Developing a sustainable framework for UK Aviation: Scoping document

Summary of Responses

Contents

Overview

1. The Government published a scoping document in March 2011 seeking views and evidence on questions around six key themes:

   - The Aviation Sector
   - International Connectivity and Hub Airports
   - Regional Connectivity and Regional Airports
   - Making Better Use of Existing Capacity
   - Climate Change Impacts
   - Local Impacts

2. A dedicated email address (aviation.policyframework@dft.gov.uk) was set up, to which all interested parties were invited to submit their responses. The scoping document was made available online, and respondents were also invited to make their submissions by post.

3. The scoping exercise was originally scheduled to close on 30 September. However the final deadline was extended to 20 October 2011 due to a delay in the publication of the Government response to the Committee on Climate Change (CCC) Report on Reducing CO_2 emissions from UK Aviation to 2050. It was judged that respondents would like time to reflect this report in their responses to the scoping document.

4. Responses were logged and analysed by the in-house aviation policy team. 635 responses were received in total. A breakdown by respondent group is included at Table 1 below. A full list of organisations who responded is at Annex A.

5. The responses received took a variety of forms - some included case studies and examples of good practice, others included or referenced subsidiary reports. The in-house team reviewed all responses and evidence supplied.

6. We are grateful to all respondents for taking the time to respond to the scoping document. The Department does not routinely publish individual responses, although we do encourage individual companies, in the interest of transparency, to release their responses where possible. This document is a summary of the responses received.

Table 1	
Respondent Type	**Total**
Aerospace	7
Airline	22
Airport	29
Airport Consultative Committee	8
Devolved Administration	3
Embassy	5
Environmental Organisations	15
Freight	5
General / Business Aviation	9
Local Community Group	42
Local Government	97
Lydd Airport Campaign	108
Member of public	187
MP / Political Representative	10
Other	34
General / Business Aviation	9
Other Business	52
Regulator	2
Grand Total	**635**

The aviation sector

7.   This topic was addressed by 38 per cent of respondents. The most commonly addressed question in the section was Q1 - "What are the benefits of the aviation sector for the UK as a whole".

How does the sector benefit the UK economy?

8.   Those that responded to this question cited a wide range of benefits that the aviation industry brings to the UK. The majority of respondents focused on the economic impacts of the industry though some also mentioned the welfare benefits from travel and cultural experiences. In assessing the benefit to the economy of aviation, many quoted various economic studies, in particular:

- British Chambers of Commerce, 2009 "Economic Impacts of Hub Airports"

- Frontier Economics, 2011, "Connecting for Growth: The Role of Britain's Hub Airport in Economic Recovery".

- FTI Consulting, 2011, "The Importance of Aviation Infrastructure to Sustainable Economic Growth". A report prepared for Gatwick Airport Limited.

- OXERA, 2009, "What is the contribution of aviation to the UK economy?" A report prepared for Airport Operators Association.

- Oxford Economic, 2011, "Economic Benefits from Air transport in the UK".

9.   The estimates of aviation's contribution to UK GDP differ across these reports as they use different measures. For instance, in the most recent report by Oxford Economics (2011) it is estimated that the aviation industry directly contributes £21bn to UK GDP and directly employs 326,000 workers. The Oxera report (2009), which does not include aerospace manufacturing or non-airside activities at airports, estimates that the aviation industry directly contributes £9bn to UK GDP and directly employs 141,000 workers.

10.   There was also a strong consensus that the channel through which aviation could benefit the UK was through connectivity, which facilitates the conduct of trade and investment by providing better access to markets. Consequently, a significant number of respondents considered the most important contribution of the aviation industry to economic growth to be its facilitation of business connectivity and international trade. This connectivity was cited as being important in determining business location decisions and facilitating inward investment. As a

result the importance of travel for business purposes was emphasised by many.

11. The importance of air freight was highlighted by many as providing benefits to the UK, particularly by allowing the delivery of 'just in time' cargo that provides goods in minimal time from source to destination. General and Business Aviation (GA) was also cited as being important to the UK both in terms of the economy in supporting jobs and in pilot training. The UK aerospace sector was cited for bringing benefits to the UK through its investment in Research and Development (R&D) and generation of intellectual property.

12. There was less consensus, however, on the impact that tourism has on the UK economy and the role that aviation plays within that. On one side there were those respondents that pointed to the significant number of jobs that depend on inbound tourism and the expenditure that the inbound tourists generate. In contrast others, particularly environmental and local community groups, cited the "tourism deficit", stemming from the number of leisure trips abroad, as a drain on the economy.

13. Many respondents including airlines and local businesses, cited the benefits to society of access to low cost travel abroad, and job opportunities created by airports. Others, who lived in close proximity to airports noted the negative impacts that aviation can have on social well being, including exposure to noise.

14. A high number of respondents expressed their concerns that demand for aviation would continue to outstrip supply based on the current status quo. They envisaged continued growth in the global aviation industry and an increase in demand for services, particularly to emerging markets. A few respondents meanwhile maintained the opposing view that current trends might continue and higher oil prices in the longer term would exert sufficient upward pressure on prices to curb demand.

15. Some respondents also illustrated the benefit of aviation to the UK economy through the use of specific case studies. These case studies highlighted the importance of the aviation industry in supporting businesses in the UK that operated both on a global scale and in the local area.

Aviation sector growth

16. Whilst many agreed there was a real trade-off between noise levels and emissions given the current path of technological development there was a mixture of views around how aviation could grow in the future within emissions and noise impacts constraints.

