  - Calling for the early abolition of the Cranford Agreement with the introduction of Easterly Alternation to afford local residents periods of respite;
  - Voicing strong opposition to unsustainable development at Heathrow airport;
  - Establishing a stakeholder Aviation Forum for local residents;
  - Advocating the need for enhanced noise mitigation packages for local communities.
- 2.2 The current coalition government ruled out a Third Runway at Heathrow Airport, stating the intention was to optimise the efficiency of the existing infrastructure (generally) in order to meet current pressures and future growth demands, particularly in the South-East, but not ruling out regional airport expansion.
- 2.3 A number of other government commitments were made, such as the abandonment of Cranford Agreement – a significant priority for Borough residents and an issue it has raised for many years given the opportunities it offers for the introduction of easterly alternation and periods of respite for local residents. The issue of night flights also remains a major concern, together with road and rail access to the airport and the perceived inefficient transport infrastructure currently available to access the airport from the west.
- 2.4 In furtherance of these statements the government also announced that it would abandon the previous Aviation White paper (2003) and initiate fresh thinking on the development of a new sustainable aviation policy for the UK, openly inviting contributions to what has become a hotly contested national debate.
- 2.5 In March 2011, the government launched a first phase scoping exercise signalling the development of a new sustainable aviation policy framework for the UK. This document was designed to stimulate ideas as to how the UK aviation industry could best serve the nation whilst capitalising on sustainable, future economic growth opportunities whilst optimising the use of existing capacities. The Borough's submitted a full response in October 2011 to the questions posed by the Government's first phase consultation document. This is set out in Appendix 2.
- 2.6 DfT has also undertaken a series of stakeholder sessions in the English regions and with devolved governments. Following responses from over 600 organisations and individuals to the scoping exercise, a second consultation was released in July 2012. This latest document states there appears to be broad agreement on the:
- Significant economic and other benefits from aviation;

- Negative global and local environmental impacts from aviation and need for these to be tackled.
  - Importance of maintaining the UK's excellent international connectivity.
- 2.7 What has also emerged is the strength of opposing views on 'how' the UK should take forward a short, medium or long term aviation strategy for both addressing the adverse impacts and for maintaining and developing UK aviation interests.
- 2.8 Consequently, there has been the re-emergence of increasing debates in both government circles and the media as to how the UK's aviation strategy should be modelled, particularly around the potential expansion and status of Heathrow airport i.e. whether there should be further airport capacity in the form of a Third runway/additional terminals; and/or preserving Heathrow Airport as the UK's only hub airport, vis-a-vis developing a new or additional hub(s).
- 2.9 Alternative proposals are also forthcoming in the form of 'Boris Island' – a brand new airport in the Thames Estuary; the expansion of regional airports<sup>1</sup> such as Birmingham, Manchester and Manston; the adapted use of existing MoD airfields and runways such as Northolt and Lyneham to optimise existing capacity; a set of new proposals advocating new runways west of Heathrow; and options for stimulating the development of new, infrastructure and connectivity facilities.
- 2.10 On the question of potential further development of airports in the South-east and the need to optimise existing capacities, there are major differences in opinion. Some parties argue there is an over-riding economic need for significant expansion throughout the South-east, whilst others have demonstrated that there is already sufficient capacity, the problem being the under-utilisation and dispersal of capacity, made worse by the dominance of the three major airports of Gatwick, Stansted and particularly Heathrow.
- 2.11 At government level there has also been significant ministerial changes in recent weeks sparking speculation that previous commitments ruling out a Third Runway at Heathrow Airport are wavering. In response, a new Independent Commission has been set up with a brief to review the position and to make recommendations to government on options for a new aviation strategy. This replaces the original process that envisaged a 'Call for Evidence' which is timetabled to report at the end of 2013, with no significant implementation until 2015. There appears to be widespread concern over certain aspects of the timetabling for the early finalisation of the APF and the scope and remit of the Commission's deliberations. **Appendix 3** summarises the current terms of reference for the Independent Commission. It is understood the membership of the Commission and the process it will adopt will be announced at the end of October 2012.
- 2.12 What is becoming increasingly clear, at the strategic level, is that the aviation debate appears to be shifting away from more local issues towards to one more centred upon supporting the UK economy. Further, issues such as 'connectivity' are now dominating the thinking both in the context of within the UK and from a global perspective, as new emerging economies such as China, India and Brazil continue to develop and open up new market opportunities.

2.13 The Borough's detailed responses to each of the questions that are raised within the DAPF document are set out in **Appendix 1**. They include some amplified comments relating to specific concerns of residents about more local issues and impacts relating to Heathrow Airport. These responses are consistent with existing Council policy or previous stances taken on specific issues.

### 3. Key Implications

What does success look like, how is it measured, what are the stretch targets?

Defined Outcomes	Unmet	Met	Exceeded	Significantly Exceeded	Date they should be delivered by
Local resident's views and concerns are raised and included as part of new national Aviation Policy Framework	Local concerns are not included In any future UK Aviation strategy.	The views of the Borough are reflected within the development of the new aviation strategy framework with govt. commitments to address key issues of concern.	Robust commitments from govt. to address the key issues of: no 3 <sup>rd</sup> runway at Heathrow; enhanced noise protection measures against night flights; early abandonment of the Cranford Agreement and commencement of easterly alternation; and improved westerly access to the airport.	All key local concerns are addressed specifically within the new strategy, as set out in the Borough's response, together with SMART objectives for resolution.	DfT timescales are variable and currently undefined

### 3.1 Summary of Draft Aviation Framework Consultation Document

#### 3.2.1 Content

The draft aviation policy framework covers the following topic areas: Regional airports, noise, night flights and emissions.

The document is divided into six chapters setting out:

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

There are also a series of Annexes:

- Annex B contains details on noise metrics and controls,
- Annex C outlines the current EU noise proposal,
- Annex D summarises noise descriptors,

- Annex E provides revised guidance on Master Plans, Airport Transport Forums and airport surface access strategies.

The framework document states it is underpinned by two core principles of collaboration and transparency.

### 3.2.2 Key Measures included in the draft aviation framework

- Further liberalisation of the UK aviation market to encourage foreign airlines to develop routes from airports other than Heathrow (notably Gatwick and Stansted).
- Measures to economically liberalise the aviation market by the future Civil Aviation Bill, including:
  - 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.
- Measures to improve reliability and reduce delays at Heathrow:
 

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.
- Measures to 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.
- Measures to 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.
- Measures to 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.

- To maximise airport capacity by supporting the introduction of new rules by airport operators, for example through limiting access to smaller aircraft.
- Measures to 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.

A copy of the full document has been placed in the Member's room and/or is available at: <http://assets.dft.gov.uk/consultations/dft-2012-35/draft-aviation-policy-framework.pdf>

#### **4. Financial Details**

There are no anticipated financial implications/impacts on the budget arising out of responding to this consultation.

#### **5. Legal Implications**

There are no direct legal implications arising from this report.

#### **6. Value for Money**

Not applicable.

#### **7. Sustainability Impact Appraisal**

The matter of sustainability is implicit in the very purpose of the Draft Aviation Policy Framework document which aims to cover all aspects of sustainability. The main points will emerge as the process evolves. There are no direct, separate issues for the Borough.

#### **8. Risk Management**

None

#### **9. Links to Strategic Objectives**

The Borough's response touches upon the following strategic objectives:

##### **Residents First**

- Improve the Environment, Economy and Transport
- Work for safer and stronger communities

##### **Value for Money**

- Invest in the future

##### **Delivering Together**

- Enhanced Customer Services
- Deliver Effective Services
- Strengthen Partnerships

#### **10. Equalities, Human Rights and Community Cohesion**

10.1 The Borough's proposed response to this consultation is seeking to secure a positive impact for residents in terms in the context of equality, human rights and community cohesion issues. A first stage Equality Impact Assessment has been conducted. This has indicated a second stage is not required.

10.2 The Department for Transport is understood to have completed its own similar study.

#### **11. Staffing/Workforce and Accommodation implications:**

None

#### **12. Property and Assets**

None

#### **13. Any other implications:**

None

#### **14. Consultation**

14.1 The Aviation Forum has met on two occasions to discuss the latest consultation document. Comments within the draft response represent the general consensus of the Aviation Forum members.

14.2 The report is to be considered by a specially convened Overview & Scrutiny Panel on a 15<sup>th</sup> October 2012. Comments from the Panel will be reported in the final version of the report presented to cabinet for consideration.

14.3 Representatives from the Borough's Aviation Forum attended a DfT stakeholder event held at the department's offices on 9<sup>th</sup> October 2012. Clarification on a number of issues emerging from this event has been included in this report.

#### **15. Timetable for Implementation**

The deadline for responses to be received by the DfT is 31<sup>st</sup> October 2012.

#### **16. Appendices**

- Appendix 1: Draft Aviation Policy Framework: Summary of Consultation Questions and Responses
- Appendix 2: RBWM Response to Scoping Consultation October 2011
- Appendix 3: Independent Aviation Connectivity Commission - replacing expected 'Call for Evidence' on UK aviation hub capacity

#### **17. Background Information**

<sup>1</sup> Kent Discussion Document entitled: *'Bold Steps for Aviation' - May 2012*  
Birmingham Airport: *'Don't put all your eggs in one basket: a challenge to aviation orthodoxy'*

Draft Aviation Policy Framework (July 2012) – DfT

Written statement by The Rt Hon Patrick McLoughlin MP dated 7<sup>th</sup> September 2012

Cabinet Report: 'Developing a Sustainable Framework for UK Aviation Scoping Document – A Department for Transport Consultation' (October 2011).

