

# Draft Aviation Policy Framework Consultation: Summary of Responses

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## Overview

The Government published a draft Aviation Policy Framework for consultation in July 2012. We sought views on the overall strategy set out in the draft Framework. Under specific chapter headings, we also asked for views on particular proposals where specific policy changes were proposed.

An online form was set up for responses and a dedicated email address ([aviation.policyframework@dft.gov.uk](mailto:aviation.policyframework@dft.gov.uk)) was also used, to which interested parties were invited to submit their responses. The consultation document was made available online, and respondents were also able to make their submissions to the Department by post.

The consultation closed on 31 October 2012. Responses were logged and read by an in-house aviation policy team, before being passed to a team of specially selected consultants from Hartley McMaster commissioned by the Department for Transport. 491 responses were received in total and all responses and evidence supplied were reviewed and summarised by Hartley McMaster, working closely with the Department for Transport. A breakdown by respondent type is included at Appendix A of the attached report.

We are grateful to all respondents for taking the time to respond to the draft Aviation Policy Framework consultation. 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. Many organisations have chosen to do this.

Hartley McMaster's report summarising the responses to the consultation is accompanied by a covering note from the Department for Transport. This includes some further information on particular areas of the Aviation Policy Framework where there was contention or a modification of our approach in the light of responses.

## Responses to the Draft Aviation Policy Framework Consultation: A Commentary from the Department for Transport

### Introduction

1. The Department for Transport welcomes the enclosed report summarising the responses to the Draft Aviation Policy Framework consultation. Policy officials in the Department logged and read the responses as they were received and worked closely with Hartley McMaster to agree an approach to summarising and analysing the responses. The Department is satisfied that their summary report is a good reflection of the views expressed in the consultation and is helpful in highlighting them in a clear and accessible way.
2. Transparency is one of the principles underpinning the Aviation Policy Framework. Consistent with this principle, the Government is publishing here a commentary to provide further information on some key points in the Framework.
3. This commentary is not intended to be a full account of the Government's conclusions or a complete description of how the policy set out in the Aviation Policy Framework was developed. Nor does it seek to reflect how each of the responses received and reflected in the summary document were taken into account in the decision making process. Rather, it is an information note aiming to explain the Government's rationale for the more significant, complex or contentious decisions or changes reflected in the final document.
4. Much of the content of the Aviation Policy Framework is similar to that of the draft version published for consultation in July 2012. This reflects the fact that many responses from individuals, the aviation and business communities, local authorities, residents groups and special interest groups raised similar points in the consultation to those raised in response to the Scoping Document.
5. The majority of the commentary below is on the issue of noise, which is also the issue on which we received the most responses.

### Chapter 1: Executive Summary

6. The majority of the content in the Executive Summary is unchanged from the consultative draft document. It outlines the Government's objectives on connectivity, climate change, noise, other local environmental matters and how airports work with their local communities. It summarises Government's other objectives on aviation which are important, but are not included in the APF: security, safety, airspace and regulation.



7. The most significant change is that the Executive Summary now refers to the Airports Commission, which was established by the Government in September 2012. This section summarises the Commission's terms of reference and explains how its work will interact with the Aviation Policy Framework. This chapter also sets out more explicitly the status of the Aviation Policy Framework in the planning process, as some consultation responses suggested that this was not clear.

## Chapter 2: Supporting Growth and the Benefits of Aviation

8. This chapter setting out the benefits of aviation. It discusses the importance of connectivity and the aviation sector itself to the UK economy. It is fuller and more assertive than the consultative draft version of the Aviation Policy Framework. This reflects both evidence received from the consultation and the Government's renewed focus on growth.
9. Some consultation responses offered evidence which has informed further detail on the value of connectivity and the UK aerospace and freight sectors. Some respondents were sceptical of the extent of the economic benefits of aviation. On the balance of evidence, however, it was considered that there is a strong case for the argument that aviation brings direct and indirect economic benefits, both at the local and national level. This is reflected in the Aviation Policy Framework.
10. The consultation sought views on extending fifth freedom rights, which already exist at airports outside the South East, to Gatwick, Stansted and Luton. Consultation responses showed broad support for this, as well as the proposal to offer bilateral partners unilateral open access to UK airports outside the South East. The Aviation Policy Framework confirms these as Government policy, subject to case by case consideration. Responses also showed support for the provision of US pre-clearance facilities at UK airports. The Aviation Policy Framework confirms that the Government will consider, with the US authorities and interested stakeholders in the UK, the feasibility of such facilities being made available in the UK, including the practical and legal issues that would need to be addressed.
11. Chapter Two of the Aviation Policy Framework reflects developments since the publication of the draft document in July 2012. These include the announcement of the northern 'Phase Two' route of the Government's high speed rail programme, HS2, the establishment of the independent Airports Commission and the revision of the Department for Transport's air passenger demand forecasts, which were published in January 2013.
12. The Draft Aviation Policy Framework referred to the Government's intention to issue a Call for Evidence on maintaining the UK's international aviation connectivity. In inviting responses to the Draft Aviation Policy Framework consultation, it was noted that the Call for Evidence would offer the

opportunity to comment on what, if any, new airport capacity may be required to meet the UK's needs in the medium and long term.

13. The Government's decision to set up the Airports Commission, led by Sir Howard Davies, to consider these questions removed the need for such a Call for Evidence. Chapter Two therefore refers to the Airports Commission in place of any Call for Evidence from Government. The Airports Commission has now begun its public dialogue and interested organisations and individuals are encouraged to engage with its work.
14. Many responses to the consultation referred to new airport capacity: either arguing for or against the need for it, or supporting or opposing any particular proposal. These comments were outside the scope of this consultation on the Draft Aviation Policy Framework. However, summaries of the points raised – excluding personal data, such as names of members of the public – have been passed to the Airports Commission's secretariat for information. The Commission may wish to take the views expressed and information provided into account as part of their work.
15. Some responses suggested that the latest air passenger demand forecasts should be included in the Aviation Policy Framework. As these have now been published, they are referred to in the Framework. Further details can be found at <http://www.gov.uk/government/publications/uk-aviation-forecasts-2013>.

### Chapter 3: Climate Change Impacts

16. Chapter 3 is largely similar to that of the consultative draft, setting out Government's emphasis on global action as the best means of making a significant and cost effective contribution towards reducing aviation's emissions, followed by action at the European level and then national action, where it is appropriate and justified in terms of the balance between benefits and costs.
17. Since the publication of the consultative draft Aviation Policy Framework, there have been two key developments in this area. Firstly, at the European level, the European Commission have proposed to 'stop the clock' on the international elements of the aviation Emissions Trading System for one year, reducing the scope to intra-European flights only during 2012. This temporary suspension is intended to provide the International Civil Aviation Organization (ICAO) with more time to make progress on reaching a global deal on aviation emissions. Secondly at the national level, the Government has confirmed that it will defer until 2016 the decision on whether to include international aviation (and international shipping) emissions in national carbon budgets, given the uncertainty around the direction of the aviation ETS.
18. Some consultation responses argued that this has weakened Government's strategy to deal with aviation's climate change impacts and some have called



for more action at a national level, such as a national emissions target for aviation. The arguments for and against a national aviation target were set out in the draft APF and these were reinforced by consultation responses. On balance, the Government has decided that, given the current uncertainty over the scale and shape of global action and the resulting long term design of the aviation EU ETS, this would not be the right time to re-examine the case for a national target.

19. Two additions were made to the climate change chapter, which aim to address some comments made in the consultation and highlight action that the aviation industry is taking to tackle and mitigate the impact of climate change. Firstly a case study has been added describing a biofuel plant, planned to open in London in 2015, which will generate jet fuel from waste. Secondly, there is a more comprehensive section on what some airports are doing to mitigate the impacts of climate change on their operations.
20. The consultation asked for further ideas on how Government could incentivise the aviation and aerospace sectors to improve the performance of aircraft. Many of the themes which came out of the consultation are things we are already doing; such as leading efforts to achieve a globally agreed solution, supporting R&D through tax relief and part funding specific projects and supporting action at a European level through EU ETS. The Aviation Policy Framework welcomes Sustainable Aviation's work and note that technologies can offer an alternative to travel in some cases.
21. As noted in the Aviation Policy Framework, a number of respondents suggested that jet fuel could be taxed to incentivise further emission reductions. The UK has international obligations in this area which include Air Service Agreements with over 150 different countries and the 1944 Chicago Convention. These agreements prohibit the taxation of international aviation fuel.

#### Chapter 4: Noise and other local environmental Impacts

22. Formerly the longest chapter in the consultative draft, the noise chapter has now been simplified and shortened. This section was necessarily descriptive in the consultative draft so as to help people to provide comments on what is a technically complex policy area. Noise was the most popular theme in responses to the consultation, the majority of which were from local residents expressing concern about the level of existing and / or future aircraft noise. The Aviation Policy Framework continues to acknowledge the importance of noise as the primary concern of local communities near airports, but stresses the need to balance these concerns with the economic benefits which aviation brings.
23. The Aviation Policy Framework confirms the existing high level policy objective on aviation noise, along with the current regulatory status of the noise designated airports. These positions were generally supported by the



consultation responses. Responses were, however, polarised on the question of whether to retain the 57 dB LAeq,16h contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance, and whether to map noise to a lower level at the designated airports. Generally, responses from the aviation sector and business organisations supported the status quo whereas local authorities, environmental groups and the public supported a move to lower levels.

24. The Government recognises that the lack of conclusive evidence on community responses to aircraft noise makes this a difficult area on which to make policy. It is clear that there is no consensus on the best way to measure the noise impacts of aviation. The Aviation Policy Framework confirms that we will maintain the existing policy on the onset of significant community annoyance and on mapping noise exposure at the designated airports. This will have the benefit of allowing noise exposure levels to be compared with historic trends at these airports. However, to facilitate improved monitoring, transparency and communication of the impact of aircraft noise, airports may wish to consider producing contours to a lower level or using other indicators as appropriate. Some responses called for separate night measures to monitor night noise exposure. The Government agrees that it would be useful to produce supplementary night contours on a regular basis and we will ensure that this is done in future for the three noise designated airports (see paragraph 47 on the cost implications of this).
25. Many responses called for the Government to carry out further research on the question of annoyance. The Airports Commission has recognised that there is no firm consensus on the way to measure the noise impacts of aviation and has stated that this is an issue on which it will carry out further detailed work and public engagement. We will keep our policy under review in the light of any new emerging evidence.
26. In a number of policy areas, the Aviation Policy Framework sets some high level principles whilst pointing towards further work which will be taken forward subsequently, either by the Department for Transport, its Aircraft Noise Management Advisory Committee, the Civil Aviation Authority (CAA) or the Airports Commission. These areas include noise envelopes, use of airspace, night restrictions at the noise designated airports, landing charges and the use of noise abatement procedures at the noise designated airports. The Government would expect to engage separately with stakeholders when developing any new policy proposals in these areas.
27. The consultation sought views on the circumstances in which it would be appropriate for Government to use regulatory powers in respect of penalties and noise monitors at noise designated airports. Responses on this were very mixed. The Aviation Policy Framework states that controls and the levels of penalties should be reviewed regularly in consultation with local communities and Consultative Committees, to ensure they remain effective. The Government is aware that some airports are already planning to review their penalties. The Department's Aircraft Noise Management Advisory Committee

is also planning to review the departure and arrivals noise abatement procedures at the noise designated airports, including noise limits and use of penalties. For these reasons, the Government does not see a need to exercise its regulatory powers at this time.

28. The consultation asked whether airports' compensation schemes were considered to be reasonable and proportionate. The majority of views expressed felt that they were not and the schemes should be more generous, either in scope or in the amounts offered. The Government is aware that some airports are already reviewing their compensation schemes and the Aviation Policy Framework confirms that where compensation schemes have been in place for many years and there are few properties still eligible for compensation, airport operators should review their schemes to ensure they remain reasonable and proportionate. It also restates and clarifies existing minimum thresholds. However, in line with its general policy on regulation, the Government does not believe it is appropriate to regulate airports on this matter.
29. The Aviation Policy Framework confirms the approach in the consultation draft on general aviation and helicopters. A number of responses suggested new regulatory or fiscal measures to tackle helicopter noise, particularly in light of concerns about helicopters in the London area. CAA data shows a declining trend of helicopter movements in London in the last six years, and the Government's view is that the evidence does not justify any new actions at this time.
30. The consultation document posed a further question on incentivising quieter planes. Responses to this included suggestions for increased Government funding for research and development, tax breaks and better use of variable landing charges. The Aviation Policy Framework encourages airports to consider differential landing charges and we await the CAA's study into these. Through the Aerospace Growth Partnership, on 18 March, industry and Government published a joint Aerospace Industrial Strategy. Central to the Strategy is an agreement to create an Aerospace Technology Institute (ATI), backed with a commitment of £2bn of joint Government and industry funding over the next seven years, which will provide an opportunity for the UK to gain a competitive edge by developing the key technologies to make aircraft quieter, more environmentally friendly and cheaper to manufacture and operate.
31. This will build on the creation of the UK Centre for Aerodynamics announced in 2012, which will now form part of the new ATI, and research already under way through the Government's £100m investment last year in a series of new project on aeroengines and aeronautics, which are leveraging an additional £80m investment by industry. Improvements enabled by the ATI are expected to lead to a reduction in CO2 emissions of more than 100 million tonnes each year from next generation aircraft - equivalent to taking 20 million cars off the road around the world. As with Air Passenger Duty (see



paragraph 39), tax is a matter for HM Treasury and is outside the scope of this document.

32. Responses to the consultation confirmed that, whilst important, air quality was not seen as such a significant local issue as noise. The Aviation Policy Framework confirms the approach in the consultation draft on tackling air quality around airports.
33. Many responses suggested that there would be merit in integrating noise regulation into a broader regulatory framework and some suggested giving greater enforcement powers to local authorities in respect of airports' local environmental obligations. However, whilst many favoured the principle of a broader regulatory framework, there was uncertainty about how these things would work in practice. Whilst noting these concerns about broader local impacts of airports, the Government does not see the benefit in making radical changes to the regime for regulating local environmental impacts at this time.

#### Chapter 5: Working Together

34. This chapter confirms the Government's objective to encourage the aviation industry and local stakeholders to strengthen and streamline the way in which they work together. It describes existing arrangements, as well as setting out ways to ensure better information provision e.g. through the Civil Aviation Act. The key points in this chapter were generally well supported in the consultation and few changes were made in the Aviation Policy Framework.
35. The consultation asked specifically whether Airport Consultative Committees (ACCs) should play a stronger role. This generally received a positive response. The Aviation Policy Framework confirms that we want ACCs to play a more effective role, within their current statutory remit. Various ideas were put forward, along with some concerns about powers and resources. The Government intends to take forward these detailed operational matters through its forthcoming review of guidance to ACCs.
36. The consultation also asked whether there was a case for changing the list of airports currently designated to provide consultative facilities. Consistent with its views on the use of regulation, set out in the executive summary of the Aviation Policy Framework, the Government sees no pressing need to add to the current list. The document makes clear that we do not see the absence of statutory designation to be a barrier to consultation, which should be a matter of good practice at airports of any size.
37. The consultation asked whether the CAA should have a role in providing independent oversight of airports' noise management. Although a majority of responses were in favour, there was a significant minority who considered that this role was not appropriate for the CAA, either because of perceptions that it was not genuinely independent of industry, or because of concerns



about duplication, complexity and costs. The Government believes that any addition of regulatory costs needs to be carefully justified. In light of these concerns, we will not pursue the proposal to give CAA any additional statutory role. However, the Aviation Policy Framework makes clear that we expect the CAA's new information functions to be potentially useful in ensuring airports publish appropriate environmental information. As mentioned in paragraph 5.23 of the consultation, it is possible that the proposed new European noise regulation, though still uncertain at this time, may in future require us to look again at the role of an independent competent authority for noise at UK airports.

## Chapter 6: Planning

38. The consultation did not include any specific questions on Chapter 6, as no new policy objectives or measures were proposed. However, some suggestions and views were submitted and these were considered by the Department for Transport. For example, it was suggested that Chapter Six could include more information on what elements of aviation and planning policy are reserved or devolved across the UK. This has now been included. There is also a more explicit reference to the status of the Aviation Policy Framework in the planning system, as some consultation responses suggested that this was not clear.

## Out of Scope Issues

39. Many responses offered information or views which were outside the scope of the consultation. The Department for Transport noted all such responses, which are referred to as 'non theme information' in Hartley McMaster's report. Only relevant views and information are included in the attached summary of responses. However, this commentary offers the opportunity to note common issues raised and seeks to explain why they were not addressed in the Aviation Policy Framework.

40. A variety of views were expressed on the issue of Air Passenger Duty. Some responses argued that it should be abolished, whereas others considered that it could be differentiated across the UK, in order to draw passengers away from the congested airports in the South East. As noted in the Aviation Policy Framework, Air Passenger Duty is a matter for HM Treasury and was outside the scope of the consultation. However, the Department for Transport noted the comments and information submitted. We will continue to work with HM Treasury who keep all taxes under review.

41. As noted above, many consultation responses argued for or against new airport capacity. While such comments were outside the scope of this consultation, they were noted and summaries have been passed to the Airports Commission.

42. A number of consultation responses raised concerns that air services to London from Northern Ireland, Scotland, and other English regions may be in danger of being squeezed out because of commercial pressures on airlines to operate more long-haul services, and suggested that the Aviation Policy Framework should include provision for the Government to ring-fence a proportion of Heathrow's slots for domestic UK services. European Union Regulations govern the allocation, transfer and exchange of slots at Heathrow and other slot co-ordinated airports in the UK. The Government has explored with the European Commission what scope exists to include further measures within the Commission's review of the slot Regulation to protect air connectivity between UK regions and congested London airports. However, it has proved difficult to devise a mechanism to protect well-trafficked, commercially viable air routes that doesn't distort the aviation market and competition across Europe.
43. Some consultation respondents expressed the view that the Aviation Policy Framework should include a section relating specifically to – or encouraging developments at - a particular airport, or airports in specific regions or larger parts of the UK. However, as explained in the draft consultation document, the Government's approach is to move away from the location-specific nature of the 2003 Air Transport White Paper. The intention of the Aviation Policy Framework is to set out the Government's high-level policy objectives and principles for UK aviation, and that these should be considered locally, right across the UK. In its work to examine how the UK can best maintain its international connectivity, the Airports Commission's terms of reference include that it should maintain a UK-wide perspective, taking appropriate account of the national, regional and local implications of any proposals for new airport capacity.

#### Impact Assessment

44. A pre-consultation Impact Assessment was produced for the draft Aviation Policy Framework as the proposals on which the Government consulted included a regulatory measure: a new role for the CAA in providing independent oversight of airports' noise management. Having considered the views and information put forward in the consultation, the decision was made not to include this measure in the Aviation Policy Framework. Consequently, there is no need for an Impact Assessment to accompany the final document. The relevant costs and benefits identified are outlined below.

#### Fifth Freedoms

45. During the consultation in 2012 respondents were asked to consider whether extending the UK's fifth freedom policy to Gatwick, Stansted and Luton is likely to attract new services and additional stop-over flights to these airports and whether it will deliver net benefits to the UK. As noted above, the responses received were generally supportive of the proposals.

46. Some of the main costs are expected to be:

- UK airlines may face some disbenefit as a result of increased competition from foreign competitors. This could particularly be the case for those that operate at Heathrow as their main base although they could operate these slots to different more profitable routes to mitigate this affect.
- Regional airports may face some increased competition as the extension could dilute the incentive behind the original regional policy to encourage their growth.
- Heathrow airport may face some disbenefit (a transfer to other airports) from increased competition from Gatwick, Stansted and Luton.

47. Some of the main benefits are expected to be:

- UK consumers could be the major beneficiaries from the cost and time savings brought about by the introduction of extra capacity and more convenient and frequent services.
- Extension of the existing regional fifth freedoms policy to Gatwick, Stansted and Luton Airports could enable these airports to compete more aggressively with Heathrow.
- An increase in competition from these other airports could reduce the price premium faced by consumers at Heathrow.

#### Noise Contours

48. The costs of producing LAeq, 8h night contours are £10-15k per annum with a central estimate of £12.5k per annum. The costs of producing annual noise contours at the noise designated airports are currently met by Government.

#### Conclusion

49. As noted above, the aim of this information note is to explain the Government's rationale for the more significant, complex or contentious decisions or changes reflected in the Aviation Policy Framework, following the consultation on the draft version. The Department for Transport is grateful to all those who took the time to respond to the draft Aviation Policy Framework consultation and welcomes the attached report summarising the themes expressed.

**March 2013**  
**Department for Transport**

**Hartley  
McMaster Ltd** 

**Project to  
Process and Analyse the Responses  
to the  
Draft Aviation Policy Framework Consultation**

**Summary Report**

**February 2013**

**DfT Draft Aviation Policy Framework, Summary Report - V2.0 Final**

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## 1. Introduction

### 1.1 Background

1.1.1. This document summarises HMCM's findings from our analysis of the responses to DfT's Draft Aviation Policy Framework consultation.

1.1.2. In total, DfT received 491 consultation responses, of which:

- 165 were responses to the online consultation questionnaire;
- 31 were in hardcopy form; and
- 295 were emails, each generally with a Word or PDF attachment.

See also Appendix A for a more detailed breakdown.

1.1.3. HMCM then:

- Allocated a respondent type (e.g. member of the public, local government organisation, airline.) to each respondent.
- Sorted the 295 email and 31 hardcopy responses (a total of 326) to identify those which:
  - Essentially followed the Q&A style sought by DfT at the outset of the DAFP consultation exercise. 227 responses (comprising 209 email plus 18 hard copy) fell into this category.
  - Did not match the Q&A style sought by the consultation. 99 responses (comprising 86 email and 18 hard copy) fell into this category.
  - Captured the key points within the 99 responses referred to above, and added these in with the non-question related comments from the other 392 responses. This resulted in an annex, almost 100 A4-pages in length, which recorded these key points and observations. This annex was then supplied DfT.
- Prepared charts to compare, by Question, the numbers of respondents expressing Agree/Yes vs. Disagree/No vs. Neither/Not Sure vs. Blank/No response, in total and by respondent type.
- Used manual techniques and analysis to identify and build (from the bottom-up) a list of the most frequently arising underlying themes within the responses to each of the questions.

1.1.4. The table below is provided to help understand the split of responses and their treatment within our analysis:

Nature of response	Format			Total
	Online	Email	Hard copy	
Directly related to at least one of the 31 questions. Such responses placed into Excel and the subject of bar and pie charts and thematic analysis.	165	209	18	<b>392</b>
Not directly related to any of the 31 questions. Such responses collated into an annex and supplied by HMCM to DfT.	0	86	13	<b>99</b>
<b>Total</b>	<b>165</b>	<b>295</b>	<b>31</b>	<b>491</b>

1.1.5. Thus, the consultation resulted in a structured set of 392 responses (out of 491) that addressed at least one of the 31 consultation questions. This is 79.8% of the respondents. The non-question related comments from the remaining 99 responses (20.2%) formed part of the 'Non-Question relevant comments' annex supplied to DfT.

1.1.6. Figure 1 below illustrates the process described above.

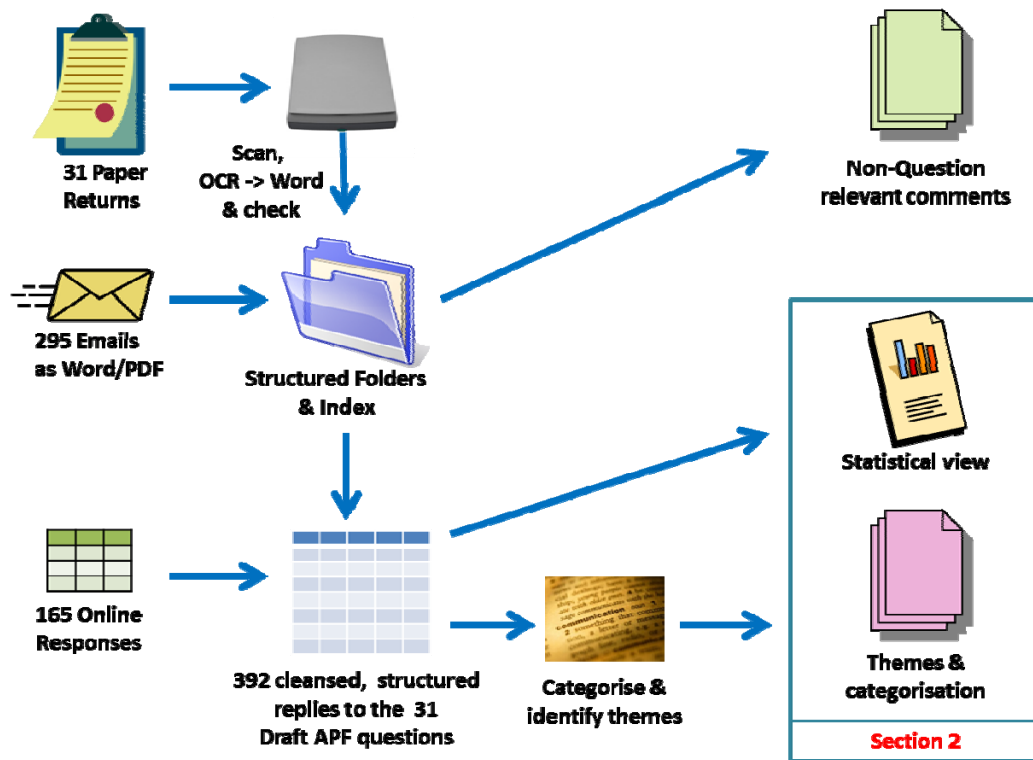


Figure 1: Overview of the method of analysis and the contents of this report

## 1.2 Structure of the analyses presented in this report

1.2.1. The analysis of each question takes a common form, and includes: Bar charts and Pie charts comparing totals of Yes/No/Neither or Agree/ Disagree/Neither (as appropriate), and breakdowns of opinion by Respondent Type, one as a Bar chart, and as a Pie chart for the members of the public response<sup>1</sup>. Some questions sought only opinion, and for those questions, such charts are not relevant.

1.2.2. All question analyses include a bullet point list of the commonly arising themes identified through our (bottom-up) analysis of responses received. Under each table of themes, we also present a table showing:

- Reading across, Themes made (T1, T2, T3 etc.) by Respondent Type; and
- Reading down a column, Theme contributors by Respondent Type.

For example (from Q25):

<sup>1</sup>We prepared a separate analysis of opinion by for the members of the public grouping because of their much greater number (181 vs. single digit / low twenties for the majority of the other respondent types). If included within the Bar graph showing opinion by respondent type, scaling of the data would have hidden some of the detail.



Respondent Type	T1	T2	T3	T4	T5	T6	T7	T8	Grand Total
(Chartered) Institute	0	0	0	1	0	0	0	1	2
Aerospace	1	1	1	0	1	0	0	0	4
Airline	1	0	1	2	0	0	0	0	4
Airport Consultative Committee	3	0	5	5	0	3	5	0	21
Airport outside London	2	13	3	3	1	1	0	0	23
Business Association	5	6	4	9	1	2	5	0	32
Environmental Organisation	5	0	1	3	4	0	0	3	16
Local Community Group	8	2	1	5	5	3	2	11	37
Local Government	23	10	14	19	13	8	6	6	99
London Airport	1	2	2	1	0	1	1	1	9
Member of the public	24	0	7	21	20	11	3	11	97
MP/Political Representative	1	0	0	2	2	0	0	0	5
Other Business	0	2	1	3	0	2	0	0	8
Political Party	0	1	0	1	0	0	0	0	2
<i>Regulator</i>	1	1	0	1	0	0	0	0	3
Surface Travel Representative	1	1	0	1	0	0	0	0	3
Trades Union	0	1	0	1	0	0	0	1	3
<b>Grand Total</b>	<b>76</b>	<b>40</b>	<b>40</b>	<b>78</b>	<b>47</b>	<b>31</b>	<b>22</b>	<b>34</b>	<b>368</b>

1.2.3. The numbers in such tables represent the number of responses which fell within the scope of each Theme. Some respondents made several observations in their responses and thus contributed to more than one theme per question. If however a particular response referred more than once to a particular theme, HMCM only counted it once.

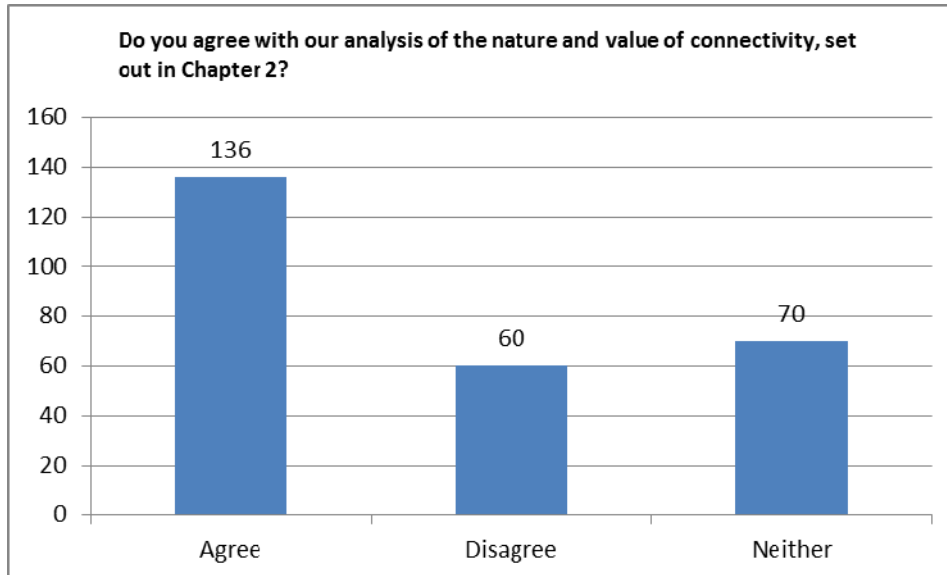
1.2.4. Thus, for example although there are only two regulators, one contributed to two Q25 themes (T1 & T2), and the other only contributed to one theme (T4). Thus, the total adds to three in the *Regulator* row. Note also that some respondents may not have contributed to any theme (generally, because the response was very brief (e.g. 'We agree') or because the response restated the question.