17. Some respondents argued that the aviation industry should not be allowed to seize all the gains from future developments (by increasing

flight frequencies, aircraft size etc) and that local residents should share – at least equally – with the aviation industry in the benefits arising from advances in aviation technology and operating procedures. Other respondents argued that to compete in the 21st century the UK economy needed an aviation policy that was geared to drive growth of the whole economy and that aviation should be allowed to expand.

18. Some respondents, particularly environmental groups, said that growth could not be unconstrained, as uncontrolled aviation growth could have a damaging impact on the local environment and the climate.

Trade-offs

19. A broad range of views were submitted on what the various trade-offs in aviation are and many identified the difficulty that policy makers face in addressing these competing interests. In particular, respondents cited the trade-off between noise and emission reductions to be a particularly difficult challenge and commented that current technological growth seems only to be able to deliver benefits for one at the cost of the other.

Strategic national interest

20. Respondents considered a number of aspects of UK aviation to be of strategic national interest, including air traffic control because of the security and safety issues, Heathrow as the "UK flag bearer", and London airports more generally due to the huge demand in the South East region. Some respondents noted the strategic importance of increasing connectivity to isolated regions of the UK, and that air travel has an important role to play in re-balancing the UK economy and ensuring that the more remote areas can continue to flourish through good links to major centres.

Regulation

21. Many agreed that regulation should be 'light touch' in approach to mitigate the costs whilst it was also emphasised that this should not be at the expense of noise mitigation and safety. Devolving Air Passenger Duty (APD) was also put forward as a potential method to reduce the regulatory cost burden. Respondents from the GA Sector outlined views that there was more scope for GA to be treated differently from other sectors of aviation in terms of regulation.

International connectivity

22. This topic was addressed by 37 per cent of respondents. Although we did not specifically ask for proposals for new capacity, a number of suggestions were put forward in responses.

Connectivity – general

23. The majority of respondents recognised the value of good connectivity to the UK economy. Several noted that good air connectivity was often cited as a significant factor for businesses in deciding where to locate and that inward investment and inbound tourism were more likely to grow in countries where airport links were good.

24. A majority of respondents, from airlines, airports, unions, consultative committees, and local businesses, said that demand in the South East was forecast to grow at such a rate that additional runway capacity in the South East would be essential to avoid demand moving away from the UK to European hubs, and to ensure that airports in the South East had sufficient resilience to cope with disruption caused by, for example, natural hazards.

Hub capacity

25. Some respondents, primarily from industry and other businesses outside London, said that there was no need to retain a hub in the UK, as it was easier for passengers originating at regional airports to use European hubs such as Frankfurt and Schipol. However, the majority of respondents stated that retaining a UK hub was vital to enable the UK to maximise employment, enable freight deliveries and provide access to the global market and inward investment opportunities.

26. A number of respondents requested more clarity on the Government's policy position on the expansion of airports, and its approach to developing South East airports. Some respondents also requested clarity on the Government's definition of a hub airport.

Virtual hubs

27. Respondents were divided over the benefits of creating virtual hubs by linking existing airports to integrate capacity, for example a high speed rail link between Heathrow and Gatwick airports. The majority felt that although improved links between airports would be valuable for passenger convenience, it would not be possible to create a workable virtual hub because the connection times would be too long between major UK airports in comparison to overseas hubs. Several respondents

noted that there were no examples of virtual hub airports, established through fast rail links, operating successfully elsewhere in the world.

Additional capacity

28. A number of suggestions were put forward for relieving capacity constraints in the South East by the full range of respondent groups, with the exception of environmental groups, including: building new runways at existing airports in the South East, building a new airport; developing RAF airports such as Northolt or Manston to support commercial operations; and expanding airports outside the South East (particularly for leisure routes).

29. However some respondents, particularly local Government, environmental organisations and members of the public, put forward strong arguments against these proposals. The majority of these arguments were put forward by local Government and members of the public from the Stansted and Kent areas and related to building more runways at Stansted and building an airport in the Thames Estuary. A number of environmental organisations also expressed support for the Government's position on a third runway at Heathrow.

Route viability

30. Respondents were split over the value of transfer passengers to the UK economy. Approximately half of those who addressed the issue of transfer passengers, mostly local Government and environmental organisations, commented that transfer passengers brought no, or limited benefits to the UK economy and point to point services should be favoured.

31. However many, mostly from the aviation industry and local businesses, felt that transfer passengers enabled routes to be operated that would not be viable otherwise; and that without the significant percentage of transfer passengers at Heathrow, passengers would have to wait longer for the market to make new routes viable, to the detriment of the UK economy.

32. Several respondents, particularly airports, unions and freight industry respondents, also referenced the value of belly hold freight in enabling route viability.

Route mix

33. The response was mixed on whether some routes were more important than others, and whether the Government should intervene on the route mix offered by airlines.

34. A majority of respondents, from across the range of groups, commented that connectivity to the emerging markets was particularly important; some referencing the BRIC countries as key players (Brazil, Russia, India and China) and others acknowledging a wider range of emerging economies including Mexico, South East Asia and Africa. A number of these, particularly from the aviation industry and businesses, perceived the UK's performance to be uncompetitive relative to European hubs in providing links to these destinations.

35. A clear majority of respondents said that it was important to maintain domestic services into London airports, particularly Heathrow, in order to: attract foreign investment into the regions; improve local economies; provide vital connectivity to remote regions otherwise unserved, or poorly served by public transport links; and facilitate inbound tourism and visits to friends and relatives. A number commented that Public Service Obligations (PSOs) might be needed to achieve this.

36. However a number of respondents, from across the respondent groups, commented that domestic flights should be discontinued to congested airports, as should GA flights, to free up more slots for long haul travel.