Policy Exchange: *'Bigger and Quieter – The Right Answer For Aviation'* (Sep 12)

London Assembly: *'Plane Speaking – Air and noise pollution around a growing Heathrow Airport'* (Mar 2012)



## 18. Consultation (Mandatory)

Name of consultee	Post held and Department	Date sent	Date received	See comments in paragraph:
<b>Internal</b>				
Cllr Burbage	Leader of the Council	20/9/12	04/10/12	
Cllr Bicknell	Lead Member	20/09/12	04/10/12	
Mike McGraughrin	Director	20/09/12	04/10/12	
Maria Lucas	Head of Legal Services	20/09/12	11/10/12	Contributions included throughout report
Mark Lampard	Finance Partner	20/09/12		
CMT/DMT	Various	20/09/12		
Overview & Scrutiny Panel		15/10/12		Any comments received to be reflected in final report
<b>External</b>				
Aviation Forum	Various representatives and members of the Aviation Forum, including local residents	21/08/12 & 10/09/12	21/08/12 & 25/09/12	Contributions included throughout report
Dept for Transport	Consultation workshop	9/10/12	9/10/12	Contributions included throughout report

## Report History

Decision type:	Urgency item?
Key decision ( <i>July 2012</i> )	No

Full name of report author	Job title	Full contact no:
Terry Gould	Head of Public Protection	01628 683501

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## APPENDIX 1: 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
<b>Chapter 2: The benefits of aviation</b>	
<b>Connectivity:</b>	
Do you agree with our analysis of the meaning and value of connectivity, set out in Chapter 2?	<p>Broadly speaking, this Council agrees with your analysis of the meaning and value of connectivity.</p> <p>Connectivity is ‘the’ key to any future national APF, in terms of global and UK connectivity. Connectivity should relate to an integrated approach covering all modes of transport to ensure efficient dispersal of passengers and services as near to the point of requirement and demand as possible. The APF states: “<i>We are 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 business at the heart of transport</i>”</p> <p>This is a national ‘strategic’ aviation framework that needs to incorporate and include all transport operators and modes of</p>

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Consultation Issue	RBWM Response
	<p>transport. Early investment in inter-airport infra-structure on the mainland can only complement the UK's aspirations to successfully access global markets and the new expanding economies. The investment in the integration of UK infra-structure must be the over-riding priority. The market will determine those areas that will expand; reduce internal uncoordinated competition between the regions and share the burdens and rewards.</p> <p>Heathrow being the only hub airport in the UK is arguably self-limiting and a constraint to growth. There appears too much focus on Heathrow expansion and the South east. There needs to be a re-think on this historical strategy as it might prove to be too inflexible and even out dated given changes in global markets and mobility expectations (i.e. leisure). The UK must have a balanced aviation industry that is dynamic, flexible and responsive to growing markets and emerging economies. This necessitates regionalisation and development of airports outside the south-east such as Manchester, Birmingham, the North East and Scotland; capitalising on existing capacity and offering greater choice to both passengers and business.</p> <p>Evidence on the need for additional capacity at Heathrow and the South east is often contradictory. For example, reports by WWF suggests there is already sufficient existing capacity, seemingly suggesting the problem being the dominance of individual airports at the expense of other airports who are seeking to expand and to serve specific market niches and local economies. This might suggest the issue is one of re-allocation</p>

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Consultation Issue	RBWM Response
	<p>and/or diversion of demand. A refreshed focus upon improving UK's internal connectivity is likely to facilitate and stimulate such a shift. As the chapter states: <i>'The UK is currently one of the best connected countries in the world'</i>. Arguably, the same cannot be said about the UK's relative internal transport connectivity. The five London airports collectively serve more routes than any other European city, but there is insufficient utilisation of existing capacities and over provision on 'popular' routes that is having the effect of reducing the frequency of flights to emerging markets. For example, too few destinations and connections to the PRC, now the world's second largest economy and other BRIC destinations.</p> <p>As recognised in the draft APF <i>'London is already an exceptionally well served capital city with five airports that together serve more routes than any other European city'</i>. We do agree that the UK needs to maintain its position if it is to compete successfully for economic growth opportunities. In this respect all the airports serving London should be considered as part of the London system (as opposed to the Heathrow hub) in particular Stansted and Gatwick in addition to Heathrow and that it is London itself that should serve as the main hub for the U.K. This infers there needs to be a shift in mindset and instead to consider what sort of hubs Gatwick and Stansted might be as this would affect the surface connectivity needs.</p> <p>The APF refers to the development of high-speed rail (HSR) as significant in terms of improving connectivity, however it is important to note that the agreed Phase 1 route of the current</p>

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Consultation Issue	RBWM Response
	<p>HS2 scheme only links London to Birmingham Airport (to date) and there have been several studies questioning the economic benefits and level of job creation that HS2 might yield. In addition, given the perceived urgency of the matter, the long timescales convey a lack of true commitment and conviction outside the South east region.</p> <p>There remain other opportunities worthy of consideration for improving connectivity, such as electrifying the route from Reading to Birmingham Airport and improving the East Coast Mainline and including a link to Doncaster Sheffield Airport, as well as other surface access links to the regional airports.</p>
<b>Fifth freedoms:</b>	
<p>Do you support the proposal to extend the UK's fifth freedom policy to Gatwick, Stansted and Luton? Please provide reasons if possible.</p>	<p>Yes. This is an absolutely essential policy change to what is currently in effect a totally out of date restrictive practice upon these and other airports which has no place in today's world of open competition.</p> <p>Fifth freedom extends the choice available to passengers and improves the efficiency of airline operations by increasing capacity utilisation of aircraft. The proposal correctly states that reciprocal rights would be required and foreign airlines should not be subsidised. The document <i>states "the UK has long had a general presumption in favour of liberalising fifth freedoms from airports outside the South East"</i>. It would appear inconsistent not to extend this policy to all other airports in the South east other than Heathrow Airport; or indeed any other regional airport not benefiting from these freedoms. This provides a competitive advantage to Heathrow to the detriment of the other SE airports and therefore constrains market development and growth at the</p>

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Consultation Issue	RBWM Response
	<p>other airports. The negative consequences of this are to amplify the demand and focus on Heathrow. As stated previously, this is a UK APF.</p> <p>Allowing foreign airline operators to carry passengers between Gatwick, Stansted and Luton Airports and another country, under fifth freedoms regulations would create opportunities for regional airports to benefit from increased activity and to contribute to increasing connectivity of the UK.</p> <p>The Royal Borough of Windsor &amp; Maidenhead (RBWM) recognises the importance of connecting with the BRIC and other emerging economies in order to stimulate growth in the domestic economy, and to ensure the UK maintains a strong and well connected economy in the long-term.</p>
<p>Are there any other conditions that ought to be applied to any extension of the UK's fifth freedom policy to Gatwick, Stansted and Luton?</p>	<p>A complementary condition of Fifth Freedoms could be a requirement to have a stringent and robust environmental mitigation package that is consistently applied at all airports e.g. quietest aircraft; noise mitigation schemes; operational procedures; noise levels; air quality – similar in principles and composition to the T5 planning conditions.</p>
<p><b>Airports outside the South East:</b></p>	
<p>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?</p>	<p>In principle 'yes' subject to the review on a case by case basis. However, it is not clear why this question only relates to airports in the South East as there should be consistent application of policy throughout the UK.</p> <p>Paragraph 2.43 of the APF actually states that the Government</p>

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Consultation Issue	RBWM Response
	<p><u>will</u> seek to use bilateral relations to persuade international partners of benefits offered by airports <u>across the UK</u> to make the best use of alterative available capacity to encourage the development of new services to new destinations wherever possible. The development of regional airports is vital if any sensible redistribution of the UK economy is to be attained. There are environmental and social benefits associated with reducing the need for air passengers and freight to travel long distances to reach larger UK airports and for providing additional capacity away from congested South East airports.</p>

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Consultation Issue	RBWM Response
<p><b><i>Any other comments:</i></b> Do you have any other comments on the approach and evidence set out in Chapter 2?</p>	<p>The key to success is the internal connectivity between the airports offering greater choice, convenience and accessibility to all customers. Without such pre-requisites, the encouragement to open new routes and facilities is likely to be severely constrained.</p> <p>The Slot allocation system needs to be reviewed, particularly in respect of “grandfather rights”. Future focus and priority must be given to ensuring good connectivity with BRIC and other emerging economies rather than outgoing tourist traffic which results in a very substantial financial deficit to UK plc.</p> <p>If Gatwick is to be developed as an Inter-continental hub, a rail connection to Ebbfleet needs to be considered, together with improvements from locations West and North of Gatwick.</p> <p>The Council is unlikely to be supportive of a policy that impacts negatively on regional airports. Additional research is required into the benefits and costs for regional airports to be produced before being able to fully address this question.</p>
<p><b>Chapter 3: Climate change impacts</b> 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>The greatest source of localised air pollution around airports is road transport. Tackling this needs to be the first priority in respect of meeting EU AQ standards and improve the health of those living in such areas. The provision of subsidised bus services which follow indirect and time wasting routes to serve many communities are not attractive to airport passengers and workers and as a result private car use is not significantly reduced. A network of express bus services with convenient interchanges would appear to be a more realistic means of reducing air pollution.</p>



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Consultation Issue	RBWM Response
	<p>The second priority ought to be the continued development and encouragement of the use of modern technology negating the need to fly.</p> <p>The third priority is to address the CO<sub>2</sub> (and NO<sub>x</sub>) emissions from aircraft and the amplified impact on green house gas effects. A carbon levy might act as an incentive to use modern fleets and be consistent with the 'polluter pay principle' but this would at the very least have to be consistent across Europe. There are serious doubts about the effectiveness of the present system due to the low price of the carbon levy on the international market.</p> <p>The Fifth Freedom criteria referred to previously would complement such an approach.</p> <p>Inclusion of aviation in the EU ETS will not automatically lead to a reduction in emissions from aviation. The onus must be on the airline operators to reduce emissions rather than accept, as it does in the APF they will be net purchasers of emission allowances from other sectors. Government needs to take a more decisive approach and to provide analysis of how the EU ETS will impact on the aviation industry and emissions' reductions once the period of free permits is complete. In order to reconcile aviation growth forecasts with climate change targets, and bring the aviation sector in line with all UK sectors required to reduce their climate change emissions, the Government needs to: revisit their passenger demand and carbon dioxide emission</p>