## 2. HMcM’s analysis of Chapters 2to 5 of the Draft APF

### 2.1 Question 1

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

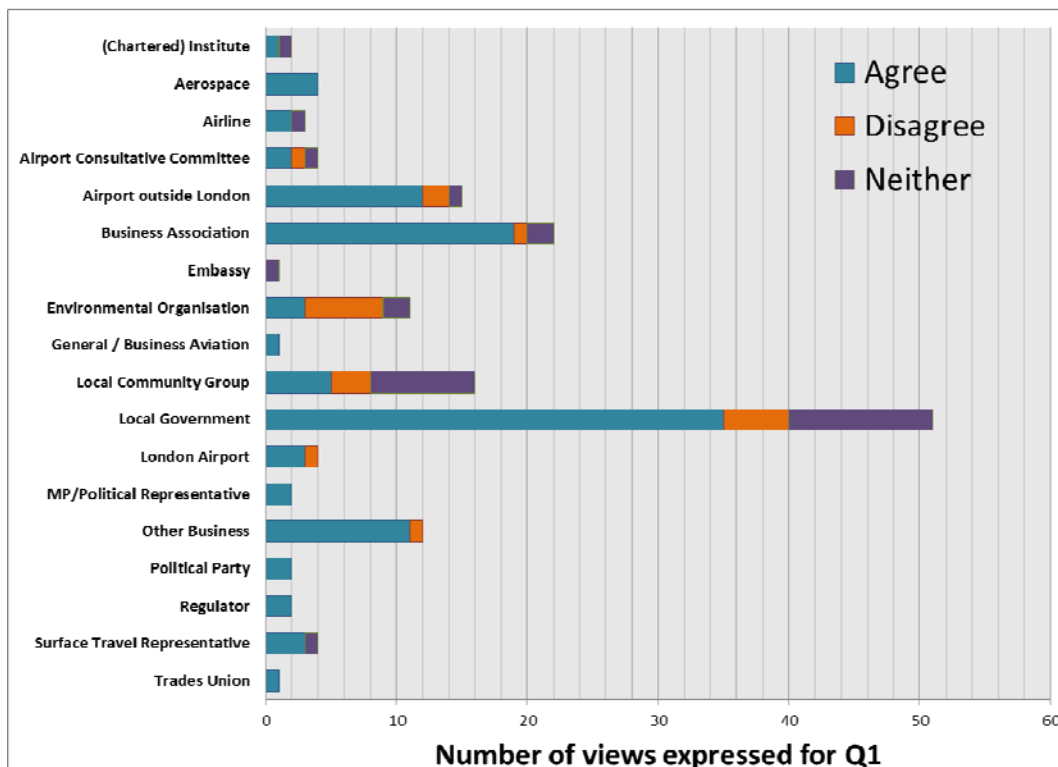
2.1.1. **The Statistical View.** Based on the data captured, the responses to the above question were:



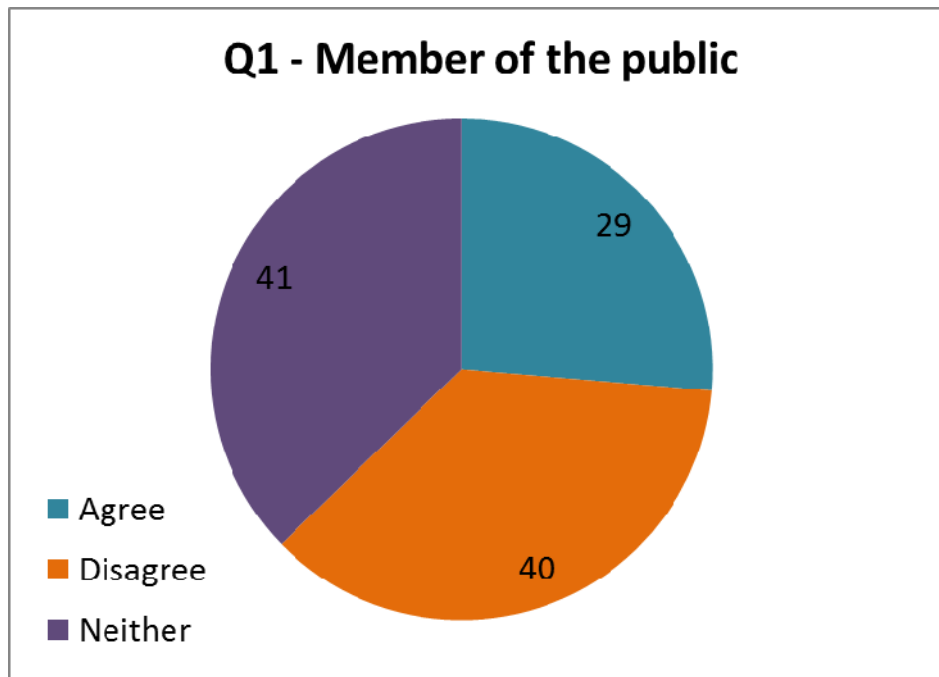
**Agree 51.1%**  
**Disagree 22.6%**  
**Neither 26.3%**

2.1.2. Overall, 266 of the 392 structured responses (67.9%) expressed an opinion to this question.

2.1.3. The responses to this question, by respondent type, (excluding members of the public, and ‘Blank,’) have the following distribution.



2.1.4. As noted for the reasons within the introduction to this report, the above bar chart excludes the responses from members of the public. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.1.5. **The Textual View.** In addition to the simple “Agree”, “No” and “simple to-the-point forms of expression for or against” etc., the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

- Theme 1: Improve the use of, or make tactical improvements to, existing transport facilities and infrastructure individually and collectively, and in addition, encourage modal changes and manage aviation demand (downwards). Some expressly called for an Integrated Transport Strategy.
- Theme 2: To what extent have the assumptions, financial values, and figures presented within the Draft APF been independently validated? Are they, and the conclusions drawn (e.g. the tourism deficit), auditable? (Both pro-aviation and anti-aviation bodies feel this is essential in order to demonstrate the validity of their cause.)
- Closely allied to Theme 2 is Theme 3: Further analysis of connectivity is required, for example by region, by passenger type, by industry/skill base, by destination etc.
- Theme 4: Regional connectivity is an important national asset and must be persevered and enhanced.
- Theme 5: Since the UK is already well connected, or has sufficient existing capacity, there is no need for hasty decisions, or (say some) no need at all, for new airport capacity. **There was a counter-argument that action is required now.**
- Theme 6: Connectivity is vital for the continued and future economic success of the UK. **There was a counter-argument that connectivity is not vital to the economy and other models or measures of success (rather than £) should be adopted as the fundamental objective to be realised by the DAFFP.**
- Theme 7: An important consideration of this policy should be to reduce noise (day and/or night) and the other adverse environmental impacts of aviation.



2.1.6. The table below shows the correspondence between the themes reported above, and the type of respondent. The table of themes also takes into account any 'Extra information / comment' sought by Q5 in relation to Chapter 2 of the Draft APF.

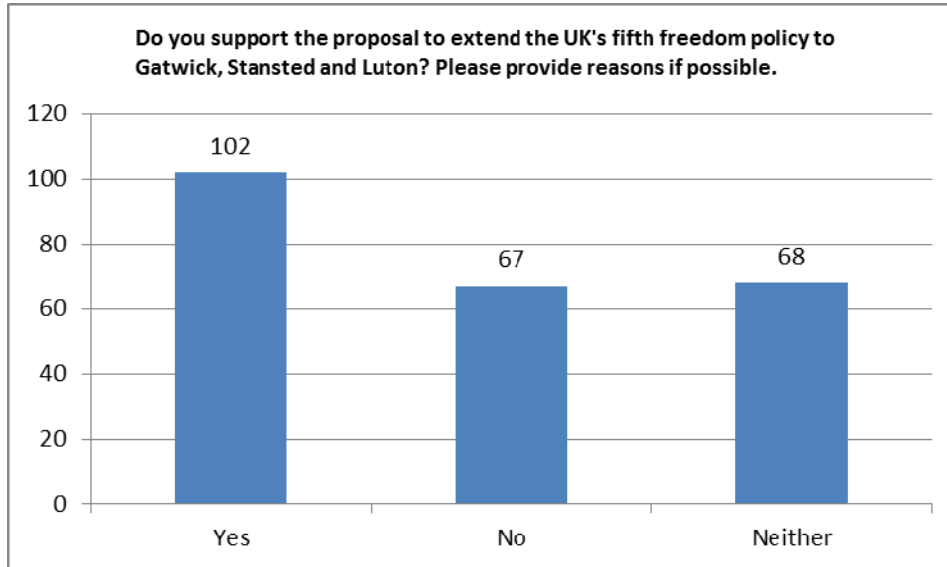
	T1	T2	T3	T4	T5	T5c	T6	T6c	T7	Grand Total
(Chartered) Institute	2			1			1			4
Aerospace	1	1							1	3
Airport Consultative Committee	3	1		2					1	7
Airport outside London	11	2	3	6	3		3			28
Business Association	13	4	5	6	1	2	5			36
Environmental Organisation	6	8	3		1			6	2	26
General / Business Aviation	1									1
Local Community Group	3	8	1	1	4		2		2	21
Local Government	24	13	5	14	6		7	1	7	77
London Airport	3					1	1			5
Member of the public	28	30		5	17	1	5	13	15	114
MP/Political Representative	1				1		1			3
Other Business	4		1	1			1			7
Political Party				1						1
Regulator	1									1
Surface Travel Representative	2	1		2					1	6
Trades Union	1			1		1				3
<b>Grand Total</b>	<b>104</b>	<b>68</b>	<b>18</b>	<b>40</b>	<b>33</b>	<b>5</b>	<b>26</b>	<b>20</b>	<b>29</b>	<b>343</b>



## 2.2 Question 2

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

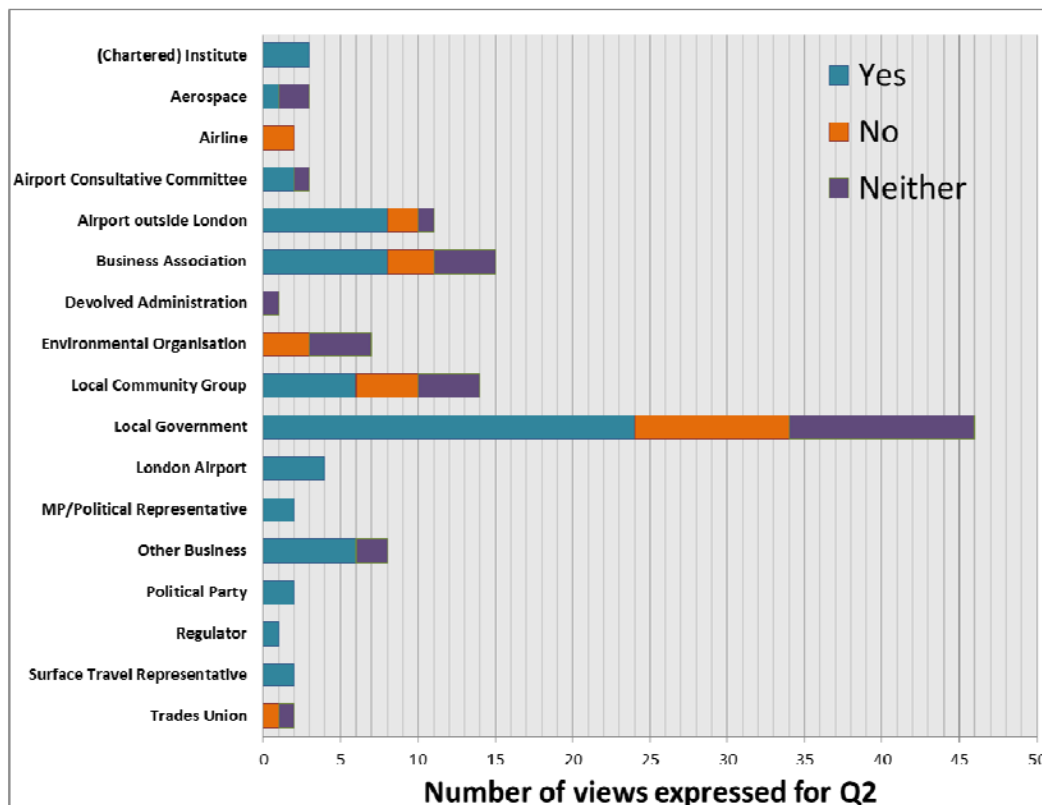
2.2.1. **The Statistical View.** Based on the data captured, the responses to the above question were:



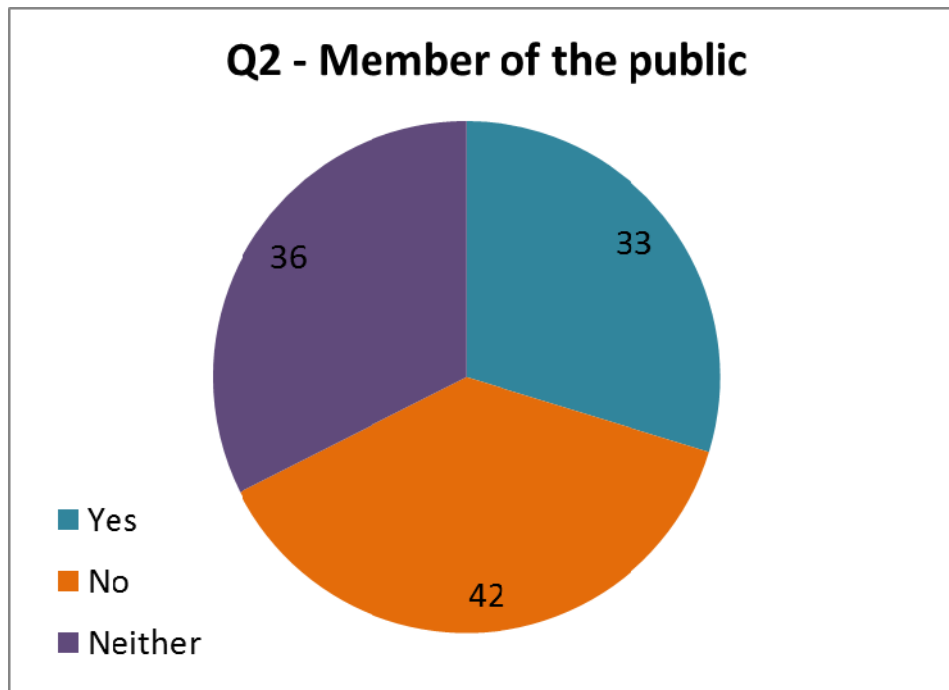
Yes 43.0%  
 No 28.3%  
 Neither 28.7%

2.2.2. Overall, 237 of the 392 structured responses (60.5%) expressed an opinion to this question.

2.2.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.



2.2.4. As noted for the reasons within the introduction to this report, the above bar chart excludes the responses from members of the public. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.2.5. **The Textual View.** In addition to the simple "Agree", "No" and "simple to-the-point forms of expression for/against," the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

- Theme 1: Extending fifth freedoms is to be welcomed, as it is consistent with using existing infrastructure better, and will encourage new routes.
- Theme 2: Further information is needed to demonstrate that this proposal will deliver worthwhile benefits, including the presentation of evidence that an unsatisfied demand exists for any extended fifth freedoms.
- Theme 3: Such extension risks increasing noise and/or other environmental damage at the airports for which such extension is granted.
- Theme 4: Extend fifth freedom rights to regional airports.
- Theme 5: Extension of fifth freedoms will increase competition and passenger choice.
- Theme 6: The UK must benefit from any extension through reciprocal arrangements, or through a proven economic and business case for the specific extended freedoms proposed.
- Theme 7: Such a change will, or has the potential to, be used to reduce the number of ATMs at Heathrow.
- Theme 8: Concern that extension will lead to increased environmental damage, including pressure to extend the airports with the new freedoms.



2.2.6. The table below shows the correspondence between the themes reported above, and the type of respondent. The table of themes also takes into account any 'Extra information / comment' sought by Q5 in relation to Chapter 2 of the Draft APF.

	T1	T2	T3	T4	T5	T6	T7	T8	Grand Total
(Chartered) Institute	2			1	1			1	5
Aerospace				1					1
Airline		1	1			2			4
Airport Consultative Committee	1	1			1	1			4
Airport outside London	3	4		6	1	2			16
Business Association	5	7		1	4	1			18
Devolved Administration		1							1
Environmental Organisation	1	2	2	1				1	7
Local Community Group	4	3	3	2	2		3		17
Local Government	16	19	15	6	6	7	5	2	76
London Airport	2	1			1				4
Member of the public	20	1	18	11	4	6	5	9	74
MP/Political Representative	1						1		2
Other Business	4	1		2	2	2	1		12
Political Party				1					1
Regulator	1	1			1				3
Surface Travel Representative				1	1		1		3
Trades Union	1			1					2
<b>Grand Total</b>	<b>61</b>	<b>42</b>	<b>39</b>	<b>34</b>	<b>24</b>	<b>21</b>	<b>16</b>	<b>13</b>	<b>250</b>



### 2.3 Question 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?

2.3.1. **The Statistical View.** Since this question is has no “Yes/No” aspect, the bar and Pie charts from e.g. Question 1 not apply. However, HMCM have provided an analysis of themes by respondent type below our textual analysis.

2.3.2. **The Textual View.** HMCM has established the following broad themes from analysis of the written material provided by respondents. In addition, note that some of the responses to Question 2 could have been made as responses to Question 3.

- Theme 1: There must be no unacceptably adverse effects, especially at night, to the local communities as a result of any extensions of fifth freedoms.
- Theme 2: There must be no adverse effect to the regional economies or regional capacity as a result of any extensions of fifth freedoms.
- Theme 3: There must be reciprocity.
- Theme 4: Any extensions of fifth freedoms must be granted on a case-by-case basis.
- Theme 5: There should be no expansion of the SE airports. As a minimum, further consultation is required to ascertain the views of the communities near Gatwick, Stansted, and Luton before considering fifth freedom (or any other) extension(s).
- Theme 6: What would then happen at Heathrow?

2.3.3. The table below shows the correspondence between the themes reported above, and the type of respondent. The table of themes also takes into account any ‘Extra information / comment’ sought by Q5 in relation to Chapter 2 of the Draft APF.

	T1	T2	T3	T4	T5	T6	Grand Total
(Chartered) Institute			1				1
Airline				1			1
Airport Consultative Committee	2	2		1			5
Airport outside London	1	5		1			7
Business Association	1	4	3	1	1		10
Devolved Administration		1					1
Environmental Organisation	2			1	1	1	5
Local Community Group	4		1			1	6
Local Government	20	3	4	4	1		32
London Airport			1				1
Member of the public	24	1	5	5	11		46
MP/Political Representative						1	1
Other Business		2	2	1	1	2	8
Trades Union	1	1		1			3
Surface Travel Representative					1		1
<b>Grand Total</b>	<b>55</b>	<b>19</b>	<b>17</b>	<b>16</b>	<b>16</b>	<b>5</b>	<b>128</b>

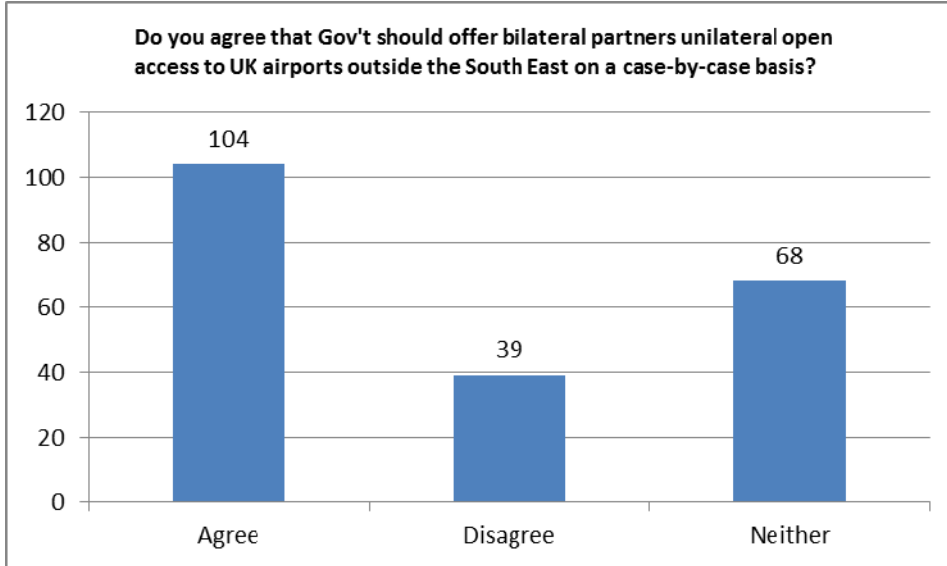




### 2.4 Question 4

Do you agree that Government should offer bilateral partners unilateral open access to UK airports outside the South East on a case-by-case basis?

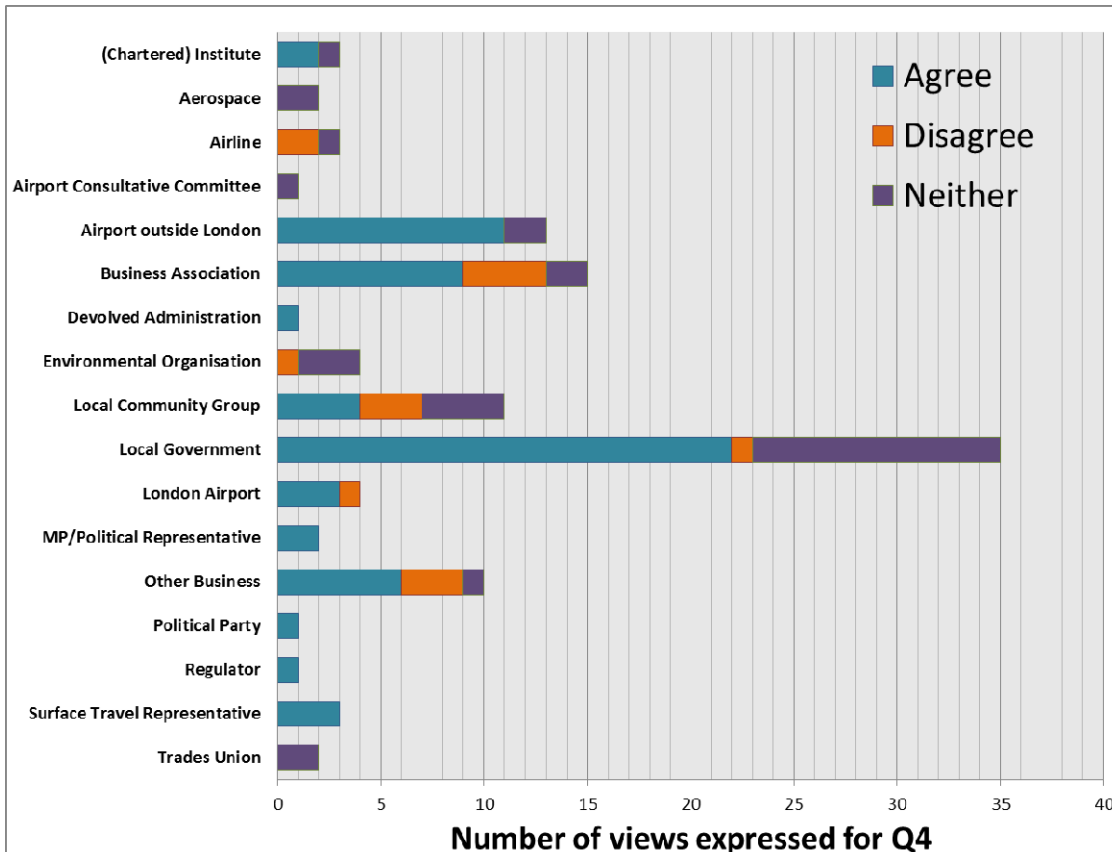
2.4.1. **The Statistical View.** Based on the data captured, the responses to the above question were:



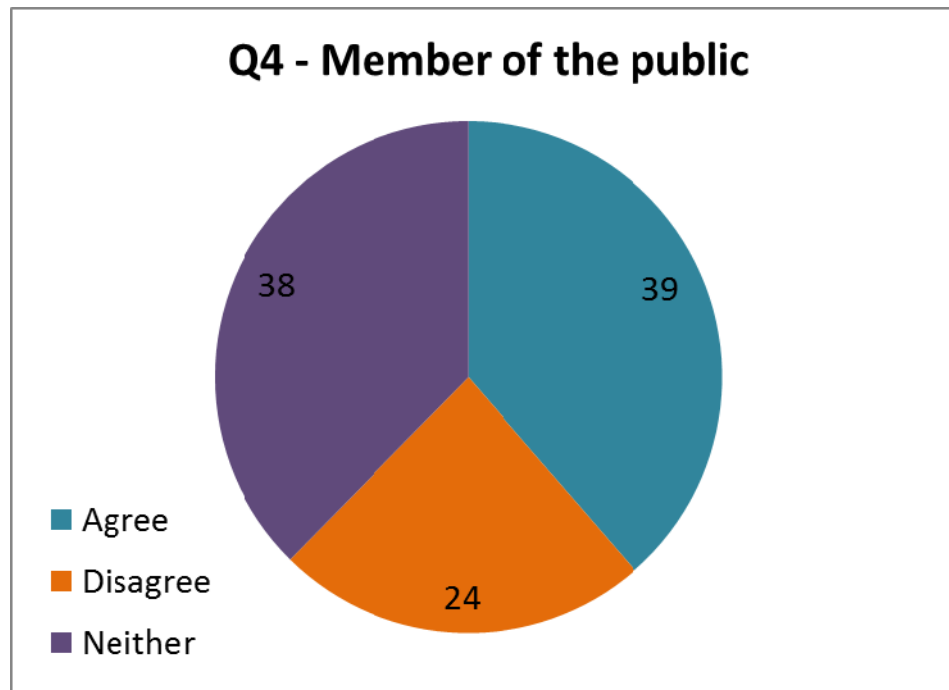
**Agree 49.3%**  
**Disagree 18.5%**  
**Neither 32.2%**

2.4.2. Overall, 211 of the 392 structured responses (53.8%) expressed an opinion to this question.

2.4.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.



2.4.4. As noted for the reasons within the introduction to this report, the above bar chart excludes the responses from members of the public. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.4.5. **The Textual View.** In addition to the simple “Agree”, “No” and “simple to-the-point forms of expression for/against,” the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

- Theme 1: Further, and more detailed, analysis is required in order to demonstrate the benefits described are worthwhile, and realisable.
- Theme 2: The benefits described are realisable.
- Theme 3: Generally in favour, and is consistent with the objective of using existing capacity and infrastructure better.
- Theme 4: Approval on a case-by-case basis is an important principle to be observed.
- Theme 5: Generally in favour, or at least neutral, but any change must not result in increased environmental damage, including noise.
- Theme 6: Believe the disadvantages of unilateral action will outweigh the benefits described.
- Theme 7: Offering unilateral provision is a bad negotiation tactic.
- Theme 8: Please consider offering such extensions to other airports too.



2.4.6. The table below shows the correspondence between the themes reported above, and the type of respondent. The table of themes also takes into account any 'Extra information / comment' sought by Q5 in relation to Chapter 2 of the Draft APF.

	T1	T2	T3	T4	T5	T6	T7	T8	Grand Total
(Chartered) Institute	1					1	1		3
Airline	2					1	1		4
Airport outside London	1	4	4	2				1	12
Business Association	5	2	2	4		3		1	17
Environmental Organisation				1	1				2
Local Community Group	1	1	1		2				5
Local Government	8	4	8	2	4	1	2	3	32
London Airport							1	1	2
Member of the public	4	5	3	5	7	2	1	1	28
MP/Political Representative	1	1							2
Other Business		3	1	1		2	1		8
Surface Travel Representative	1	1							2
Trades Union	1								1
<b>Grand Total</b>	<b>25</b>	<b>21</b>	<b>19</b>	<b>15</b>	<b>14</b>	<b>10</b>	<b>7</b>	<b>7</b>	<b>118</b>



## 2.5 Question 5

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

2.5.1. Many of the responses to this question could be categorised under themes already identified from the analyses of Questions 1 to 4. The analyses presented for those questions include any relevant comments to this Question 5. HMCM referred the non-theme information to DfT.

## 2.6 Question 6

**Do you have any further ideas on how Government could incentivise the aviation and aerospace sectors to improve the performance of aircraft with the aim of reducing emissions?**

2.6.1. **The Statistical View.** Since this question has no “Yes/No” aspect, the bar and Pie charts from e.g. Question 1 not apply. However, HMCM have provided an analysis of themes by respondent type below our textual analysis.

2.6.2. **The Textual View.** HMCM has established the following broad themes from analysis of the written material provided by respondents.

- Theme 1: Tax aviation fuel to incentivise a reduction in emissions.
- Theme 2: Support the European Union Emissions Trading Scheme (EU ETS), (*with some being against*).
- Theme 3: Support the Sustainable Aviation Group.
- Theme 4: Adopt ICAO and IATA Recommendations.
- Theme 5: Support research and development.
- Theme 6: Aviation should be included within the carbon budgets.
- Theme 7: Aviation taxes should be linked to aircraft emissions including noise.
- Theme 8: Biofuels (some being for, *others being against*)
- Theme 9: There should be a globally agreed solution.
- Theme 10: Agreement that alternatives to air-travel, such as video conferencing, should be encouraged.
- Theme 11: Force the aviation industry to cut emissions to their 2005 levels.

2.6.3. The table below shows the correspondence between the themes reported above, and the type of respondent.

	T1	T2	T2c	T3	T4	T5	T6	T7	T8	T8c	T9	T10	T11	Grand Total
(Chartered) Institute		1			2									3
Aerospace				1	2	1			1					5
Airline		1	1		1				2					5
Airport outside London		9		3	1	3			3		6			25
Business Association		5	3	2	5	1	1	1			4	2	1	25
Embassy					1									1
Environmental Org.	2	1	1		1	1	3	1	1		1	1		13
Local Community Group	3	2	1				4		1	2		1	2	16
Local Government	4	6	1	2	1		16	2	4	3	3	3	1	46
London Airport		2		2		1	1		1		2		1	10
Member of the public	18	7	6				10	6	1	3		6	8	65
MP/Political Rep.		1					1							2
Other Business		1	2		1	2				1	2			9
Regulator		1		1	1	1	1							5
Surface Travel Rep	1	1										1		3
Trades Union									1					1
<b>Grand Total</b>	<b>28</b>	<b>38</b>	<b>15</b>	<b>11</b>	<b>16</b>	<b>10</b>	<b>37</b>	<b>10</b>	<b>15</b>	<b>9</b>	<b>18</b>	<b>14</b>	<b>13</b>	<b>234</b>



**2.7 Question 7**

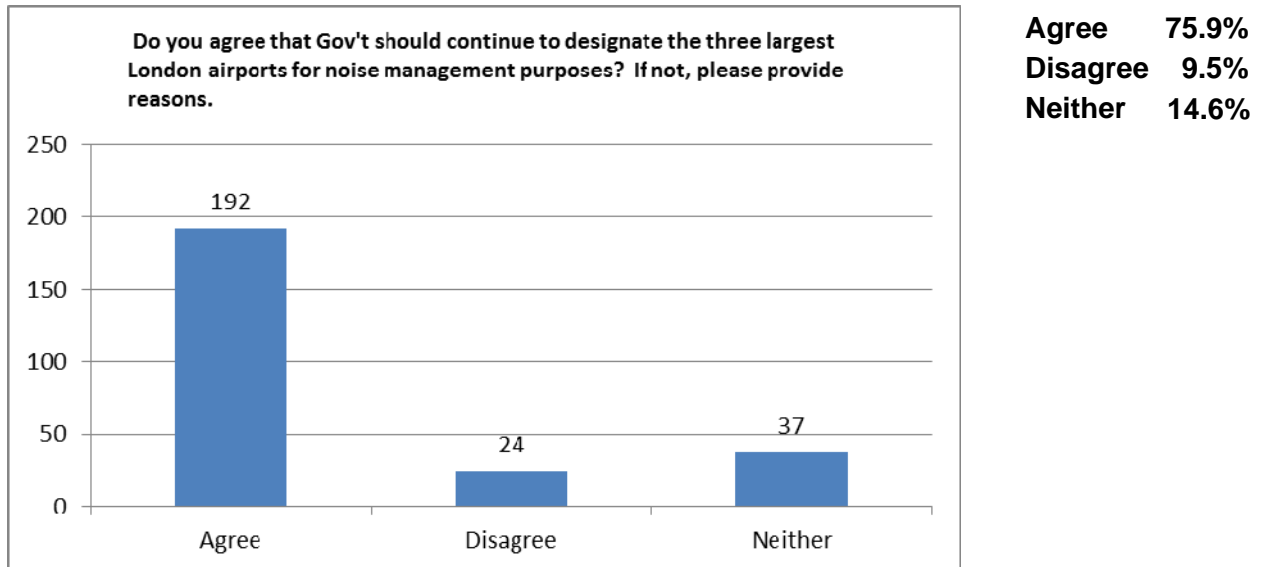
**Do you have any other comments on the approach and evidence set out in Chapter 3?**

2.7.1. The analysis at Q6 takes into account any comments made in relation to this Q7. HMCM referred the non-theme information to DfT.