37. There was no consensus on whether the Government should leave the route mix entirely to the market or intervene to incentivise the establishment of routes to emerging economies or reestablishment of domestic routes. Respondents within the same groups took different positions on this issue.

Alternatives to travel

38. The majority of respondents stated that while some aviation demand could be replaced by measures such as video conferencing, there would always be a need for business air travel to facilitate valuable face to face meetings. However several respondents, particularly environmental organisations and local community groups, cited the WWF report on alternatives to travel, which said that video conferencing could play a greater role for businesses and replace some domestic aviation demand.

Regional connectivity

39. This topic was addressed by 40 per cent of respondents. The most commonly addressed question was Question 17 - "Can regional airports absorb demand pressures due to constraints in the South East?".

Local economy

40.   There was general consensus that greater connectivity from airports across the UK to London and international hubs supported local economies. Examples were cited of improvements to local economies that could be directly related to the establishment of new international links (e.g. an Emirates route to Dubai set up from Newcastle Airport), and on the damaging impact to business of reducing connectivity.

Easing congestion in the south east

41.   A number of respondents, particularly from local councils and businesses in the regions said that there was scope to relieve demand pressure in the South East by creating mini-hubs at bigger airports like Manchester and Birmingham, facilitated by improved links into London via High Speed 2 (HS2). Some respondents said that Government's recognition of the role that airports in Northern Ireland, Scotland, Wales and regional airports in England could play in relieving capacity constraints in the South East, especially with HS2 in place, would further assist the economic development of these areas.

42.   However a number of respondents, mostly those based or headquartered in London, commented that there was limited scope for these airports to absorb demand from the South East because they had smaller catchment areas and passengers currently using South East airports were not willing to travel to them. Respondents felt that this was particularly true for the users of high value products (e.g. business class travel), high sales of which assisted in establishing route viability.

43.   Some respondents emphasised the role that airports outside the South East could play in supplying different types of hub connectivity; for example the fact that East Midlands airport acted as a freight hub, and that industry respondents felt that Government recognition of its importance in this regard would give confidence to foreign investors. Respondents from the freight industry noted that if freight hubs were to move offshore, this would slow delivery times and lead to a more expensive freight market for consumers and greater emissions from road travel.

44.   Similarly a number of respondents, particularly with interests in the local area, felt that it would be helpful to recognise Aberdeen airport as a specialist hub serving the oil and gas, and offshore renewables industry, and ensure that connections into London were retained. They felt that this would support the economy of Aberdeen and the surrounding region.

Charges

45. A large number of respondents, particularly from airports outside the South East, councils and businesses, called for the Government to look again at offering variable rates of APD and landing charges as an incentive for airlines to use airports in Northern Ireland, Scotland, Wales and regional airports in England. They stated that the current rates of APD combined with the introduction of the Emissions Trading System (ETS) were pricing out travel to and from these airports.

General aviation

46. GA respondents generally felt that GA helped make airports outside the South East viable. Some respondents said that Government support for airports to provide commercial air traffic should not come at the expense of GA, especially if restrictions were in place at congested airports like Heathrow.

47. Respondents from remote areas including airports and local businesses cited the value of GA, and helicopter flights, in providing essential connectivity in their areas.

Modal shift

48. There were several calls for Government to take a more integrated approach to the development and alignment of aviation and high speed rail strategies. Many respondents, from across the respondent groups, said that HS2 could offer no short term solution to relieving airport capacity constraints, due to the long development timescales (the London to Birmingham line is currently due to be completed in 2026).

49. There was broad consensus among respondents that although HS2 has the potential to replace some domestic aviation demand, it would not provide a complete solution to the capacity constraints in the South East. Several respondents cited the CCC's estimate[1] that HS2 could contribute to up to a 4% demand reduction in air travel if extended to Scotland, linked directly to Heathrow and joined up with High Speed 1 to provide direct links to Europe as the Government's strategy for high speed rail proposes, to put the value of HS2 into context.

50. Many organisations who responded felt that HS2 would complement domestic aviation rather than replace it, and that the modal shift achieved would be minimal unless further incentives were given to passengers to use rail.

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[1] "Meeting the UK Aviation target – options for reducing emissions to 2050 - December 2009"

51. It was generally felt by respondents across all groups: that passengers would not choose rail for journeys over 3-4 hours; that rail did not compete with domestic aviation on price for shorter journeys; and that more affordable tickets would be needed to incentivise modal shift. Some respondents also called for improved facilities e.g. offering check-in facilities at rail stations.

52. Some respondents, particularly environmental groups, suggested making domestic aviation less attractive to passengers in order to encourage modal shift. Suggestions for achieving this included raising air fares.

53. Several respondents, particularly major airports and airlines, commented that HS2 would only be of real benefit if it was linked directly into airports (especially Heathrow). This would improve convenience for passengers and allow Heathrow to compete with European hubs that offer integrated air-rail services e.g. Frankfurt. Some respondents suggested that code sharing between airports and high speed rail should be looked at to further improve the offer to passengers. They also thought that linking high speed rail directly into airports could attract passengers from outside London to fly from Heathrow rather than via EU hubs, benefiting the UK's economy.

54. Many respondents recognised the value that HS2 could provide in freeing up some slots at congested airports for long haul business routes. However, a number of respondents, from across the groups, pointed out that rail links would be of limited benefit to large parts of the aviation sector. This included flights connecting remote regions, and regions separated from the mainland such as Northern Ireland. A number of respondents called for domestic flights to these regions to be protected through mechanisms such as PSOs.

55. Freight industry respondents stressed that significant modal shift from air to rail was also not realistic for the express freight industry, due to the time pressured nature of its delivery model, and called for Government to recognise this in drawing up infrastructure investment plans so that the focus was not only on rail.

