

Government Green Paper Consultation on Aviation Strategy

What this paper is about

Delegates are invited to consider the attached draft response prepared by the Secretariat and advise as to whether it should be submitted to Government.

Points for discussion

- To seek ACCs' views on compensation and mitigation packages and the outcome from the DfT's Focus Group to be held on 6 June
- Whether any comments on APD should be included in UKACCs response to the Green Paper?

Possible Action

Depending on discussion at the meeting.

Background

1. The DfT launched its consultation the Aviation Strategy Green Paper: Aviation 2050 – the Government’s proposed long-term plan for the future of aviation on 17 December 2018. The consultation document and its supporting documents are available on the DfT website at: <https://aviationstrategy.campaign.gov.uk> . Since the publication of the Green Paper the Government has extended the consultation period to 20 June to provide further time for stakeholders to consider its proposals and submit their consultation responses.
2. The Working Group reviewed the Green Paper at its meeting on 18 February. It was recognised that each ACC would have different priorities and would be submitting their own responses. It was therefore agreed to send ACCs a summary document covering the consultation to assist them in the preparation of their individual responses (circulated to all member ACCs on 19 February).
3. The Working Group also agreed that UKACCs should submit a collective response. It was suggested that UKACCs could focus on areas that others might not, for example sustainable growth, passenger experience and regional growth and connectivity. Any response should also urge the Government to be more honest in the final document with more detailed information about how the aspirations would translate into practice.
4. The attached draft response seeks to cover the issues raised by the Working Group and issues discussed with Baroness Sugg - the then Aviation Minister. The draft also makes reference to the Committee on Climate Change’s recent report. A matter not addressed in the draft response is the future of APD and how the money raised through this tax is used by the Government. Delegates views are sought on whether this should be addressed in the UKACCs response.
5. Delegates are invited to approve the draft UKACCs response set out in Annex 1.

Frank Evans
UKACCs Secretariat

SUGGESTED DRAFT UKACCS RESPONSE

Introduction

1. This response is being submitted on behalf of UKACCs – the Liaison Group of UK Airport Consultative Committees - representing 23 airport consultative committees (ACCs) from the UK's largest airports (ranging from major international airports such as Heathrow and Gatwick to small regional airports such as Inverness and Bournemouth.) Some 50 UK airports are required by civil aviation legislation to establish an appropriate consultative arrangement, normally designated as an ACC. UKACCs seeks to bring together member ACCs to discuss matters of common interest and to share experience and best practice.
2. Membership of an ACC is required to cover three "categories"
 - users of the airport (airlines, passengers, freight operators, staff, transport providers, caterers and other on-airport businesses);
 - local authorities in the vicinity of the airport and
 - other organisations from the “community” surrounding the airport that have an interest in the operations and management of the airport. “Community” does not just mean local residents but also business and tourism interests, environmental and local amenity groups.
3. ACCs aim to act as a critical friend to the airport and develop a consensus view among all stakeholders on the operation and future development of their airports. ACCs are required to operate in accordance with DfT guidelines but have no statutory powers.

General overview

4. UKACCs welcomes the development of a new Aviation Strategy which takes into account the growth of the industry in recent years, advances due to new technology and the need to reconsider the consequences for the environment, local economies, communities and passengers. It is important that the strategy seeks to ensure that the negative impacts are addressed, managed and minimised particularly in terms of noise disturbance, pollution, carbon emissions and surface transport as well as recognising and supporting the role that aviation can play in developing the national, regional and local economy.
5. The policy measures addressed in the Green Paper are comprehensive and wide ranging. However it is important that these support the competitiveness of the industry such as between UK airports and between UK airports and their competitors overseas and that UK airlines are not put at a competitive disadvantage in the global market. It should also be recognised that airports play an important role as key economic drivers in their regions, a position that needs to be protected and harnessed in order to safeguard the future economic performance of the area, its ability to continue to attract businesses and investment which in turn secures jobs and jobs creation for the future. The growth in aviation therefore has an essential role in supporting the growth of the region. However balanced against this growth it is vital that action is taken to address the negative impacts of growth in aviation/airports. Local communities must have greater confidence that these negative impacts will be properly addressed with measures put in place to ensure delivery of key environmental performance targets. This will require the need to develop a balanced approach that is supported by all affected by the operation of the airport.

