

DRAFT AVIATION POLICY FRAMEWORK CONSULTATION

RESPONSE OF: LOCAL AUTHORITIES' AIRCRAFT NOISE COUNCIL

<u>Question</u>	<u>Response</u>
Chapter 2 The Benefits of Aviation	
Connectivity:	
Do you agree with our analysis of the meaning and value of connectivity, set out in Chapter 2?	Yes - but with the caveat that the DfT should check the growth assumption modelling undertaken for the Air Transport White Paper and the previous government's Heathrow Expansion programme to ensure that future growth predictions are still within calibration
Fifth freedoms:	
Do you support the proposal to extend the UK's fifth freedom policy to Gatwick, Stansted and Luton? Please provide reasons if possible.	<p>Yes. LAANC believes this will promote new services from the 3 airports concerned which in turn will improve London and UK connectivity as well as taking some pressure off demand for Heathrow slots.</p> <p>In June 2005, the UK Civil Aviation Authority (CAA) published a report on the impact of granting 'fifth freedom' passenger services to foreign (i.e. non EU) airline operators at UK regional airports¹.</p> <p>The report found that the balance of benefits to the UK from greater liberalisation of fifth freedoms to and from regional airports is likely to be positive.</p>
Are there any other conditions that ought to be applied to any extension of the UK's fifth freedom policy to Gatwick, Stansted and Luton?	No.
Airports outside the South East:	
Do you agree that the Government should offer bilateral partners unilateral open access to UK airports outside the South	Yes. The growth of regional airports in relation to the contribution to local regional economies is supported.

¹ 'An Economic Assessment of the Impacts of Granting Fifth-Freedom Rights to Passenger Services from UK Regional Airports', Civil Aviation Authority, 2005 <http://www.caa.co.uk/default.aspx?catid=589&pagetype=90&pageid=5043>

<p>East on a case-by-case basis?</p>	<p>There are environmental and social benefits associated with reducing the need for air passengers and freight to travel long distances to reach larger UK airports and for providing additional capacity away from congested South East airports.</p>
<p>Any other comments:</p>	<p>Future policy should aim to rebalance runway capacity away from an over concentration in the SE. This might for example see a reduction in Heathrow transfers and an increase in flights to and from the regions.</p> <p>The Open skies policy introduction in 1990 has led to route duplication at Heathrow with greater frequencies to fewer destinations but also with lower loadings.</p> <p>It is clear from the Heathrow experience that within the existing regulatory framework that The choice of where planes fly is made by neither the airport owner nor the Government. It is made by the airlines who prioritise the more profitable routes. At Heathrow BA having acquired the BMI slots at Heathrow are now using these not for risky new routes to China (for the benefit of UK plc) but instead to more profitably certain routes such as Alicante, Rotterdam and Leeds Bradford. LAANC suggests that if government wishes to be able exercise control over how runway resources are utilised it may need to consider the reintroduction of traffic distribution rules or some similar regulatory power.</p> <p>Future policy needs to accept that Heathrow will never be able to function as hub airport in the style of US and EU airports (as well as China).</p> <p>LAANC urges that Heathrow should to be excluded from the review of hub capacity. The hub airport model has by definition an insatiable demand for additional runway and terminal capacity. The many connecting flights which feed the long haul routes all need to arrive in the same time window if passengers are not to be left waiting for hours at their airport.</p> <p>Successful hub airports make sure they have additional runway capacity to cope with these 'waves' of arrivals. It is why three runways will never be enough at Heathrow.</p> <p>Comparisons with key competitors are always made to support Heathrow's case for expansion – but the nearest, Charles de Gaulle, has four runways (and is located away from the capital), Frankfurt has four runways and Schiphol has six. There are simply no circumstances in which a four-runway Heathrow would ever be acceptable. It would give rise to a host of new flight paths over residential areas on all sides of the airport and in so doing radicalise new communities not previously affected by aircraft noise.</p> <p>Thus a three runway at Heathrow would soon be full again due to the exponential growth in feeder traffic that will be needed to feed "new" destinations. It is then inevitable that runway 3 and terminal 6 will be followed by further demands for runway 4 and</p>