Making better use of existing capacity

56. This was the least commonly addressed section in the scoping document. It was addressed by 34 per cent of respondents.

Airport slots

57. Respondents were divided over whether the existing slot allocation mechanism was effective. Some, particularly environmental groups, local community groups and local Government, said that it needed

immediate reform. Suggestions included: a business case based approach which could include assessing the range of routes that an airline would provide; a fully market based, primary auction approach; or ensuring that a wider range of organisations was represented on slot allocation committees.

58. Others, particularly airlines, airports, regulatory bodies and unions, felt that the existing mechanism worked well as it provided for the allocation of scarce capacity at congested airports, while allowing airlines the flexibility to optimise their schedules. These respondents also felt that the mechanism ensured stability and gave airlines confidence in their investment plans. They felt that secondary trading had introduced sufficient competition to benefit consumers.

Air traffic management (ATM) improvements

59. A large number of respondents, from across the range of groups, stated that ATM improvements were essential, and represented the best way to make better use of existing capacity.

60. Examples of possible ATM improvements included: putting in place airport based measures such as collaborative decision making and operational freedoms at Heathrow; air traffic control measures such as minimising stacking and aircraft time on the ground through continual descent approach (CDA) and continuous climb departures (CCD); and wider air traffic management measures such as redesigning London airspace and allowing more direct routes through the Single European Sky project, and the CAA's Future Airspace Strategy.

Demand management

61. A limited number of respondents, particularly local community groups, addressed this point. Some felt that some demand management measures might be appropriate to restrict smaller aircraft from congested airports, or encourage people to use alternatives to air travel, but many of those who responded, particularly industry respondents, were not in favour of the measure as they felt it could distort competition.

Increased load factors

62. Some respondents suggested that capacity constraints could be addressed if airlines used larger planes with higher load factors; some suggesting that airlines could be taxed more aggressively for running aircraft with low load factors. However the majority felt that this measure would not be sufficient to address capacity constraints.

Climate change impacts

63. This topic was addressed by 39 per cent of respondents. Responses focused around the four broad areas outlined below.

Carbon dioxide emissions

64. A clear majority of respondents including airlines, airports and industry groups, as well as some local community groups and Local Government, supported the inclusion of aviation in the EU Emissions Trading Scheme (EU ETS) as a fair measure to tackle aviation's CO_2 emissions.

65. However several respondents commented that the impact of its introduction was yet to be proven. They felt that in its current form, EU ETS might not be sufficient to manage aviation's impact on CO_2 emissions, and may cause competitive distortion because it was not global. Some environmental groups and members of the public suggested that the measure did not go far enough and that the total number of flights needed to be reduced to meet UK climate change targets. However some industry respondents thought that the measure was unfair, particularly when combined with APD, as it resulted in a double tax on aviation.

66. Although some respondents, particularly environmental groups, supported a form of unilateral measure to meet climate change commitments, or a specific target for UK aviation emissions (e.g. the aviation 2050 target), the majority felt that unilateral targets were inappropriate to tackle a global problem; and that all targets should be set at a global level so as not to disadvantage the UK aviation sector. A number of respondents also felt that aviation should be set in the wider context of global cross-sector carbon reduction and strategies developed accordingly.

67. Some respondents, including airlines and local businesses, said that airlines were incentivised to reduce fuel burn by the high price of aviation fuel. The improvements in efficiency resulting from this constraint were judged by several respondents to be the most significant factor in improving the UK aviation sector's emissions performance.

Non-CO2 impacts

68. The majority of respondents who addressed this point felt that there was insufficient evidence on the impact of non-CO_2 emissions to take a decision on how to tackle the effects. However a number of respondents, particularly members of Sustainable Aviation, the industry organisation, pointed to progress being made, especially through Sustainable Aviation's road map for tackling emissions.

69. A large number of respondents from across the different groups also recommended that the Government should provide more support in the form of financial incentives, or R&D funding to address the impacts of emissions. Some felt that this should be directed towards research into technological advancements such as turboprop engines.

Biofuels

70. The majority of respondents across the aviation industry and local Government, were in favour of using biofuels as a source of aviation fuel, but only if sustainability concerns were addressed. A clear majority rejected the use of crop-based biofuels as a source of aviation fuel because of the indirect land use implications, namely: using land to grow crops for fuel instead of food, which leads to food shortages among local populations; and destruction of rainforests. Respondents were generally supportive of the use of 2nd generation biofuels, but several recognised that insufficient progress had been made for any kind of UK target to be set for aviation.

71. There were a number of calls from the aviation industry and local Government, for more Government funding to be made available for R&D projects on sustainable biofuel use.

72. Some respondents felt that development of aviation biofuels should be expedited, and financial incentives for use of sustainable biofuels in aviation should be set up. However others felt that biofuels would have a limited impact on the aviation sector, at least in the short-medium term and should not be treated as carbon neutral for ETS calculation purposes, as is currently the case.

Interaction with local impacts

73. A number of respondents called for the Government to give a clear steer on whether their priority was to minimise the impacts of noise or of climate change. Some felt that climate change should be prioritised as it is a global issue, and that solutions to tackle noise impacts should be developed to fit into that solution. However, significantly more respondents addressed questions on local impacts than climate change.

Local impacts

74. There was general consensus that noise was the most significant impact of aviation for people living near airports. 80 per cent of respondents addressed this topic in their scoping document response, making it the most frequently addressed topic by a considerable margin.