**2.8 Question 8**

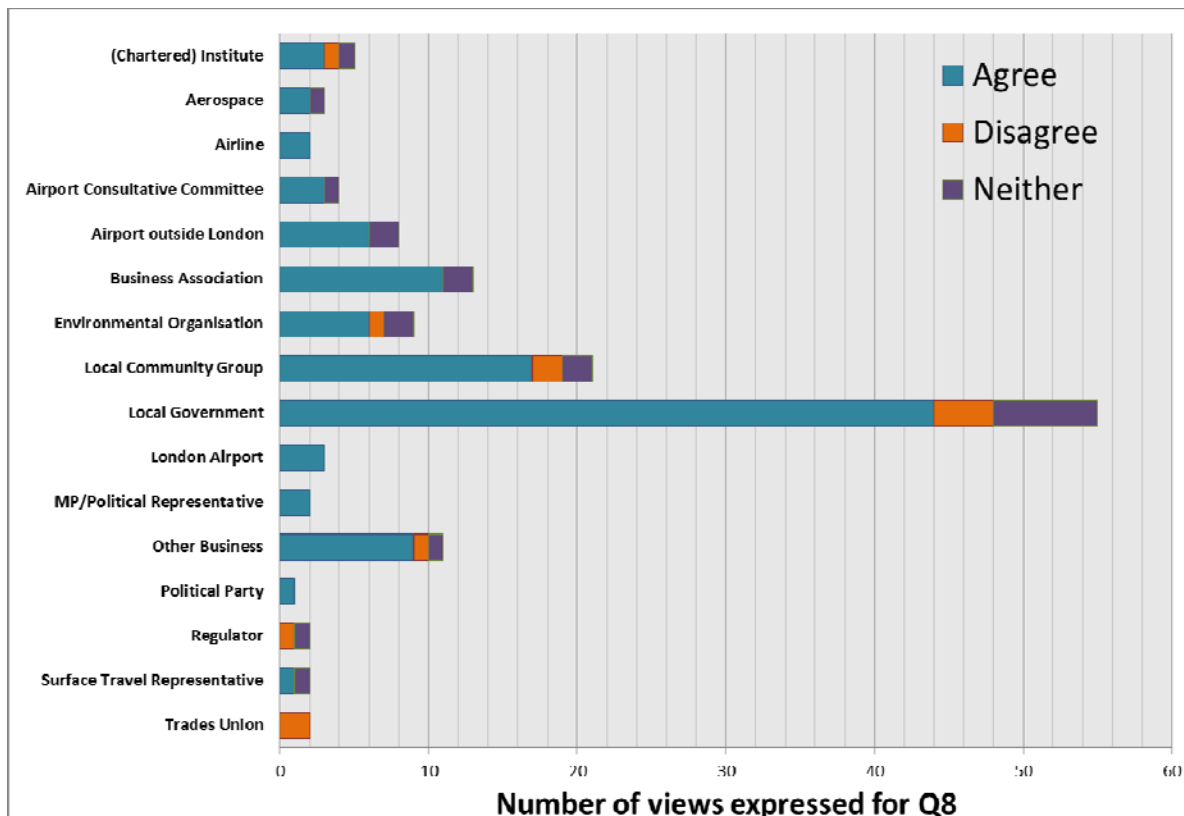
Do you agree that the Government should continue to designate the three largest London airports for noise management purposes? If not, please provide reasons.

2.8.1. **The Statistical View.** Based on the data captured by the consultation, the responses to the above question were:

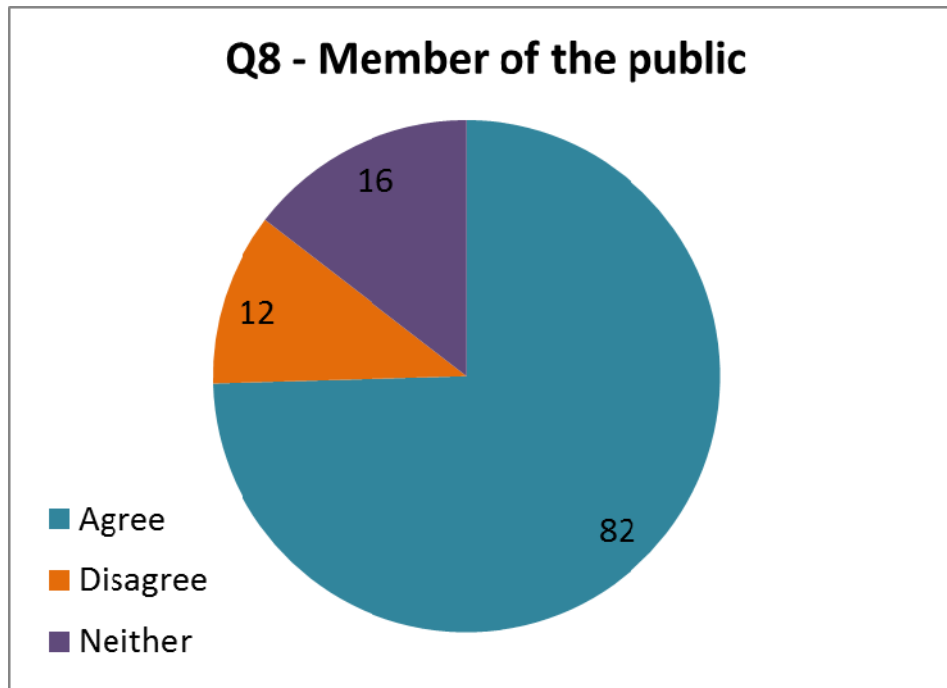


2.8.2. Overall, 253 of the 392 structured responses (64.5%) expressed an opinion to this question.

2.8.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.



2.8.4. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.8.5. **The Textual View.** In addition to the simple “Agree”, “No” and simple to-the-point forms of expression for/against, the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

- Theme 1: That designation should be extended beyond the three largest London airports (e.g. based upon the number of ATMs or their night noise level of operation).
- Theme 2: That continued designation would help to maintain an (independent) balance between the vested interests and priorities of stakeholders. See also Q8 Theme 6 below, which is allied to this theme.
- Theme 3: That the restrictions associated with designation were insufficient and needed to be extended. Some respondents suggested the use of European Standards would be of benefit in this regard.
- Theme 4: That Local Authorities were not either (currently) skilled or funded or otherwise equipped (e.g. to balance local vs. national priorities) to take on the tasks and responsibilities associated with designation if Government were to de-designate. (Some cited Luton Airport as an example of the Local Authority acting as owner and enforcer.) **There was a counter-argument that Local Authorities knew (or should know) the issues and needs of residents better than a Central Government Department or Agency, and thus a more effective regulator. Some (44, 152 and 376) explicitly call for de-designation of Stansted/Gatwick.**
- Theme 5: That whilst designation was, in general, to be welcomed, it should not preclude or prevent additional local enhancements, and to enforce a one-size fits all would be a mistake.
- Theme 6: A consistent, apolitical, and independent noise management framework is needed, with a means of arbitration in case of disputes, at all airports. See also Q8 Theme 2 above, which is allied to this theme.





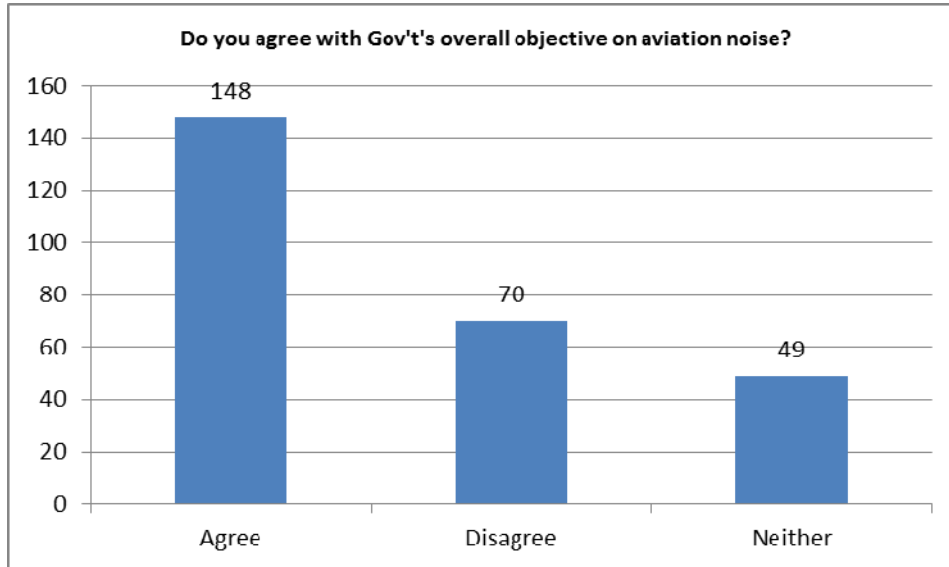
2.8.6. The table below shows the correspondence between the themes reported above, and the type of respondent.

	T1	T2	T3	T4	T4c	T5	T6	Grand Total
(Chartered) Institute	1	1		1	2		3	8
Airline						1	1	2
Airport Consultative Committee						2		2
Airport outside London		2				1	1	4
Business Association	1	2		2	1	2	2	10
Environmental Organisation	3	1	2	2			2	10
Local Community Group	3	1		6		1	6	17
Local Government	12	12	6	7	3	4	5	49
London Airport		2		2		1		5
Member of the public	20	9	3	6	1	1	3	43
MP/Political Representative							1	1
Other Business	1	3		2		1		7
Trades Union	2							2
<b>Grand Total</b>	<b>43</b>	<b>33</b>	<b>11</b>	<b>28</b>	<b>7</b>	<b>14</b>	<b>24</b>	<b>160</b>

**2.9 Question 9**

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

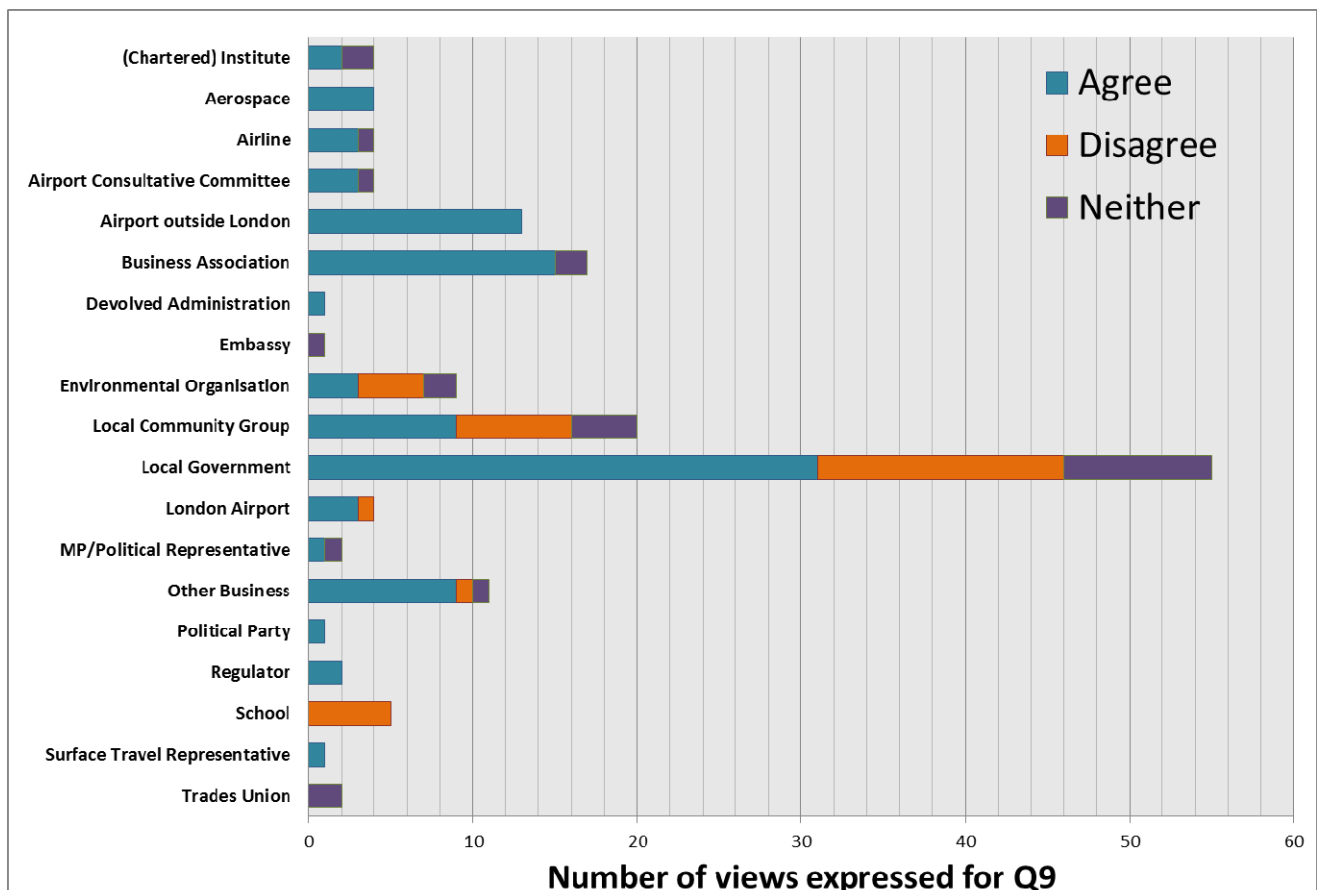
2.9.1. **The Statistical View.** Based on the data captured by the consultation, the responses to the above question were:



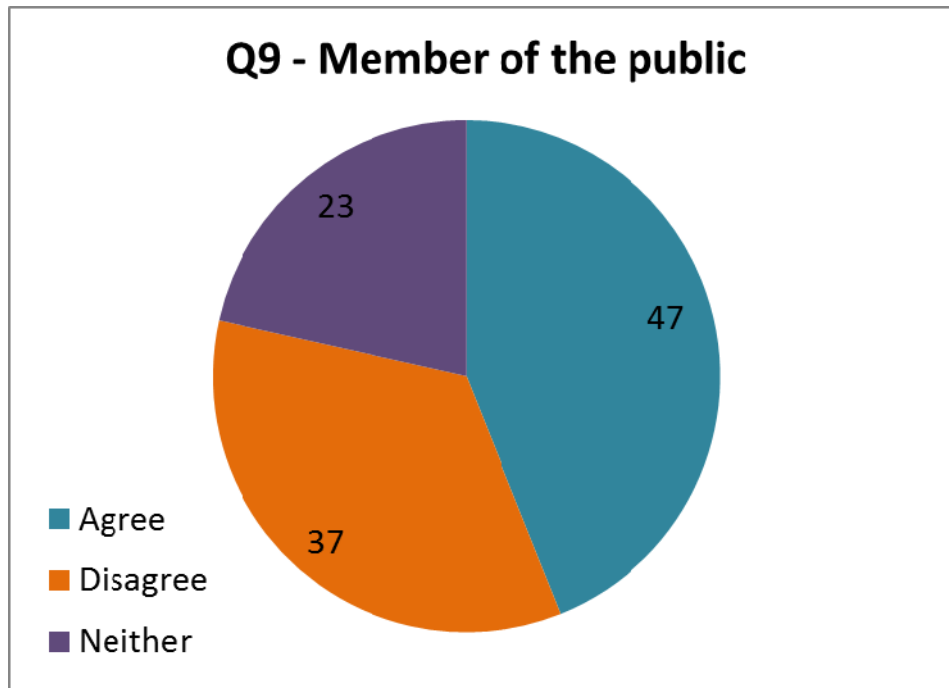
**Agree 55.4%**  
**Disagree 26.2%**  
**Neither 18.4%**

2.9.2. Overall, 267 of the 392 structured responses (68.1%) expressed an opinion to this question.

2.9.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.



2.9.4. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.9.5. **The Textual View.** In addition to the simple "Agree", "No" and simple to-the-point forms of expression for/against, the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

- Theme 1: The objective needs to be more demanding.
- Theme 2: That the objective did not or would not address the issue of noise or the impact of noise.
- Theme 3: That generally in agreement, the objective meant nothing if not, and seen to be, enforced.
- Theme 4: That if realised, the objective may result in unwanted or unexpected outcomes. A balance is therefore required to avoid this.
- Theme 5: That the objective was unclear or needed tighter wording.
- Theme 6: Greater alignment is required, (particularly with land use planning policies).

2.9.6. There are five other groups of observations that DfT may wish to note:

- The need to protect tranquil areas should be addressed by the more detailed objective.
- The need to protect schools and other sensitive building e.g. hospitals from the impact of airport noise (but see below under Other Matters).
- The importance of permitting local adaptation rather than a "one-size for all."
- Traffic travelling to/from airports is a source of noise for DfT also to consider.
- Airlines prefer common standards.



2.9.7. The table below shows the correspondence between the themes reported above, and the type of respondent.

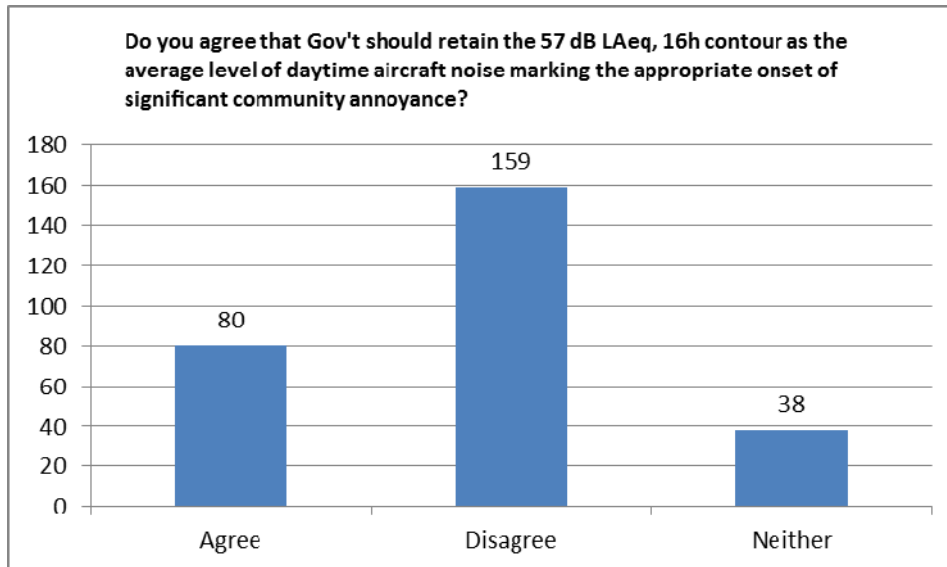
	T1	T2	T3	T4	T5	T6	Grand Total
(Chartered) Institute			1	4	1		6
Aerospace				1		2	3
Airline				2		2	4
Airport Consultative Committee			2			1	3
Airport outside London			1	3	1	3	8
Business Association		1		6		2	9
Devolved Administration					1		1
Embassy				1			1
Environmental Organisation	2		1		2	1	6
Local Community Group	6	2	2	3	2	1	16
Local Government	12	1	6	7	3	6	35
London Airport				1		3	4
Member of the public	24	11	11	5	5		56
MP/Political Representative						1	1
Other Business	1	2	1	5	1		10
Regulator	1				1		2
School	1						1
Surface Travel Representative			1				1
Trades Union		1		1			2
<b>Grand Total</b>	<b>47</b>	<b>18</b>	<b>26</b>	<b>39</b>	<b>17</b>	<b>22</b>	<b>169</b>



### 2.10 Question 10

Do you agree that the Government should retain the 57 dB L<sub>Aeq, 16h</sub> contour as the average level of daytime aircraft noise marking the appropriate onset of significant community annoyance?

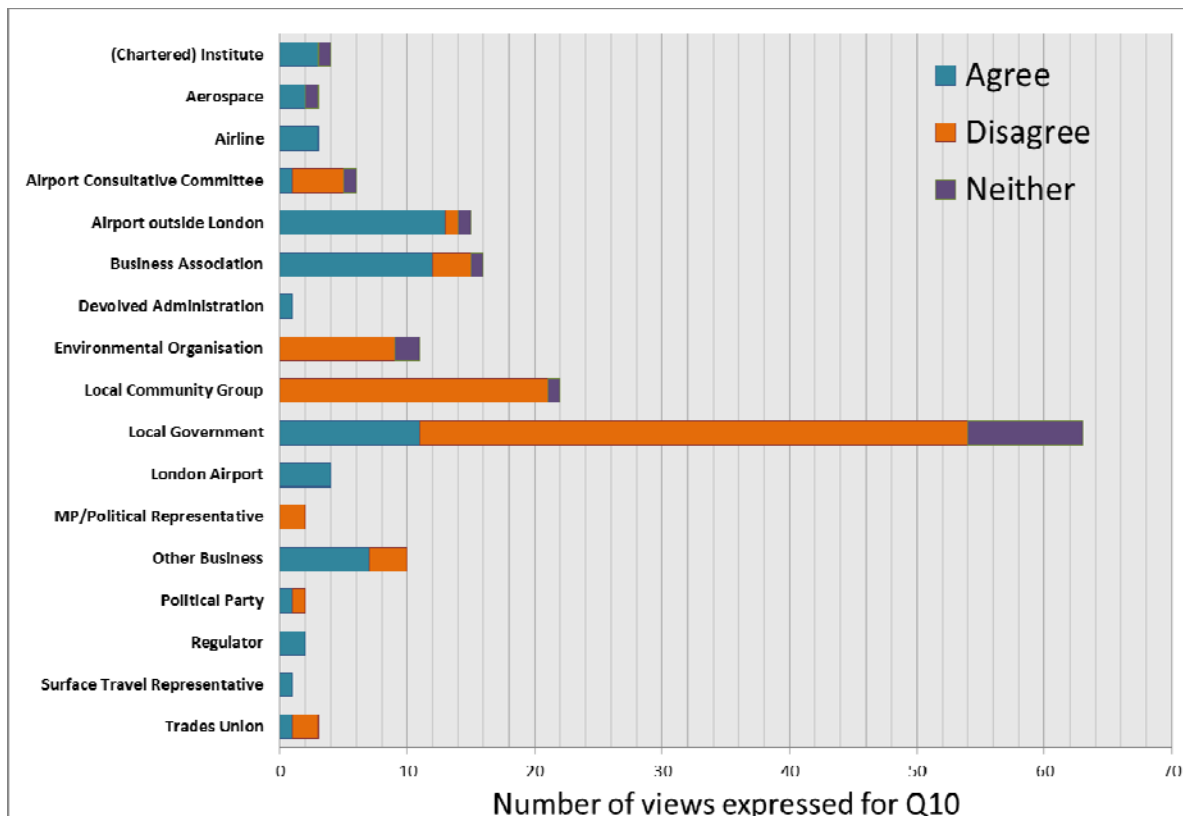
2.10.1. The Statistical View. Based on the data captured by the consultation, the responses to the above question were:



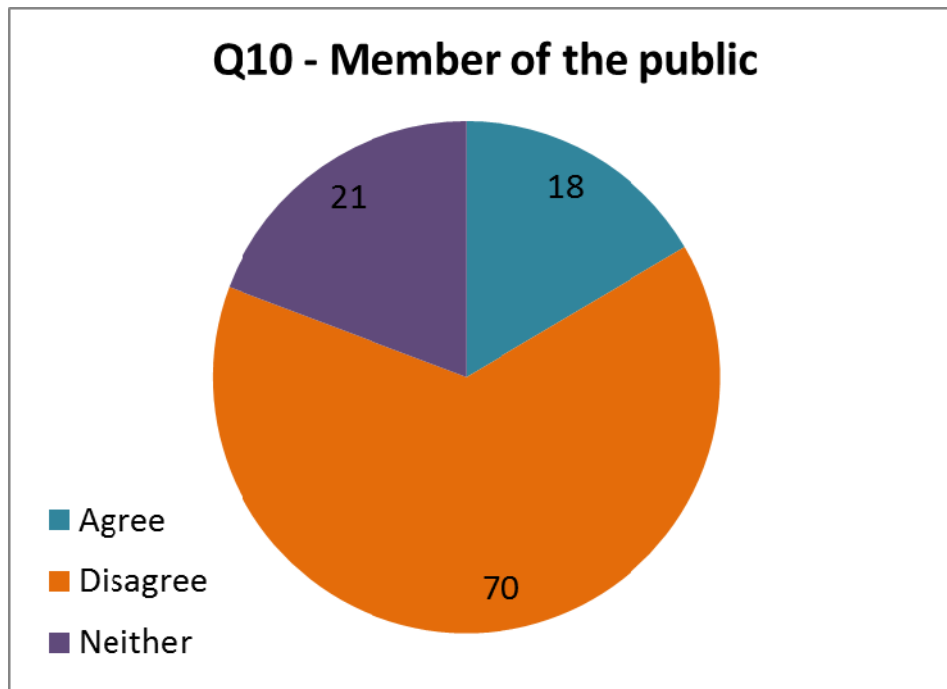
Agree	28.9%
Disagree	57.4%
Neither	13.7%

2.10.2. Overall, 277 of the 392 structured responses (70.7%) expressed an opinion to this question. This was the most commonly answered question

2.10.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.



2.10.4. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.10.5. **The Textual View.** In addition to the simple “Agree”, “No” and simple to-the-point forms of expression for/against, the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

2.10.6. DfT should note that many respondents conflated their response to Q10 and Q11. As a result, there is some overlap between the themes below and those for Q11 on the following pages.

- Theme 1: The 57 dB  $L_{Aeq, 16h}$  contour is the wrong means of measurement because it is out-dated / represents an average / is ineffective. In summary, there is no confidence in this contour as the (sole) basis for taking decisions regarding aviation noise. (Many respondents (28) also suggested the need for separate and night measures to control and monitor noise exposure. Some others (8) referred to the need to protect quiet areas and ANOBs.)
- Closely aligned to Q10 Theme 1 is, Theme 2: The onset of community annoyance is at a lower level than that measured by the contour.
- Theme 3: Regardless of whether pro or anti, the 57 dB  $L_{Aeq, 16h}$  contour is serves as a benchmark against which to measure future improvements or deterioration in noise levels. Cessation of measurement could also affect historic decisions.
- Theme 4: Research is required, or existing research needed, to agree, an evidence-based value, and means of measurement, before setting a level. **There was a counter-argument that: There is overwhelming evidence from formal research, practice in other countries, the number of complaints regarding noise, and other anecdotal opinion, that change to a lower level and/or different widely accepted means of measurement, is now appropriate.**
- Theme 5: Typically people do not understand, or easily relate to, decibels when considering noise measurement.
- Theme 6: Government should signal an intention to use a lower or different means of measurement and to use this as a lever or incentive for the aviation industry and



airport managers to reduce noise, or as a concession (to the public) in the event of expansion.

2.10.7. There are four other groups of observations that DfT may wish to note:

- A balance is needed to ensure addressing noise issues unduly damages other objectives such as economic development.
- Traffic and other non-airport/aircraft noise must be addresses too.
- Noise management and planning policies are linked and need to be addressed coherently.
- Local solutions must be permitted as well as any central government direction that may be issued.