	<p>terminal 7.</p> <p>Although LAANC would not wish to see Heathrow close it believes that the airport has reached the limit of its capacity. The noise burden from Heathrow on surrounding communities is unacceptable, particularly the impact of night flights.</p> <p>The council believes that it has to be faced that Heathrow cannot grow forever; if the airport is to remain the premier business airport serving London then the government may need to consider the reintroduction of traffic distribution rules for London in some form This may be the only way to ensure that existing underused runway capacity around London is brought into use.</p> <p>Future night noise policy at Heathrow should be quite clear that take off's after midnight London (i.e on Easterlies) will not be permitted save for exceptional circumstances such as humanitarian need or national emergency.</p> <p>.</p>
Chapter 3: Climate change impacts:	
Do you have any further ideas on how the Government could incentivise the aviation and aerospace sectors to improve the performance of aircraft with the aim of reducing emissions?	Differential landing charges are needed, to encourage the reduction of noise and other pollution emissions
Any other comments:	No
Do you have any other comments on the approach and evidence set out in Chapter 3?	<p>It is unclear as to how consultees can respond in areas where Government have yet to make a decision or a policy commitment. These include:</p> <ul style="list-style-type: none"> • Inclusion of aviation emissions in the UK national carbon budgets • Whether to retain a national emissions target for aviation has yet been made and no timescales are given as to when this will happen • The use of biofuels is still a long way off and there is an issue about the use of land that would otherwise be used for growing crops
Chapter 4: Noise and other local environmental impacts:	
Do you agree that the Government should continue to designate the three largest London airports for noise management purposes? If not, please provide reasons.	Yes. The Government needs to maintain control over these airports for planning issues and noise controls, so the designation must remain.
Do you agree with the Government's	No - There is lack of clarity between the Consultation document statement on Policy and that provided by

<p>overall objective on aviation noise?</p>	<p>the Noise Policy Statement for England (NPSE).</p> <p>The Government's policy is stated in the consultation document at paragraph 4.22 as being "to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise".</p> <p>The consultation document further claims (paragraph 4.24) that the policy is consistent with NPSE aim of "avoiding significant adverse impacts on health and quality of life".</p> <p>However in the council's view "limit and "reduce" are not the same as "avoid".</p> <p>The NPSE refers to Lowest Observed Adverse Effect Level (LOAEL) and Significant Observed Adverse Effect Level" (SOAEL). These levels are not given in NPSE, but vary for different noise sources.</p> <p>As the Government has formally adopted the NPSE as the touchstone of its noise policies for England the council considers that it must be the case that future aviation policy be consistent with the aims of of the NPSE.</p> <p>The council there urges that future aviation policy should be clear that the Government intends to:</p> <p>(i) AVOID significant adverse effects on health and quality of life (it is accepted that this may need to be a long term commitment).</p> <p>(ii) give guidance on SOAEL noise level above which significant adverse effects on health and quality of life occur; and</p> <p>(iii) give guidance on LOAEL as lowest noise level above which adverse effects in health and quality of life can be detected.</p> <p>The council suggests that WHO / EU research data can be used for the derivation of both LOAEL and SOAEL for aircraft noise</p> <p>Further there should be a short tem objective to ensure that nobody is exposed to aircraft noise in a residential setting at 69dB_{L_{Aeq}16 hr} or above after 2020.</p>
<p>Do you agree that the Government should retain the 57 dB LAeq,16h contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance?</p>	<p>No. - Evidence from independent studies in Europe is that the 57dB contour is seriously out of calibration as a benchmark for defining the onset of unacceptable air noise emission. In our view we do not believe it has any future value in a UK aviation policy context - in short it should be retired.</p> <p>The EU is currently developing its own environmental noise limit values based upon a number of studies in member states and unless the UK Government is willing to fund further repair work on ANASE so that its findings can be considered robust enough to inform policy the UK should adopt emerging EU standards.</p>