Government Role

6. In developing a future strategy, it is vital that the Government fully recognises its role as an enabler. Airports, airlines and ACCs can take local action but in a number of areas, action can only be taken through government involvement. As aviation grows, surface access will become an increasingly important area. There are a number of key stakeholders involved for example - Network Rail, train companies; Highways England; local authorities and coach companies etc. A fully co-ordinated

approach is essential to ensure that passengers have access to a fully integrated transport system. It is up to Government to facilitate and co-ordinate suitable and effective processes with clear timetables.

7. Similarly, it is important that Government provides advice on how aviation should respond to the challenges set out in the recent report by the Committee on Climate Change. UKACCs notes that aviation emissions in the UK have more than doubled since 1990, while emissions for the economy as a whole have fallen by around 40%. Achieving aviation emissions at or below 2005 levels in 2050 will require contributions from all parts of the aviation sector, including from new technologies and aircraft designs, improved airspace management, airlines' operations, and use of sustainable fuels. It will also require steps to limit growth in demand. In the absence of a true zero-carbon aircraft, demand cannot continue to grow unfettered over the long-term. Again, local action can be taken but it needs to be taken in the overall context of the Government approach.

8. One of the key challenges in developing aviation strategy is balancing growth with environmental impact. ACCs are fully aware that an airport provides economic, employment and leisure opportunities for a region not just the immediate vicinity. However airports have an important environmental impact on local residents. Whilst aircraft are becoming more noise efficient the number of flights and low flying aircraft now appear to be the key concerns of people living under flightpaths.

Specific Issues

Regional Connectivity

9. The protection of slots for regional services at the capacity constrained London airports, principally Heathrow and Gatwick remains a key area of concern for UKACCs. UKACCs would welcome a discussion on what more can be done to ensure access to London airports for regional services in the short term before new runway capacity is delivered. This is particularly important for services from the further regions of the UK where other options e.g. rail or coach do not represent a viable or convenient alternative.

10. It is essential that action is taken to ensure the sustainability of UK domestic services from the further regions. These services are critical to the business life of the regions, for leisure travel and for interlining at airports such as Manchester, Birmingham and Newcastle (which can help to ease the impact on capacity at SE airports).

Environmental Impact

Overview

11. As stated above, whilst aircraft are becoming more noise efficient the number of flights now appears to be the key concern of people living under flightpaths. There is a need to develop supplementary metrics to better track and monitor impacts and environmental performance to help address the concerns of communities and to give them confidence that the negative impacts against the backdrop of traffic growth are being proactively monitored and action taken to provide further mitigation where necessary. What work is being carried out by the Government to take forward the development of supplementary metrics and will proposals be included in the forthcoming Green Paper for wider consultation?

12. UKACCs acknowledges the increasing use of PBN and the potential opportunities it can bring for providing respite/mitigation as well as ensuring optimisation of flight procedures e.g. better management of altitude of aircraft on arrival to reduce noise impacts. However it is also recognised that there a number of conflicting interests. It is therefore vital that an equitable balance is achieved reflecting the divergent interests and that any strategy is fully sustainable. UKACCs would be happy to assist in the development of this work.

Airspace change

13. UKACCs welcomes the new airspace change process and the greater transparency. It is hoped that this will lead to consistency of information. In the past there have been acrimonious debates as to which set of information is correct in reaching decisions. The new process will hopefully help to address this and the reasons for airspace decisions to be universally accepted. UKACCs is reviewing with

member ACCs the mechanisms in place at their airports to ensure the engagement with communities is effective and fit for purpose. Is the Government looking at best practice models for this?