2.10.8. The table below shows the correspondence between the themes reported above, and the type of respondent.

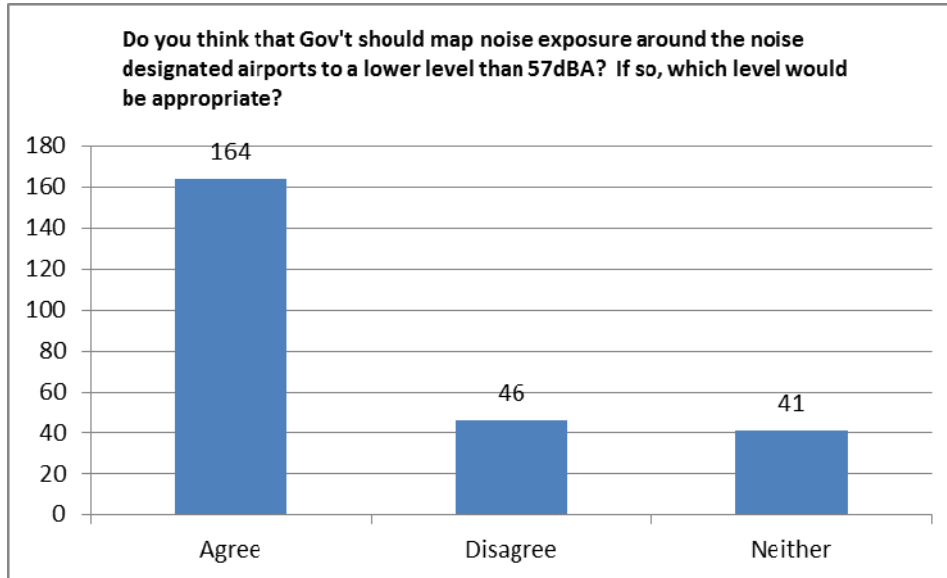
	T1	T2	T3	T4	T4c	T5	T6	Grand Total
(Chartered) Institute	2		2	1		1	1	7
Aerospace			1	1		1		3
Airline			2	1				3
Airport Consultative Committee	5		3	2	1	1		12
Airport outside London			6	2		1		9
Business Association	2		5	1	1			9
Environmental Organisation	5	4						9
Local Community Group	11	11	1	1	3	1	1	29
Local Government	31	14	7	21	10	6	1	90
London Airport			3			1		4
Member of the public	27	41		2	13	7	4	94
MP/Political Representative	1				1			2
Other Business	1	1	3	3		1	1	10
Political Party					1			1
Regulator			2	1				3
Surface Travel Representative			1					1
Trades Union			1		1	1	1	4
<b>Grand Total</b>	<b>85</b>	<b>71</b>	<b>37</b>	<b>36</b>	<b>31</b>	<b>21</b>	<b>9</b>	<b>290</b>



### 2.11 Question 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?

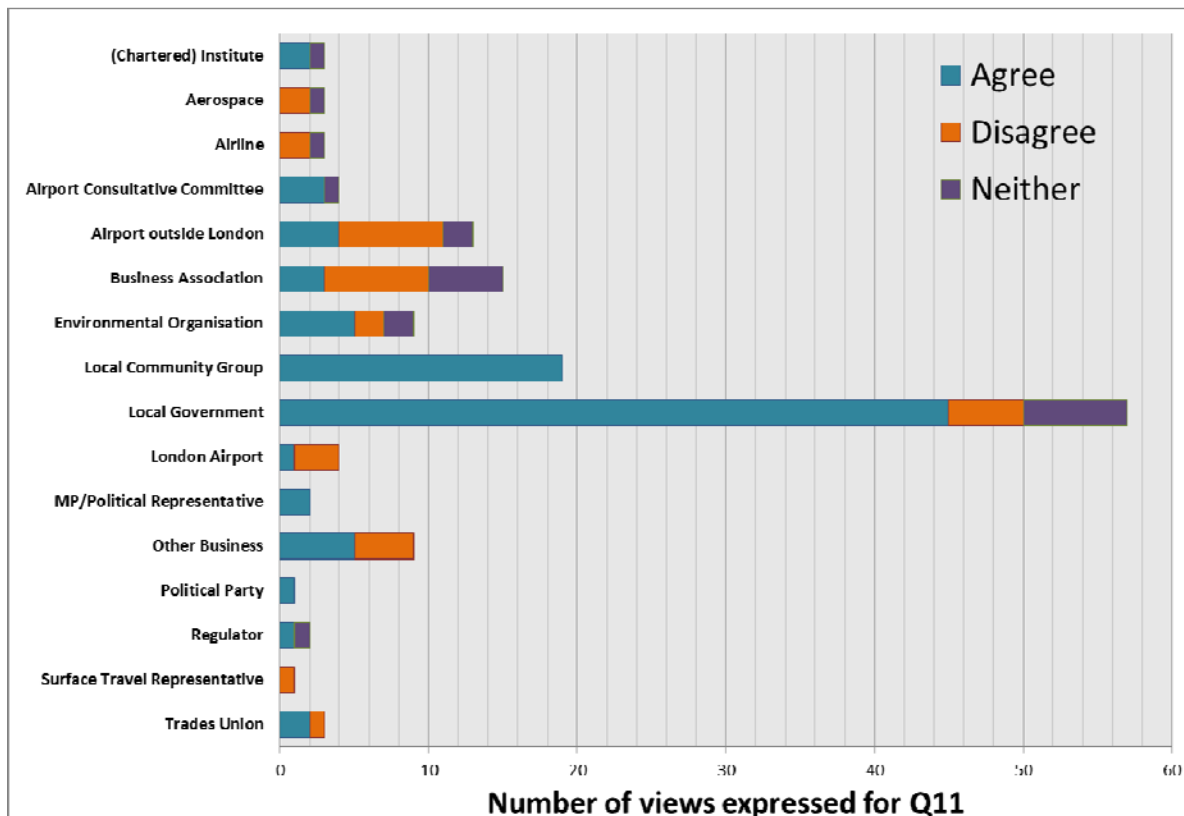
2.11.1. The Statistical View. Based on the data captured by the consultation, the responses to the above question were:



Agree	65.3%
Disagree	18.3%
Neither	16.3%

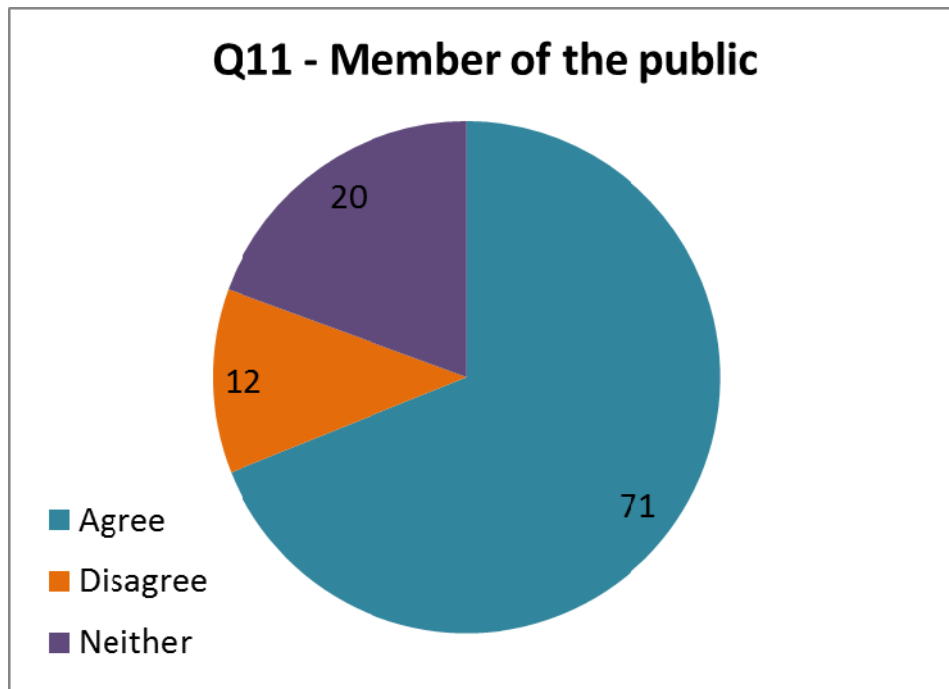
2.11.2. Overall, 251 of the 392 structured responses (64.0%) expressed an opinion to this question.

2.11.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.





2.11.4. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.11.5. **The Textual View.** In addition to the simple “Agree”, “No” and simple to-the-point forms of expression for/against, the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

2.11.6. DfT should note that many respondents conflated their response to Q10 and Q11. As a result, there is some overlap between the themes below and those for Q10 on the previous pages. It also appears that some respondents ignored the word ‘designated’ in the question and seem to have answered based on their local circumstances e.g. Belfast City airport’s noise levels.

- Theme 1: A lower, not specified, value. Most respondents offered little or no rationale. Some of those who did provide an explanation to their response noted that values expressed as dB and 16h/8h averages did not provide a convenient ‘language’ to discuss this issue. See also Q10 Theme 5.
- Theme 2: No change is required – DAFP Option 1a.
- Theme 3: 55 dB(A)  $L_{den}$  - Draft APF Option 1b.
- Theme 4: 54 dB  $L_{Aeq, 16h}$  – Draft APF Option 1c.
- Theme 5: Something different to the proffered Options. A range of ideas were proposed, not all of which included a justification. These included:
  - (a) A value less than 54dB (the lowest of which was 10dB).
  - (b) Separate contouring for day-time and night-time (at a lower value than for the day time contours).
  - (c) Measurement of noise should be extended e.g. to other airports, to other airport operations, and/or helicopter noise.
  - (d) Averages are not a useful measure.
  - (e) The WHO guidelines should be adopted.



- Theme 6: Further research into measures and the perception of noise is required before making a decision).

2.11.7. There are five other groups of observations that DfT may wish to take into account:

- The 57 dB(A) measure acts as a useful to assess the effects of noise reduction measures over time and for planning purposes.
- That, as DfT noted, some airports are already obliged, under END, to produce contour maps using Lden and some, e.g. Heathrow Airport (309), do this annually.
- The local circumstances of an airport dictate the most appropriate contouring and measures to use e.g. its day/night mix or its day/weekend mix (e.g. LHR vs. LCY).
- If changes are to made the DfT must make it clear the overall objectives of so doing and understand the expectations that may then follow from those affected by aircraft noise.
- Any reductions in noise should not be used as a reason to increase the number of ATMs to 'fill' and gap between actual noise and the contour 'ceiling'.

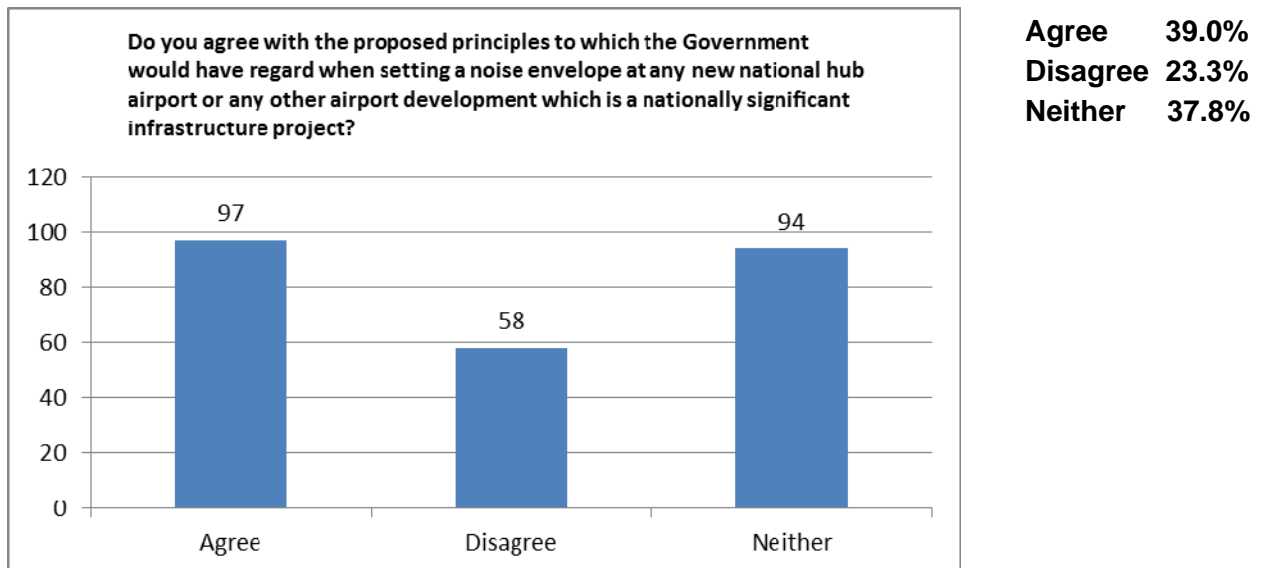
2.11.8. The table below shows the correspondence between the themes reported above, and the type of respondent.

	T1	T2	T3	T4	T5a	T5b	T5c	T5d	T5e	T6	Grand Total
(Chartered) Institute	2	1						1		1	5
Aerospace		1									1
Airline		1								2	3
Airport Consultative Committee				2						3	5
Airport outside London		5	2	1						2	10
Business Association	1	7				1		1		1	11
Environmental Organisation			1	1	1		1	1	2	1	8
Local Community Group	1		9	5		5	4	4	2	1	31
Local Government	8		21	9	2	13	1	3	4	11	72
London Airport		3	1	1				1			6
Member of the public	19	1	6	3	10	6	10	9	6	6	76
MP/Political Representative			1							2	3
Other Business	2	3				1				1	7
Political Party	1										1
Regulator				2							2
Surface Travel Representative		1		1							2
Trades Union			2	2							4
<b>Grand Total</b>	<b>34</b>	<b>23</b>	<b>43</b>	<b>27</b>	<b>13</b>	<b>26</b>	<b>16</b>	<b>20</b>	<b>14</b>	<b>31</b>	<b>247</b>

**2.12 Question 12**

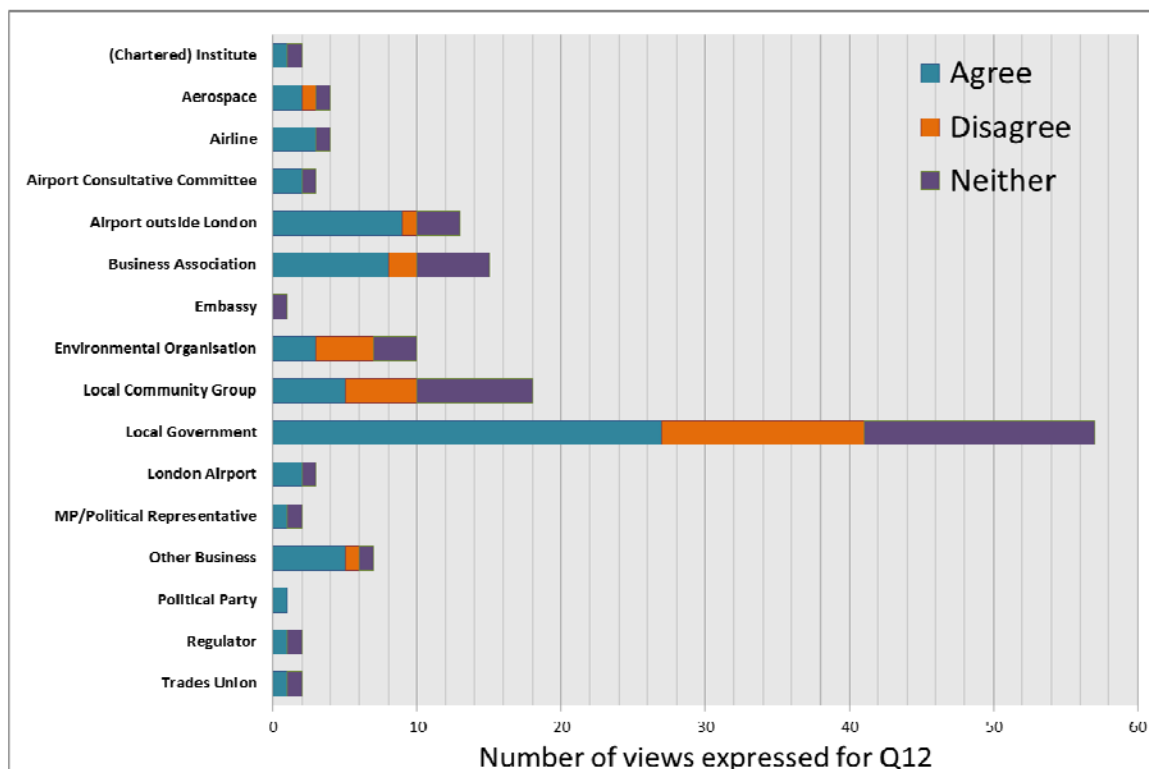
Do you agree with the proposed principles to which the Government would have regard when setting a noise envelope at any new national hub airport or any other airport development which is a nationally significant infrastructure project?

2.12.1. **The Statistical View.** Based on the data captured by the consultation, the responses to the above question were:

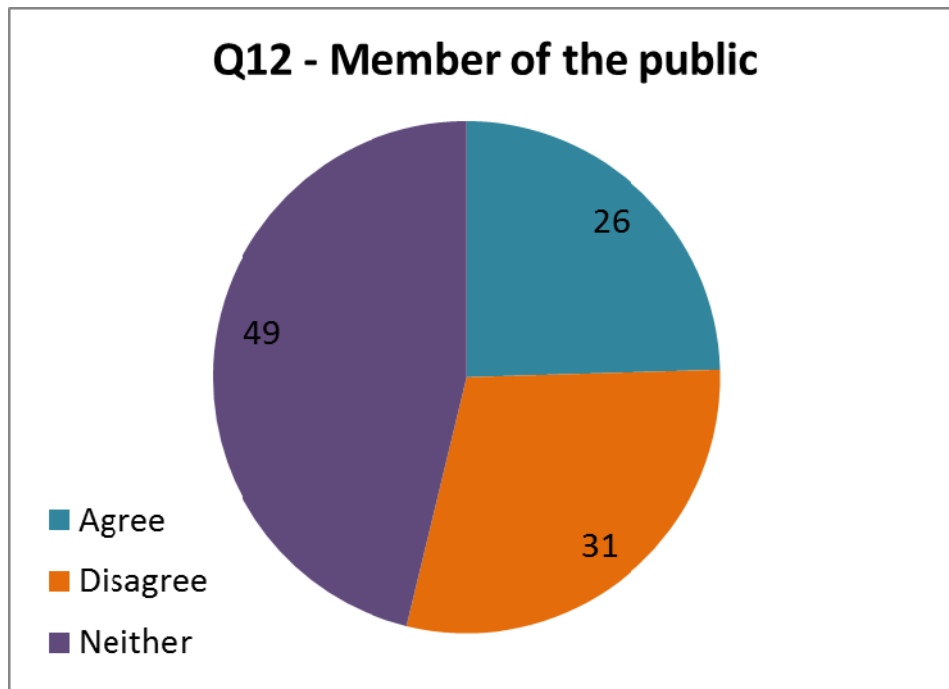


2.12.2. Overall, 249 of the 392 structured responses (63.5%) expressed an opinion to this question.

2.12.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.



2.12.4. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.12.5. **The Textual View.** In addition to the simple “Agree”, “No” and simple to-the-point forms of expression for/against, the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

- Theme 1: Neutral or in generally in agreement, but further details are required on how noise envelopes would be established, enforced and managed over time.
- Theme 2: The explanation in the Draft APF is too vague or lacks examples.
- Theme 3: Adoption of noise envelopes would do nothing to reduce noise from a (London) hub, and perhaps could be exploited as an opportunity to increase noise or evade criticism.
- Theme 4: No expansion or new hubs are required.
- Theme 5: The principles should be extended to lesser infrastructure. **There was a counter-argument that: There any such proposals must not be regarded as suitable for either a 'one size to fit all' and that local and regional differences have a role to play for any (significant) infrastructure development.**

2.12.6. There are two other groups of observations that DfT may wish to note:

- That the phrase ‘and reduce’ seems to have been omitted within the principles.
- That communities and airlines/airports must each benefit from any such principles are adopted in the future.



2.12.7. The table below shows the correspondence between the themes reported above, and the type of respondent.

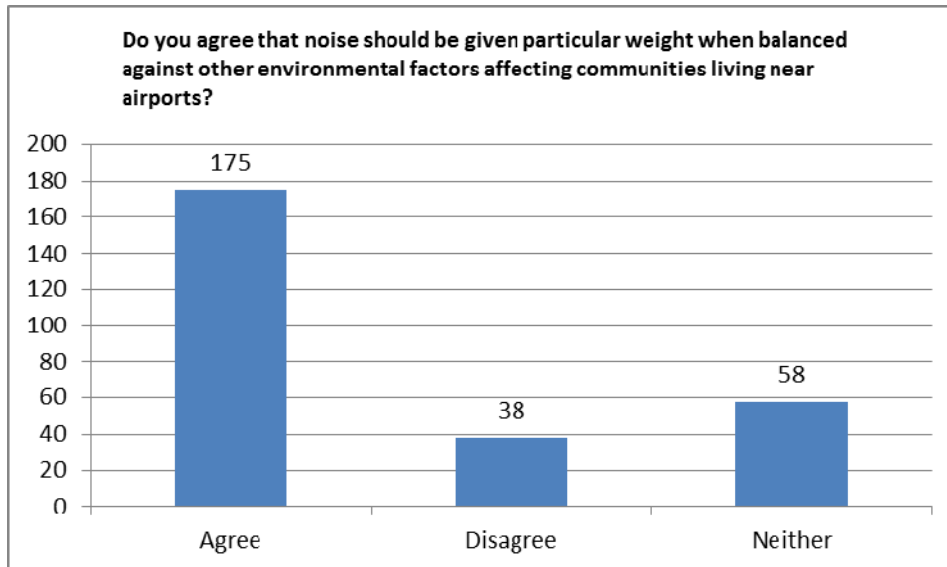
	T1	T2	T3	T4	T5	T5c	Grand Total
(Chartered) Institute	1	1					2
Aerospace	1						1
Airline	2						2
Airport Consultative Committee	1					1	2
Airport outside London	1				1	2	4
Business Association	5					3	8
Embassy	1						1
Environmental Organisation	1		1	1	1	1	5
Local Community Group	4	3	6		2		15
Local Government	12	3	6	1	2	3	27
London Airport	2				1		3
Member of the public	2	8	11	4	1		26
MP/Political Representative	1						1
Other Business	1	2					3
Regulator	1				1		2
Trades Union	1						1
<b>Grand Total</b>	<b>37</b>	<b>17</b>	<b>24</b>	<b>6</b>	<b>9</b>	<b>10</b>	<b>103</b>



### 2.13 Question 13

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

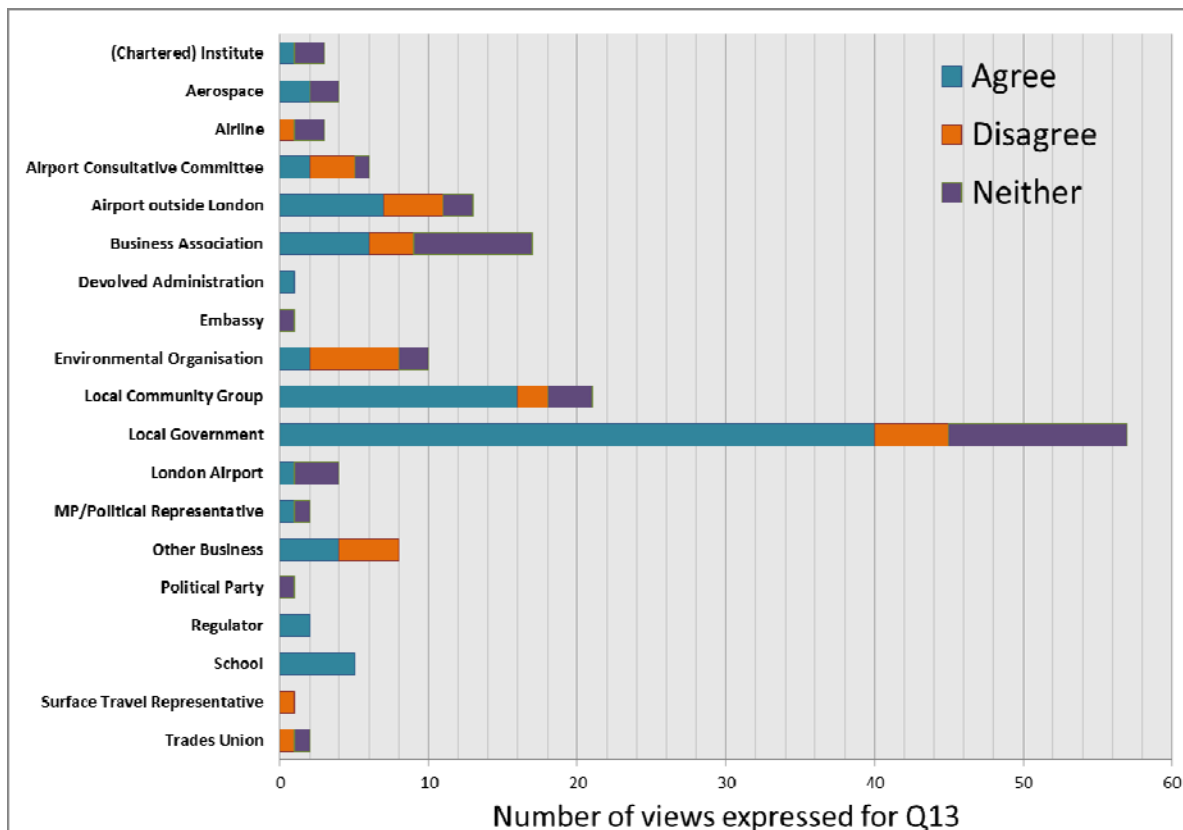
2.13.1. The Statistical View. Based on the data captured by the consultation, the responses to the above question were:



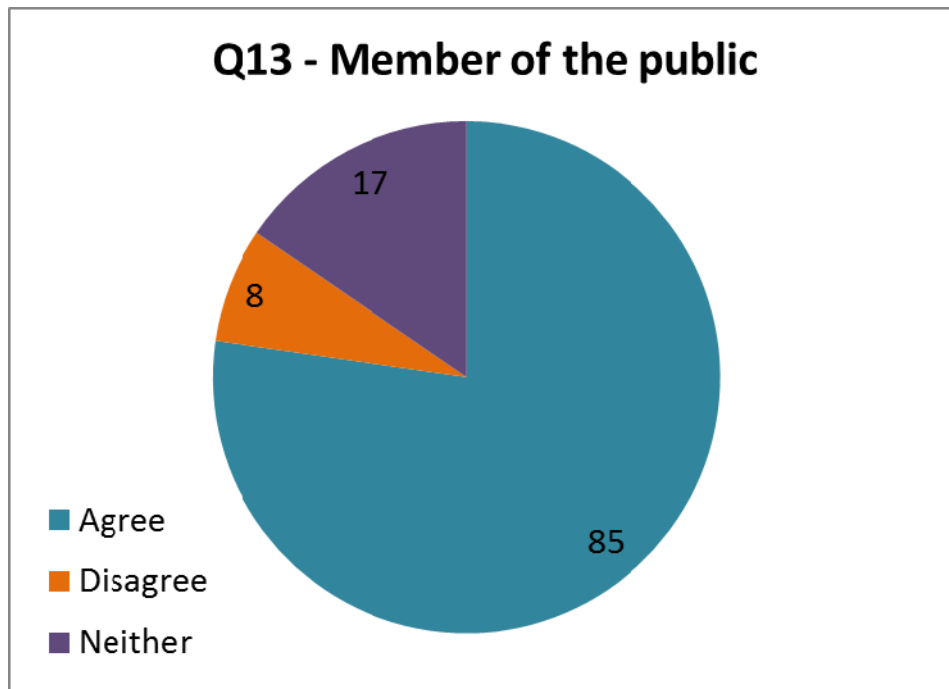
Agree	64.6%
Disagree	14.0%
Neither	21.4%

2.13.2. Overall, 271 of the 392 structured responses (69.1%) expressed an opinion to this question. This was the third most commonly answered question.

2.13.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.



2.13.4. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.13.5. **The Textual View.** In addition to the simple "Agree", "No" and simple to-the-point forms of expression for/against, the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

- Theme 1: Noise is not the only factor to consider, and other environmental factors (emissions commonly cited) must be included when deciding where to strike a balance.
- Theme 2: The reduction of noise is paramount and thus it should have the highest weighting, at least in the short term.
- Theme 3: Different priorities applied between day, night, and early mornings.
- Theme 4: The impact of noise should not be allowed to increase.
- Theme 5: Non aircraft noise must be considered in any future weighting scheme.
- Theme 6: The location of a community and its current exposure to noise should be a factor when determining the best 'counter-measure' to noise. (For example, rural communities are disturbed more than town dwellers by the same level of noise; whereas those living nearest to a major airport are exposed to the greatest noise nuisance and have particular requirements.)

2.13.6. Other less frequent points arising for consideration were:

- Queries about the question wording including 'Near' and 'Balanced'.
- Helicopter noise.
- Action is required to enforce existing standards and targets, rather than place effort going into consultation and policy review.
- What about those who hear aircraft noise, but do not find it a particular nuisance?
- Government should not ignore the economic benefits of aviation.



2.13.7. The table below shows the correspondence between the themes reported above, and the type of respondent.

	T1	T2	T3	T4	T5	T6	Grand Total
(Chartered) Institute	1	2					3
Aerospace	1						1
Airline	2	1				1	4
Airport Consultative Committee	4		1		2	1	8
Airport outside London	2	2			1	5	10
Business Association	7	2		1	1	4	15
Environmental Organisation	3						3
Local Community Group	2	7	1				10
Local Government	20	20	6	3	4	9	62
London Airport		1				2	3
Member of the public	16	15	11	2	1	3	48
MP/Political Representative		1					1
Other Business	4	1			2	1	8
Regulator		1					1
Surface Travel Representative						1	1
Trades Union	2				1		3
<b>Grand Total</b>	<b>64</b>	<b>53</b>	<b>19</b>	<b>6</b>	<b>12</b>	<b>27</b>	<b>181</b>





## 2.14 Question 14

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

2.14.1. **The Statistical View.** Since this question is has no “Yes/No” aspect, the bar and Pie charts from e.g. Question 8 not apply. However, HMCM have provided an analysis of themes by respondent type below our textual analysis.

2.14.2. **The Textual View.** HMCM has established the following broad themes from analysis of the written material provided by respondents.

- Theme 1: That respite is vital and cannot be traded against other environmental factors.
- Theme 2: That respite should be extended to more airports.
- Theme 3: That respite and noise considerations are an integral part of environmental considerations and must be considered as such.
- Theme 4: That respite might alleviate local issues but cause problems elsewhere.
- Theme 5: That local factors need to be considered (as opposed to a one-size-fits-all approach), that there is need for further research and a need for meaningful local consultation.
- Theme 6: That consideration of respite should not deter the search for other mitigation approaches.
- Theme 7: That any consideration on policy should include the full range of benefits and dis-benefits, not simply consider environmental issues on their own.

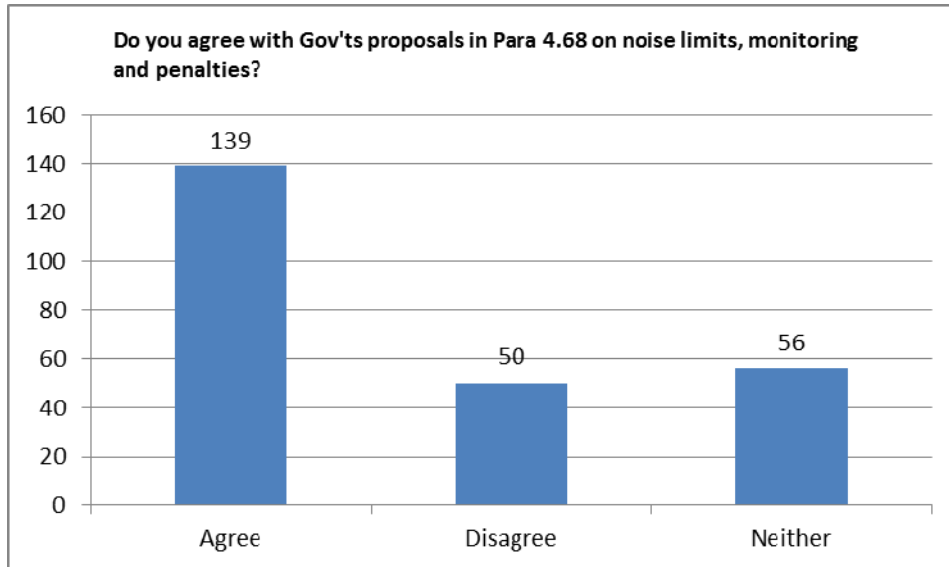
2.14.3. The table below shows the correspondence between the themes reported above, and the type of respondent.

