

DfT: DRAFT AVIATION POLICY FRAMEWORK
Initial thoughts on a response from Uttlesford District Council

Preamble

The first point is that this is really only half a draft framework. It deals in some detail with a possible short term “make do” approach up to 2020, but because the Government has now announced that an independent Commission is to be set up on maintaining the UK’s international aviation connectivity, it says little on the medium and longer terms. The reason for this is undoubtedly political expediency. The Government says that it intends to adopt the framework by March 2013, but the Commission will not publish its final report until the summer of 2015 for action by the next Government if it thinks fit. The Commissions' work will inform the Government's National Policy Statement in due course.

The framework must address the medium and longer terms and cannot duck important (and probably unpopular) decisions about what to do about airport capacity, particularly in the SE. The new Secretary of State has said in his recent Written Statement that the framework will “*set the high level policy parameters within which any new proposals for airport development may be considered*”. The DfT published quite detailed aviation forecasts in August 2011 for the period up to 2050, and the Government must set out how it intends (or does not intend) to meet the demand set out in those forecasts. We should therefore reserve our right to add to / amend our comments when the outcome of the Commission's work is known.

The framework requests answers to the following questions under 4 chapter headings, but we are not required to answer them all. I have added bullet points as a starting point. I have dealt with some questions more fully than others.

CHAPTER 2: THE BENEFITS OF AVIATION

Do you agree with our analysis of the meaning and value of connectivity, set out in Chapter 2?

- Meaning (a combination of destinations served and frequency of flights) – yes.
- Value – (relative importance of the destination, cost of accessing them and reliability of the services) – depends what is meant by “relative importance” – is this an attempt to distinguish between business and leisure? The framework defines cost as the end-to-end journey time and the price of air travel, but what about the environmental cost?

Do you support the proposal to extend the UK’s fifth freedom policy to Gatwick, Stansted and Luton? (Note: “fifth freedom” is the right for an airline from one country to fly to another, pick up passengers, and then fly on to a third country)

- Yes in theory if it means that regional demand for long haul services can be met (e.g. to the USA), avoiding the need to travel to Heathrow.

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This could also free up some passenger handling capacity at Heathrow.

- Provides long haul services without the need to establish hub operations.
- Could be one way of making use of spare slots at Stansted which are not of much use to low fares airlines because they don't fit their pattern of rotations.

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?

- No – the same conditions should apply as elsewhere in the UK.

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?

- Yes, provided the Government is satisfied that there is a level competitive playing field with the country in question.

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

- Welcome the proposed review of rail access to airports – ideally this should be carried out by the DfT, Network Rail, the rail franchisee(s), the airport operator and other local stakeholders as part of the work of the Transport Forums. At Stansted there is some concern that the rail timetable hasn't evolved sufficiently to meet the needs of air passengers, especially those who have early departures.
- Support the proposal to welcome applications by devolved and regional bodies to impose Public Service Obligations to protect services between other UK airports and London (by ring-fencing slots), but only where there is no other reasonable alternative, such as rail.
- The short term strategy refers to “*making best use of existing capacity to improve performance, resilience and the passenger experience*”. In this context, we must query what is meant by “best use”. It should not mean maximum use because that would impinge on resilience.
- Welcome the Government's intention to ensure that general and business aviation has equitable access to airports. This is important at Stansted and is a good source of highly skilled, local employment.

CHAPTER 3: CLIMATE CHANGE IMPACTS

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?

- International action is required – it's difficult to see what the UK could do unilaterally.

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

- There's really nothing new here, and unless action on a global level is achieved, the effects of EU or UK-only measures will be more limited.

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(SASIG describes this chapter of the framework as “fairly discursive”, which is right). In the absence of what the Government calls “*an ambitious global agreement to tackle aviation emissions*” it is, however, right that the Government continues to support the EU ETS and the Single European Sky Programme.

CHAPTER 4: NOISE AND OTHER ENVIRONMENTAL IMPACTS

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

- The draft framework refers to some Stansted stakeholders querying whether Government regulation of noise at the airport should continue, or whether local authorities should play this role. We need to take a view on this, particularly in conjunction with ECC, EHDC and HCC. An obvious issue for us is the resource implications.
- If designation is to continue, we need to impress on the Government that what suits Heathrow and Gatwick may not suit Stansted.

Do you agree with the Government’s overall objective on aviation noise?

- If the Government is still putting forward the existing high-level policy objective set out in the 2003 ATWP (“*to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise*”), yes, but the ATWP then seemed to act against this objective by being a blunt instrument for airport expansion. It is presumed that the new framework will not go the same way.

Do you agree that the Government should retain the 57dB LAeq 16h contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance?

- No. This is a metric which has little public confidence. At the very least 54dB LAeq should be used instead, but Lden measurements which give more weight to evening noise and night noise would be more representative. We commented on this in our response to the aviation scoping document in October of last year.
- The Government argues against mapping even lower level contours (below 54dB LAeq) because “*this would increasingly represent a level of noise which is approaching typical background noise levels in an urban environment*”. It needs to be made clear to the Government that not all airports exist in urban environments. One size does not fit all...
- The Government also seems to criticise the Lden metric by saying that it is not sensitive to small changes in night movements. “*For example, if the number of night flights at Heathrow were reduced by half, the reduction in Lden would be very small*”. This is not a valid criticism of Lden. It would be of little comfort to a resident to learn that they are only going to be awakened 5 times each night instead of 10 – that is still disturbed sleep which Lden is rightly reflecting.
- In London Stansted’s Noise Strategy and Action Plan 2010-2015, noise mapping data is included for 2006 using a number of different metrics. Using the 60dB noise level (common to all the metrics), it is telling that

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the number of residents within the relevant Lden contour is 2,100, more than double the number in the equivalent contour using the other metrics.