Noise targets and measurement (general)

75.   The majority of organisations who responded favoured concentration of noise to limit the total number of people disrupted by noise and avoid people being newly affected. There was a fairly even split amongst members of the public between those who favoured concentration of aircraft noise and those who favoured dispersal because they felt it would be fairer to limit the extent of the disruption to those affected, even if that meant affecting more people. Responses were in many cases influenced by where respondents lived: those who lived close to airports tended to favour dispersal to allow them some respite, while those not currently impacted by aviation noise favoured concentrating noise to avoid newly affecting any residents or employees in built up areas.

76.   Respondents in general supported the use of noise preferential routes (NPRs) in congested airspace, but had a number of suggestions as to how to improve them. These included: a full review of all NPRs to ensure they took into account recent developments; targeting arrivals rather than departures as arrivals cause more disturbance; and replacing the current routes with more direct routes to limit the impact of emissions. Some industry respondents called for Government to discourage building in defined noise contours.

77.   A number of respondents, particularly members of the public and local community groups, felt that the 57 db contour was not a good metric as the impacts of noise were significant, particularly around congested London airports and that airports should extend consultation exercises to a wider area. Several cited the WHO research on acceptable noise limits as more appropriate. There was no consensus on what measure would be appropriate although a number of respondents, particularly those based in the vicinity of London airports felt that L_{den} was a better measure than L_{eq}. Some also referenced the fact that European legislation was based on a 55 l_{den} limit, and it would be sensible for the UK Government to use the same, or a similar measure to reduce the noise measurement burden on airport operators.

Noise envelopes

78.   A clear majority of respondents agreed that a noise envelope could be beneficial, but the concept was generally not well understood by respondents. Some respondents, particularly local community groups, called for more clarity before confirming support for the idea. Others judged significant refinements to the idea to be necessary such as ensuring that the measure was flexible and that it took into account the number of people affected, the number of flights included and the geographical area covered.

79. Others stressed the need for a collaborative approach to developing such proposals and the need to give airports the flexibility to deliver local solutions that best met the needs of local communities. There were calls from a few respondents to streamline the noise targets in place and replace them all with a noise envelope structure that combined the effects of these measures.

80. A few respondents did not support the concept of a noise envelope in any form as they felt the priority was to limit disruption to those affected by reducing air traffic movements.

Noise impacts and mitigation

81. Some respondents, across the different groupings, felt that the Government should invest more in R&D to speed up the development of quieter engines as the best means to reduce noise disruption.

82. A significant number of respondents, particularly members of the public, referenced the CE Delft 2007 report on Traffic Noise Reduction in Europe[2], particularly highlighting the cited impacts of aircraft noise on health and children's learning. Some respondents called for an independent Government funded study into the health impacts, but many recognised that progress had been made in recent years in reducing noise disturbance.

83. There was no consensus on the issue of night noise. Some respondents, mostly members of the public living near flight paths and local councils, felt that the benefits of night flights were outweighed by the costs, particularly the lower levels of productivity in the workforce of businesses situated near the affected airports caused by lack of sleep.

84. However many respondents, mostly airlines, airports, industry groups and unions, while for the most part agreeing that noise should be limited at night, recognised the benefits that night flights bring to the economy through enabling the delivery model for the express freight industry, and making transferring at London appealing for long haul passengers. They considered that a more stringent night flying regime could drive passengers to use other EU hubs and damage the UK economy.

85. A number of respondents, across industry, local Government and local community groups, cited ATM improvements, such as further use of Continuous Climb Departures, as effective tools to reduce the noise impacts on local communities. Others were content with the current noise mitigation strategies in place, e.g. runway alternation at Heathrow and NPRs, because these measures offered a degree of certainty, and defined periods of respite.

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[2] http://www.transportenvironment.org/sites/default/files/media/2008-02_traffic_noise_ce_delft_report.pdf

86.   Some respondents felt that noise targets should be set at a local level to deliver solutions appropriate to local areas and enable the balanced approach to be implemented as appropriate for their areas. They thought that National Government should not play a part in setting these controls. However others felt that, given no natural incentive to airlines to provide quieter planes, there could be an oversight role for national Government or another body in ensuring that noise levels remained below acceptable limits.

Helicopter and light aircraft noise

87.   A number of respondents, particularly members of the public, had concerns over helicopter noise which they felt was particularly disruptive. Issues raised included the fact that helicopters are permitted to fly at low levels, closer to the ground and are under-regulated. Several respondents were also concerned by the lack of reference to the impacts of helicopter noise in the scoping document.

88.   Suggestions for tackling this included: providing more incentives for owners to replace older helicopters with newer models, which are more efficient and which have reduced levels of fuel burn making them more economical; defining higher flight paths for helicopters; setting up NPRs or noise envelopes for helicopters; and establishing clearer mechanisms for registering complaints about helicopter noise.

89.   A few respondents also noted the disruption caused by microlite and light aircraft noise.

Surface access

90.   A number of businesses called for improved surface access to airports in order better to address their connectivity needs. The environmental considerations of current surface access arrangements were raised as a concern by a number of non-industry respondents.

91.   The most frequently raised issues were: the impact that road transport to airports had on local pollution, both noise and emissions; and the traffic congestion on roads around airports. Some respondents felt that airports were not incentivised to deliver significant improvements in the percentage of passengers and employees accessing airports by public transport, because airports generated revenue through airport car park charges. However others cited examples of good practice where high public transport modal share targets had been achieved e.g. at Manchester airport, and most of the London Airports.

92.   "Kiss and Fly" was identified as a concern by some respondents, whereby passengers are dropped off and picked up at airports, doubling the number of private car trips. Other respondents pointed to poor rail links between airports and major cities surrounding them and

encouraged the Government to ensure that not all infrastructure development funds were directed at HS2 when connections to airports off the HS2 route needed improvement.