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Consultation Issue	RBWM Response
	<p>forecasts to explain discrepancies;            assess and verify projected claims of technological gains prior to making policy and expansion decisions based on such claims;            and validate the credentials of bio-fuels prior to progressing policy in this area to reflect the associated issues: land take – avoiding exacerbation of deforestation and not competing with food supply; lifecycle analysis of production techniques – resource inputs and pollution outputs; and safe fuel mix proportions for aviation.</p>
<p><b><i>Any other comments:</i></b>            Do you have any other comments on the approach and evidence set out in Chapter 3?</p>	<p>It is unclear as to how consultees are best able to respond in areas where Government have yet to make a decision or a policy commitment. These include, for example:</p> <ul style="list-style-type: none"> <li>– Inclusion of aviation emissions in the UK national carbon budgets</li> <li>– Whether to retain a national emissions target for aviation that has yet to be made and no timescales are given as to when this will happen</li> <li>– The potential use of bio-fuels.</li> </ul> <p>RBWM would support the further use of ‘sustainable’ bio fuels e.g. where their production does not lead to negative social, economic or environmental impacts. Greater government (international cooperation) assistance towards research and development on bio fuels producing better yields i.e. more energy per gram of weight and on bio fuels with a lower freezing point allowing aircraft to fly higher and so reduce fuel consumption.</p>

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Consultation Issue	RBWM Response
	<p>Differential landing and departure charges related to fuel efficiency might offer a consistent approach to incentivise the aviation and aerospace sectors to reduce emissions.</p> <p>Both government and airport operators need to engage more fully with local authorities and residents in developing local policies and action plans related to aviation and climate change. RBWM welcomes the Government’s recognition that further detailed analysis of aviation’s non-CO<sub>2</sub> emissions impacts is needed in order to provide a more consistent analysis of the impacts of policy measures.</p> <p>RBWM welcomes reference in the APF to initiatives such as superfast broadband designed to reduce the need to travel, as well as investment in cleaner modes of travel such as high-speed rail.</p>
<b>Chapter 4: Noise and other local environmental impacts</b>	
<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>Yes.</p> <p>There is a growing argument in support of <u>all</u> airports over a certain size being designated for noise management purposes and not merely restricted to Heathrow, Gatwick and Stansted –. This would secure greater consistency of approach; a level playing field between airports; and complement the proposed revised remit of the CAA’s new independent role for policy development, regulation and enforcement; or indeed any other independent body set up to conduct this role in the future.</p>

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Consultation Issue	RBWM Response
Do you agree with the Government's overall objective on aviation noise?	<p>Yes, RBWM supports and agrees in principle with the government's aspirational statement '<i>to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise</i>'. However, in the absence of a credible scientifically robust calibration system for assessing how to specifically measure and evaluate those '<i>significantly affected</i>', this aspiration will be extremely difficult to attain.</p> <p>Furthermore, RBWM is increasingly frustrated by the stonewalling and apparent lack of commitment on behalf of government to address such a significant and flawed weakness such as the current measurement of disturbance related to noise. The averaging systems currently in use do not appear to accurately reflect the level of community annoyance; yet there is plenty of time to review any shortcomings in the now discredited "ANASE" report. If there is in fact no intention to follow up with a new study, then in consideration of the government's stated commitment to transparency a full explanation should be provided.</p> <p>Moreover, until such a review is conducted there can be no confidence that any defined limits to baseline values or noise contours properly addresses the level of disturbance. This seriously questions the value of any 'Noise Envelope', 'Quiet Areas', 'Contours' and such similar initiatives as they are all based on very suspect baseline data and criteria. Therefore, the 480000 atm annual limit at Heathrow must be retained indefinitely in accordance with the original T5 commitment.</p> <p>There should also be an additional objective - namely to ensure that nobody in a residential setting is exposed to aircraft noise at</p>

## WORKING DRAFT

Consultation Issue	RBWM Response
	69dBL <sub>Aeq16 hr</sub> or above after 2020.
Do you agree that the Government should retain the 57 dBL <sub>Aeq16 hr</sub> contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance?	<p>Absolutely not! – see expanded comments on ANASE; WHO Community Noise standards; the urgent need for further calibration study to establish baseline community response thresholds</p> <p>No. All the evidence from Europe is that the 57 dBL<sub>Aeq16 hr</sub> contour is seriously out of calibration as a benchmark for defining the onset of unacceptable noise emission. In our view we do not believe it has any future value in a UK aviation policy context - in short it should be retired.</p> <p>The EU is currently developing its own environmental noise limit values based upon a number of studies in member states and unless the UK government is willing to fund further repair work on ANASE so that its findings can be considered robust enough to inform policy the UK, as a member of the EU, should adopt emerging EU standards.</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, which level would be appropriate?	<p>Absolutely! At the T5 Inquiry local authorities argued in favour of lower noise levels down to 54dBL<sub>Aeq16 hr</sub> given the discredited 57 dBL<sub>Aeq16 hr</sub> threshold for community annoyance, forcing the production of such despite strong resistance.</p> <p>The use of the 57dBL<sub>Aeq 16h</sub> to mark the onset of significant community annoyance to aircraft noise has already been demonstrated to seriously underestimate the extent of the</p>

## WORKING DRAFT

Consultation Issue	RBWM Response
	<p>aircraft noise problem. This significantly changes the extent of the negative impacts of Heathrow. Consequently the Government commissioned the ANASE study. This too has since been discredited and interpreted as 'inconclusive', that is seen by many as expedient, leaving the UK with no credible threshold levels as we move into a long term APF.</p> <p>Without a credible alternative, the WHO Community Noise Guidelines should form the basis of the thresholds given they are well researched and represent the most up to date internationally accepted limit values.</p> <p>There are also issues around the noise index that should be used. The UK appears to be wedded to <math>dB_{LAeq16\text{ hr}}</math> values, whilst the EU to the <math>dB L_{den}</math> index.</p> <p>The sensitive 'shoulder' and night time period values need to become established features of any revised noise contouring regime. The technology and means are already available to meet this requirement.</p> <p>Another indication that the extent of the aircraft noise problem is underestimated is given by use of the <math>L_{den}</math> noise indicator as required by EU Directive 2002/49/EC. The Directive requires estimates of the number of people exposed to aircraft noise in noise bands commencing at <math>55dB L_{den}</math>, and consideration of noise reduction measures commencing at <math>55 dB L_{den}</math>. This suggests that <math>55 dB L_{den}</math> is used in the Directive to indicate the noise level at which noise becomes an issue.</p> <p>The <math>55dB L_{den}</math> contour for Heathrow in 2010 covers an area of <math>222.3 \text{ sq km}</math> in which <math>712,100</math> people live. In contrast, the <math>57 dB</math></p>

## WORKING DRAFT

Consultation Issue	RBWM Response
	<p><math>L_{Aeq\ 16h}</math> contour for Heathrow in 2010 covers an area of 106.3 sq km in which 224,550 people live. Use of the 55dB <math>L_{den}</math> contour suggests that more than three times as many people are affected by aircraft noise as previously recognised using the 57dB <math>L_{Aeq\ 16h}</math> contour. RBWM believes that the 55dB <math>L_{den}</math> contour gives a more realistic indication than the 57dB <math>L_{Aeq\ 16h}</math> noise contour of the geographic extent of the area in which aircraft noise is a problem.</p> <p>The Council notes the Impact Assessment accompanying the APF outlines two options in relation to drawing contours at a lower noise level:</p> <p><u>Policy Option 1c</u>: <i>“Draw noise contours at a lower noise level of 55dB<sub>A</sub> <math>L_{den}</math> for the noise designated airports (currently Heathrow, Gatwick and Stansted).”</i></p> <p>The benefits of Policy Option 1c identified in the Impact Assessment are:</p> <ul style="list-style-type: none"> <li>extending the contour acknowledges that some people who currently live outside the 57dB <math>L_{eq}</math> contour could also be annoyed by aircraft noise;</li> <li>the 55 <math>L_{den}</math> measure also takes account of night time noise - this may inform future decisions on measures taken to mitigate noise;</li> <li>useful to have noise contours at the lower lever to monitor the number of people potentially affected by aircraft noise, and to measure reductions in the number of people who are affected by noise; and</li> <li>the choice of 55<math>L_{den}</math> is consistent with the obligation to carry out five yearly mapping of noise under European law.</li> </ul> <p><u>Policy Option 1d</u>: <i>“Draw noise contours at a lower noise level</i></p>

# WORKING DRAFT

Consultation Issue	RBWM Response
	<p><i>54dB L<sub>Aeq,16h</sub> with an 8-hour night L<sub>Aeq</sub> for the noise designated airports (currently Heathrow, Gatwick and Stansted)."</i></p> <p>The benefits of Policy Option 1d identified in the Impact Assessment are:</p> <p>measuring noise at the lower level will acknowledge that some people who currently live outside the 57dB L<sub>eq</sub> contour could also be significantly annoyed by aircraft noise; and it could mean that future airport policy is considered to be more credible with respect to noise and based on sound evidence. Given the international framework within which aviation operates, it is more sensible to opt for Option 1c</p> <p>RBWM welcomes the Government's recognition that <i>"...frequency of movements can be a source of annoyance for some people living in areas exposed to lower average levels of noise across the whole day."</i> This supports retention of movement limits in aviation night noise policy, and highlights the need to incorporate this feature in any regime for management of daytime aviation noise.</p> <p><u>General Comment:</u></p> <p>RBWM was a major contributor to the T5 Public Inquiry. Evidence presented comprehensively covered the effect and impact of the number of flights upon over-flown communities, indicating the importance of 'number' alongside noise certification controls. We believe the Government's stated intention for their <i>'Attitudes to Noise from Aviation Sources in England' (ANASE)</i> study, derived from that debate, sought to assess the limitations of the noise index 'L<sub>eq</sub>', as well as informing any future consideration of the air transport movement</p>



## WORKING DRAFT

Consultation Issue	RBWM Response
	<p>(ATM) condition applied at Heathrow.</p> <p>Due to the Government's subsequent dismissal of their ANASE study, noise management policy has not moved on in the UK, and consequently has not addressed those same points discussed at the Heathrow Terminal 5 Public Inquiry more than a decade ago. It is essential that a follow up study is commissioned if the UK is to have a credible baseline determinant and before consideration can be given to concepts such as a satisfactory 'noise envelope'. In contrast aviation noise policy in Europe has been advanced in recent years and therefore the Government should look to Europe for examples of best practice. There is mounting evidence to suggest that the historical 57 dB L<sub>Aeq</sub> noise contour is now inadequate as a noise measure. RBWM urges the government not to base a long term noise policy on flawed, un-calibrated or inconclusive data. There is an urgent need for the Government to update noise policy and further investigate the annoyance relationship for aircraft noise. A greater understanding of the community response to aviation noise is an essential prerequisite for an improved aviation noise management and reduction regimes.</p>
<p>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?</p>	<p>In principle 'yes', however, this relies entirely on having a calibrated threshold for the onset of community annoyance. As stated above, this is currently not the case.</p>