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?

- Yes (see above).

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 projects?

- Yes, but challenging noise envelopes should be set that don't just legitimise the final development. Interim targets are needed, with sanctions imposed on the airport operator if they are not met.

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

- Yes. It was clear to the Council when considering the Stansted Generation 1 and Generation 2 planning applications that noise was the major impact for local communities and for people living in tranquil areas outside the immediate vicinity of the airport. The Council included a commentary on the representations that it received on the Generation 1 application with its response to the aviation scoping document.

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

- One main issue must be the knock-on effects of the respite measures on others in the community, especially in relation to noise. Whilst Heathrow can practise runway alternation, single runway airports cannot and are limited to measures such as concentration vs dispersal within NPRs and varying the final approach joining point. Our experience, however, from dealing with many airport noise related enquiries from members of the public, particularly those thinking of moving to the area, is that they are looking for as much certainty as possible on which to make decisions.

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

- Yes. A review of departure noise limits is required as the existing ones have remained operative since the 1990s and must now be outdated as technology moves on. The existing limits are unlikely to be very challenging for most modern aircraft.

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

- It should be a standard requirement of designation that a penalty scheme is established and maintained.

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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?

- Ditto above...

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

- Landing fees for noisier aircraft should be increased. It is of concern that the Government says “we have only limited evidence on how airports are using landing fees to incentivise the use of the quietest and cleanest aircraft”. The CAA investigation that the Government is ordering into the use of differential landing fees is therefore welcomed. Those affected by aircraft noise need reassurance that the scale of fees fairly reflects the environmental cost of flights and not the economic preferences of the airport operator.

Do you think airport compensation schemes are reasonable and proportionate?

- No, the Council commented on this in its response to the aviation scoping document.

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? (Note: this places a duty on the CAA in exercising its aerodrome licensing functions to have regard to the need to minimise as far as is reasonably practicable any adverse effects on the environment and any disturbance to the public from (among other things) noise attributable to the use of aircraft at the aerodrome).

- The Section 5 power is a reserve power that the Government has never used, so its effectiveness cannot be judged. Perhaps this is because:
 - a) local solutions have always worked (doubtful), or
 - b) use of Section 5 has been considered, but was not fit for purpose (because it is quite vague in what it says)
- The Council would always support the operators of small aerodromes working together with local stakeholders to try to resolve disturbance issues.
- The Government is acknowledging that there is scope for considerable disturbance from helicopter noise. We highlighted this in our response to the aviation scoping document, and so did many others especially in London. Whilst helicopters have to meet internationally agreed standards, the problems come from the nature of helicopter noise, the fact that helicopters don't fly very high and their lack of restriction in uncontrolled airspace. It is welcome that the Government is encouraging NATS and the CAA to look at these issues overall, depending of course upon what “look at” actually means.

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

- “These sources” presumably meaning general aviation and helicopters. I’m not sure whether pilot training includes techniques for noise reduction whilst in flight, but if not it should be looked at.

Do you have any further ideas on how the Government could incentivise the aviation and aerospace sector to deliver quieter planes?

- It’s difficult to see what the Government could do unilaterally, but it should continue to push through ICAO for further reductions at source.

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

- May be, but there will always be a difference of opinion between airport operators who say they are meeting all the statutory requirements, and local communities who will always say that is never enough. Independent verification / audit have a role to play here.

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

- Yes, if it makes the overall impacts and their inter-relationship easier to understand.

CHAPTER 5: WORKING TOGETHER

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

- The Government is expecting airports to work with local communities through ACCs to understand their information needs and to meet those needs wherever practical. This is a very important role that ACCs are equipped to help with. For instance, the Government rightly acknowledges that knowing that an area lies within a particular noise contour does not help a potential house purchaser understand the typical noise that would be experienced. That is certainly our experience. London Stansted has published some very useful patterns of arrival and departure maps which the public find much easier to understand and interpret than contour maps.
- Support the updating of the 2003 guidance for ACCs.
- Support the proposal that the ACC chairmanship should be advertised externally and should be for a fixed term.

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

- Probably not, but all airfields should at least be encouraged to look at the advantages of setting up a consultative facility. It worked at Andrewsfield where antagonism had built up with the local community, although a subsequent change in the airfield operator did help.

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

- Yes, if this would result in the greater transparency, trust and local accountability of the noise management process that the Government says it is seeking. This would also be a good way of giving the CAA more of a local remit from which it might also benefit.

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

- Yes, taking the objective to be encouraging *"the aviation industry and local stakeholders to strengthen and streamline the way in which they work together"*.
- The Government reiterates that master plans do not have statutory status, but does recommend that the plans should address the long term land requirements for future development. This does beg the question as to where master plans are supposed to fit in the scheme of things, especially if the longer term ambitions of the airport operator are at odds with the local development framework / local plan. The Government sees a benefit in master plans identifying additional land and property involved *"to minimise long term uncertainty and non-statutory blight"*. The likelihood is that publishing details of any additional land-take will do just the opposite, particularly when there is no extant planning permission for the development.

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

- The guidance is fine, but what is really needed is a way for everyone to work together in a manner that genuinely balances the economic interests of the airport operator with the environmental concerns of the local community.

Do you agree that master plans should incorporate airport surface access strategies?

- Yes, but as a master plan may have a longer timeframe than the ASAS, the ASAS should be in the form of an annex so it can be easily amended and updated.

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

- Yes. Updating both every five years should be achievable.

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Amended version 10th September 2012.