93. Some respondents called for better information to be made available to passengers on surface access options for travelling to and from airports.

Local engagement

94. A number of respondents did not feel that airports reflected a wide enough range of interests in their long term plans for surface access and airport development. Some respondents suggested that independent bodies, such as Local Enterprise Partnerships should have an oversight role on Airport Transport Forums (ATFs) so that surface access strategies reflected the needs of local employees and residents and were consistent with local transport plans. There were several calls for wider representation on all committees, and for ties into local planning organisations.

95. The structures in place including airport master plans, surface access strategies and noise action plans, and the committees that oversaw them including ATFs and Airport Consultative Committees, were generally felt to be the right ones. However some respondents felt that some of the functions could be more closely aligned, or combined with each other and with other arrangements – e.g. surface access strategies could be combined into masterplans, which already contain surface access sections. It was thought that this could minimise the consultative burden for local businesses and residents.

96. Some respondents called for the new framework to address the guidance gap left by the removal of PPG24 - Planning and Noise, when the Government's National Planning Policy Framework was published, and for the Aviation Policy Framework to provide clear guidance to those responsible for, or with an interest in planning.

97. On airport master plans in particular, the majority of respondents felt that they were an effective tool to assist airport planning, although some felt that they became outdated too quickly to be fully effective, and did not represent the views of all those impacted by the airport. The fact that they are not statutory documents, and targets are not enforceable, was also cited by some as a limit to their effectiveness.

Air quality

98. Very few respondents addressed this point. Those that did were mostly members of the public and local councils, and they requested that the Government take air quality considerations into account when taking decisions due to the health and irritation impacts of aircraft fumes.

Any other comments

99. Few respondents made comments that did not relate to the sections above. Comments that did not fall under other categories tended to reflect location specific concerns for example; Industry and local Government respondents from Northern Ireland called for a separate aviation strategy for Northern Ireland, or for Northern Ireland to be granted special status in the framework; Scottish businesses, airports and Government called for the UK to support Scotland's goal to develop more international routes; and Welsh Government and airports called for greater recognition and development of Cardiff airport. A number of respondents from the Stansted and Gatwick areas also called for safeguarded properties at Stansted and Gatwick to be relinquished and compensation provided.

100. A few respondents highlighted the need to take into account the risk of bird strike, and the impact of aviation on the natural environment and historical buildings, before any decisions are made over future airport capacity provision.

101. Others, particularly industry specialists, raised concerns over the lack of focus given to aviation safety and airport security in the scoping document; and the importance of recognising the benefits of Unmanned Aerial Vehicles e.g. in the fields of oil, gas and mineral exploration.

Annex A - List of respondents

Respondent Type	Name
Aerospace	Rolls Royce Plc
Aerospace	Royal Aeronautical Society
Aerospace	Aerospace, Defence & Security
Aerospace	Airbus
Aerospace	Raytheon
Aerospace	Boeing UK Ltd
Aerospace	UAV Systems Association
Airline	Ryanair
Airline	Singapore Airlines
Airline	Board of Airline Representatives UK
Airline	International Air Transport Association
Airline	British Air Transport Association
Airline	Jet Airways India
Airline	Virgin Atlantic
Airline	British Airways
Airline	Easyjet
Airline	London (Heathrow) Airline Consultative Committee
Airline	Cathay Pacific
Airline	Oman Air
Airline	Finnair
Airline	Thai Airways
Airline	Air Transport Association of America
Airline	Kuwait Airways
Airline	Flybe
Airline	SAS
Airline	Qantas Airways
Airline	All Nippon Airways
Airline	American Airlines
Airline	Oneworld Alliance
Airport	Gloucestershire Airport
Airport	Cardiff Airport
Airport	Aberdeen Airport
Airport	Edinburgh Airport (BAA)
Airport	Oxford Airport
Airport	Southampton International Airport (BAA)
Airport	London City Airport
Airport	London Southend Airport

Respondent Type	Name
Airport	Birmingham Airport
Airport	Manchester Airports Group
Airport	Airport Operators Association
Airport	Gatwick Airport
Airport	Heathrow Airport (BAA)
Airport	Stansted Airport (BAA)
Airport	London Luton Airport
Airport	Bristol Airport
Airport	Newcastle International Airport
Airport	Highlands and Islands Airports Ltd
Airport	Leeds Bradford International Airport
Airport	Peel Airports
Airport	Belfast City Airport
Airport	Belfast International Airport
Airport	Newquay Airport
Airport	Norwich Airport
Airport	Manston Airport
Airport	Glasgow Airport
Airport	London Luton Airport
Airport	Glasgow Prestwick Airport
Airport	City of Derry Airport
Airport Consultative Committee	Aberdeen Airport Consultative Committee
Airport Consultative Committee	Manchester Airport Consultative Committee
Airport Consultative Committee	Heathrow Airport Consultative Committee
Airport Consultative Committee	London City Airport Consultative Committee
Airport Consultative Committee	Gatwick Airport Consultative Committee
Airport Consultative Committee	Stansted Airport Consultative Committee
Airport Consultative Committee	London Luton Airport Consultative Committee
Airport Consultative Committee	UK Airport Consultative Committees
Devolved Administration	Department for Regional Development Northern Ireland
Devolved Administration	Scottish Government
Devolved Administration	Welsh Government
Embassy	British High Commission in Ottawa
Embassy	British Embassy - Bejing
Embassy	Singapore High Commission
Embassy	US Embassy - London
Embassy	Australian High Commission
Environmental Organisations	English Heritage