## WORKING DRAFT

Consultation Issue	RBWM Response
<p>Do you agree that noise should be given particular weight when balanced against other environmental factors affecting communities living near airports?</p>	<p>Yes.</p> <p>There is little doubt that noise is the most obvious perceived environmental problem for those living in close proximity to airports and/or under the flight paths and therefore should be weighted accordingly. However, there are also a number of other factors that could be of equally important significance in some locations. Therefore, it is suggested a 'basket of measures' might be a better approach for deriving a cumulative impact measure. For example, in respect of noise, use of WHO criteria over a range of activities and situations. This approach has already been adopted by government for Quality of Life indicators and a measure of community sustainability in recent years.</p>
<p>What factors should the Government consider when deciding how to balance the benefits of respite with other environmental benefits?</p>	<p>The motive or intention behind this question is not clear as it is hard to reconcile why 'the benefits of respite' should need to be balanced with 'other environmental benefits'. This suggests there is some incompatibility yet the two appear synonymous. The key issue is one of equality of opportunity for all communities around an airport to be afforded some respite i.e. using the government term '<i>to share the noise burden</i>' or any other negative impact.</p> <p>It is important that scheduled periods of relief should be provided. The procedure for runway alternation should be considered at any airport when additional runways are built and airport capacity limited accordingly.</p> <p>Otherwise it is dependent on the relative impact of the environmental benefits.</p> <p>Predictable periods of respite are one of the single most</p>

## WORKING DRAFT

Consultation Issue	RBWM Response
	<p>effective noise amelioration measures available upon which local communities plan their daily routines.</p>
<p>Do you agree with the Government's proposals in paragraph 4.68 on noise limits, monitoring and penalties?</p>	<p>The principles are sound, but to coin a phrase 'the devil is in the detail' and there is little information provided at this stage.</p> <p>This Council has long argued that to be meaningful and relevant to present day operations, Infringement levels, monitoring and non-compliance penalties should include both departing and arrival aircraft and that these should be routinely reviewed on a planned basis (e.g. as per night flight regime) every 5 years, perhaps even at the same time given the close relationship.</p> <p>Low flying approaching flights tend to follow the same closely controlled final flight paths for approximately 15 nautical miles in relation to each runway, thus generating an unrelenting greater noise impact on a far larger area than steeper climbing and rapidly dispersing departing flights. There should be an aspiration to amend the current 3 degree Constant Descent Approach (CDA) angle to 4 degrees to increase the height and thereby decrease the resulting noise of arriving aircraft.</p> <p>Penalties for breach of limits should not be imposed for revenue raising purposes and should have some relationship to the seriousness of the breach with the proceeds re-invested to fund community mitigation packages.</p> <p>To be effective this requires the levels of penalty for justified cases to be set at realistic levels to act as both a deterrent for non-compliance and an incentive for the introduction of less</p>

# WORKING DRAFT

Consultation Issue	RBWM Response
	<p data-bbox="1131 284 1323 312">noisy aircraft.</p> <p data-bbox="1131 355 2022 531">The principles of greater transparency and independent monitoring and evaluation in the regulation and enforcement of noise limits is warmly welcomed and supported. RBWM assumes this relates to the proposed enhanced and expanded role of the CAA?</p> <p data-bbox="1131 576 2047 1011">In this respect, one of the greatest concerns of RBWM residents is the issue of night flights. At Heathrow most of the sensitive period flights are arrival aircraft. However, unscheduled departures in the middle of the night are also particularly disturbing. There is a very real need to address the fact that the Night Flight Quota Number is usually doubled by the number of unscheduled early arrivals from about 4.20 a.m. There is concern that the claimed benefits to business activity should be more fairly balanced against the proven detrimental effects of sleep disturbance specifically from aviation. This Council has repeatedly called for the gradual phasing out of night flights and will continue to do so.</p> <p data-bbox="1131 1056 2024 1273">RBWM has also repeatedly called for the introduction of arrival noise limits, to be met with the consistent response that safety considerations on approach override noise concerns. However, such controls exist at other overseas' airports and the level of technological sophistication of modern fleets would suggest such a response is out dated and inconsistent.</p> <p data-bbox="1131 1318 1984 1345">This Council believes it is time local communities around the</p>

## WORKING DRAFT

Consultation Issue	RBWM Response
	UK's major airports are further protected by not only the review of the long standing departure noise limits but also by the introduction of maximum noise limits for landing aircraft.
In what circumstances would it be appropriate for the Government to direct noise designated airports to establish and maintain a penalty scheme?	<p>A two part question.</p> <p>In respect of establishing a penalty scheme, in all cases as a matter of course.</p> <p>In respect of maintaining a penalty scheme i.e. on-going regulatory function and enforcement, where there are breaches of any noise amelioration measures designed to protect local communities are significant, avoidable and repetitive. This should include landing noise as stated above as well as departure noise level infringements and also non compliance with NAP targets, poor CDA, track keeping performance and NPR compliance. The regime should be a balanced combination of deterrence, penalties and incentivisation and administered by an independent agency (CAA). Self regulation and voluntary schemes are likely to be far less effective and receive less community support and confidence. We understand the UK is the only EU state which devolves the monitoring of airport NAPs to the airport operators and in some quarters is likened to appointing a poacher as the gamekeeper.</p>
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?	A fundamental requirement of an effective regulating and enforcement regime is the operation and maintenance of a credible noise monitoring system where those affected have easy access to transparent data and reports that can be

## WORKING DRAFT

Consultation Issue	RBWM Response
	<p>scrutinised. This is consistent with the commitment within the APF that advocates greater collaborative working between airports and local authorities.</p> <p>A suggested way of demonstrating such a commitment would be for the airports to approach LAs requesting them to host and manage remote monitoring sites; share data and regularly discuss the local monitoring data. This would foster better working relationships.</p> <p>Another circumstance would be failure of the airport operator to respond to requests for specific monitoring by representatives of the relevant airport consultative committee backed up by a request from the regulator.</p>
<p>How could differential landing fees be better utilised to improve the noise environment around airports, particularly at night?</p>	<p>The principle behind differential landing fees is to incentivise the use of less noisy (and cleaner) aircraft and reflects the relative impact upon the local community. Therefore, the size of aircraft should not be material as it is the noise it emits and its negative impact is what the scheme is intended to regulate. It follows, if a larger aircraft is chosen to operate at night but in doing so emits a higher noise level then it should be expected to incur an increased landing <u>and</u> departure fee as compensation for the increased noise i.e. 'Polluter Pays Principle'.</p> <p>Another option for utilising incentivisation principles especially at night would be to devise a passenger weighting to avoid a large number of small quiet aircraft, rewarding greater occupancy rates. Linking schemes to variants of occupancy rates needs further investigation.</p>

## WORKING DRAFT

Consultation Issue	RBWM Response
	Alternatively increasing landing and departure fees for all aircraft 23:00 to 07:00 (and also weighted to other times of the day) that are retrospectively applied based on 'actual' monitored noise rather than the more general ICAO Noise Certification Classification. This is preferable as ICAO uses manufacturer's anticipated performance data which, as accepted in the context of Night Noise Quota limits, for specific aircraft such as aging Boeing 747's actual levels are far noisier than assumed by their classification.
Do you think airport compensation schemes are reasonable and proportionate?	<p>No - the UK airport compensation scheme are woefully inadequate and require a root and branch review, to be carried out by the regulator in consultation with other stakeholders</p> <p>Current mitigation packages are perceived to be derisory, outdated, overly bureaucratic, un-calibrated and insufficiently hypothecated.</p> <p>New standards of entitlement should be determined and based upon referenced standards e.g. WHO and EU Noise standards for the protection of human health.</p>
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?	Yes. However, most such noise in the RBWM comes from police helicopters, air ambulances or used for security purposes.
What other measures might be considered that would improve the management of noise from these sources?	No comment - not a sufficient problem in RBWM in recent times although training and recreational flying from White Waltham

## WORKING DRAFT

Consultation Issue	RBWM Response
	<p>has been a problem in the past.</p> <p>This is an issue best tackled via a greater number of local community airport consultative committees actively supported by the CAA in their new role, as required.</p> <p>A greater willingness in exercising the existing powers of section 5 of Civil Aviation Act 1982 rather than a presumption against using the powers would resolve on-going matters more expeditiously.</p>
<p>Do you have any further ideas on how the Government could incentivise the aviation and aerospace sector to deliver quieter planes?</p>	<p>For major airports, it should be mandatory that Noise Action Plans include specific objectives and targets to encourage the quietest fleet. The existing arrangements of airport operators being the nominated 'Responsible Authority' means the NAPs are not as effective or robustly applied as intended.</p> <p>A landing slot regime which discriminates against noisy engines but rewards for fuel efficient / quieter types.</p>
<p>Do you believe that the regime for the regulation of other local environmental impacts at airports is effective?</p>	<p>Local Air Quality Management Areas are not as effective as they could be. The regime suffers from the fundamental problem that although local authorities are ultimately responsible for the air quality in their respective administrative areas they have no powers of enforcement with regard to airside emissions from airports or major trunk roads and motorways adjacent to an airport. This links right back to the 'Connectivity' comments at the start of this response.</p> <p>Given the contribution of surface access emissions to local air</p>



## WORKING DRAFT

Consultation Issue	RBWM Response
	<p>quality around major airports, one mitigating solution might be to give airport operators specific legal obligations and duties in relation to air quality management, irrespective of any voluntary measures they may introduce.</p> <p>Greater collaboration and integration of local plans and those of the airport operators is required.</p>
<p>Do you think that noise regulation should be integrated into a broader regulatory framework which tackles the local environmental impacts from airports?</p>	<p>If Airport Master Plan and Noise Action Plan regimes worked correctly and as originally intended this should be a sufficiently robust and independent framework for integrating all the environmental impacts. Clearly, there needs to be robust monitoring, surveillance and compliance regimes in place.</p>
<p><b>Chapter 5: Working together</b></p>	<p><b>GENERAL COMMENT:</b></p> <p>There appears a general inability to keep the public sufficiently informed about what is happening with regard to aviation. Almost all newspaper comment reflects the philosophy of the specific newspaper and, as a result seeks to create rather than report news.</p> <p>Similarly the various airport consultative committees fail to adequately keep the general public advised of their activities. There is an identified weakness in current practices and wider circulation using a basket of media, including local authority and other stakeholder web sites is suggested.</p> <p>Another area of concern is with the reporting of Airport Noise</p>