	T1	T2	T3	T4	T5	T6	T7	Grand Total
(Chartered) Institute	0	0	0	4	3	1	0	8
Aerospace	0	0	0	0	1	0	2	3
Airline	0	0	0	1	1	0	2	4
Airport Consultative Committee	2	0	0	2	0	0	0	4
Airport outside London	0	2	1	2	5	4	2	16
Business Association	2	1	1	1	4	2	5	16
Embassy	0	0	0	0	1	0	0	1
Environmental Organisation	2	1	1	2	2	0	0	8
Local Community Group	6	6	2	5	4	6	0	29
Local Government	24	8	8	14	11	10	6	81
London Airport	0	0	0	1	2	1	1	5
Member of the public	26	16	7	2	14	7	12	84
MP/Political Representative	2	0	0	0	1	0	1	4
Other Business	0	0	0	2	3	2	3	10
Regulator	0	0	0	1	1	1	1	4
Trades Union	0	1	0	1	1	0	0	3
<b>Grand Total</b>	<b>64</b>	<b>35</b>	<b>20</b>	<b>38</b>	<b>54</b>	<b>34</b>	<b>35</b>	<b>280</b>

**2.15 Question 15**

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

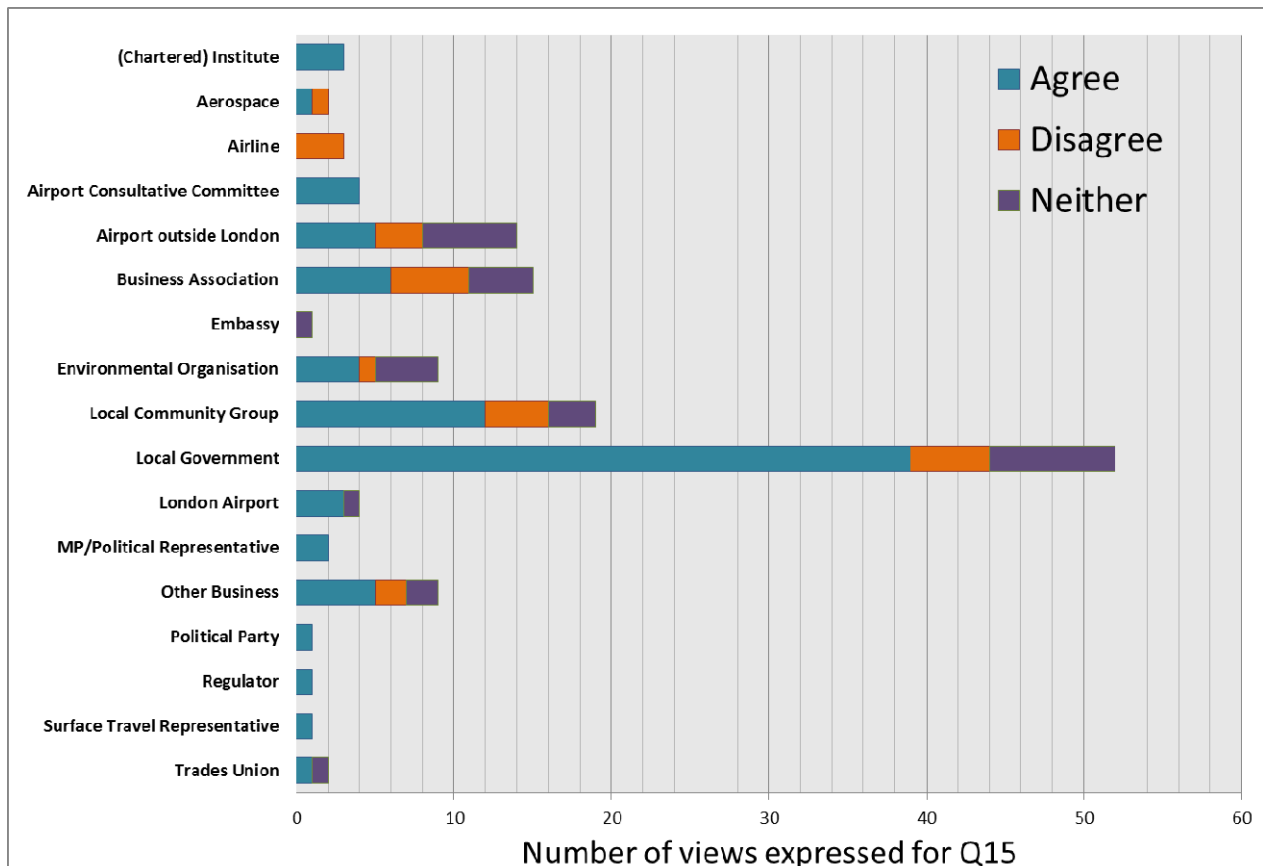
2.15.1. **The Statistical View.** Based on the data captured by the consultation, the responses to the above question were:



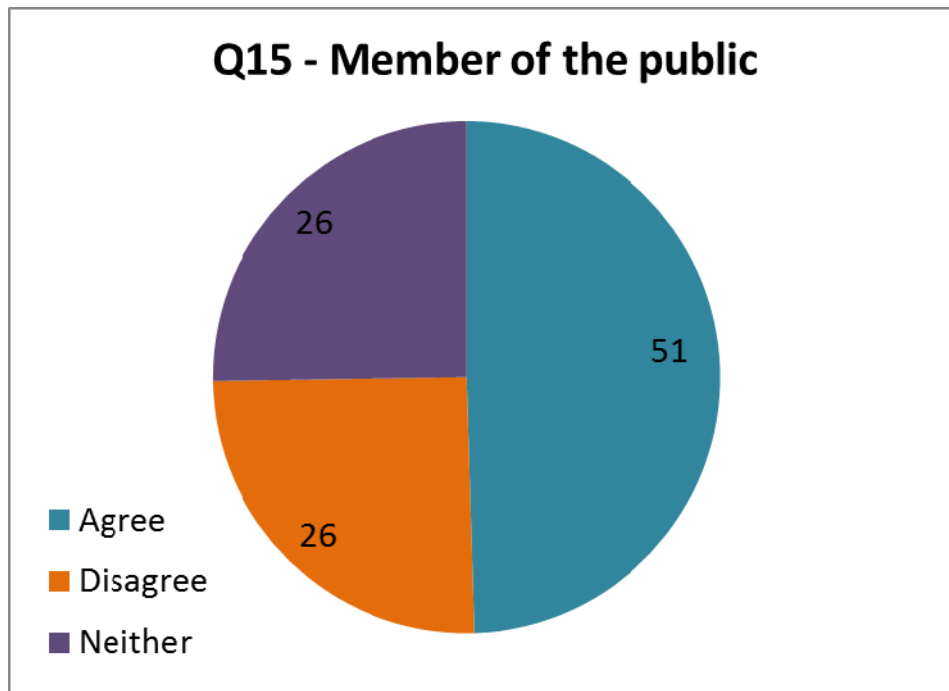
**Agree 56.7%**  
**Disagree 20.4%**  
**Neither 22.9%**

2.15.2. Overall, 245 of the 392 structured responses (62.5%) expressed an opinion to this question.

2.15.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.



2.15.4. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.15.5. **The Textual View.** In addition to the simple "Agree", "No" and simple to-the-point forms of expression for/against, the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

- Theme 1: That a voluntary approach which encourages a gradual move to less noise impact is the most effective way forward.
- Theme 2: That local solutions rather than a central "one-size-fits-all" are more effective.
- Theme 3: That independence of monitoring and enforcement and transparency and public access to noise and enforcement data is vital.
- Theme 4: That noise levels should be reduced and limits should apply to flight approaches as well as departures.
- Theme 5: That higher penalties and a harder line on enforcement of these are needed.
- Theme 6: That a more flexible approach to noise limitation would be more effective.



2.15.6. The table below shows the correspondence between the themes reported above, and the type of respondent.

	T1	T2	T3	T4	T5	T6	Grand Total
(Chartered) Institute	0	1	1	2	1	0	5
Aerospace	2	0	0	0	0	0	2
Airline	3	1	1	0	0	1	6
Airport Consultative Committee	0	1	0	4	3	0	8
Business Association	6	9	3	0	2	1	21
Embassy	5	1	4	2	2	2	16
Environmental Organisation	1	0	0	0	0	0	1
Local Community Group	0	1	3	4	5	0	13
Local Government	1	3	5	8	8	1	26
Member of the public	1	14	20	18	18	2	73
Other Business	2	2	2	1	1	1	9
Surface Travel Representative	0	8	16	21	33	0	78
Trades Union	0	0	0	1	1	0	2
Airport outside London	4	3	1	1	0	2	11
Regulator	0	0	1	0	1	0	2
London Airport	1	0	0	1	0	0	2
MP/Political Representative	1	0	1	0	0	0	2
<b>Grand Total</b>	<b>27</b>	<b>44</b>	<b>58</b>	<b>63</b>	<b>75</b>	<b>10</b>	<b>277</b>



## 2.16 Question 16

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

2.16.1. **The Statistical View.** Since this question is has no “Yes/No” aspect, the bar and Pie charts from e.g. Question 8 not apply. However, HMCM have provided an analysis of themes by respondent type below our textual analysis.

2.16.2. **The Textual View.** HMCM has established the following broad themes from analysis of the written material provided by respondents.

- Theme 1: All designated airports should be directed to establish and maintain a penalty scheme.
- Theme 2: All airports should be directed to establish and maintain a penalty scheme.
- There were two variations on this theme:
  - 2a. All airports over a certain size (in terms of passenger numbers) should be directed to establish and maintain a penalty scheme.
  - 2b. All airports where more than x residents are affected should be directed to establish and maintain a penalty scheme.
- Theme 3: No Airports should be directed to establish and maintain a penalty scheme.
- Theme 4: Airports where Noise intrusion frequent and Loud should be directed to establish and maintain a penalty scheme.
- Theme 5: The Government should not be directing airports to establish and maintain a penalty scheme. An independent external body should be involved.

2.16.3. The table below shows the correspondence between the themes reported above, and the type of respondent.

	T1	T2	T3	T4	T5	Grand Total
Airline	0	0	2	0	0	2
Airport outside London	1	0	5	0	0	6
Business Association	0	1	5	1	0	7
Environmental Organisation	0	4	0	0	0	4
Local Community Group	3	2	0	0	1	6
Local Government	13	4	1	3	1	22
London Airport	0	0	3	0	0	3
Member of the public	15	13	1	5	6	40
Other Business	0	0	4	0	0	4
Trades Union	0	1	0	0	0	1
<b>Grand Total</b>	<b>32</b>	<b>25</b>	<b>21</b>	<b>9</b>	<b>8</b>	<b>95</b>



## 2.17 Question 17

### In what circumstances would it be appropriate for Government to make an order requiring designated airports to maintain and operate noise monitors and produce noise measurement reports?

2.17.1. **The Statistical View.** Since this question is has no “Yes/No” aspect, the bar and Pie charts from e.g. Question 8 not apply. However, HMCM have provided an analysis of themes by respondent type below our textual analysis.

2.17.2. **The Textual View.** HMCM has established the following broad themes from analysis of the written material provided by respondents.

- Theme 1: The Government should make an order requiring ALL designated airports to maintain and operate noise monitors and produce noise measurement reports.
- Theme 2: The Government should make an order requiring ALL airports to maintain and operate noise monitors and produce noise measurement reports.
- There were variations on the theme:
  - 2a. All airports over a certain size should be required to maintain, and operate, noise monitors, and to produce noise measurement reports.
  - 2b. All airports where more than x residents are affected should be required to maintain, and operate, noise monitors, to produce noise measurement reports.
- Theme 3: There is no need for the Government to make an order requiring designated airports to maintain and operate noise monitors and produce noise measurement reports - The current approach is acceptable.
- Theme 4: There is no need for the Government to make an order requiring designated airports to maintain and operate noise monitors and produce noise measurement reports - An independent external body should be involved.

2.17.3. The table below shows the correspondence between the themes reported above, and the type of respondent.

	T1	T2	T3	T4	Grand Total
(Chartered) Institute	1	0	0	0	1
Aerospace	0	0	1	0	1
Airline	0	0	1	0	1
Airport Consultative Committee	1	0	1	0	2
Airport outside London	1	0	4	0	5
Business Association	1	0	5	0	6
Environmental Organisation	0	2	0	1	3
Local Community Group	2	7	0	2	11
Local Government	20	3	2	1	26
London Airport	0	0	2	0	2
Member of the public	14	21	1	7	43
Other Business	2	0	4	0	6
Trades Union	0	1	0	0	1
<b>Grand Total</b>	<b>42</b>	<b>34</b>	<b>21</b>	<b>11</b>	<b>108</b>



## 2.18 Question 18

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

2.18.1. **The Statistical View.** Since this question is has no “Yes/No” aspect, the bar and Pie charts from e.g. Question 8 not apply. However, HMCM have provided an analysis of themes by respondent type below our textual analysis.

2.18.2. **The Textual View.** HMCM has established the following broad themes from analysis of the written material provided by respondents.

- Theme 1: Night time landing fees need to be higher.
- Theme 2: Higher landing fees for noisy aircraft.
- Theme 3: Differential landing fees could be used to incentivise noise reduction and less pollution.
- Theme 4: There should be no night flights.
- Theme 5: Differential landing fees should use the quota count system.

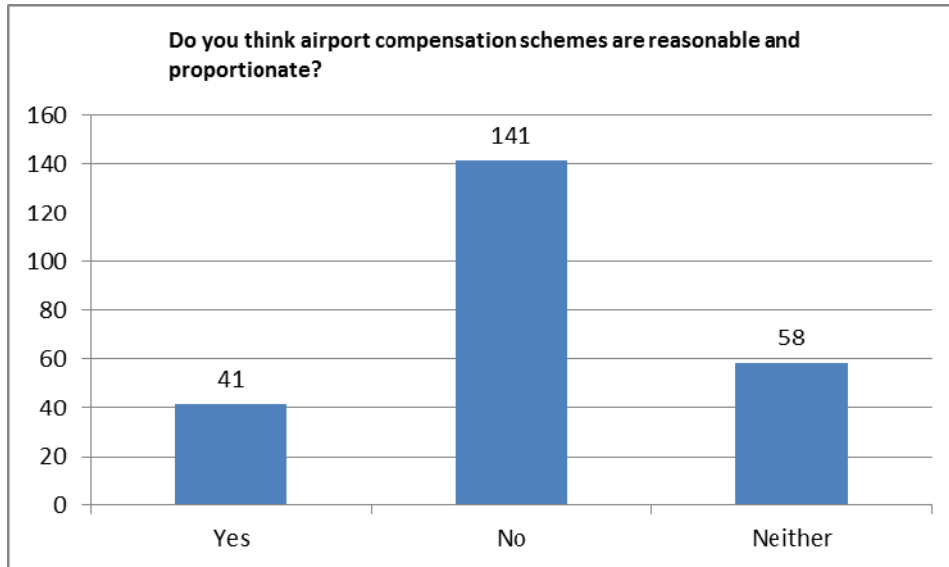
2.18.3. The table below shows the correspondence between the themes reported above, and the type of respondent.

	T1	T2	T3	T4	T5	Grand Total
(Chartered) Institute	2	0	1	0	0	3
Airport Consultative Committee	1	1	1	0	1	4
Airport outside London	0	1	0	0	0	1
Business Association	2	2	2	0	1	7
Environmental Organisation	3	2	1	0	1	7
Local Community Group	3	3	3	3	1	13
Local Government	16	12	9	5	7	49
London Airport	0	0	2	0	1	3
Member of the public	18	6	3	13	2	42
MP/Political Representative	0	2	1	0	0	3
Other Business	0	0	4	0	1	5
Political Party	0	0	1	0	0	1
Trades Union	0	0	1	0	1	2
<b>Grand Total</b>	<b>45</b>	<b>29</b>	<b>29</b>	<b>21</b>	<b>16</b>	<b>140</b>

**2.19 Question 19**

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

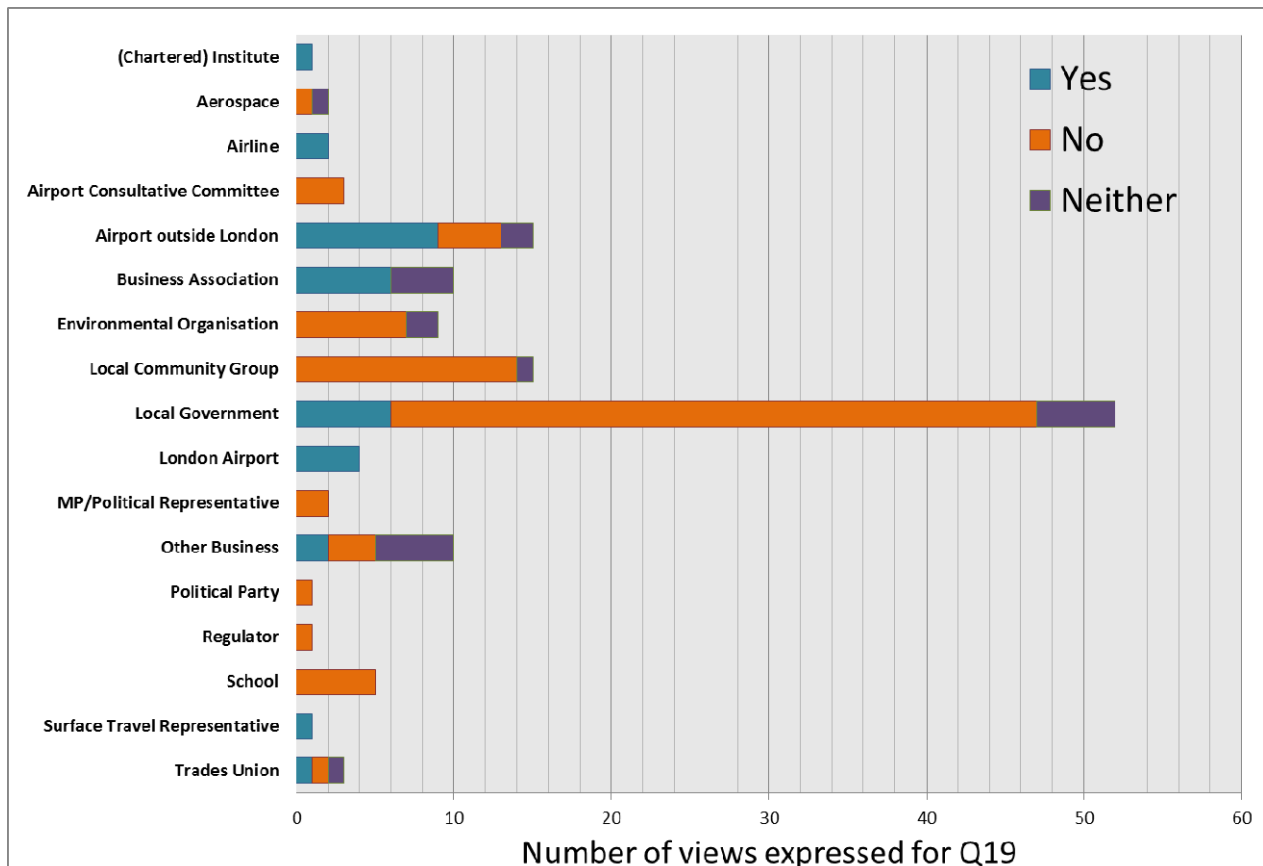
2.19.1. **The Statistical View.** Based on the data captured by the consultation, the responses to the above question were:



**Yes** 17.1%  
**No** 58.8%  
**Neither** 24.2%

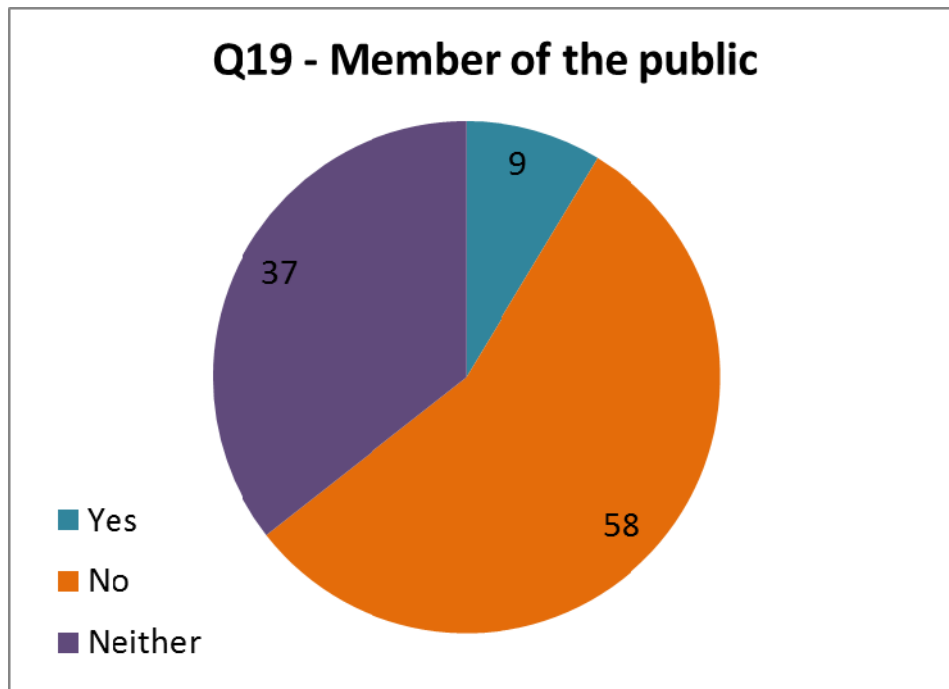
2.19.2. Overall, 240 of the 392 structured responses (61.2%) expressed an opinion to this question.

2.19.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.





2.19.4. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.19.5. **The Textual View.** In addition to the simple “Agree”, “No” and simple to-the-point forms of expression for/against, the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

- Theme 1: The area covered by Compensation schemes should be increased.
- Theme 2: The noise threshold level is unacceptable.
- Theme 3: A review is needed of Current compensation schemes.
- Theme 4: Currently does not provide adequate compensation.

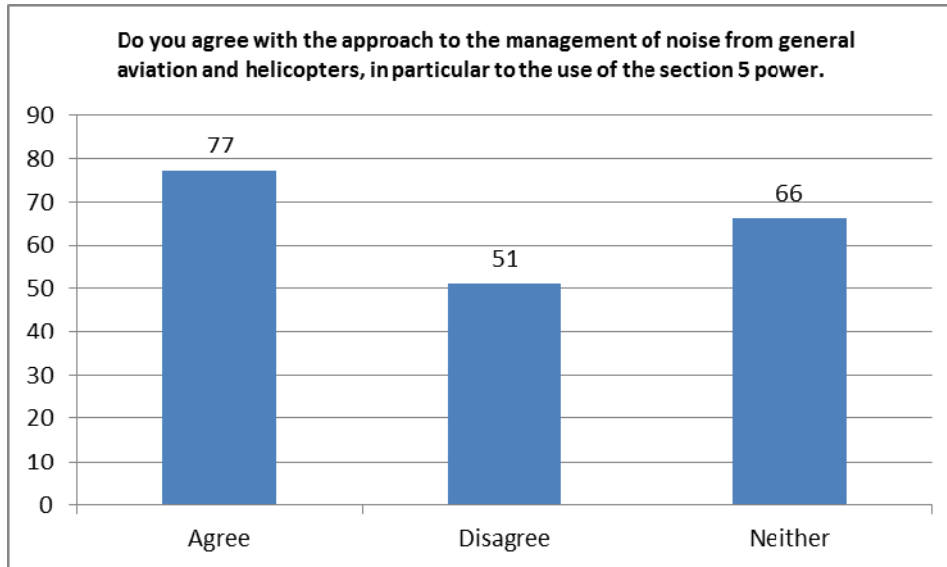
2.19.6. The table below shows the correspondence between the themes reported above, and the type of respondent.

	T1	T2	T3	T4	Grand Total
Aerospace	0	0	1	0	1
Airline	0	0	2	0	2
Airport Consultative Committee	2	1	0	0	3
Airport outside London	1	0	0	0	1
Business Association	0	1	0	0	1
Environmental Organisation	2	2	0	2	6
Local Community Group	5	6	1	2	14
Local Government	11	18	8	4	41
London Airport	0	0	2	0	2
Member of the public	20	10	1	2	33
MP/Political Representative	1	1	1	0	3
Other Business	0	0	1	1	2
Political Party	0	1	0	0	1
School	4	0	0	0	4
Trades Union	0	1	0	0	1
<b>Grand Total</b>	<b>46</b>	<b>41</b>	<b>17</b>	<b>11</b>	<b>115</b>

**2.20 Question 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?**

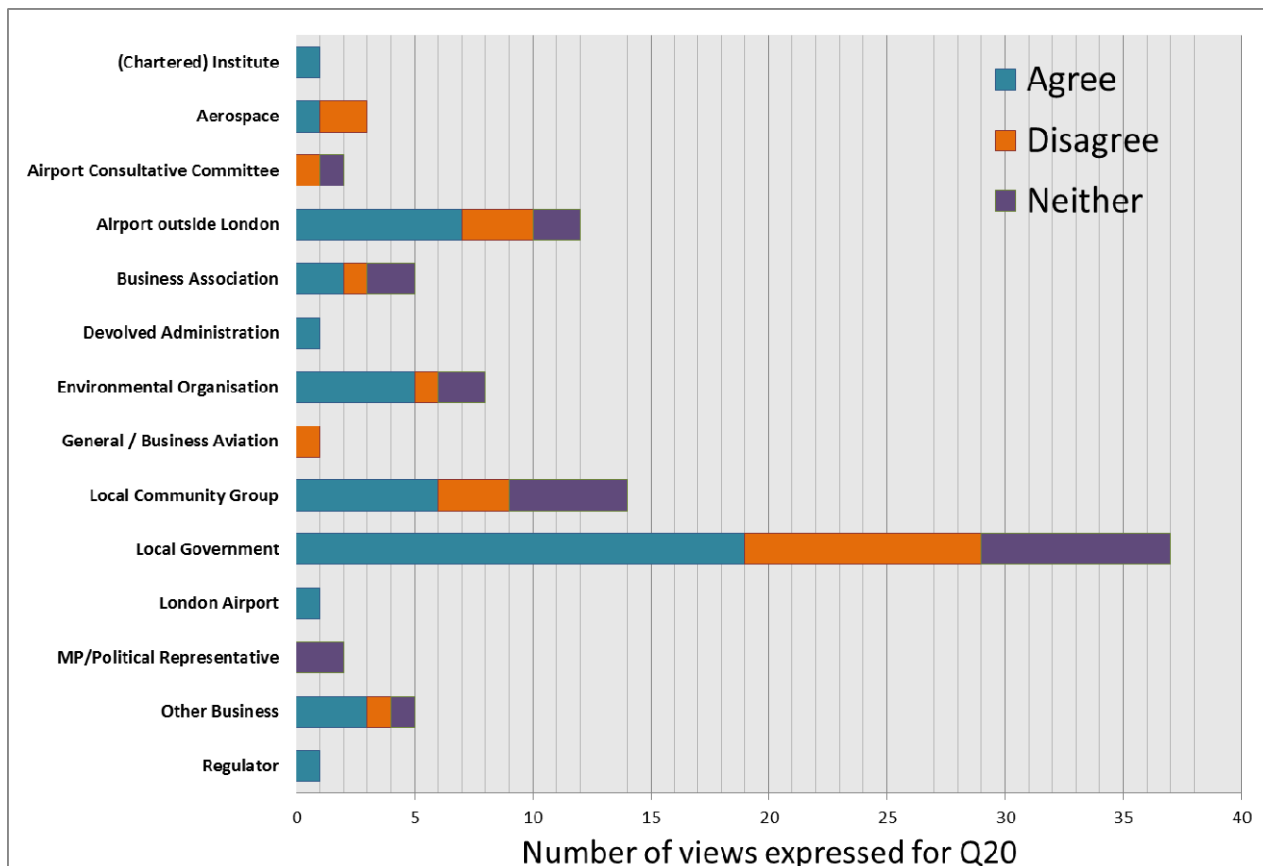
2.20.1. **The Statistical View.** Based on the data captured by the consultation, the responses to the above question were:



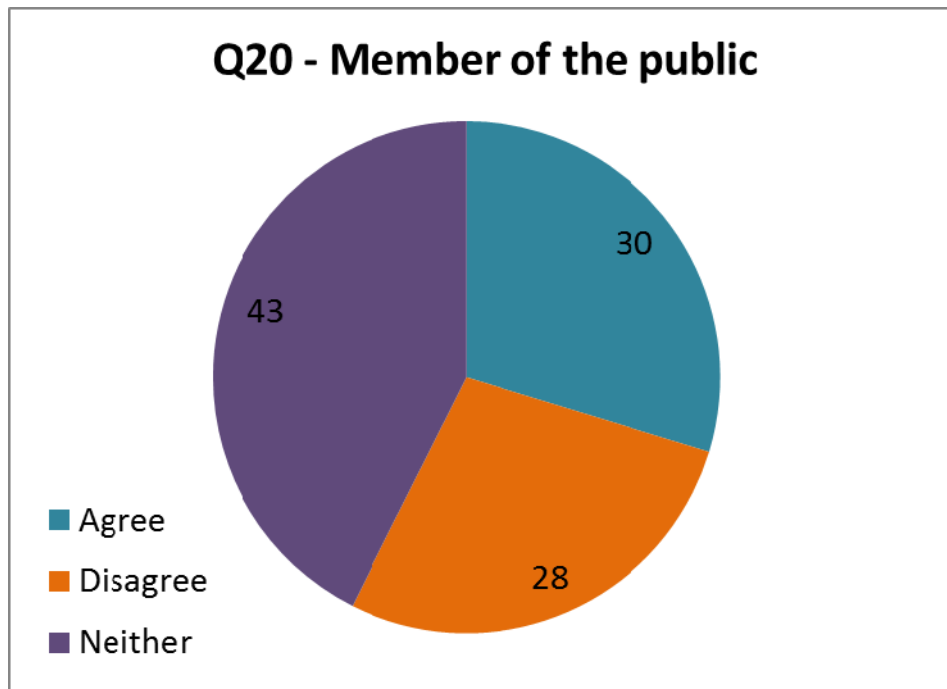
**Agree 39.7%**  
**Disagree 26.3%**  
**Neither 34.0%**

2.20.2. Overall, 194 of the 392 structured responses (49.5%) expressed an opinion to this question. This was the lowest level of response within the Draft APF consultation.

2.20.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.



2.20.4. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.20.5. **The Textual View.** In addition to the simple "Agree", "No" and simple to-the-point forms of expression for/against, the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

- Theme 1: That respondents favour (potentially wider) use of the Section 5 powers.
- Theme 2: Specific points about specific locations (including Central London).
- Theme 3: That GA/Helicopter noise was not a significant problem and that it could be dealt with by current approaches.
- Theme 4: That more research was required on the acceptable levels of noise and the best ways to reduce this.
- Theme 5: That Helicopter and GA noise is a significant problem.
- Theme 6: That current management of Helicopter and GA noise is failing and a tougher regime is required.
- Theme 7: That Helicopter noise is a significant problem throughout the flight path.