Noise

14. Aviation noise continues to be a major concern for communities living around airports. Although technological developments have resulted in the operation of quieter aircraft, the issue of frequency of overflight of aircraft and the height of aircraft on arrival remain matters of concern. UKACCs therefore welcomes the proposals set out in the Green Paper particularly the initiatives to progressively reduce the noise of individual flights, the requirement to consider noise impacts through the airspace design process; the setting of noise caps as part of airport growth planning decisions; the introduction of a new national indicator to track the long term performance of the aviation sector in reducing noise and setting a new objective to limit, and where possible, reduce total adverse effects on health and quality of life from aviation noise. In addition to these measures the Government should be exploring operational measures which result in improved noise outcomes.

15. UKACCs supports the proposal that all major airports set out a plan which commits to future noise reduction, and to review this periodically. This should contain clear targets and timelines and be developed in consultation with the local ACC and the local community. An indicator table recording airports' environmental performance could act as a powerful incentive for airports to improve performance.

16. UKACCs notes the work undertaken by the CAA to monitor airports' performance in providing services for disabled passengers and are rated according to their performance. This has clearly acted as an incentive to airports to improve their performance. A similar system could be very effective in encouraging airports to monitor environmental performance.

Climate Change & Emissions

17. UKACCs fully recognises that tackling climate change and reducing emissions is another key challenge facing the aviation industry. International action is needed and UKACCs believes that the government needs to play a key role in providing international leadership. This action should consider all abatement options and should actively encourage the industry to develop solutions.

18. UKACCs welcomes the Committee on Climate Change's report on global temperature goals and notes that it argues that the UK should lead the global fight against climate change by cutting greenhouse gases to nearly zero by 2050 and also that it believes the growth in aviation must be constrained. The way in which the Government will address this will no doubt attract much debate and scrutiny from a wide range of interests and UKACCs acknowledges that difficult decisions will have to be made.

19. It is noted that the Green Paper advises that the Government commits to regular updates of the Aviation Strategy. It is important that these regular reviews are undertaken as it will provide an opportunity to assess how the UK's commitments under the Paris Agreement are being met and what more needs to be done as global policies emerge. UKACCs would therefore like to see included in the Final Strategy specific time-points for these reviews to be undertaken to ensure that the aviation strategy aligns with developments in the Government's overarching climate change strategy.

Air quality

20. UKACCs agrees that there is a need for the Government to take further action to ensure aviation's contribution to local air quality issues is properly understood and addressed. Improved and effective monitoring should form a key element. UKACCs also supports the proposal that all major airports should develop air quality plans to manage emissions within local air quality targets. It also believes that the industry should be supported in the development of cleaner fuels to reduce the air quality impacts of aviation fuels.

21. UKACCs also notes that there are currently no air quality standards for Ultra Fine Particles (UFP) in the UK atmosphere and the WHO has not recommended an air quality guideline, although the matter remains under consideration given authoritative reviews of the health effects of UFP exposure

are not yet conclusive. UKACCs is aware of a recent report of the UK government's air quality expert group (AQEG) in that it has concluded that until such matters are resolved through further research, it will be important to continue to monitor and evaluate the concentrations of UFP in the UK, both to understand better their sources and dynamics and to provide a database for use in health effects research. UKACCs suggests therefore that the Final Strategy takes into account the recent findings of the report and provides guidance to airports as to whether UFP is to be monitored around airports and by whom.

Surface Access

22. Providing efficient and reliable surface access to airports is key to helping the industry work for its customers and users (passengers, freight operators, airport/airline staff, businesses and other users). As aviation grows, it is essential that access to airports is developed to meet anticipated demand. In particular access to airports by public transport should be encouraged. Additional car use will only serve to worsen air quality around airports and have greater impact on residents living close to airports.

23. It is important that an integrated approach is adopted and that Government facilitates and co-ordinates infrastructure developments. Local airport transport fora can play a key role in both reviewing performance and suggesting priorities.