## WORKING DRAFT

Consultation Issue	RBWM Response
	<p>Action Plans as this appears almost non-existent in the wider community e.g. the status of the Cranford Agreement and timescale for its long-overdue abandonment in favour of a more equitable sharing of the noise burden.</p> <p>As a result by the time most communities who will be affected by any specific decision become aware of the situation, it is often a <i>fait accompli</i> and all they can do is complain about the result. This must be recognised and addressed and only those directly involved in the various consultations have the working knowledge to achieve that.</p>
<p>Do you think Airport Consultative Committees should play a stronger role and if so, how could this be achieved?</p>	<p>Yes. In future it should not be possible for the wishes of democratic decisions taken by the relevant airport consultative committee (ACC) to be ignored or over-ruled by the airport operator without an independent review by the regulator e.g. CAA.</p> <p>Under current arrangements at Heathrow, for example, the Heathrow Airport Consultative Committees' (HACC) function is primarily a forum for exchange of information and soliciting views on current topics amongst parties that often have totally different and opposing objectives. HACC debates do not often progress to more than a request or recommendation from one interest group [usually the local authorities] which in practice has no power to instruct the airport operator with regard to commercial or operating procedures which they may or may not be able or willing to accommodate.</p> <p>A more equitable solution would be for the ACCs to be jointly</p>

## WORKING DRAFT

Consultation Issue	RBWM Response
	funded by government, industry and by the airport operator, but independently staffed and facilitated. The operator should be responsible for submitting regular reports and performance statistics relating to the airport. The airport operator should not have the responsibility for selecting the membership. Greater involvement of the CAA as independent regulator would engender a greater sense of cooperation from all parties and improve and develop more collaborative relationships.
Is there a case for changing the list of airports currently designated to provide consultative facilities?	Yes. All commercial airports and all but the smallest aerodromes should provide consultative committees. Membership of these should be periodically reviewed e.g. every 5 years.
Do you agree that the Civil Aviation Authority should have a role in providing independent oversight of airports' noise management?	Yes. The remit of the CAA could be modelled on that of the Environment Agency with specific powers to take independent enforcement action for non-compliance of noise mitigation measures operating at airports. The interest needs to shift from one of a promoter of aviation services, sponsored by industry, to one of an independent authority that strikes a balance between the interests of local communities and that of the aviation sector and associated business interests. An example being when Noise Management Plans produced under the requirements of the END do not comply with the minimum requirements or, are not actioned; or where there is a need for arbitration arising out of Consultative Committees then the CAA should have step in powers. This will require a fundamental cultural shift, change of role with clear terms of reference and significant support from government.

## WORKING DRAFT

Consultation Issue	RBWM Response
Do you agree with the Government's overall objective on working together?	Yes
Is the high-level guidance provided in Annex E sufficient to allow airports to develop local solutions with local partners?	<p>Yes, subject to the caveats:</p> <ul style="list-style-type: none"> <li>– Sufficiently flexible to include at a later date other aspects that will inevitably arise not currently covered.</li> <li>– The inclusion of national businesses to local businesses.</li> <li>– Inclusion of the general public/residents' User Forums</li> <li>– The continuation of Airport Master Plans is not supported in their present form. They are currently non statutory and have no standard format. They quickly become out of date - or as in the case of Heathrow remain in interim or draft status. They do not appear to have any official status with the National Planning Policy Framework - which we believe they need to have if they are to be of any value as a land planning tool.</li> </ul>
Do you agree that Master Plans should incorporate airport surface access strategies?	Yes. Airport Surface Access Strategies are fundamental and a pre-requisite to getting customers and users to and from an airport before granting or creating additional capacity.
Do you agree that, where appropriate, the periods covered by master plans and noise action plans should be aligned?	Yes. These should be integrated in any event.

**APPENDIX 2: Borough's Response (2011) to: 'Developing a Sustainable Framework for UK Aviation – Scoping Document – A Department for Transport Consultation'.**

<p><b>Please note:</b> 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><b>The aviation sector</b></p>	
<p><b>5.1</b> 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 &amp; amenity</p>
<p><b>5.2</b> 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><b>5.3</b> 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><b>5.4</b> 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><b>5.5</b> 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.
<b>5.6</b> 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 <b>the</b> 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.
<b>5.7</b> 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.
<b>5.8</b> 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.
<b>International connectivity and hub airports</b>	
<b>5.9</b> 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.
<b>5.10</b> 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.
<b>5.11</b> 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.
<b>5.12</b> 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.
<b>5.13</b> 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.
<b>5.14</b> How important are transfer and transit passengers to the UK economy?	Transit and transfer passengers only contribute to Airport operator's revenue and not significantly to the local economy.  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).
<b>5.15</b> What are the relative merits of a hub versus a point-to-point airport?	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.  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

	will make interesting reading.
<b>5.16</b> 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.
<b>Regional connectivity and regional airports</b>	
<b>5.17</b> 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.
<b>5.18</b> 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.
<b>5.19</b> How could the benefits from any future high speed rail network be maximised for aviation?	Some consultees feel the answer is interrelated with previous questions: this



	<p>could deter direct flights.</p> <p>High-speed rail should be provided for domestic and European air connections, essentially substituting those short-haul flights.</p>
<p><b>5.20</b> How can regional airports and the aviation sector as a whole support the rebalancing of the economy across the UK?</p>	<p>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.</p>
<p><b>Making better use of existing capacity</b></p>	
<p><b>5.21</b> 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?</p>	<p>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</p>
<p><b>5.22</b> 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?</p>	<p>If capacity is increased this must be to improve resilience - not to increase air traffic movements with consequent disruption to local communities.</p> <p>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.</p>
<p><b>5.23</b> 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?</p>	<p>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.</p>
<p><b>5.24</b> 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?</p>	<p>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<sup>st</sup> 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></p>
<p><b>5.25</b> Could resilience become an issue at regional airports? If so, how might this be avoided?</p>	<p>No comment.</p>

<p><b>5.26</b> 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><b>5.27</b> 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><b>5.28</b> 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><b>5.29</b> 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><b>Climate change impacts</b></p>	
<p><b>5.30</b> 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><b>5.31</b> 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"> <li>• Play an equitable role without favour.</li> <li>• Assume responsibility for local transport emissions connected to airport activities.</li> <li>• Accountability for funding local transport policy initiatives</li> <li>• Use of alternative energy for ground operations and aircraft when on the ground.</li> <li>• Audit waste production and minimise.</li> </ul>
<p><b>5.32</b> 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.
<b>5.33</b> What is the best way to define and quantify the UK's share of the CO <sub>2</sub> emissions generated from international aviation?	Any flight which has an origin and destination in the UK should be part of the UK's CO <sub>2</sub> emissions.  The use of many different carbon calculators is currently confusing. This matter requires rationalisation.
<b>5.34</b> 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.
<b>5.35</b> 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.
<b>5.36</b> Which technologies (e.g. for aircraft and air traffic management) have the most potential to help reduce aviation's CO <sub>2</sub> 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.
<b>5.37</b> 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.
<b>5.38</b> 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
<b>5.39</b> 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"> <li>• Better utilisation of existing capacities</li> <li>• Greater efficiency of operations</li> <li>• Incentivisation to increase loading</li> <li>• Technology development</li> </ul>

<b>Local impacts</b>	
<p><b>5.40</b> 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><b>5.41</b> 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><b>5.42</b> 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 &amp; air quality issues).</p>
<p><b>5.43</b> 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><b>5.44</b> 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><b>5.45</b> 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><b>5.46</b> 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><b>5.47</b> 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><b>5.48</b> 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>

### **APPENDIX 3 : Independent Aviation Connectivity Commission - replacing expected 'Call for Evidence' on UK aviation hub capacity**

<http://www.dft.gov.uk/news/statements/mcloughlin-20120907a>

"The Government has asked Sir Howard Davies to Chair an independent commission tasked with identifying and recommending to Government options for maintaining this country's status as an international hub for aviation.

The Commission will:

- examine the scale and timing of any requirement for additional capacity to maintain the UK's position as Europe's most important aviation hub; and
- identify and evaluate how any need for additional capacity should be met in the short, medium and long term.

In doing so, the Commission, will provide an interim report to the Government no later than the end of 2013 setting out:

- its assessment of the evidence on the nature, scale and timing of the steps needed to maintain the UK's global hub status; and
- its recommendation(s) for immediate actions to improve the use of existing runway capacity in the next five years – consistent with credible long term options.

The Commission will then publish by the summer of 2015 a final report, for consideration by the Government and Opposition Parties, containing:

- its assessment of the options for meeting the UK's international connectivity needs, including their economic, social and environmental impact;
- its recommendation(s) for the optimum approach to meeting any need;
- its recommendation(s) for ensuring that the need is met as expeditiously as practicable within the required timescale; and
- materials to support the Government in preparing a National Policy Statement to accelerate the resolution of any future planning application(s).

A decision on whether to support any of the recommendations contained in the final report will be taken by the next Government.

The Government intends this independent Commission to be part of a process that is fair and open and that takes account of the views of passengers and residents as well as the aviation industry, business, local and devolved government and environmental groups. We would like, if possible to involve the opposition as part of our work alongside Sir Howard to finalise the arrangements for the Commission. I will provide Parliament with further details on the full membership of the Commission and the terms of reference for its work shortly."

## Response ID ANON-55AJ-EQTV-N

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### What is your name?

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### What is your organisation?

**Organisation:**

Royal Borough Windsor and Maidenhead

## 1. Do you agree with our analysis of the nature and value of connectivity, set out in Chapter 2?

Neither agree nor disagree

**Comments:**

Broadly speaking, this Council agrees with your analysis of the meaning and value of connectivity.