2.20.6. The table below shows the correspondence between the themes reported above, and the type of respondent.

	T1	T2	T3	T4	T5	T6	T7	Grand Total
(Chartered) Institute	1	0	0	0	0	1	0	2
Aerospace	1	0	3	0	0	0	0	4
Airport Consultative Committee	0	0	1	1	0	1	0	3
Business Association	0	0	8	4	2	0	0	14
Environmental Organisation	2	1	1	1	1	1	0	7
Local Community Group	2	0	1	1	5	3	0	12
Local Government	0	0	1	1	0	0	0	2
Member of the public	5	1	2	1	7	3	3	22
MP/Political Representative	9	1	4	4	10	15	6	49
Other Business	0	0	2	0	0	0	1	3
Airport outside London	8	9	3	9	28	28	5	90
Regulator	0	1	0	1	2	1	0	5
London Airport	0	0	0	0	2	1	1	4
General / Business Aviation	0	0	0	1	0	1	1	3
<b>Grand Total</b>	<b>28</b>	<b>13</b>	<b>26</b>	<b>24</b>	<b>57</b>	<b>55</b>	<b>17</b>	<b>220</b>

## 2.21 Question 21

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

2.21.1. **The Statistical View.** Since this question is has no “Yes/No” aspect, the bar and Pie charts from e.g. Question 8 not apply. However, HMCM have provided an analysis of themes by respondent type below our textual analysis.

2.21.2. **The Textual View.** HMCM has established the following broad themes from analysis of the written material provided by respondents.

- Theme 1: Additional charges and taxes to act as a disincentive to the worst excesses, or conversely, provide incentives to move to less disruptive GA/helicopters, and thus reduce the perceived nuisance.
- Theme 2: Establish acceptable routes and standard minimum height and agreed landing/take-off procedures.
- Theme 3: New legislation and/or codes of practice together with regular reviews of existing codes of practice and operational effects of GA/helicopters.
- Theme 4: Impose limits on the number of GA/helicopter movements in a particular location. (Examples of limits being to include consideration of maximum allowable dB, time of day (especially at night), and at weekends.)
- Theme 5: Improve monitoring, liaison, reporting, and enforcement arrangements. Some, but not all, calling for meaningful penalties for the worst breaches.
- Theme 6: The arrangements for GA/helicopters and their operating locations should be similar to those for other aircraft types.

2.21.3. There are two other groups of observations that DfT may wish to note:

- That there is a need for local not national policies to manage the problem, some suggesting perhaps using ACCs as a model for establishing these.
- That work was needed to capture a comprehensive view of the noise problem, particularly for London and the South East, out of which appropriate measures and management arrangements could be established.

2.21.4. The table below shows the correspondence between the themes reported above, and the type of respondent.

	T1	T2	T3	T4	T5	T6	Grand Total
(Chartered) Institute		2		1			3
Aerospace	2	1			2		5
Airport Consultative Committee						1	1
Airport outside London	1			1			2
Business Association			1			1	2
Environmental Organisation		1	2		2		5
General / Business Aviation					1		1
Local Community Group	5	3		4	5	2	19
Local Government	2	3	10	6	10	6	37
London Airport			1				1
Member of the public	12	15	5	14	11	6	63
MP/Political Representative	1		1		2		4
Other Business			1		1		2
Surface Travel Representative						1	1
<b>Grand Total</b>	<b>23</b>	<b>25</b>	<b>21</b>	<b>26</b>	<b>34</b>	<b>17</b>	<b>146</b>



## 2.22 Question 22

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

2.22.1. **The Statistical View.** Since this question is has no “Yes/No” aspect, the bar and Pie charts from e.g. Question 8 not apply. However, HMCM have provided an analysis of themes by respondent type below our textual analysis.

2.22.2. **The Textual View.** HMCM has established the following broad themes from analysis of the written material provided by respondents.

- Theme 1: Variable Landing charges including higher charges or taxes for noisy aircraft and lower charges or taxes for quieter aircraft.
- Theme 2: The government should follow and work with the Sustainable Aviation.
- Theme 3: Targeted R&D.
- Theme 4: Tax Relief for R&D of quieter aircraft.

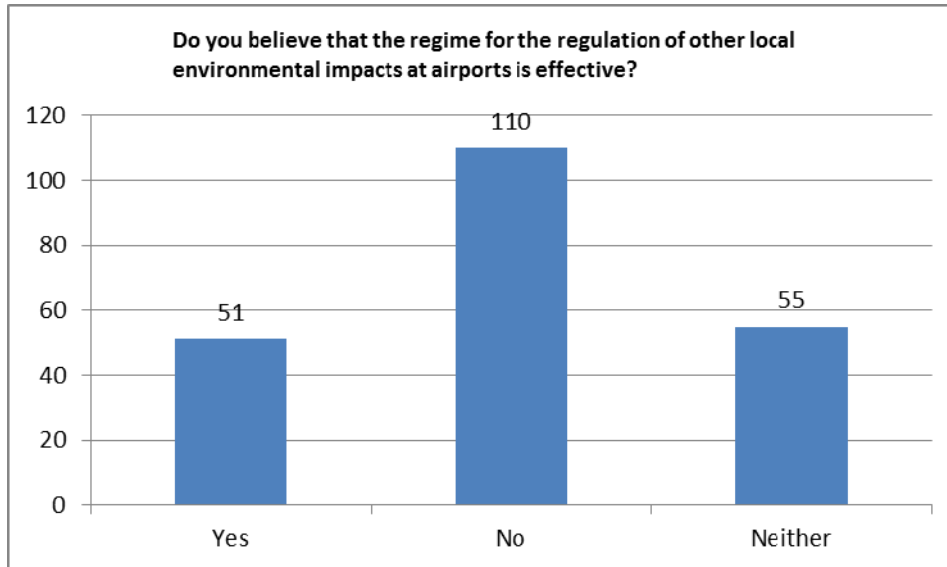
2.22.3. The table below shows the correspondence between the themes reported above, and the type of respondent.

	T1	T2	T3	T4	Grand Total
(Chartered) Institute	0	0	2	1	3
Aerospace	0	0	1	0	1
Airline	0	1	1	1	3
Airport Consultative Committee	1	0	0	0	1
Airport outside London	0	8	0	0	8
Business Association	0	1	2	0	3
Embassy	0	0	1	0	1
Environmental Organisation	1	0	0	0	1
Local Community Group	2	0	0	1	3
Local Government	10	1	4	7	22
London Airport	0	1	1	0	2
Member of the public	15	0	1	2	18
Other Business	1	1	0	0	2
Surface Travel Representative	0	0	0	1	1
<b>Grand Total</b>	<b>30</b>	<b>13</b>	<b>13</b>	<b>13</b>	<b>69</b>

**2.23 Question 23**

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

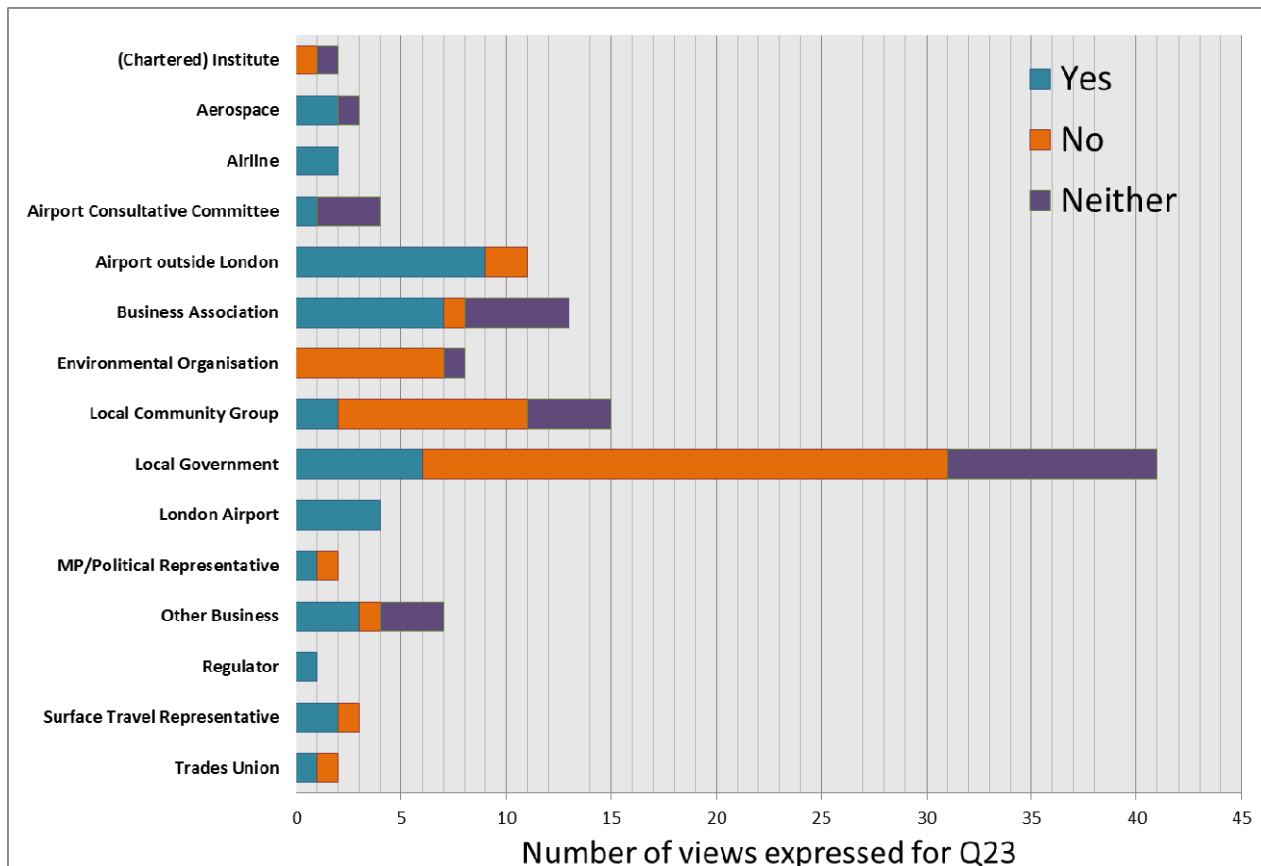
2.23.1. **The Statistical View.** Based on the data captured by the consultation, the responses to the above question were:



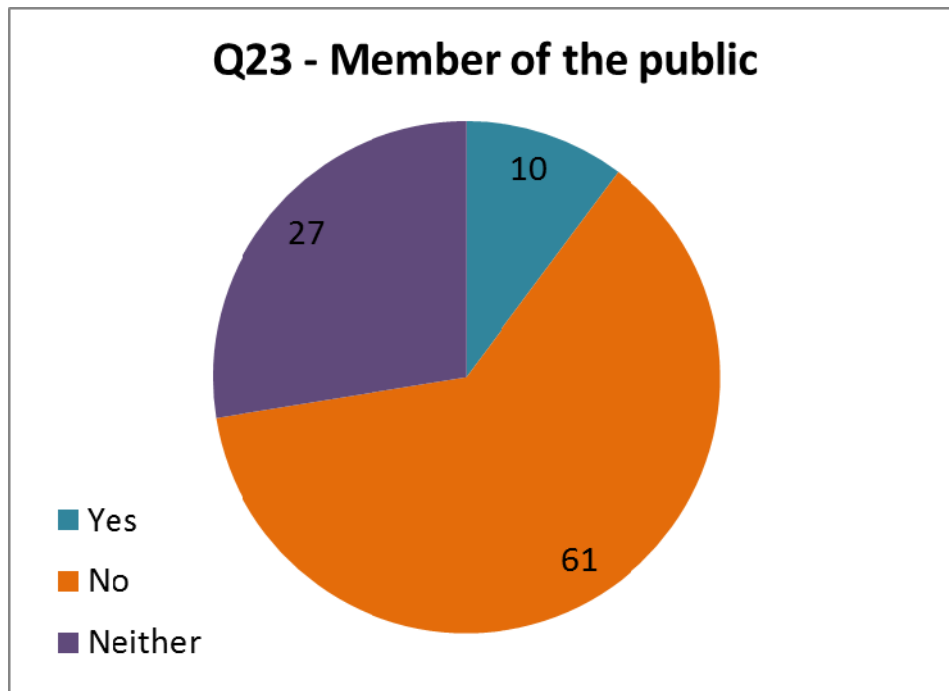
**Yes 23.6%**  
**No 50.9%**  
**Neither 25.5%**

2.23.2. Overall, 216 of the 392 structured responses (55.1%) expressed an opinion to this question. This was the third lowest level of response within the Draft APF consultation.

2.23.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.



2.23.4. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.23.5. **The Textual View.** In addition to the simple “Agree”, “No” and simple to-the-point forms of expression for/against, the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

- Theme 1: A priority should be to reduce the environmental impact by addressing surface transport effects (from private transport to less harmful public transport).
- Theme 2: Better, transparent, and independent, collation and reporting and dissemination of the current environmental impact against i. EU/UK Government targets, ii. Targets in airport related plans, and iii. legal obligations is necessary, in order to:
  - a) inform what measures are being taken (or not)
  - b) publicise successes
  - c) highlight future priorities and to set related targets, and
  - d) identify areas where new strategies are required or where trade-off balances need to be adjusted.

Note that Theme 2 has parallels with Q24 and the responses to that question.

- Theme 3: Legal/punitive enforcement is required of the UK operational aviation industry, to measure and report its environmental impacts. Failure to meet limits and obligations should not be permitted (or be seen/perceived to take place). In addition, local authorities and local councils should have greater enforcement powers to support this objective.
- Theme 4: The regime at small/local airports is effective, and it would be wrong to apply e.g. the Heathrow solution to a local/regional airport.
- Theme 5: Even if targets are currently being (or in the future are) met, improvements should continue to reduce the environmental impact further.

2.23.6. The table below shows the correspondence between the themes reported above, and the type of respondent.



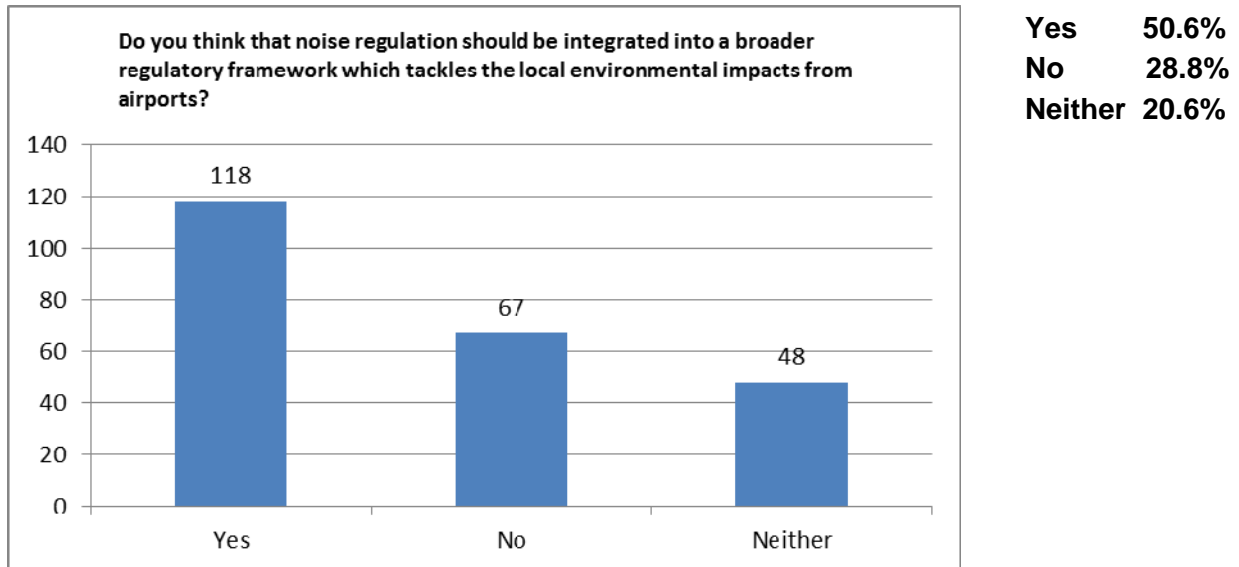


	T1	T2	T3	T4	T5	Grand Total
(Chartered) Institute	1			1		2
Aerospace		1				1
Airline				1		1
Airport Consultative Committee					3	3
Airport outside London	3			4		7
Business Association	3	1		2		6
Environmental Organisation	2		2			4
Local Community Group	1	4	1		1	7
Local Government	7	13	4	1	4	29
Member of the public	3	13	12	1	3	32
MP/Political Representative	1	1				2
Other Business	1			1		2
Surface Travel Representative	1	1				2
Trades Union	1					1
<b>Grand Total</b>	<b>24</b>	<b>34</b>	<b>19</b>	<b>11</b>	<b>11</b>	<b>99</b>

**2.24 Question 24**

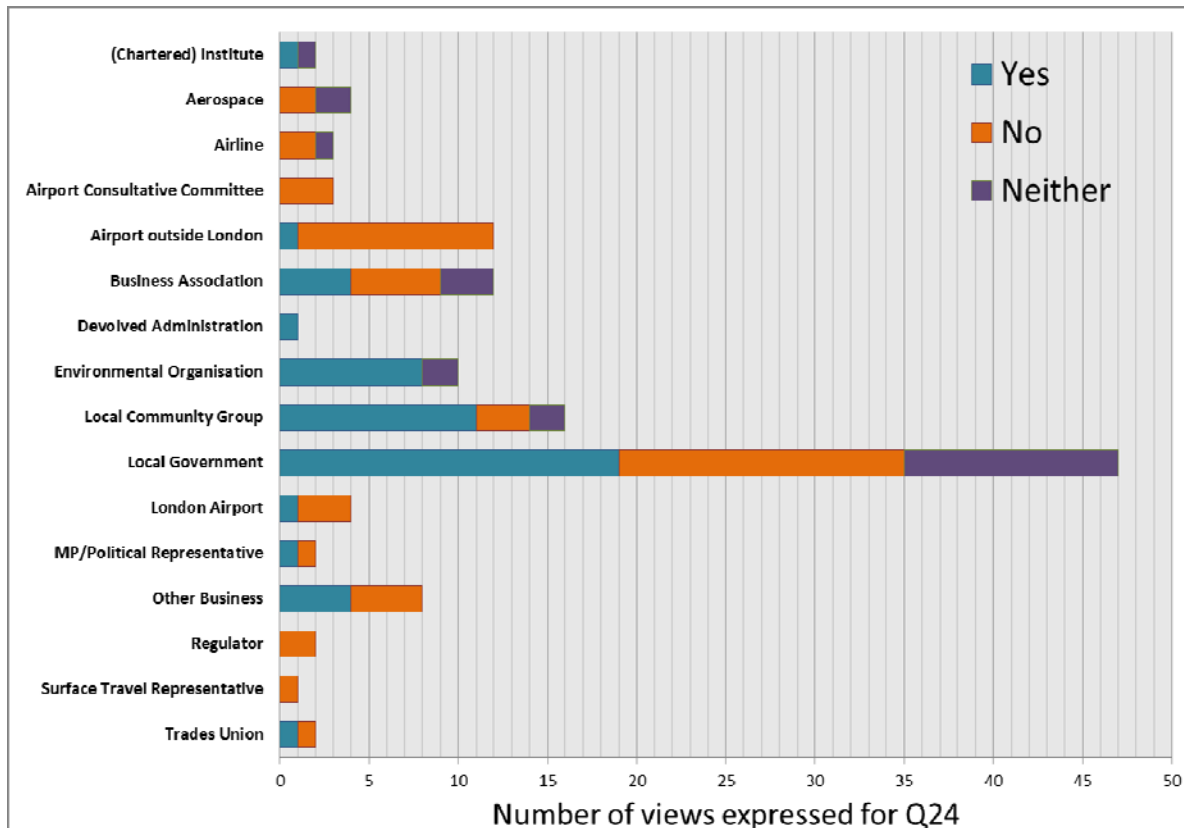
**Do you think that noise regulation should be integrated into a broader regulatory framework which tackles the local environmental impacts from airports?**

2.24.1. **The Statistical View.** Based on the data captured by the consultation, the responses to the above question were:

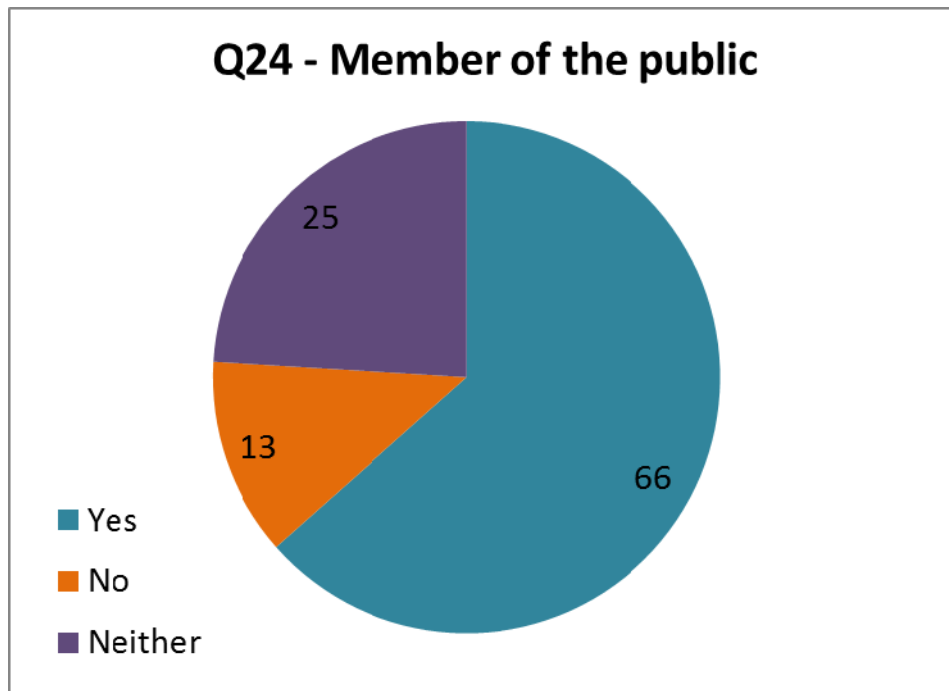


2.24.2. Overall, 233 of the 392 structured responses (59.4%) expressed an opinion to this question.

2.24.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.



2.24.4. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.24.5. **The Textual View.** In addition to the simple “Agree”, “No” and simple to-the-point forms of expression for/against, the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

- Theme 1: Generally favourable in principle, but so long as to do so will not result in delay or an unfavourable trade-off between different aspects of the environmental impact (generally noise).
- Theme 2: Generally negative or at best neutral, because to do so would result in a delay or reduction of current priorities and actions to reduce the environmental impact (generally noise) on UK citizens.
- Theme 3: Integration had the potential to provide a whole system view, which necessarily would make trade-offs (generally noise vs. air quality) explicit.
- Theme 4: Concern that integration would result in additional bureaucracy and operating costs. **A counter-argument was that integration would simplify the current operating and reporting arrangements.**
- Theme 5: Integration would have an adverse effect upon regional airports and local initiatives, especially if solutions designed for London/Heathrow air operations were extended to the UK.

2.24.6. A few respondents also asked for further information as to how any integration into an overall framework would work in practice, including how integration would align with Q27.



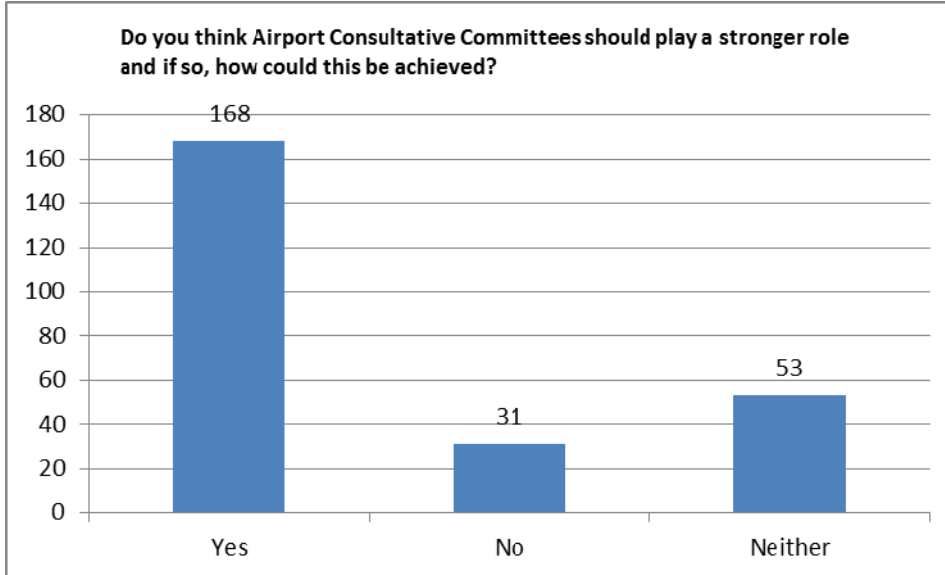
2.24.7. The table below shows the correspondence between the themes reported above, and the type of respondent.

	T1	T2	T2a	T3	T4	T4c	T5	Grand Total
(Chartered) Institute			1	1		1		3
Aerospace			1	1				2
Airline			1		2			3
Airport Consultative Committee		1		1	1			3
Airport outside London		1	5		2		4	12
Business Association		1		3	1		3	8
Environmental Organisation				4				4
Local Community Group	2	2		3				7
Local Government	9	11	3	10		1	3	37
London Airport			2	1		1	1	5
Member of the public	5	5	4	2				16
MP/Political Representative	1	1		1				3
Other Business	2			3				5
Regulator		1	1	1				3
Surface Travel Representative					1			1
<b>Grand Total</b>	<b>19</b>	<b>23</b>	<b>18</b>	<b>31</b>	<b>7</b>	<b>3</b>	<b>11</b>	<b>112</b>

**2.25 Question 25**

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

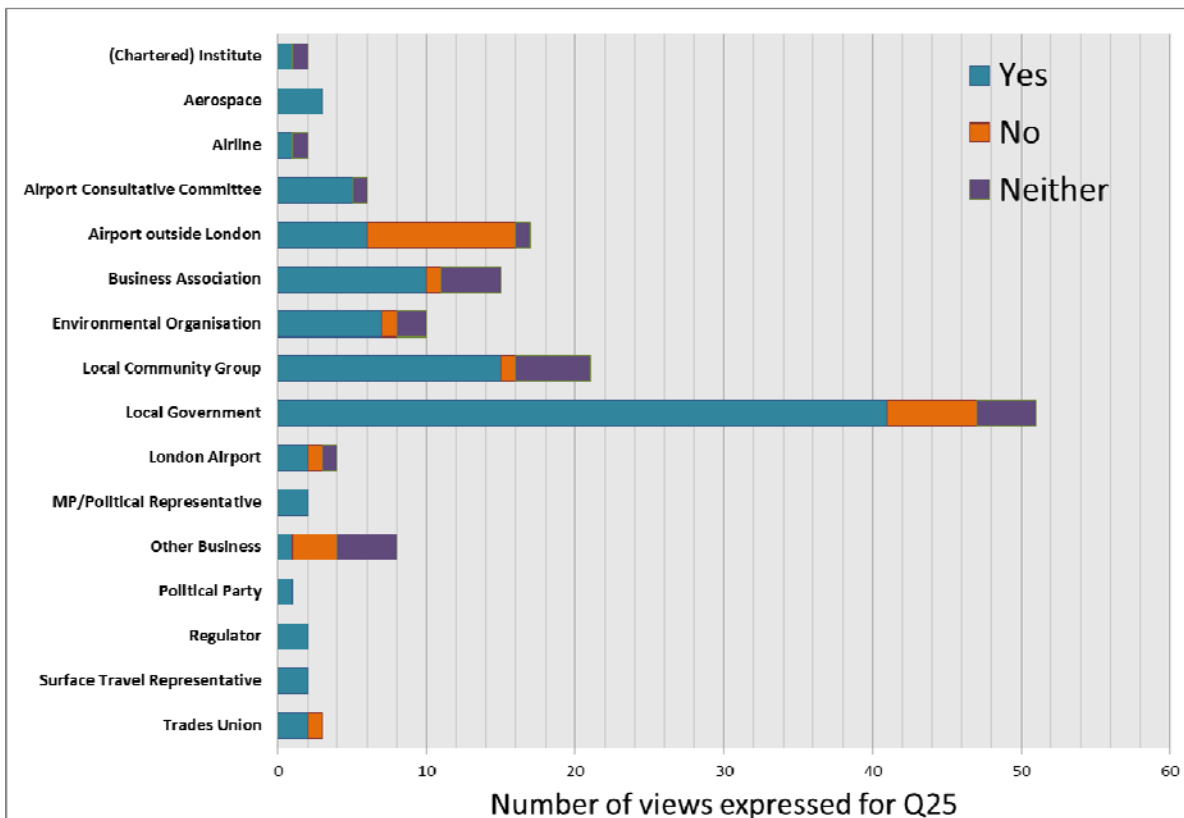
2.25.1. **The Statistical View.** Based on the data captured by the consultation, the responses to the above question were:



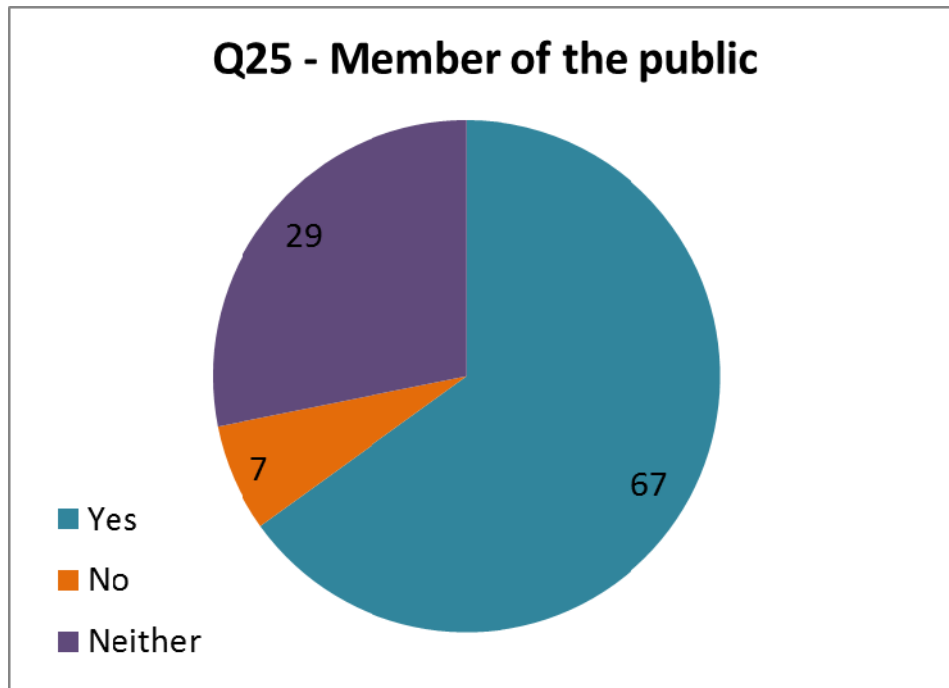
**Yes 66.7%**  
**No 12.3%**  
**Neither 21.0%**

2.25.2. Overall, 252 of the 392 structured responses (64.3%) expressed an opinion to this question.

2.25.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.