Land Use Planning

24. UKACCs regrets the delay in Government providing greater clarity on planning conditions affecting airports. Planning authorities used to be guided by Planning Policy Guidance Note 24 on Planning and Noise (PPG24). UKACCs, individual ACCs and the industry e.g. Sustainable Aviation has highlighted this to Government for a number of years now. Significant improvements have been made in reducing noise around airports over the past decade but as the noise contours have shrunk the result is developments have been permitted closer to airports. Any benefits resulting from efforts by airports/NATS to reduce flight path swathes can easily be negated if the local planning authority approves housing developments directly under flight paths. The policy vacuum left by the revocation of PPG24 has resulted in the absence of technical guidance at national level for planning authorities, airports and developers and this urgently needs to be addressed.

25. UKACCs is aware (to be reported at the annual meeting – see item 3(a)(iii)) of the proactive work of Crawley Borough Council, the planning authority for Gatwick Airport, in that it has developed as part of its Local Plan process a bespoke noise policy underpinned by specific noise standards aimed at preventing development in areas where noise exposure is greater than 66dB. This approach was found “sound” by the Planning Inspector at the Local Plan Examination and successfully defended at planning appeal. UKACCs therefore urges the Government to consider the approach adopted by Crawley Borough Council and to bring forward national guidance to address this important issue.

26. In addition to this, UKACCs is aware of a new challenge arising from the recent change to national planning policy of “Permitted Development” which allows noise sensitive developments to come forward without restriction or mitigation such as a recent case where an office accommodation block was converted to housing with poor quality glazing which exposes occupants to significantly high noise levels. This issue must also be addressed by the Government.

Mitigation

27. UKACCs agrees that a review of the different forms of mitigation is needed. In addition to monetary compensation and insulation etc. what more or different options can be explored? *(the DfT is holding a Focus Group on compensation on 6 June – an update will be given at the meeting. Delegates will be asked to review this part of UKACCs' response at the meeting)*

ICCAN

28. UKACCs welcomes the establishment of ICCAN and its emerging strategy. However it is important that this new body is given an opportunity and the resources to assist in the development of noise policy. For example, the body could develop guidance tiered to reflect the size of the airport and local circumstances. Given the broad geographic reach of UKACCs and its member ACCs, UKACCs is well placed to input to ICCAN's work and in the development of best practice guidelines.

Community Groups

29. UKACCs recognises the concerns and values the input from community noise groups but is concerned that many community groups appear reluctant to engage with their ACC elected representatives to bring their concerns to the attention of the ACC.

30. In some cases, the Department has accorded great prominence to the views expressed by the more active community groups which UKACCs believes should be treated in a fair and balanced way. UKACCs is concerned that some of these community groups may not be fully representative of the communities they purport to represent and may not provide a balanced view. In particular it seems that these groups tend to be very South East centric focussing on major airports and there is concern that their views may not reflect the views of regional airports. It is therefore important that the development of the new aviation strategy recognises that each airport has different local circumstances and this should be acknowledged in developing policy. Issues affecting major international airports will not necessarily be the same as those faced by smaller regional airports.

Consultative Committees

31. UKACCs strongly believes that ACCs can play a key role in assisting Government in the development of its future aviation strategy. For example ACCs are involved in the airspace change process not only as a key stakeholder but also in helping to build an understanding between the various stakeholders of their airport's plans and the need for change; advising the airport of local community issues that need to be taken into account; and raising awareness of the timeline of the various stages of the CAP 1616 process and how interested parties can get involved.

32. UKACCs provides an effective means by which the airports across the UK can collectively engage with a wide range of local stakeholders all with differing views, in helping to raise awareness of the airport's operation and future development plans and to assist in building a common understanding across the various interests on issues to be addressed. UKACCs welcomes the positive reference in the Green Paper about the important work of the statutory airport consultative committees and the need to improve the effectiveness of the process and the need for local communities to use their ACC to engage with airports through their locally elected representatives. The suggestion that Government might consider the scope for developing supplementary guidance to ACCs is therefore welcomed and can assist further in fostering local engagement. It should be recognised ACCs are only advisory but have no powers. Perhaps consideration should be given to the responsibilities and powers available to ACCs particularly in respect of their role in monitoring performance standards – passenger and environmental – at their airports?