Connectivity is 'the' key to any future national APF, in terms of global and UK connectivity. Connectivity should relate to an integrated approach covering all modes of transport to ensure efficient dispersal of passengers and services as near to the point of requirement and demand as possible. The APF states: " We are 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 business at the heart of transport"

This is a national 'strategic' aviation framework that needs to incorporate and include all transport operators and modes of transport. Early investment in inter-airport infra-structure on the mainland can only complement the UK's aspirations to successfully access global markets and the new expanding economies. The investment in the integration of UK infra-structure must be the over-riding priority. The market will determine those areas that will expand; reduce internal uncoordinated competition between the regions and share the burdens and rewards.

Heathrow being the only hub airport in the UK is arguably self-limiting and a constraint to growth. There appears too much focus on Heathrow expansion and the South east. There needs to be a re-think on this historical strategy as it might prove to be too inflexible and even out dated given changes in global markets and mobility expectations (i.e. leisure). The UK must have a balanced aviation industry that is dynamic, flexible and responsive to growing markets and emerging economies. This necessitates regionalisation and development of airports outside the south-east such as Manchester, Birmingham, the North East and Scotland; capitalising on existing capacity and offering greater choice to both passengers and business.

Evidence on the need for additional capacity at Heathrow and the South east is often contradictory. For example, reports by WWF suggests there is already sufficient existing capacity, seemingly suggesting the problem being the dominance of individual airports at the expense of other airports who are seeking to expand and to serve specific market niches and local economies. This might suggest the issue is one of re-allocation and/or diversion of demand. A refreshed focus upon improving UK's internal connectivity is likely to facilitate and stimulate such a shift. As the chapter states: 'The UK is currently one of the best connected countries in the world'. Arguably, the same cannot be said about the UK's relative internal transport connectivity. The five London airports collectively serve more routes than any other European city, but there is insufficient utilisation of existing capacities and over provision on 'popular' routes that is having the effect of reducing the frequency of flights to emerging markets. For example, too few destinations and connections to the PRC, now the world's second largest economy and other BRIC destinations.

As recognised in the draft APF 'London is already an exceptionally well served capital city with five airports that together serve more routes than any other European city'. We do agree that the UK needs to maintain its position if it is to compete successfully for economic growth opportunities. In this respect all the airports serving London should be considered as part of the London system (as opposed to the Heathrow hub) in particular Stansted and Gatwick in addition to Heathrow and that it is London itself that should serve as the main hub for the U.K. This infers there needs to be a shift in mindset and instead to consider what sort of hubs Gatwick and Stansted might be as this would affect the surface connectivity needs.

The APF refers to the development of high-speed rail (HSR) as significant in terms of improving connectivity, however it is important to note that the agreed Phase 1 route of the current HS2 scheme only links London to Birmingham Airport (to date) and there have been several studies questioning the economic benefits and level of job creation that HS2 might yield. In addition, given the perceived urgency of the matter, the long timescales convey a lack of true commitment and conviction outside the South east region.

There remain other opportunities worthy of consideration for improving connectivity, such as electrifying the route from Reading to Birmingham Airport and improving the East Coast Mainline and including a link to Doncaster Sheffield Airport, as well as other surface access links to the regional airports.



**2. Do you support the proposal to extend the UK's fifth freedom policy to Gatwick, Stansted and Luton? Please provide reasons if possible.**

Yes

**Comments:**

Yes. This is an absolutely essential policy change to what is currently in effect a totally out of date restrictive practice upon these and other airports which has no place in today's world of open competition.

Fifth freedom extends the choice available to passengers and improves the efficiency of airline operations by increasing capacity utilisation of aircraft. The proposal correctly states that reciprocal rights would be required and foreign airlines should not be subsidised. The document states "the UK has long had a general presumption in favour of liberalising fifth freedoms from airports outside the South East". It would appear inconsistent not to extend this policy to all other airports in the South east other than Heathrow Airport; or indeed any other regional airport not benefiting from these freedoms. This provides a competitive advantage to Heathrow to the detriment of the other SE airports and therefore constrains market development and growth at the other airports. The negative consequences of this are to amplify the demand and focus on Heathrow. As stated previously, this is a UK APF.

Allowing foreign airline operators to carry passengers between Gatwick, Stansted and Luton Airports and another country, under fifth freedoms regulations would create opportunities for regional airports to benefit from increased activity and to contribute to increasing connectivity of the UK.

The Royal Borough of Windsor & Maidenhead (RBWM) recognises the importance of connecting with the BRIC and other emerging economies in order to stimulate growth in the domestic economy, and to ensure the UK maintains a strong and well connected economy in the long-term.

**3. Are there any other conditions that ought to be applied to any extension of the UK's fifth freedom policy to Gatwick, Stansted and Luton?**

**Q3:**

A complementary condition of Fifth Freedoms could be a requirement to have a stringent and robust environmental mitigation package that is consistently applied at all airports e.g. quietest aircraft; noise mitigation schemes; operational procedures; noise levels; air quality – similar in principles and composition to the T5 planning conditions.

**4. 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?**

Agree

**Comments:**

In principle 'yes' subject to the review on a case by case basis. However, it is not clear why this question only relates to airports in the South East as there should be consistent application of policy throughout the UK.

Paragraph 2.43 of the APF actually states that the Government will seek to use bilateral relations to persuade international partners of benefits offered by airports across the UK to make the best use of alternative available capacity to encourage the development of new services to new destinations wherever possible. The development of regional airports is vital if any sensible redistribution of the UK economy is to be attained. There are environmental and social benefits associated with reducing the need for air passengers and freight to travel long distances to reach larger UK airports and for providing additional capacity away from congested South East airports.

**5. Do you have any other comments on the approach and evidence set out in Chapter 2?**

**Q5:**

- i. The Slot allocation system needs to be reviewed, particularly in respect of "grandfather rights". Future focus and priority must be given to ensuring good connectivity with BRIC and other emerging economies rather than outgoing tourist traffic which results in a very substantial financial deficit to UK plc.
- ii. If Gatwick is to be developed as an Inter-continental hub, a rail connection to Ebbfleet needs to be considered, together with improvements from locations West and North of Gatwick.
- iii. The Council is unlikely to be supportive of a policy that impacts negatively on regional airports. Additional research is required into the benefits and costs for regional airports to be produced before being able to fully address this question.

**6. 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?**

**Q6:**

The greatest source of localised air pollution around airports is road transport. Tackling this needs to be the first priority in respect of meeting EU AQ standards and improve the health of those living in such areas. The provision of subsidised bus services which follow indirect and time wasting routes to serve many communities are not attractive to airport passengers and workers and as a result private car use is not significantly reduced. A network of express bus services with convenient interchanges would appear to be a more realistic means of reducing air pollution.

The second priority ought to be the continued development and encouragement of the use of modern technology negating the need to fly.

The third priority is to address the CO<sub>2</sub> (and NO<sub>x</sub>) emissions from aircraft and the amplified impact on green house gas effects. A carbon levy might act as an incentive to use modern fleets and be consistent with the 'polluter pay principle' but this would at the very least have to be consistent across Europe. There are serious doubts about the effectiveness of the present system due to the low price of the carbon levy on the international market. The Fifth Freedom criteria referred to previously would complement such an approach.

Inclusion of aviation in the EU ETS will not automatically lead to a reduction in emissions from aviation. The onus must be on the airline operators to reduce emissions rather than accept, as it does in the APF they will be net purchasers of emission allowances from other sectors. Government needs to take a more decisive approach and to provide analysis of how the EU ETS will impact on the aviation industry and emissions' reductions once the period of free permits is complete.

In order to reconcile aviation growth forecasts with climate change targets, and bring the aviation sector in line with all UK sectors required to reduce their climate change emissions, the Government needs to:

- i. revisit their passenger demand and carbon dioxide emission forecasts to explain discrepancies;
- ii. assess and verify projected claims of technological gains prior to making policy and expansion decisions based on such claims; and validate the credentials of bio-fuels prior to progressing policy in this area to reflect the associated issues: land take – avoiding exacerbation of deforestation and not competing with food supply; lifecycle analysis of production techniques – resource inputs and pollution outputs; and safe fuel mix proportions for aviation.

## **7. Do you have any other comments on the approach and evidence set out in Chapter 3?**

### **Q7:**

It is unclear as to how consultees are best able to respond in areas where Government have yet to make a decision or a policy commitment. These include, for example:

- Inclusion of aviation emissions in the UK national carbon budgets
- Whether to retain a national emissions target for aviation that has yet to be made and no timescales are given as to when this will happen
- The potential use of bio-fuels.

RBWM would support the further use of 'sustainable' bio fuels e.g. where their production does not lead to negative social, economic or environmental impacts. Greater government (international cooperation) assistance towards research and development on bio fuels producing better yields i.e. more energy per gram of weight and on bio fuels with a lower freezing point allowing aircraft to fly higher and so reduce fuel consumption.

Differential landing and departure charges related to fuel efficiency might offer a consistent approach to incentivise the aviation and aerospace sectors to reduce emissions.

Both government and airport operators need to engage more fully with local authorities and residents in developing local policies and action plans related to aviation and climate change.

RBWM welcomes the Government's recognition that further detailed analysis of aviation's non-CO<sub>2</sub> emissions impacts is needed in order to provide a more consistent analysis of the impacts of policy measures.

RBWM welcomes reference in the APF to initiatives such as superfast broadband designed to reduce the need to travel, as well as investment in cleaner modes of travel such as high-speed rail.

## **8. Do you agree that the Government should continue to designate the three largest London airports for noise management purposes? If not, please provide reasons.**

Agree

### **Comments:**

Yes.

There is a growing argument in support of all airports over a certain size being designated for noise management purposes and not merely restricted to Heathrow, Gatwick and Stansted –. This would secure greater consistency of approach; a level playing field between airports; and complement the proposed revised remit of the CAA's new independent role for policy development, regulation and enforcement; or indeed any other independent body set up to conduct this role in the future.

## **9. Do you agree with the Government's overall objective on aviation noise?**

Agree

### **Comments:**

Yes, RBWM supports and agrees in principle with the government's aspirational statement 'to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise'. However, in the absence of a credible scientifically robust calibration system for assessing how to specifically measure and evaluate those 'significantly affected', this aspiration will be extremely difficult to attain.