2.25.4. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.25.5. **The Textual View.** In addition to the simple “Agree”, “No” and simple to-the-point forms of expression for or against, the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

- Theme 1: ACCs should have more powers and greater independence from commercial stakeholders.
- Theme 2: There is no real problem and the status quo should be maintained.
- Theme 3: ACCs need more (independent) administrative resources and more technical/expert input.
- Theme 4: Wider, more balanced membership of ACCs.
- This was a frequently arising theme, but there was a clear difference in views on where the current bias lies.
- Theme 5: ACCs need to demonstrate offer openness, transparency, and ease of access.
- Theme 6: Local solutions are required (rather than a one-size-fits-all approach).
- Theme 7: ACCs should operate more effectively and could share best practice.
- Theme 8: A basic lack of confidence in ACCs at present (extrapolating forward).



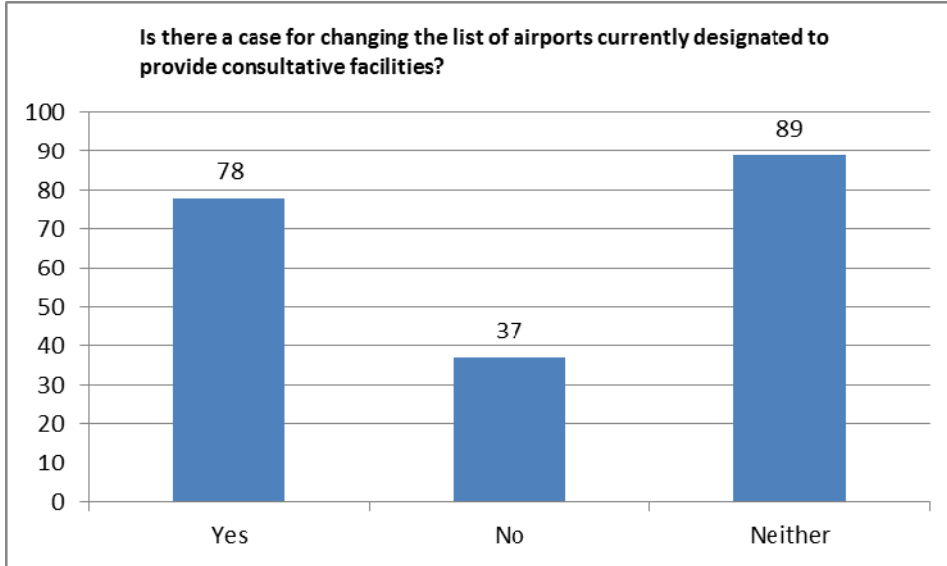
2.25.6. The table below shows the correspondence between the themes reported above, and the type of respondent.

<b>Respondent Type</b>	<b>T1</b>	<b>T2</b>	<b>T3</b>	<b>T4</b>	<b>T5</b>	<b>T6</b>	<b>T7</b>	<b>T8</b>	<b>Grand Total</b>
(Chartered) Institute	0	0	0	1	0	0	0	1	<b>2</b>
Aerospace	1	1	1	0	1	0	0	0	<b>4</b>
Airline	1	0	1	2	0	0	0	0	<b>4</b>
Airport Consultative Committee	3	0	5	5	0	3	5	0	<b>21</b>
Airport outside London	2	13	3	3	1	1	0	0	<b>23</b>
Business Association	5	6	4	9	1	2	5	0	<b>32</b>
Environmental Organisation	5	0	1	3	4	0	0	3	<b>16</b>
Local Community Group	8	2	1	5	5	3	2	11	<b>37</b>
Local Government	23	10	14	19	13	8	6	6	<b>99</b>
London Airport	1	2	2	1	0	1	1	1	<b>9</b>
Member of the public	24	0	7	21	20	11	3	11	<b>97</b>
MP/Political Representative	1	0	0	2	2	0	0	0	<b>5</b>
Other Business	0	2	1	3	0	2	0	0	<b>8</b>
Political Party	0	1	0	1	0	0	0	0	<b>2</b>
Regulator	1	1	0	1	0	0	0	0	<b>3</b>
Surface Travel Representative	1	1	0	1	0	0	0	0	<b>3</b>
Trades Union	0	1	0	1	0	0	0	1	<b>3</b>
<b>Grand Total</b>	<b>76</b>	<b>40</b>	<b>40</b>	<b>78</b>	<b>47</b>	<b>31</b>	<b>22</b>	<b>34</b>	<b>368</b>

**2.26 Question 26**

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

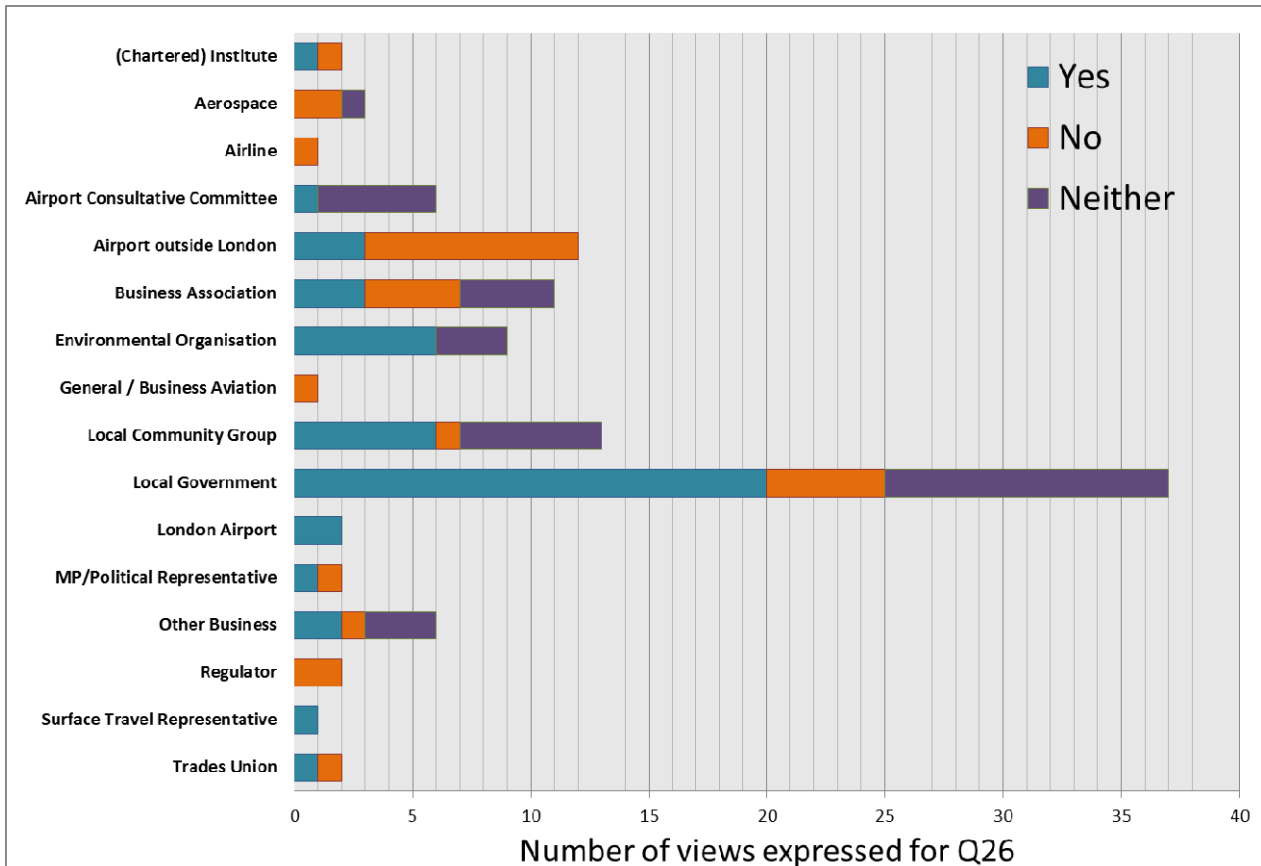
2.26.1. **The Statistical View.** Based on the data captured by the consultation, the responses to the above question were:



**Yes 38.2%**  
**No 18.1%**  
**Neither 43.6%**

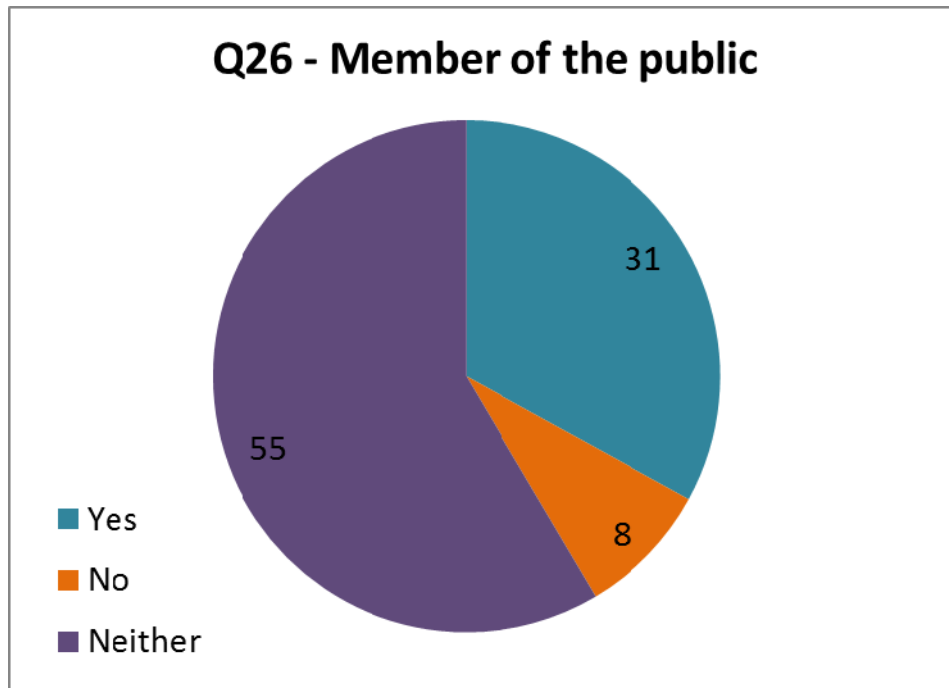
2.26.2. Overall, 204 of the 392 structured responses (52.0%) expressed an opinion to this question. This was the second lowest level of response within the Draft APF consultation.

2.26.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.





2.26.4. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.26.5. **The Textual View.** In addition to the simple “Agree”, “No” and simple to-the-point forms of expression for or against, the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

- Theme 1: All airports and airfields should have consultative arrangements.
- Theme 2: No changes are needed to the list.
- Theme 3: There should be clear guidelines to decide whether or not a formal ACC is needed and/or if less formal arrangements are needed.
- Theme 4: (a) This is required for airports above a certain size; and (b) appropriately scaled measures, if any, are required for smaller airports.
- Theme 5: The form of the consultative arrangement need not necessarily be an ACC but some form of arrangement is needed which at least meets a minimum standard of engagement.
- Theme 6: ACCs are not always effective. Overall standards need to be improved as part of, or ahead of any wider roll-out.
- Theme 7: Heliports should provide consultative arrangements.
- Theme 8: Statements to the effect that existing arrangements are working well and are of benefit.



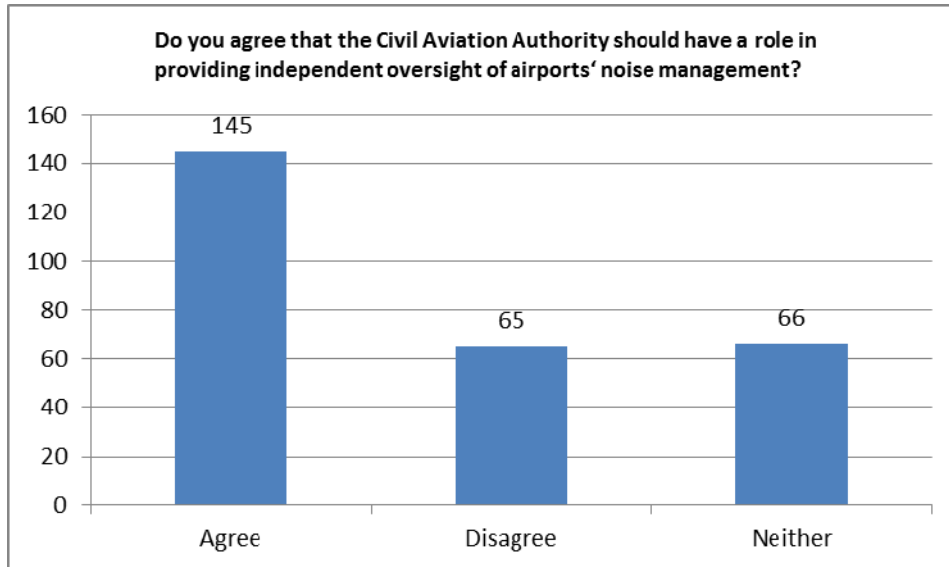
2.26.6. The table below shows the correspondence between the themes reported above, and the type of respondent.

	T1	T2	T3	T4a	T4b	T5	T6	T6c	T7	T8	Grand Total
(Chartered) Institute	1	1									2
Aerospace		2									2
Airport Consultative Committee			3		3						6
Airport outside London	2	2				2		1		3	10
Business Association		5	1		1						7
Environmental Organisation	4		3		2	3	3				15
General / Business Aviation					1						1
Local Community Group	5		1	1	1	3	1		1		13
Local Government	7	6	3	5	1	1	1		5	1	30
London Airport	1		1		1	1				1	5
Member of the public	17			1			1				19
MP/Political Representative	1	1									2
Other Business		1		2			1				4
Regulator		2									2
Surface Travel Representative			1	1							2
Trades Union	1										1
<b>Grand Total</b>	<b>39</b>	<b>20</b>	<b>13</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>7</b>	<b>1</b>	<b>6</b>	<b>5</b>	<b>121</b>

**2.27 Question 27**

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

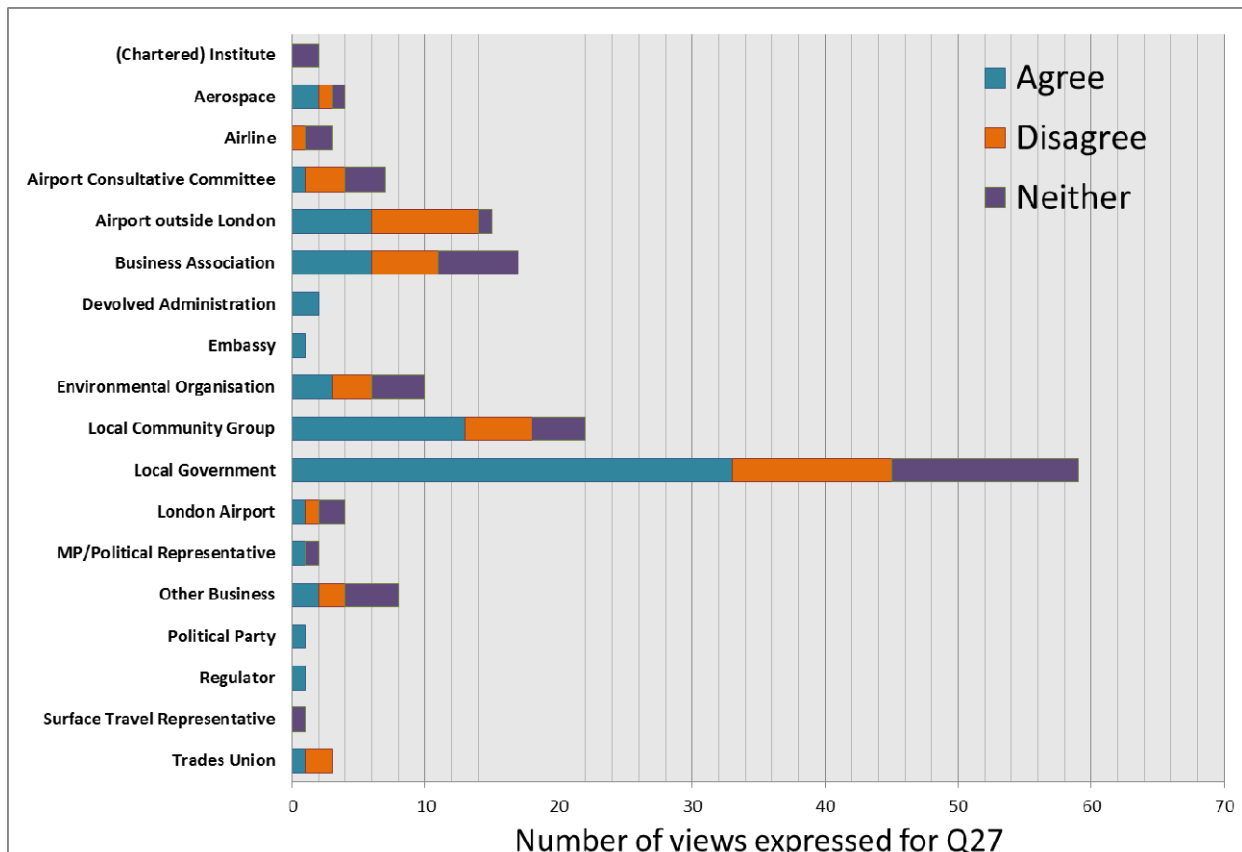
2.27.1. **The Statistical View.** Based on the data captured by the consultation, the responses to the above question were:



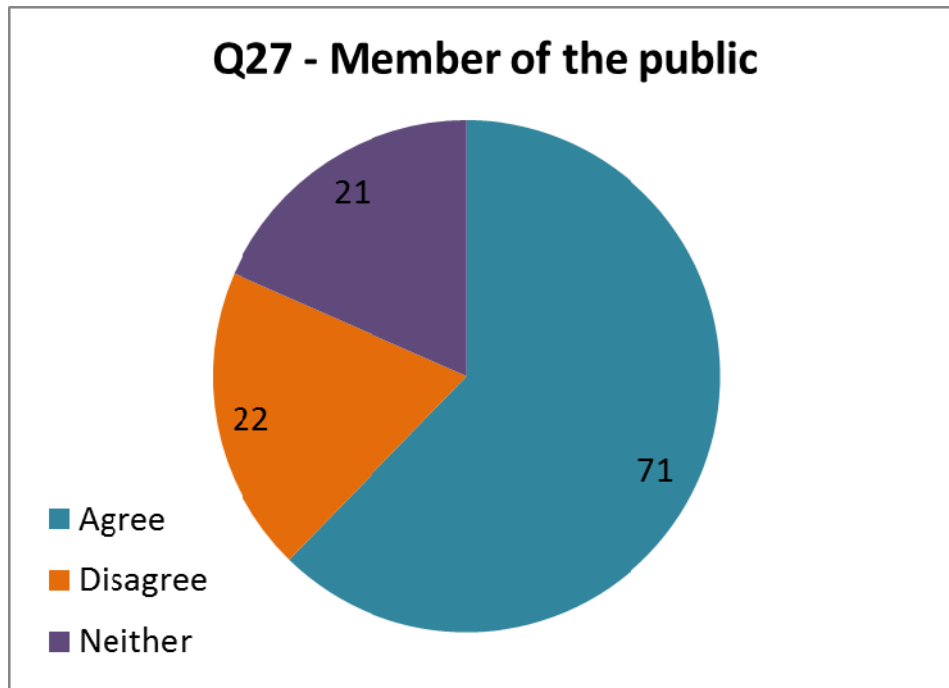
**Agree 52.5%**  
**Disagree 23.6%**  
**Neither 23.9%**

2.27.2. Overall, 276 of the 392 structured responses (70.4%) expressed an opinion to this question. This was the second most commonly answered question.

2.27.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.



2.27.4. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.27.5. **The Textual View.** In addition to the simple “Agree”, “No” and simple to-the-point forms of expression for or against, the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

- Theme 1: A truly independent body is required and the CAA is not seen as been truly independent.
- Theme 2: Agree only if independent and unbiased.
- Theme 3: Comments regarding the oversight of noise management.
- Theme 4: Reservations regarding the experience and/or capability of the CAA to perform such a role adequately.
- Theme 5: The oversight of airports' noise management should be carried out at a local level, at least in the first instance.
- Theme 6: The CAA should have a role in providing transparent, high quality information.
- Theme 7: The CAA should be given the power to take action against non-compliance and dispute resolution.



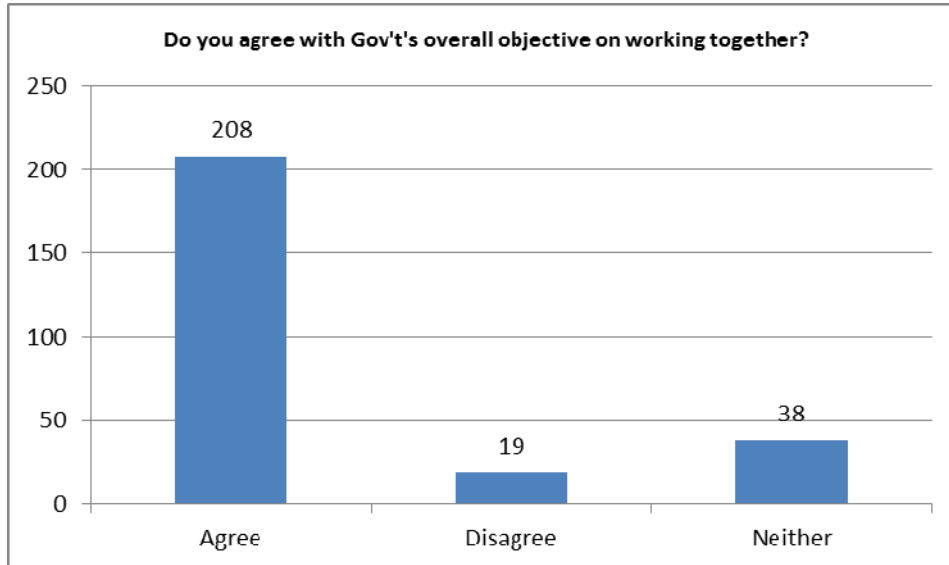
2.27.6. The table below shows the correspondence between the themes reported above, and the type of respondent.

	T1	T2	T3	T4	T5	T6	T7	Grand Total
(Chartered) Institute	1							1
Aerospace	1	1		1			1	4
Airline				1				1
Airport Consultative Committee	3		1	2	1			7
Airport outside London		2	1		3	4		10
Business Association	1	1	1	1	1	2		7
Devolved Administration		1	1					2
Environmental Organisation	5		1					6
Local Community Group	6	2		1			1	10
Local Government	17	9	11	4	3	1	5	50
London Airport	1	1	1		1	1		5
Member of the public	15	13	2	1	1		1	33
MP/Political Representative	1	1	1					3
Other Business	2	1	1	1				5
Regulator					1	1		2
Trades Union	1							1
<b>Grand total</b>	<b>54</b>	<b>32</b>	<b>21</b>	<b>12</b>	<b>11</b>	<b>9</b>	<b>8</b>	<b>147</b>

**2.28 Question 28**

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

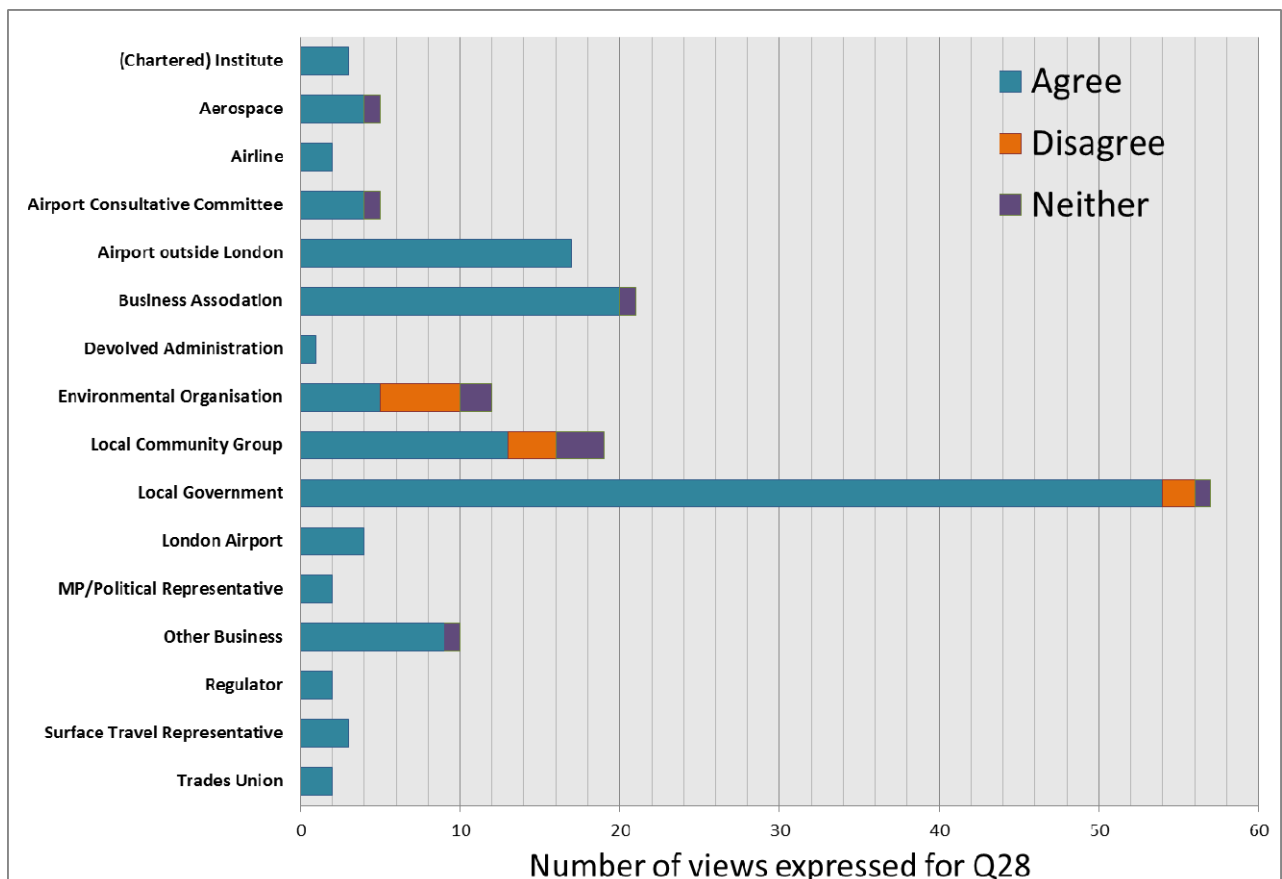
2.28.1. **The Statistical View.** Based on the data captured by the consultation, the responses to the above question were:



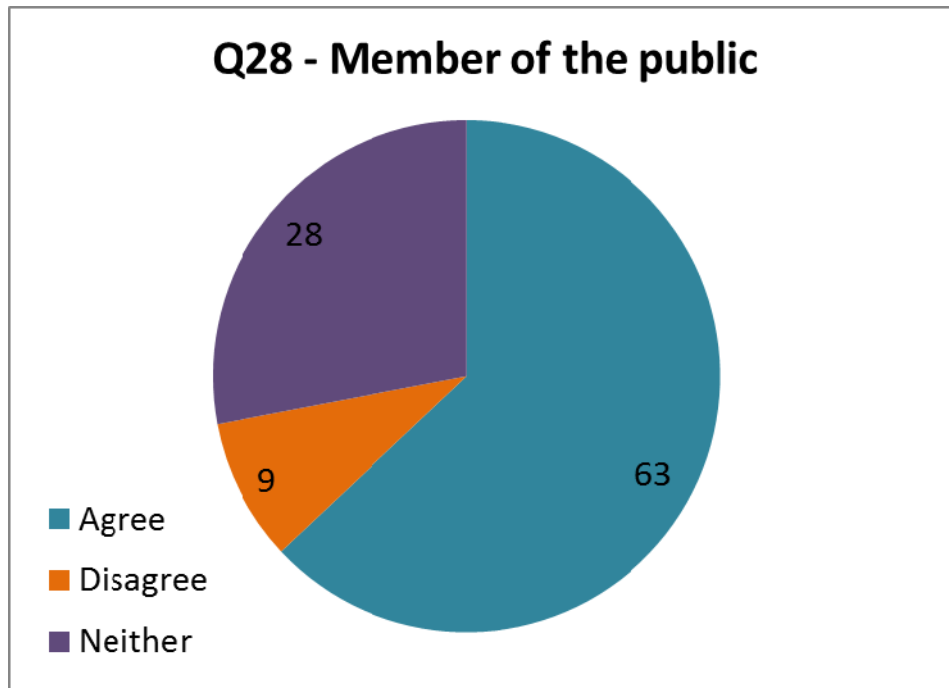
**Agree 78.5%**  
**Disagree 7.2%**  
**Neither 14.3%**

2.28.2. Overall, 265 of the 392 structured responses (67.6%) expressed an opinion to this question.

2.28.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.



2.28.4. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.28.5. **The Textual View.** In addition to the simple "Agree", "No" and simple to-the-point forms of expression for or against, the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

- Theme 1: Queries and observations regarding how Working Together will operate in practice, including DfT's role; escalation of issues; resolution of impasses; and overall assurance that working together is working effectively at individual airports and airfields. See also Q29 Theme 2.
- Theme 2: Working Together requires proper and adequate consultation to take place with all sides working in a spirit of cooperation to 'get things done' with due recognition and equitable use of each party's strengths, weaknesses, resources, and access to information and people.
- Theme 3: Queries and observations regarding ways of working and participation, as part of a flexible (but not overly flexible) working relationship between the various parties. See also Q29 Theme 3.
- Theme 4: The various parties have such differing agendas and 'history' that will prevent, or at least make it very difficult, for the various parties ever properly to work together as DfT envisage.
- Theme 5: The resources and power of the major airport operators and airlines will mean that Working Together will favour aviation, and thus the wider community and environmental issues and concerns will rarely be resolved.
- Theme 6: Work and support will be required to facilitate the current working relationships and processes to those required to realise the Working Together overall objective.