<p>Do you think that the Government should map noise exposure around the noise designated airports to a lower level than 57 dBA? If so, which level would be appropriate?</p>	<p>Yes. As a first step at least 55dB Lden accompanied by 50dB Lnight. In future down to lower levels - 50dB Lden and 40dB Lnight.</p> <p>In support of these noise levels, attention is drawn to the World Health Organisation (WHO) document "Guidelines for Community Noise" (1999) which give a limit of 50 dB LAeqT (over T values of 12 or 16 hours) to protect the majority of people from being moderately annoyed during the daytime (albeit for continuous noise), and the WHO document "Night Noise Guidelines for Europe" of 2009 gives 40 dB Lnight as the lowest observed adverse effect level (LOAEL) for night noise.</p>
<p>Do you agree with the proposed principles to which the Government would have regard when setting a noise envelope at any new national hub airport or any other airport development which is a nationally significant infrastructure project?</p>	<p>No. Hitherto the benefits of technology (in terms of noise) have always been granted to the aviation industry to the point where there needs to be a realignment of benefits.</p> <p>The cause of this misalignment has to a major extent been the continued use of the 57dB contour which has permitted development and expansion with unacceptable levels of noise exposure for most communities who live close to UK commercial airports.</p> <p>Any new infrastructure projects need to be evaluated against updated dose response benchmarks - at a minimum down to 55dB Lden and 50dB Lnight and preferably to also include 50dB Lden with 40dB Lnight</p> <p>Experience at Heathrow has shown that a simple contour cap would not provide any incentive for airlines to use the quietest fleet possible. The T5 noise contour cap is 145km² for the 57dB contour - the latest CAA Heathrow contours show that the 57dB contour has shrunk to 108km². Without the 480,000 atms cap this headroom would almost certainly have been used to increase flights rather than reduce noise.</p> <p>In our view noise caps can only drive the use of quieter aircraft if the cap is set on a "reducing area" basis.</p>
<p>Do you agree that noise should be given particular weight when balanced against other environmental factors affecting communities living near airports?</p>	<p>Yes. Noise reduction should be a priority for communities nearest to an airport.</p>
<p>What factors should the Government consider when deciding how to balance the</p>	<p>Predictable periods of respite is the single most effective noise amelioration measure available for communities who live under landing flightpaths</p>

benefits of respite with other environmental benefits?	
Do you agree with the Government's proposals in paragraph 4.68 on noise limits, monitoring and penalties?	Yes. However the council does not agree with the assertion contained at paragraph 4.22 of the consultation document that the previous administrations' policy on aircraft can be regarded as being consistent with the later (2010) Noise Policy Statement for England (NPSE). Government Policy on aircraft noise should meet the requirements of NPSE. The NPSE has a clear objective to "avoid" significant adverse impacts on health and quality of life. The previous administrations' policy only aims to limit and reduce where possible the number of people in the UK significantly affected by aircraft noise.
In what circumstances would it be appropriate for the Government to direct noise designated airports to establish and maintain a penalty scheme?	LAANC agrees with the Government that a penalty scheme should be considered by airports. For example in cases where there are no clear overriding safety reasons for failure to comply with CDA requirements and / or a requirement to maintain a minimum height when joining the final approach.
In what circumstances would it be appropriate for the Government to make an order requiring designated airports to maintain and operate noise monitors and produce noise measurement reports?	Failure of the airport operator to respond to requests for specific monitoring by representatives of the relevant airport consultative committee backed up by a request from the regulator.
How could differential landing fees be better utilised to improve the noise environment around airports, particularly at night?	Increased landing fees for all aircraft 23:00 to 07:00. During the sensitive times of the day (06:00 - 07:00) and 22:00 - 23:00 an additional premium could be added (base plus x £ to all but the quietest types (QC 0.25) and below). QC 0.25 and below aircraft types that fly with at least 90% loading might be rewarded with a base minus x £ fee.
Do you think airport compensation schemes are reasonable and proportionate?	No. The UK airport compensation schemes are woefully inadequate and require a root and branch review, to be carried out by the regulator in consultation with other stakeholders. New standards of entitlement should be determined and based upon WHO and EU noise standards for the protection of human health.
Do you agree with the approach to the management of noise from general aviation and helicopters, in particular to the use of the section 5 power?	Yes.
What other measures might be considered that would improve the management of noise from these sources?	Regular dialogue between originating aerodromes and communities who are regularly overflowed by helicopters / general aviation. This may need to involve other airport consultative committees somewhat distant from the originating aerodrome. For example many complaints received by the Battersea heliport consultative group have been found to originate from rotor craft which have an origin / destination at Redhill aerodrome with no business connection at Battersea.