Furthermore, RBWM is increasingly frustrated by the stonewalling and apparent lack of commitment on behalf of government to address such a significant and flawed weakness such as the current measurement of disturbance related to noise. The averaging systems currently in use do not appear to accurately reflect the level of community annoyance; yet there is plenty of time to review any shortcomings in the now discredited "ANASE" report. If there is in fact no intention to follow up with a new study, then in consideration of the government's stated commitment to transparency a full explanation should be provided.

Moreover, until such a review is conducted there can be no confidence that any defined limits to baseline values or noise contours properly addresses the level of disturbance. This seriously questions the value of any 'Noise Envelope', 'Quiet Areas', 'Contours' and such similar initiatives as they are all based on very suspect baseline data and criteria. Therefore, the 480000 atm annual limit at Heathrow must be retained indefinitely in accordance with the original T5

commitment.

There should also be an additional objective - namely to ensure that nobody in a residential setting is exposed to aircraft noise at 69dBLAeq16 hr or above after 2020.

## **10. 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?**

Disagree

### **Comments:**

Absolutely not! – see expanded comments on ANASE; WHO Community Noise standards; the urgent need for further calibration study to establish baseline community response thresholds

No. All the evidence from Europe is that the 57 dBLAeq16 hr contour is seriously out of calibration as a benchmark for defining the onset of unacceptable noise emission. In our view we do not believe it has any future value in a UK aviation policy context - in short it should be retired.

The EU is currently developing its own environmental noise limit values based upon a number of studies in member states and unless the UK government is willing to fund further repair work on ANASE so that its findings can be considered robust enough to inform policy the UK, as a member of the EU, should adopt emerging EU standards.

## **11. Do you think that the Government should map noise exposure around the noise designated airports to a lower level than 57dBA? If so, which level would be appropriate?**

Agree

### **Comments:**

Absolutely! At the T5 Inquiry local authorities argued in favour of lower noise levels down to 54dBLAeq16 hr given the discredited 57 dBLAeq16 hr threshold for community annoyance, forcing the production of such despite strong resistance.

The use of the 57dBLAeq 16h to mark the onset of significant community annoyance to aircraft noise has already been demonstrated to seriously underestimate the extent of the aircraft noise problem. This significantly changes the extent of the negative impacts of Heathrow. Consequently the Government commissioned the ANASE study. This too has since been discredited and interpreted as 'inconclusive', that is seen by many as expedient, leaving the UK with no credible threshold levels as we move into a long term APF.

Without a credible alternative, the WHO Community Noise Guidelines should form the basis of the thresholds given they are well researched and represent the most up to date internationally accepted limit values.

There are also issues around the noise index that should be used. The UK appears to be wedded to dBLAeq16 hr values, whilst the EU to the dB Lden index. The sensitive 'shoulder' and night time period values need to become established features of any revised noise contouring regime. The technology and means are already available to meet this requirement.

Another indication that the extent of the aircraft noise problem is underestimated is given by use of the Lden noise indicator as required by EU Directive 2002/49/EC. The Directive requires estimates of the number of people exposed to aircraft noise in noise bands commencing at 55dB Lden, and consideration of noise reduction measures commencing at 55 dB Lden. This suggests that 55 dB Lden is used in the Directive to indicate the noise level at which noise becomes an issue.

The 55dB Lden contour for Heathrow in 2010 covers an area of 222.3 sq km in which 712,100 people live. In contrast, the 57 dB LAeq 16h contour for Heathrow in 2010 covers an area of 106.3 sq km in which 224,550 people live. Use of the 55dB Lden contour suggests that more than three times as many people are affected by aircraft noise as previously recognised using the 57dB LAeq 16h contour. RBWM believes that the 55dB Lden contour gives a more realistic indication than the 57dB LAeq 16h noise contour of the geographic extent of the area in which aircraft noise is a problem.

The Council notes the Impact Assessment accompanying the APF outlines two options in relation to drawing contours at a lower noise level:

Policy Option 1c: "Draw noise contours at a lower noise level of 55dBA Lden for the noise designated airports (currently Heathrow, Gatwick and Stansted)."

The benefits of Policy Option 1c identified in the Impact Assessment are:

- extending the contour acknowledges that some people who currently live outside the 57dB Leq contour could also be annoyed by aircraft noise;
- the 55 Lden measure also takes account of night time noise - this may inform future decisions on measures taken to mitigate noise;
- useful to have noise contours at the lower lever to monitor the number of people potentially affected by aircraft noise, and to measure reductions in the number of people who are affected by noise; and
- the choice of 55Lden is consistent with the obligation to carry out five yearly mapping of noise under European law.

Policy Option 1d: "Draw noise contours at a lower noise level 54dB LAeq,16h with an 8-hour night LAeq for the noise designated airports (currently Heathrow, Gatwick and Stansted)."

The benefits of Policy Option 1d identified in the Impact Assessment are:

- measuring noise at the lower level will acknowledge that some people who currently live outside the 57dB Leq contour could also be significantly annoyed by aircraft noise; and
- it could mean that future airport policy is considered to be more credible with respect to noise and based on sound evidence.

Given the international framework within which aviation operates, it is more sensible to opt for Option 1c

RBWM welcomes the Government's recognition that "...frequency of movements can be a source of annoyance for some people living in areas exposed to lower average levels of noise across the whole day." This supports retention of movement limits in aviation night noise policy, and highlights the need to incorporate this

feature in any regime for management of daytime aviation noise.

General Comment:

RBWM was a major contributor to the T5 Public Inquiry. Evidence presented comprehensively covered the effect and impact of the number of flights upon over-flown communities, indicating the importance of 'number' alongside noise certification controls. We believe the Government's stated intention for their 'Attitudes to Noise from Aviation Sources in England' (ANASE) study, derived from that debate, sought to assess the limitations of the noise index 'Leq', as well as informing any future consideration of the air transport movement (ATM) condition applied at Heathrow.

Due to the Government's subsequent dismissal of their ANASE study, noise management policy has not moved on in the UK, and consequently has not addressed those same points discussed at the Heathrow Terminal 5 Public Inquiry more than a decade ago. It is essential that a follow up study is commissioned if the UK is to have a credible baseline determinant and before consideration can be given to concepts such as a satisfactory 'noise envelope'. In contrast aviation noise policy in Europe has been advanced in recent years and therefore the Government should look to Europe for examples of best practice. There is mounting evidence to suggest that the historical 57 dB LAeq noise contour is now inadequate as a noise measure. RBWM urges the government not to base a long term noise policy on flawed, un-calibrated or inconclusive data. There is an urgent need for the Government to update noise policy and further investigate the annoyance relationship for aircraft noise.

A greater understanding of the community response to aviation noise is an essential prerequisite for an improved aviation noise management and reduction regimes.

## **12. 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?**

Neither agree nor disagree

### **Comments:**

In principle 'yes', however, this relies entirely on having a calibrated threshold for the onset of community annoyance. As stated above, this is currently not the case.

THIS ISSUE MUST BE RESOLVED AS IT LIES AT THE HEART OF MOST COMMUNITY OBJECTIONS TO AIRPORT DEVELOPMENT. WHAT IS SO DIFFICULT TO UNDERSTAND ABOUT THIS CONCERN?

WHY IS THERE SUCH RETISCENCE IN COMMITTING TO RESOLVE BY CONDUCTING A SURVEY OR ALIGNING WITH EXISTING RESEARCH FINDINGS?

## **13. Do you agree that noise should be given particular weight when balanced against other environmental factors affecting communities living near airports?**

Agree

### **Comments:**

Yes.

There is little doubt that noise is the most obvious perceived environmental problem for those living in close proximity to airports and/or under the flight paths and therefore should be weighted accordingly. However, there are also a number of other factors that could be of equally important significance in some locations. Therefore, it is suggested a 'basket of measures' might be a better approach for deriving a cumulative impact measure. For example, in respect of noise, use of WHO criteria over a range of activities and situations. This approach has already been adopted by government for Quality of Life indicators and a measure of community sustainability in recent years.

## **14. What factors should the Government consider when deciding how to balance the benefits of respite with other environmental benefits?**

### **Q14:**

The motive or intention behind this question is not clear as it is hard to reconcile why 'the benefits of respite' should need to be balanced with 'other environmental benefits'. This suggests there is some incompatibility yet the two appear synonymous. The key issue is one of equality of opportunity for all communities around an airport to be afforded some respite i.e. using the government term 'to share the noise burden' or any other negative impact.

It is important that scheduled periods of relief should be provided. The procedure for runway alternation should be considered at any airport when additional runways are built and airport capacity limited accordingly.

Otherwise it is dependent on the relative impact of the environmental benefits.

Predictable periods of respite are one of the single most effective noise amelioration measures available upon which local communities plan their daily routines.

## **15. Do you agree with the Government's proposals in paragraph 4.68 on noise limits, monitoring and penalties?**

Agree

### **Comments:**

The principles are sound, but to coin a phrase 'the devil is in the detail' and there is little information provided at this stage.

This Council has long argued that to be meaningful and relevant to present day operations, Infringement levels, monitoring and non-compliance penalties should include both departing and arrival aircraft and that these should be routinely reviewed on a planned basis (e.g. as per night flight regime) every 5 years, perhaps

even at the same time given the close relationship.

Low flying approaching flights tend to follow the same closely controlled final flight paths for approximately 15 nautical miles in relation to each runway, thus generating an unrelenting greater noise impact on a far larger area than steeper climbing and rapidly dispersing departing flights. There should be an aspiration to amend the current 3 degree Constant Descent Approach (CDA) angle to 4 degrees to increase the height and thereby decrease the resulting noise of arriving aircraft.

Penalties for breach of limits should not be imposed for revenue raising purposes and should have some relationship to the seriousness of the breach with the proceeds re-invested to fund community mitigation packages.

To be effective this requires the levels of penalty for justified cases to be set at realistic levels to act as both a deterrent for non-compliance and an incentive for the introduction of less noisy aircraft.

The principles of greater transparency and independent monitoring and evaluation in the regulation and enforcement of noise limits is warmly welcomed and supported. RBWM assumes this relates to the proposed enhanced and expanded role of the CAA?