2.28.6. The table below shows the correspondence between the themes reported above, and the type of respondent.

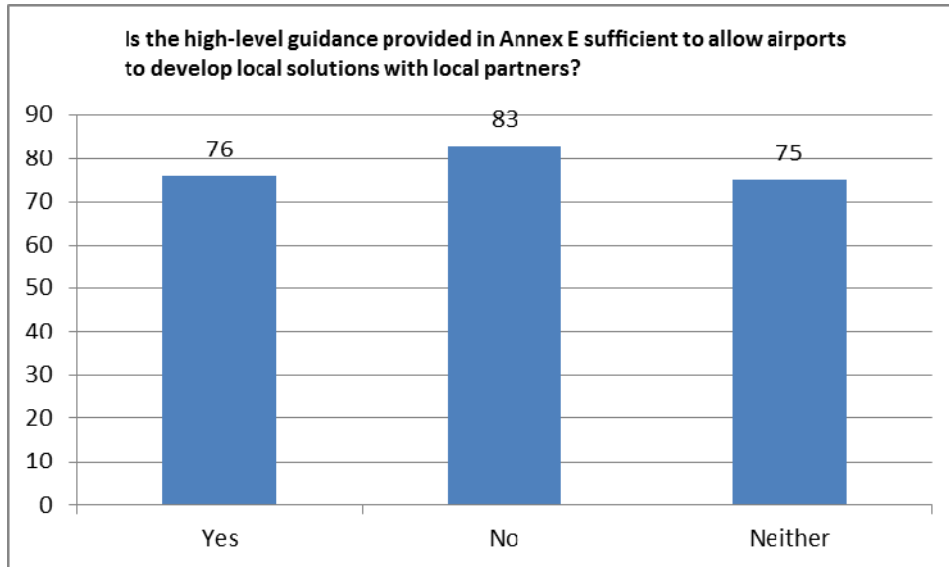
	T1	T2	T3	T4	T5	T6	Grand Total
(Chartered) Institute	1						1
Aerospace		2	3	1			6
Airport Consultative Committee	4			1		2	7
Airport outside London		2	2				4
Business Association	1	1	4	1			7
Environmental Organisation	4	2	2	1	2	2	13
Local Community Group	6	5	2	4	4	1	22
Local Government	13	8	8	5	3	2	39
London Airport	1						1
Member of the public	5	8	4	10	3	3	33
Other Business	1	2	2	1			6
Surface Travel Representative		1	1			1	3
Trades Union		1		1			2
<b>Grand Total</b>	<b>36</b>	<b>32</b>	<b>28</b>	<b>25</b>	<b>12</b>	<b>11</b>	<b>144</b>



**2.29 Question 29**

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

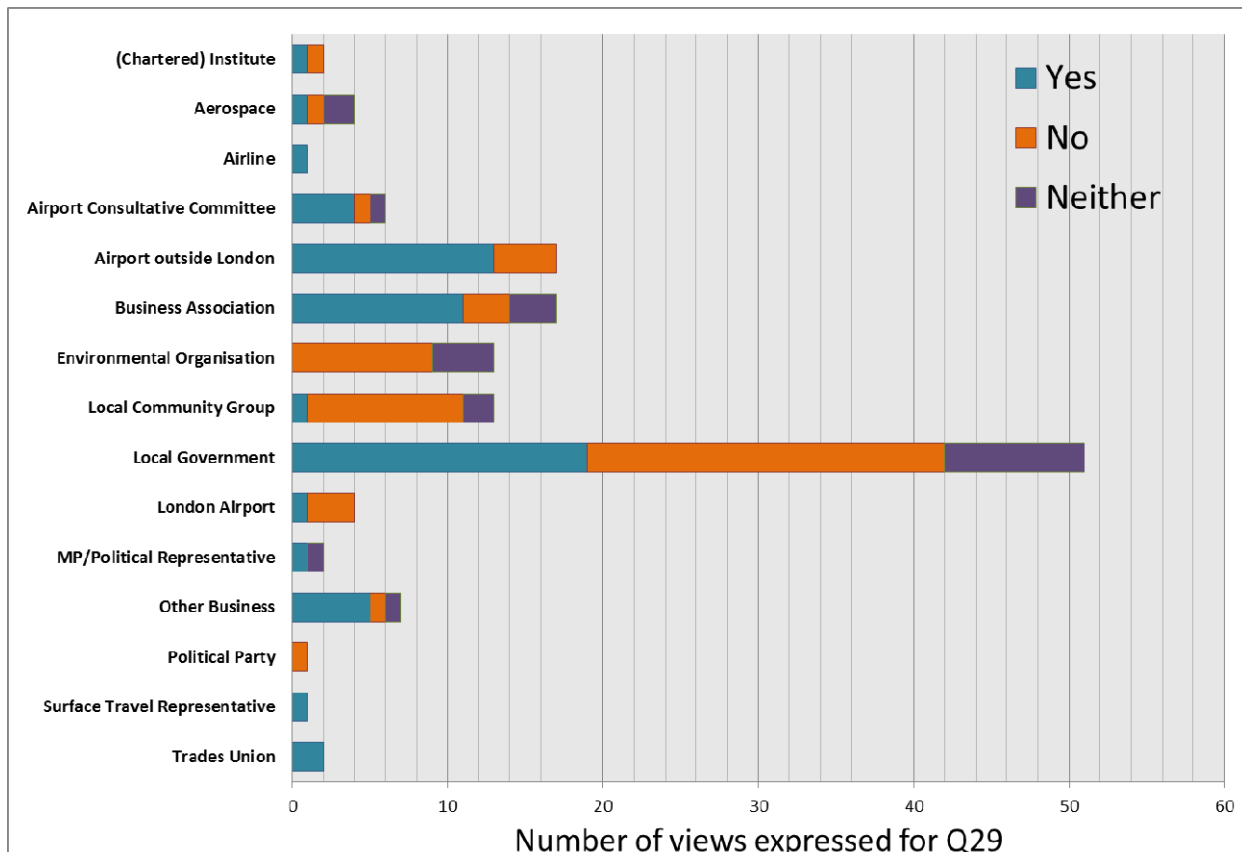
2.29.1. **The Statistical View.** Based on the data captured by the consultation, the responses to the above question were:



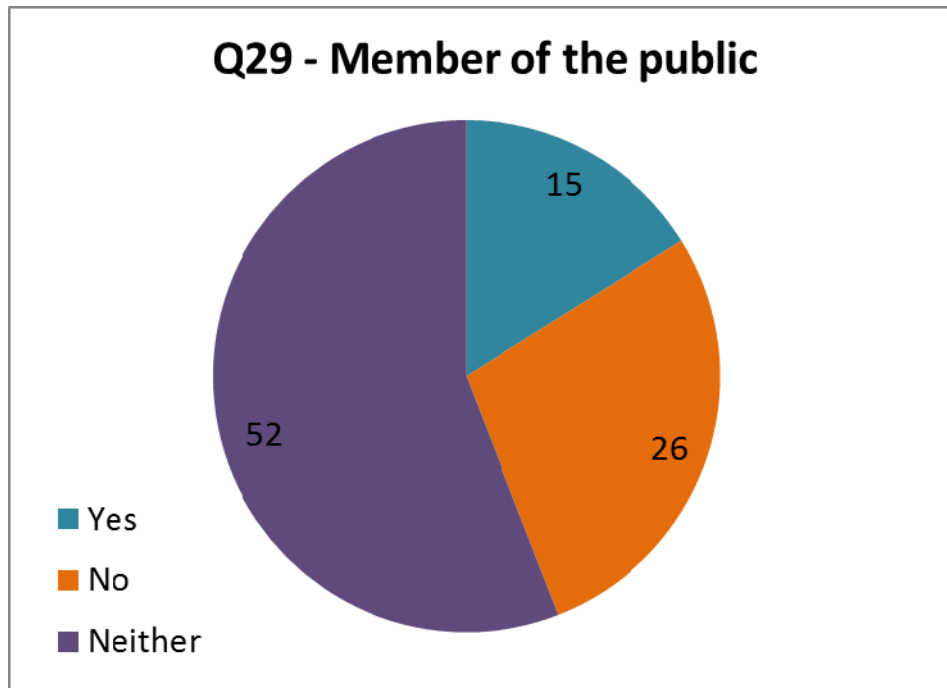
**Yes 32.5%**  
**No 35.5%**  
**Neither 32.1%**

2.29.2. Overall, 234 of the 392 structured responses (59.7%) expressed an opinion to this question.

2.29.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.



2.29.4. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.29.5. **The Textual View.** In addition to the simple “Agree”, “No” and simple to-the-point forms of expression for/against, the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

- Theme 1: Master plans must have a more official (perhaps statutory) basis and must comply with a minimum standard and approval process. They should be statements of intent supported by plans with targets. See also Q30 Theme 7.
- Theme 2: Queries and observations regarding how Master Plans would be reviewed and governed, including: DfT’s role, escalation of issues, and resolution of impasses and, finally, overall assurance of their compliance to standards. See also Q28 Theme 1.
- Theme 3: Queries and observations regarding the various organisations and bodies to participate in the creation, review and monitoring of the Master Plan. See also Q28 Theme 3.
- Theme 4: The guidance in Annex E, if properly constituted, or amended as proposed by the respondent, has the potential to ensure greater coherence across the various plans prepared by airports and by Local Authorities/Regional bodies within which airports are located. (Theme 5 and the items at Other Matters below identify areas for suggested change/improvement.)
- Theme 5: Annex E is a reasonable start but more is required on (variously):
  - The benefits of airports e.g. local employment and air travel as well as their negative aspects e.g. noise
  - Cross geographical-boundary issues
  - General Aviation (as applicable)
  - Surface access, including public and private transport operations.
- Theme 6: Such guidance must permit a degree of flexibility, not adhered to rigidly without thought of local circumstances.



- Theme 7: This will not be effective without the adequate provision of timely, accessible, and complete information to support the creation and review of such plans and at the meetings of forums at which such matters are discussed.

2.29.6. The table below shows the correspondence between the themes reported above, and the type of respondent.

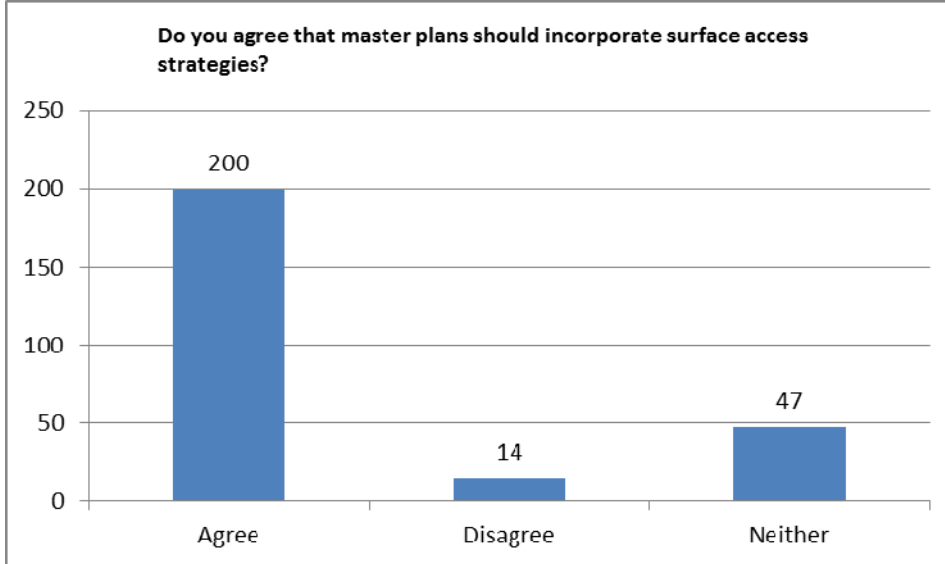
	T1	T2	T3	T4	T5	T6	T7	Grand Total
(Chartered) Institute					1			1
Aerospace	1				1			2
Airline			1					1
Airport Consultative Committee		2	2			2		6
Airport outside London	5		2	8	2	2		19
Business Association	2		2		1	1		6
Environmental Organisation	2	3	4	2				11
Local Community Group	6	3	5		1		2	17
Local Government	14	10	11	8	3	4	2	52
London Airport			1	2	1	2		6
Member of the public	8	8	6		2		3	27
Other Business	1				2			3
Political Party		1						1
Surface Travel Representative	1			1				2
Trades Union					1			1
<b>Grand Total</b>	<b>40</b>	<b>27</b>	<b>34</b>	<b>21</b>	<b>15</b>	<b>11</b>	<b>7</b>	<b>155</b>



### 2.30 Question 30

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

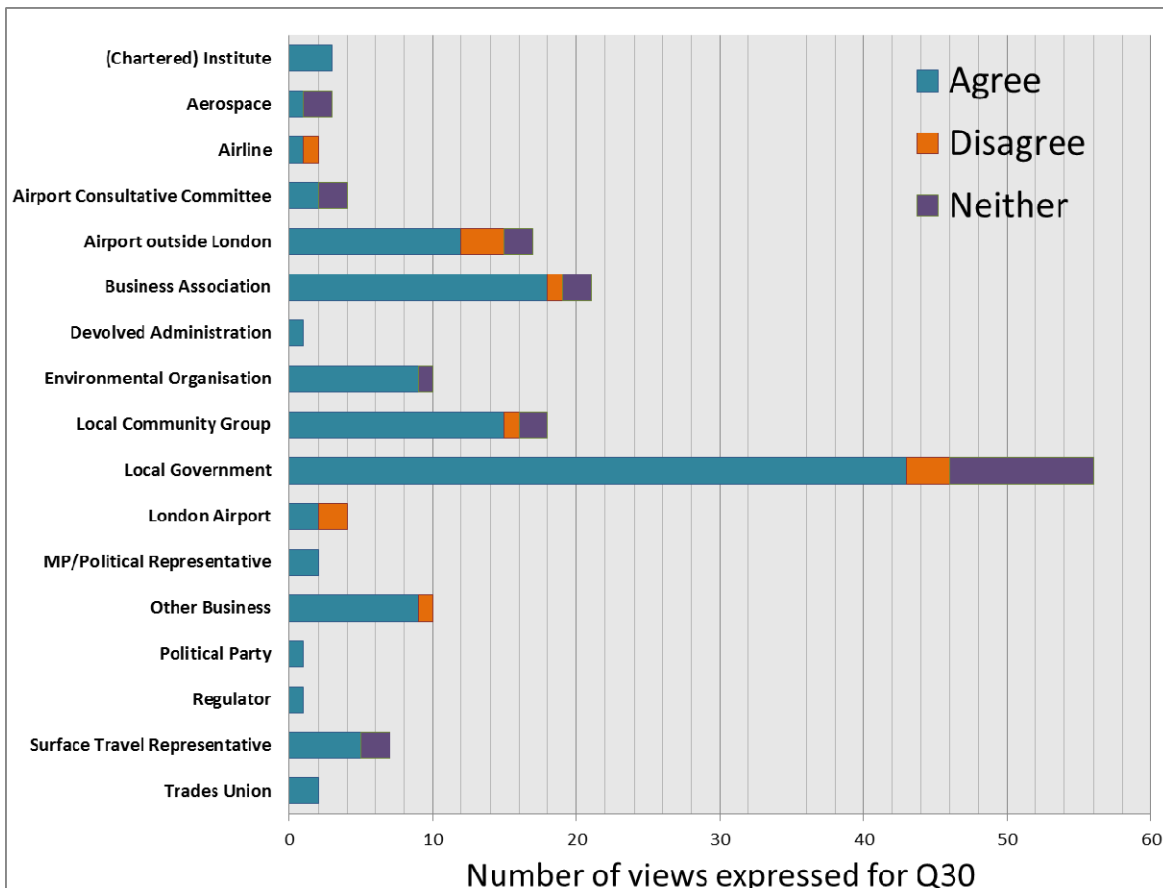
2.30.1. **The Statistical View.** Based on the data captured by the consultation, the responses to the above question were:



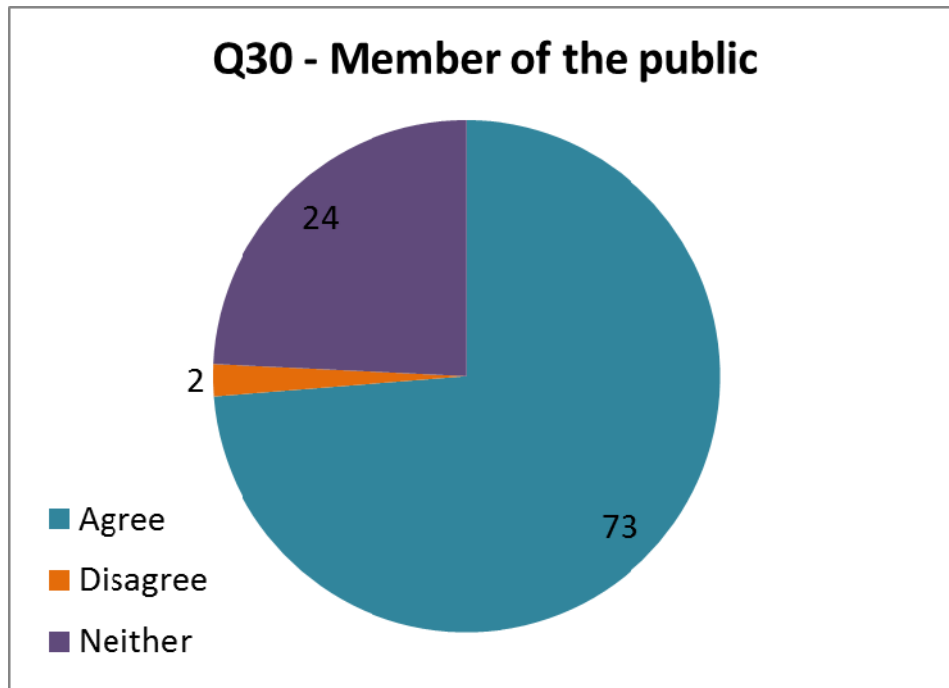
Agree 76.6%  
 Disagree 5.4%  
 Neither 18.0%

2.30.2. Overall, 260 of the 392 structured responses (66.3%) expressed an opinion to this question.

2.30.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.



2.30.4. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.30.5. **The Textual View.** In addition to the simple “Agree”, “No” and simple to-the-point forms of expression for/against, the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

- Theme 1: Such a move is (generally) welcomed because it will (or has the potential to) lead to greater coherence between these documents and other related documents prepared by Local Authorities/Regional bodies, within which airports are located.
- Theme 2: Alignment between these (and other related documents) is more important than them being physical combined. The decision to combine, or not, should be part of the consultation processes required to create and review such documents.
- Theme 3: The importance of such documents being the subject of a) proper and meaningful time or event driven reviews; and b) enforcement and maintenance activity with critical review of the targets and outcomes presented within. See also Q31 Theme 1.
- Theme 4: The role of public transport as a means to access the airport needs to be emphasised; and an opportunity exists to do this during development of the detailed policy.
- Theme 5: Disagree with this proposal because the documents are different nature and thus the disadvantages outweigh the benefits.
- Theme 6: Queries and observations regarding the various organisations and bodies to participate in the creation, review and monitoring of these plans.
- Theme 7: Master plans must have a more official (perhaps statutory) basis and must comply with a minimum standard and approval process. They should be statements of intent supported by plans with targets. See also Q29 Theme 1.



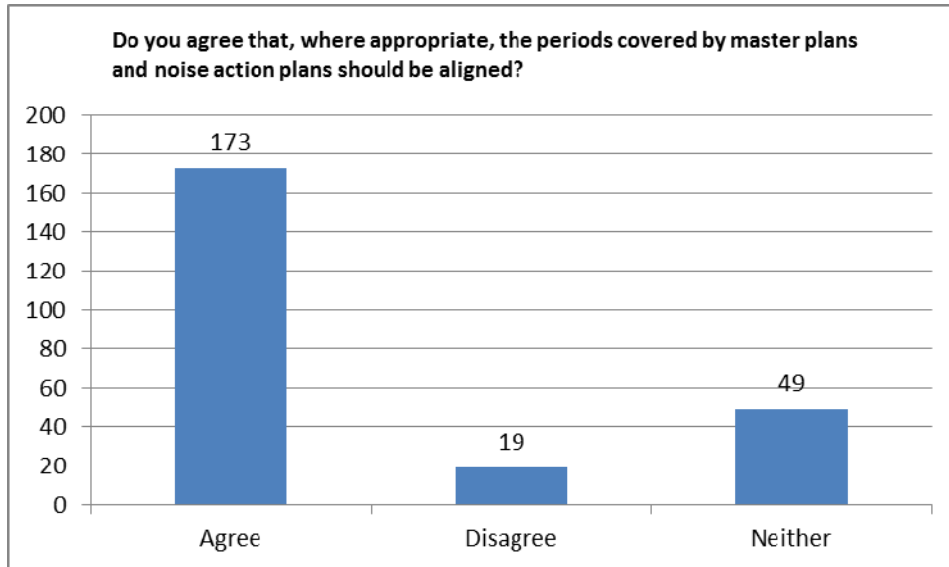
2.30.6. The table below shows the correspondence between the themes reported above, and the type of respondent.

	T1	T2	T3	T4	T5	T6	T7	Grand Total
(Chartered) Institute	1	1	1			1		4
Aerospace	1							1
Airline		1	1		1			3
Airport Consultative Committee		2	1					3
Airport outside London	5	10			4	5		24
Business Association	8	4	2	2	3	1		20
Environmental Organisation	3	1	2	3		3	1	13
Local Community Group	1	1	2				3	7
Local Government	16	15	10	6	6	4	4	61
London Airport	2	4			2	1		9
Member of the public	8	1	2	5		2		18
MP/Political Representative				1	1	1		3
Other Business	1	2		1	1	1		6
Political Party				1				1
Regulator	1							1
Surface Travel Representative	1	2		1		2		6
Trades Union			1					1
<b>Grand Total</b>	<b>48</b>	<b>44</b>	<b>22</b>	<b>20</b>	<b>18</b>	<b>21</b>	<b>8</b>	<b>181</b>

**2.31 Question 31**

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

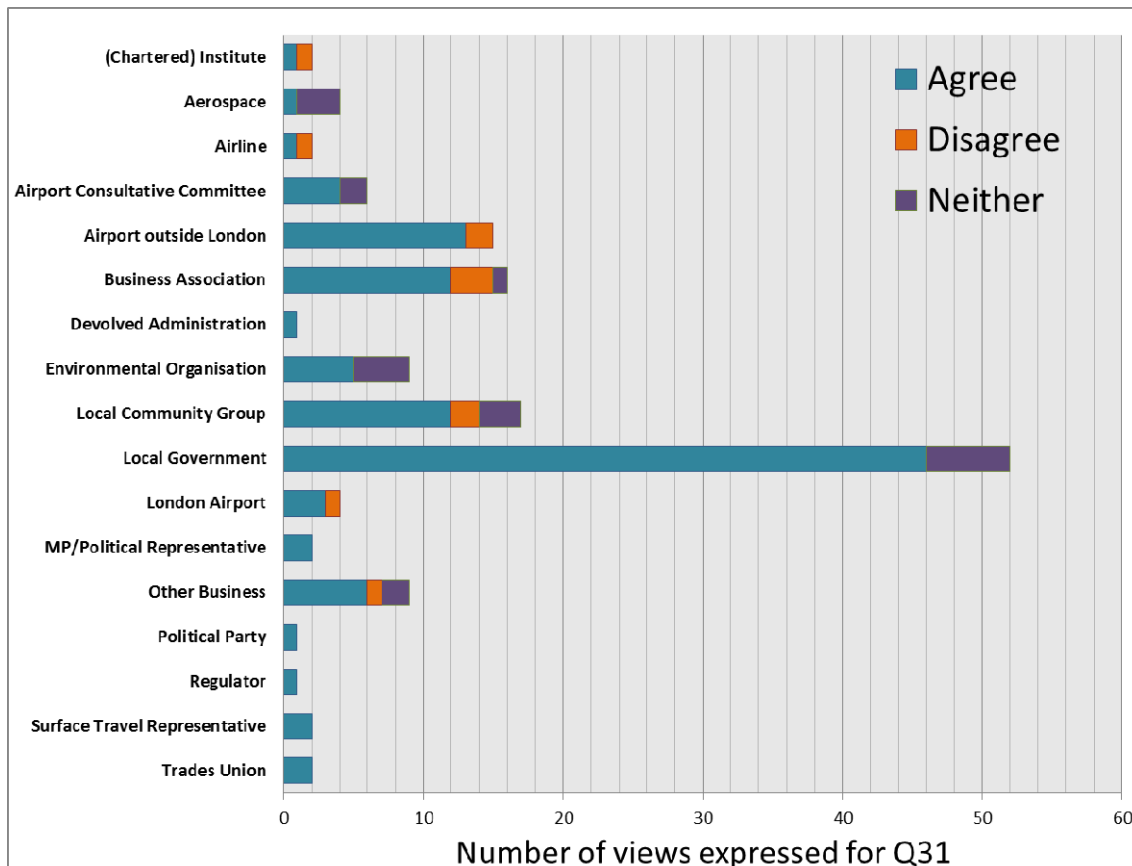
2.31.1. **The Statistical View.** Based on the data captured by the consultation, the responses to the above question were:



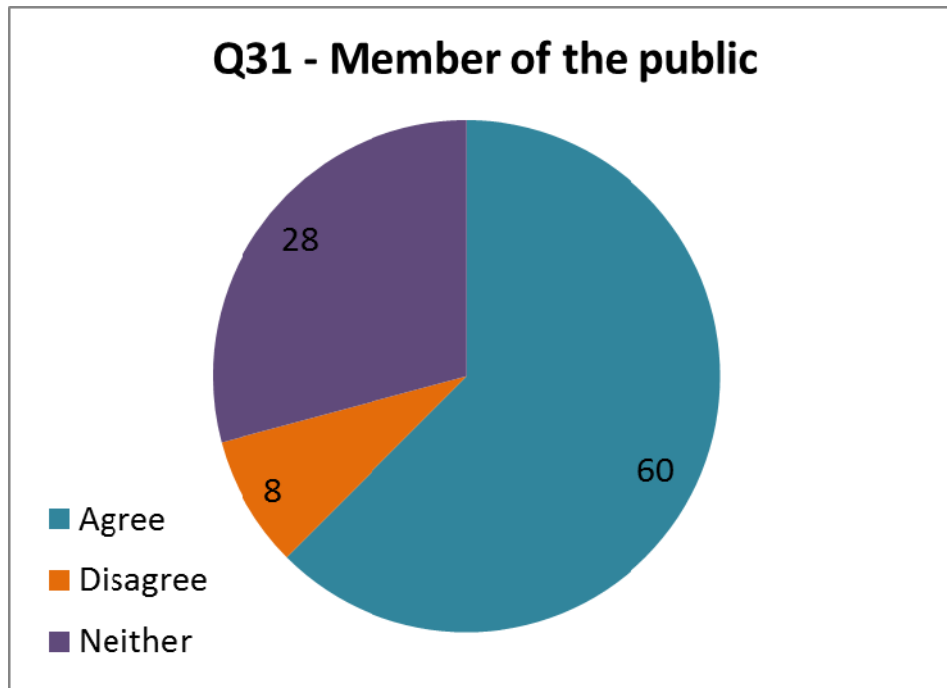
**Agree 71.8%**  
**Disagree 7.9%**  
**Neither 20.3%**

2.31.2. Overall, 241 of the 392 structured responses (61.5%) expressed an opinion to this question.

2.31.3. The responses to this question, by respondent type, (excluding members of the public, and 'Blank,') have the following distribution.



2.31.4. The Pie chart below shows the breakdown for the Member of the Public category. It excludes the 'Blank' response.



2.31.5. **The Textual View.** In addition to the simple “Agree”, “No” and simple to-the-point forms of expression for/against, the following broad themes have been established by HMCM from analysis of the written material provided by respondents.

- Theme 1: The importance of such documents being the subject of both meaningful time or (flexible) event driven reviews. See also Q30 Theme 2.
- Theme 2: Generally, in favour as the end result, benefits and outcomes of the processes described in these documents will be better. **Two respondents felt combination would increase the review effort to an extent that smaller bodies would be unable to contribute as fully as historically.**
- Theme 3: Alignment between these (and other related documents) is more important than them being physical combined. The decision to combine, or not, should be part of the consultation processes required to create and review such documents.
- Closely aligned to Theme 3 is: Theme 4: It would be wrong to mandate this. The decision to combine, or not, should be part of the wider consultation processes required to create and review such documents.
- Theme 5: There must be no watering down or diminution of the benefits currently being delivered or required by such plans.
- Theme 6: What is meant by “Appropriate” and how can this be determined in practice?





2.31.6. The table below shows the correspondence between the themes reported above, and the type of respondent.

	T1	T2	T2c	T3	T4	T5	T6	Grand Total
(Chartered) Institute					1			1
Aerospace	1			1				2
Airline	1				1			2
Airport Consultative Committee	3	3			1	1	1	9
Airport outside London	3	2	1	2	4	1		13
Business Association	3	4		3	1	1		12
Environmental Organisation	3	1				1		5
Local Community Group	4	1		1	2	1	2	11
Local Government	13	11		8	3	5	4	44
London Airport	1		1	1	3			6
Member of the public	5			4		5	4	18
MP/Political Representative		1						1
Other Business	1	1			1			3
Regulator		1						1
Trades Union		1						1
<b>Grand Total</b>	<b>38</b>	<b>26</b>	<b>2</b>	<b>20</b>	<b>17</b>	<b>15</b>	<b>11</b>	<b>129</b>



## Appendix A Analysis of Respondents to the Consultation

Table A.1 below the breakdown of the responses received by respondent type and by method of response (email, online database entry, or paper/hardcopy). We have not counted responses received as hardcopy when sent as a backup to an online or email return.

<b>Respondent Type</b>	<b>Email</b>	<b>Online</b>	<b>Paper</b>	<b>Grand Total</b>
(Chartered) Institute	6			<b>6</b>
Aerospace	7	2		<b>9</b>
Airline	6			<b>6</b>
Airport Consultative Committee	12	1	3	<b>16</b>
Airport outside London	21	1	1	<b>23</b>
Business Association	35	7	3	<b>45</b>
Devolved Administration	3			<b>3</b>
Embassy	1			<b>1</b>
Environmental Organisation	17	3		<b>20</b>
General / Business Aviation	2		1	<b>3</b>
Local Community Group	28	8	1	<b>37</b>
Local Government	71	11	7	<b>89</b>
London Airport	4			<b>4</b>
Member of the public	49	125	7	<b>181</b>
MP/Political Representative	1	1	1	<b>3</b>
Other Business	14	4	2	<b>20</b>
Political Party	2	1		<b>3</b>
Regulator	2			<b>2</b>
School	1		4	<b>5</b>
Surface Travel Representative	11	1		<b>12</b>
Trades Union	2		1	<b>3</b>
<b>Grand Total</b>	<b>295</b>	<b>165</b>	<b>31</b>	<b>491</b>