Respondent Type	Name
Environmental Organisations	AirportWatch
Environmental Organisations	Natural England
Environmental Organisations	Airfields Environment Trust
Environmental Organisations	Noise Abatement Society
Environmental Organisations	Biofuelwatch
Environmental Organisations	WWF
Environmental Organisations	Friends of the Earth
Environmental Organisations	Greenpeace
Environmental Organisations	Aviation Environment Federation
Environmental Organisations	Helicopter Noise Coalition
Environmental Organisations	National Trust
Environmental Organisations	Woodland Trust
Environmental Organisations	RSPB
Environmental Organisations	Campaign to Protect Rural England
Freight	DHL
Freight	UPS
Freight	Association of International Courier & Express Services
Freight	Fedex
Freight	Freight Transport Association
General / Business Aviation	British Microlight Aircraft Association
General / Business Aviation	General Aviation Awareness Council
General / Business Aviation	London Heliport Consultative Group
General / Business Aviation	The Air League
General / Business Aviation	General Aviation Alliance
General / Business Aviation	Farnborough Airport
General / Business Aviation	NetJets
General / Business Aviation	London Biggin Hill Airport
General / Business Aviation	Regional Airports Ltd
Local Community Group	Barnes Community Association
Local Community Group	Gatwick Area Conservation Campaign
Local Community Group	Residents of London Borough of Bromley
Local Community Group	Belfast City Airport Watch
Local Community Group	The Blackheath Society
Local Community Group	West Windsor Residents Association
Local Community Group	Heathrow Association for the Control of Aircraft Noise
Local Community Group	Dounreay Stakeholder Group
Local Community Group	Ealing Aircraft Noise Action Group
Local Community Group	Gatwick Anti-Noise Group
Local Community Group	Lydd Airport Action Group
Local Community Group	Oxfordshire CPRE
Local Community Group	The Ickleton Society
Local Community Group	Hever Castle Ltd
Local Community Group	The Chiltern Society

Respondent Type	Name
Local Community Group	Stop Stansted Expansion
Local Community Group	Luton & District Association for the Control of AN
Local Community Group	Chiltern Countryside Group
Local Community Group	Aberdeen Community Planning Partnership
Local Community Group	Ottershaw Society
Local Community Group	LLATVCC
Local Community Group	Lagan Valley Group Residents Association
Local Community Group	Clapham Transport User Group
Local Community Group	Ealing Fields Residents Association
Local Community Group	Richmond Heathrow Campaign
Local Community Group	Friends of Liverpool Airport
Local Community Group	Leicestershire CPRE
Local Community Group	Chobham Society - Fairoaks Representative
Local Community Group	The Roydon Society
Local Community Group	Birmingham Friends of the Earth
Local Community Group	Hampshire CPRE
Local Community Group	Plane Stupid / Cirencester People and Planet
Local Community Group	Gatwick Can Be Quieter
Local Community Group	Stop Expansion at Manchester Airport
Local Community Group	Knutsford and Mobberley Joint Action Group
Local Community Group	The Reigate Society
Local Community Group	Melbourne Civic Society
Local Community Group	Surrey Green Party
Local Community Group	Chilterns Conservation Board
Local Community Group	Wirral Transport Users Association
Local Community Group	People Against Intrusive Noise
Local Community Group	Friends of the North Kent Marshes
Local Government	Kent County Council
Local Government	Cuckfield Parish Council
Local Government	Tunbridge Wells Borough Council
Local Government	South Derbyshire District Council
Local Government	Rushmoor Borough Council
Local Government	Hatfield Heath Parish Council
Local Government	Aberdeen City Council
Local Government	Westerham Parish Council
Local Government	Epping Forest District Council
Local Government	Broadland District Council
Local Government	Cowden Parish Council
Local Government	West Midlands Planning and Transportation Sub-Committee

Respondent Type	Name
Local Government	East Sussex County Council
Local Government	Eastleigh Borough Council
Local Government	Stansted Mountfitchet Parish Council
Local Government	City of Edinburgh Council
Local Government	Hampshire County Council
Local Government	Edenbridge Town Council
Local Government	North Yorkshire County Council
Local Government	North Somerset Council
Local Government	Menston Parish Council
Local Government	Salfords & Sidlow Parish Council
Local Government	Ware Town Council
Local Government	Wandsworth Council
Local Government	Thanet District Council
Local Government	Lancashire County Council
Local Government	Leeds City Council
Local Government	Antrim Borough Council
Local Government	The Highland Council
Local Government	Much Hadham Parish Council
Local Government	Town and Country Planning Association
Local Government	City of London
Local Government	Middlesborough Council
Local Government	Camden Council
Local Government	Dundry Parish Council
Local Government	Parish Councils Airport Association
Local Government	Churchill Parish Council
Local Government	Greenwich Council
Local Government	Cleeve Parish Council
Local Government	Dorset County Council
Local Government	Wraxall and Failand Parish Council
Local Government	Horne Parish Council
Local Government	London Borough of Redbridge
Local Government	Brockley Parish Council
Local Government	London Borough of Waltham Forest
Local Government	Little Easton Parish Council
Local Government	Yatton Parish Council
Local Government	Charlwood Parish Council
Local Government	Solihull Metropolitan Borough Council
Local Government	Tilty Parish Meeting
Local Government	London Borough of Hillingdon
Local Government	London Borough of Hounslow
Local Government	2M Group
Local Government	Strategic Aviation Special Interest Group
Local Government	West Sussex County Council
Local Government	Essex County Council