In this respect, one of the greatest concerns of RBWM residents is the issue of night flights. At Heathrow most of the sensitive period flights are arrival aircraft. However, unscheduled departures in the middle of the night are also particularly disturbing. There is a very real need to address the fact that the Night Flight Quota Number is usually doubled by the number of unscheduled early arrivals from about 4.20 a.m. There is concern that the claimed benefits to business activity should be more fairly balanced against the proven detrimental effects of sleep disturbance specifically from aviation. This Council has repeatedly called for the gradual phasing out of night flights and will continue to do so.

RBWM has also repeatedly called for the introduction of arrival noise limits, to be met with the consistent response that safety considerations on approach override noise concerns. However, such controls exist at other overseas' airports and the level of technological sophistication of modern fleets would suggest such a response is out dated and inconsistent.

This Council believes it is time local communities around the UK's major airports are further protected by not only the review of the long standing departure noise limits but also by the introduction of maximum noise limits for landing aircraft.

## **16. In what circumstances would it be appropriate for the Government to direct noise designated airports to establish and maintain a penalty scheme?**

### **Q16:**

A two part question.

In respect of establishing a penalty scheme, in all cases as a matter of course.

In respect of maintaining a penalty scheme i.e. on-going regulatory function and enforcement, where there are breaches of any noise amelioration measures designed to protect local communities are significant, avoidable and repetitive. This should include landing noise as stated above as well as departure noise level infringements and also non compliance with NAP targets, poor CDA, track keeping performance and NPR compliance. The regime should be a balanced combination of deterrence, penalties and incentivisation and administered by an independent agency (CAA). Self regulation and voluntary schemes are likely to be far less effective and receive less community support and confidence. We understand the UK is the only EU state which devolves the monitoring of airport NAPs to the airport operators and in some quarters is likened to appointing a poacher as the gamekeeper.

## **17. 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?**

### **Q17:**

A fundamental requirement of an effective regulating and enforcement regime is the operation and maintenance of a credible noise monitoring system where those affected have easy access to transparent data and reports that can be scrutinised. This is consistent with the commitment within the APF that advocates greater collaborative working between airports and local authorities.

A suggested way of demonstrating such a commitment would be for the airports to approach LAs requesting them to host and manage remote monitoring sites; share data and regularly discuss the local monitoring data. This would foster better working relationships.

Another circumstance would be failure of the airport operator to respond to requests for specific monitoring by representatives of the relevant airport consultative committee backed up by a request from the regulator.

## **18. How could differential landing fees be better utilised to improve the noise environment around airports, particularly at night?**

### **Q18:**

The principle behind differential landing fees is to incentivise the use of less noisy (and cleaner) aircraft and reflects the relative impact upon the local community. Therefore, the size of aircraft should not be material as it is the noise it emits and its negative impact is what the scheme is intended to regulate. It follows, if a larger aircraft is chosen to operate at night but in doing so emits a higher noise level then it should be expected to incur an increased landing and departure fee as compensation for the increased noise i.e. 'Polluter Pays Principle'.

Another option for utilising incentivisation principles especially at night would be to devise a passenger weighting to avoid a large number of small quiet aircraft, rewarding greater occupancy rates. Linking schemes to variants of occupancy rates needs further investigation.

Alternatively increasing landing and departure fees for all aircraft 23:00 to 07:00 (and also weighted to other times of the day) that are retrospectively applied

based on 'actual' monitored noise rather than the more general ICAO Noise Certification Classification. This is preferable as ICAO uses manufacturer's anticipated performance data which, as accepted in the context of Night Noise Quota limits, for specific aircraft such as aging Boeing 747's actual levels are far noisier than assumed by their classification.

## **19. Do you think airport compensation schemes are reasonable and proportionate?**

No

### **Comments:**

No - the UK airport compensation scheme are woefully inadequate and require a root and branch review, to be carried out by the regulator in consultation with other stakeholders

Current mitigation packages are perceived to be derisory, out-dated, overly bureaucratic, un-calibrated and insufficiently hypothecated.

New standards of entitlement should be determined and based upon referenced standards e.g. WHO and EU Noise standards for the protection of human health.

## **20. 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?**

Agree

### **Comments:**

Yes. However, most such noise in the RBWM comes from police helicopters, air ambulances or used for security purposes.

## **21. What other measures might be considered that would improve the management of noise from these sources?**

### **Q21:**

No comment - not a sufficient problem in RBWM in recent times although training and recreational flying from White Waltham has been a problem in the past.

This is an issue best tackled via a greater number of local community airport consultative committees actively supported by the CAA in their new role, as required.

A greater willingness in exercising the existing powers of section 5 of Civil Aviation Act 1982 rather than a presumption against using the powers would resolve on-going matters more expeditiously.

## **22. Do you have any further ideas on how the Government could incentivise the aviation and aerospace sectors to deliver quieter planes?**

### **Q22:**

For major airports, it should be mandatory that Noise Action Plans include specific objectives and targets to encourage the quietest fleet. The existing arrangements of airport operators being the nominated 'Responsible Authority' means the NAPs are not as effective or robustly applied as intended. A landing slot regime which discriminates against noisy engines but rewards for fuel efficient / quieter types.

## **23. Do you believe that the regime for the regulation of other local environmental impacts at airports is effective?**

No

### **Comments:**

Local Air Quality Management Areas are not as effective as they could be. The regime suffers from the fundamental problem that although local authorities are ultimately responsible for the air quality in their respective administrative areas they have no powers of enforcement with regard to airside emissions from airports or major trunk roads and motorways adjacent to an airport. This links right back to the 'Connectivity' comments at the start of this response.

Given the contribution of surface access emissions to local air quality around major airports, one mitigating solution might be to give airport operators specific legal obligations and duties in relation to air quality management, irrespective of any voluntary measures they may introduce.

Greater collaboration and integration of local plans and those of the airport operators is required.

## **24. Do you think that noise regulation should be integrated into a broader regulatory framework which tackles the local environmental impacts from airports?**

Yes

### **Comments:**

If Airport Master Plan and Noise Action Plan regimes worked correctly and as originally intended this should be a sufficiently robust and independent framework for integrating all the environmental impacts. Clearly, there needs to be robust monitoring, surveillance and compliance regimes in place.

**25. Do you think Airport Consultative Committees should play a stronger role and if so, how could this be achieved?**

Yes

**Comments:**

GENERAL COMMENT:

There appears a general inability to keep the public sufficiently informed about what is happening with regard to aviation. Almost all newspaper comment reflects the philosophy of the specific newspaper and, as a result seeks to create rather than report news.

Similarly the various airport consultative committees fail to adequately keep the general public advised of their activities. There is an identified weakness in current practices and wider circulation using a basket of media, including local authority and other stakeholder web sites is suggested.

Another area of concern is with the reporting of Airport Noise Action Plans as this appears almost non existent in the wider community e.g. the status of the Cranford Agreement and timescale for its long over due abandonment in favour of a more equitable sharing of the noise burden.

As a result by the time most communities who will be affected by any specific decision become aware of the situation, it is often a fait accompli and all they can do is complain about the result. This must be recognised and addressed and only those directly involved in the various consultations have the working knowledge to achieve that.

Yes. In future it should not be possible for the wishes of democratic decisions taken by the relevant airport consultative committee (ACC) to be ignored or over-ruled by the airport operator without an independent review by the regulator e.g. CAA.

Under current arrangements at Heathrow, for example, the Heathrow Airport Consultative Committees' (HACC) function is primarily a forum for exchange of information and soliciting views on current topics amongst parties that often have totally different and opposing objectives. HACC debates do not often progress to more than a request or recommendation from one interest group [usually the local authorities] which in practice has no power to instruct the airport operator with regard to commercial or operating procedures which they may or may not be able or willing to accommodate.

A more equitable solution would be for the ACCs to be jointly funded by government, industry and by the airport operator, but independently staffed and facilitated. The operator should be responsible for submitting regular reports and performance statistics relating to the airport. The airport operator should not have the responsibility for selecting the membership. Greater involvement of the CAA as independent regulator would engender a greater sense of cooperation from all parties and improve and develop more collaborative relationships.

**26. Is there a case for changing the list of airports currently designated to provide consultative facilities?**

Yes

**Comments:**

Yes. All commercial airports and all but the smallest aerodromes should provide consultative committees. Membership of these should be periodically reviewed e.g. every 5 years.

**27. Do you agree that the Civil Aviation Authority should have a role in providing independent oversight of airports' noise management?**

Agree

**Comments:**

Yes. The remit of the CAA could be modelled on that of the Environment Agency with specific powers to take independent enforcement action for non-compliance of noise mitigation measures operating at airports. The interest needs to shift from one of a promoter of aviation services, sponsored by industry, to one of an independent authority that strikes a balance between the interests of local communities and that of the aviation sector and associated business interests. An example being when Noise Management Plans produced under the requirements of the END do not comply with the minimum requirements or, are not actioned; or where there is a need for arbitration arising out of Consultative Committees then the CAA should have step in powers. This will require a fundamental cultural shift, change of role with clear terms of reference and significant support from government.

**28. Do you agree with the Government's overall objective on working together?**

Agree

**Comments:**

Yes

**29. Is the high-level guidance provided in Annex E sufficient to allow airports to develop local solutions with local partners?**

Not Answered

**Comments:**

Yes, subject to the caveats:

■ Sufficiently flexible to include at a later date other aspects that will inevitably arise not currently covered.

■ The inclusion of national businesses to local businesses.

■ Inclusion of the general public/residents' User Forums

■ The continuation of Airport Master Plans is not supported in their present form. They are currently non statutory and have no standard format. They quickly become out of date - or as in the case of Heathrow remain in interim or draft status. They do not appear to have any official status with the National Planning Policy Framework - which we believe they need to have if they are to be of any value as a land planning tool.

**30. Do you agree that master plans should incorporate surface access strategies?**

Agree

**Comments:**

Yes. Airport Surface Access Strategies are fundamental and a pre-requisite to getting customers and users to and from an airport before granting or creating additional capacity.

**31. Do you agree that, where appropriate, the periods covered by master plans and noise action plans should be aligned?**

Agree

**Comments:**

Yes. These should be integrated in any event.