33. Although airports are supposed to consult the ACCs on proposed developments relating to the airports, experience suggests that the consultation is not always as effective as it might be. This needs to be addressed.

Passenger Charter

34. UKACCs fully supports the proposal to establish a new Passenger Charter for aviation to bring together into one document those statutory and regulatory obligations placed on airports and airlines in delivering passenger services and the rights of passengers when things go wrong. Given the absence of detail in the Green Paper on other possible measures to be included in the Charter it is important

that further consultation is undertaken on the development of a basic set of requirements covering the needs of all passengers.

35. UKACCs also suggests that whilst a charter should contain a basic set of requirements, it will need to be developed to reflect an airport's local circumstances and be proportionate to the scale of operation at an airport. It is noted that the expectation is for the industry to voluntarily improve its standards through the Charter, while also delivering on its legal obligations. It is important that the Government/CAA review the effectiveness of the voluntary measures and, if standards are not being met, whether regulation is needed for improved outcomes. It is important also for the Final Strategy to give guidance on who should fund this new requirement and its monitoring.

36. UKACCs notes that the Charter would be supported by:

- a performance framework with clear Key Performance Indicators (KPIs) to allow monitoring, reporting and ongoing improvement;
- expanded enforcement powers for the CAA with respect to legal obligations for passengers with reduced mobility and compensation claims;
- new standards for open data, data sharing and data protection;
- improved border performance standards through changes to business and delivery models and funding arrangements;
- enhanced passenger representation.

37. UKACCs welcomes these proposals. It is further noted that some of these measures would require legislative change to be implemented. UKACCs would be willing to engage in initial discussions on the development of the charter.

38. UKACCs acknowledges the proposal to give Transport Focus an enhanced representation role as the voice of air passengers considering airline performance under the Charter. It is not clear from the Green Paper or in its supporting documents as to the reasons for this proposal. It is not clear what added value Transport Focus could bring to what is already a complex area involving a whole range of organisations/agencies and international obligations and would to a certain extent duplicate the work of ACCs in looking after the passengers' interest at their airport. Have other options been considered? Without any further justification UKACCs could not support the proposal at this stage.

Disabilities

39. Any passenger using an airport should be able to have a seamless experience rather than face a series of obstacles. The proposed range of measures designed to assist disabled passengers are welcomed. In particular there is a need to:

- improve the pre-notification process – to capture and transmit all relevant information, particularly around wheelchairs and batteries, in an accurate and timely manner so that the special assistance service provided can be tailored to the customer needs, and ground handlers can prepare for wheelchair loading;
- strengthen standards around waiting times, handover instances and requirements for critical infrastructure – to provide a quality assistance service;
- improve the storage standards for wheelchairs in the hold – through improving knowledge of wheelchairs and batteries for ground handlers, creating safe stowage areas in the hold, and considering wheelchair standards, such as universal tether points, for robust securement
- adopt the recommendations and provisions in European Civil Aviation Conference (ECAC) Document Number 30 in Section 5 on Facilitation of the Transport of Persons with Disabilities and Persons with Reduced Mobility. It is noted that there is a reluctance amongst some airlines to board disabled passengers first. It is important disabled passengers are able to board aircraft with dignity.
- remove limits to payments for damage caused to wheelchairs during flight so that realistic replacement or repair costs are remunerated by airlines
- increase uptake of training programmes to improve disability awareness for customer-facing staff including security and border staff, and for ground handlers to minimise damage to wheelchairs when loading

- expand the range of enforcement powers available to the CAA to provide for fines for breaches of Regulation [EC] 1107/2006 (accessibility requirements)
- provide consistent, standards for allergy sufferers to make certain that consumers know what to expect when they fly

40. UKACCs welcomes the CAA's action to monitor airports' performance in serving the needs of disabled passengers. To date this has been based on metrics. It is important that this is developed further to assess the actual quality of the service provided.

Conclusion

41. If the Government needs further clarification on any point, UKACCs would be happy to provide further detail.