Respondent Type	Name
Local Government	South East Strategic Leaders
Local Government	City of Westminister
Local Government	Norfolk County Council
Local Government	Chew Magna Parish Council
Local Government	Association of North East Councils
Local Government	London Borough of Bromley
Local Government	Luton Borough Council
Local Government	The Royal Borough of Windsor & Maidenhead
Local Government	Uttlesford District Council
Local Government	London Councils
Local Government	Planning Officers Society & ADEPT
Local Government	Surrey County Council
Local Government	Braughing Parish Council
Local Government	Broxted Parish Council
Local Government	Winford Parish Council
Local Government	Great Hallingbury Parish Council
Local Government	Transport Futures, Local Government Association
Local Government	Tees Valley Unlimited
Local Government	Little Hallingbury Parish Council
Local Government	Forest Row Parish Council
Local Government	Tower Hamlets Council
Local Government	Tandridge District Council
Local Government	Halton Borough Council
Local Government	Buckinghamshire Association of Local Councils
Local Government	London Borough Havering
Local Government	The Royal Borough of Kensington and Chelsea
Local Government	Tandridge Parish Council
Local Government	London Borough of Richmond on Thames
Local Government	Crawley Borough Council
Local Government	North Lincolnshire Council
Local Government	Local Authorities Aircraft Noise Council
Local Government	Reigate and Banstead Borough Council
Local Government	Old Windsor Parish Council
Local Government	Wirral Council
Local Government	Birchanger Parish Council
Local Government	Doncaster Metropolitan Council
Local Government	Wrington Parish Council
Local Government	South Ayrshire Council
Local Government	Takeley Borough Council

Respondent Type	Name
Local Government	Belfast City Council
Local Government	Fermanagh District Council
MP / Political Representative	Paul Maynard MP
MP / Political Representative	Tom Brake MP
MP / Political Representative	Tracey Crouch MP
MP / Political Representative	The Lord Noon Kt
MP / Political Representative	Mayor of London
MP / Political Representative	Victoria Borwick, Londonwide Assembly Member
MP / Political Representative	Paul Burstow MP
MP / Political Representative	Lady Hermon MP
MP / Political Representative	Councillor Tim Huxtable
MP / Political Representative	The Alliance Party of Northern Ireland
Other	Dr David Warnock-Smith
Other	Merseytravel
Other	Consumer Council Northern Ireland
Other	Caithness Partnership
Other	Unite
Other	Visit England
Other	NATS
Other	The Charlwood Society
Other	Guild of Air Pilots & Air Navigators
Other	The Chartered Institute of Logistics & Transport
Other	Nestrans
Other	British Air Line Pilots Association
Other	South East Scotland Transport Partnership
Other	The Highlands & Islands Transport Partnership (HITRANS)
Other	Future Airspace Strategy Industry Implementation Group
Other	Sustainable Aviation
Other	Irwin M Stelzer
Other	Regional Transport Partnerships
Other	States of Guernsey
Other	Howe Green House School
Other	States of Jersey
Other	Prof. Trevor Cox
Other	Heathrow Airport Scheduling Committee
Other	VisitBritain
Other	Manchester Metropolitan University
Other	Transport Planning Society
Other	Transport for Greater Manchester
Other	South Yorkshire Integrated Transport

Respondent Type	Name
	Authority
Other	Scottish Passenger Agents Association
Other	VisitScotland
Other	The Royal Academy of Engineering
Other	Airport Coordination Limited
Other	Demand Campaign
Other	ASTRAEA
Other Business	Big Pond Aviation
Other Business	Vivid Change Partnership
Other Business	Gatwick Diamond
Other Business	Scottish Enterprise
Other Business	Blue Skies
Other Business	Futter/Short/Taylor & Associates
Other Business	VanDerLande Industries
Other Business	Independent Aviation Advisory Group
Other Business	The Jersey Chamber of Commerce
Other Business	Pulford Media
Other Business	COGNITO
Other Business	Canary Wharf Contractors
Other Business	The Boisot Waters Cohen Partnership
Other Business	WYG Planning & Design
Other Business	Aberdeen City and Shire Economic Future
Other Business	West London Business
Other Business	Institute of Directors
Other Business	TUI Travel
Other Business	Confederation of Bristish Industry
Other Business	British Chambers of Commerce
Other Business	London Chamber of Commerce and Industry
Other Business	Shell
Other Business	London First
Other Business	Association of British Travel Agents
Other Business	Wharf Land Investments Ltd
Other Business	North East Chamber of Commerce
Other Business	Thomas Cook Group
Other Business	British Vehicle Rental and Leasing Association
Other Business	MSP Solutions Ltd
Other Business	Thames Reach Airport Ltd
Other Business	Doncaster Chamber of Commerce and Enterprise
Other Business	Birmingham Chamber of Commerce
Other Business	Institute of Directors Northern Ireland
Other Business	Foster & Partners and Halcrow

Respondent Type	Name
Other Business	North Eastern Local Enterprise Partnership
Other Business	Greater Manchester Chamber of Commerce
Other Business	Rothwell Airports Ltd
Other Business	JLS Consulting
Other Business	Liverpool Chamber of Commerce
Other Business	GE Aviation
Other Business	Assocation of Noise Consultants
Other Business	Heathrow Hub Ltd
Other Business	Highlands and Islands Enterprise
Other Business	Institution of Civil Engineers
Other Business	Interlinking Transit Solutions Ltd
Other Business	The Guild of Travel Management Companies
Other Business	Caribbean Tourism Organisation
Other Business	National Express
Other Business	Sheffield City Region LEP
Other Business	Knock Travels
Other Business	Scottish Council for Development and Industry
Other Business	Hull & Humber Chamber of Commerce
Regulator	CAA
Regulator	Environment Agency