<p>Do you have any further ideas on how the Government could incentivise the aviation and aerospace sector to deliver quieter planes?</p>	<p>Support further development of alternative technologies for short haul aircraft suitable for travel within EU destinations.</p> <p>Tax breaks for investment in new quieter rotor craft.</p> <p>For major airports NAPS to have an objective to encourage quietest fleet</p> <p>A landing slot regime which discriminates against noisy engines and rewards for fuel efficient / quieter types.</p>
<p>Do you believe that the regime for the regulation of other local environmental impacts at airports is effective?</p>	<p>The Environment Agency's role and powers regarding water pollution from major aerodromes appears to work and should therefore be retained.</p> <p>The local Air Quality regime is not as effective as it should be. It suffers from the fundamental problem that although local authorities are ultimately responsible for the air quality in the respective administrative areas they have no powers of enforcement with respect to airside emissions from airports.</p>
<p>Do you think that noise regulation should be integrated into a broader regulatory framework which tackles the local environmental impacts from airports?</p>	<p>No it needs to stand alone.</p>
<p>Chapter 5: Working together:</p>	
<p>Do you think Airport Consultative Committees should play a stronger role and if so, how could this be achieved?</p>	<p>Yes. In future it should not be possible for the wishes of democratic decisions taken by the relevant consultative committee to be ignored or over ruled by the airport operator without being independently reviewed by the regulator (CAA).</p> <p>ACCs should operate in a transparent manner and existing ones should be required to review their structures on a regular basis to ensure that they are able to operate without undue influence from the airport operator.</p> <p>Appointments to the Chair of Airport Consultative Committees should be advertised and should be undertaken in accordance with good practice for public appointments. Appointments committees should include at least one community representative.</p>
<p>Is there a case for changing the list of airports currently designated to provide consultative facilities?</p>	<p>Yes - it should at least be reviewed. Battersea heliport as London's only commercial heliport should be designated for consultation purposes.</p>
<p>Do you agree that the Civil Aviation Authority should have a role in providing independent oversight of airports' noise</p>	<p>Yes. And in addition to have the power to take action when Noise Management Plans produced under the requirements of the END do not comply with the minimum requirements.</p>

management?	
Do you agree with the Government's overall objective on working together?	<u>Yes.</u>
Is the high-level guidance provided in Annex E sufficient to allow airports to develop local solutions with local partners?	<u>No.</u> The continuation of Airport Master Plans is not supported in their present form. They are currently non statutory, have no standard format and do not include proposals for managing future surface access. In addition the plans quickly become out of date and in the case of Heathrow still remain in interim or draft status some 7 years after publication. Airport master plans do not appear to have any official status with the National Planning Policy Framework, which we believe they need to have if they are to be of any value as a land planning tool.
Do you agree that master plans should incorporate airport surface access strategies?	If master plans are to continue then this would answer one of the criticisms that LAANC currently has about the master plan process.
Do you agree that, where appropriate, the periods covered by master plans and noise action plans should be aligned?	If Master Plans are to continue this would seem sensible.

ENDS

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21/10/2012 - version 3