STRATEGIC AVIATION SPECIAL INTEREST GROUP
of the Local Government Association

SASIG RESPONSE

NATIONAL AVIATION POLICY REVIEW – 'SCOPING DOCUMENT' CONSULTATION

20 October 2011

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Executive Summary

1 This response is from the Strategic Aviation Special Interest Group of the Local Government Association (SASIG). SASIG represents 39 Local Authorities across England, all with an interest in strategic aviation issues (see **Annex A**, pg.42). These Local Authorities comprise a population of 12.5 million people, around a quarter of the total population of England.

2 We recognise the importance of the Government's programme to underpin existing, and secure future, economic growth, and are eager to support that, as appropriate for Local Authorities, across all sectors, of which the aviation industry is one.

3 The drive for economic growth is one part of the overarching aim of improving people's quality of life and well-being. Meeting this broader aim requires an understanding of how to achieve economic growth in concert with protecting and improving environmental and social conditions.

4 This policy review presents the opportunity for practical application of the Government's renewed sustainable development vision and commitments, building on the UK's 2005 Sustainable Development Strategy. "…the time has come to move sustainable development beyond being considered as a separate, 'green' issue which is a priority for only a few government departments."[1]

5 SASIG sees a need for the next stage of this policy review to embrace this broader aim by addressing the areas that have not been adequately addressed in the process so far:

- **strategic planning**;
- transparent, accepted methodology for **calculating economic value**;
- understanding how to **capture projected economic benefits**;
- application of a 'noise envelope' to provide **reduced noise impacts**;
- improved understanding of the **impacts of concentration and dispersion of flightpaths**;
- progression towards a **ban on night flights** where residents are overflown;
- integration with **climate change policy** to meet the required targets;
- integration with **rail policy**;
- provision and improvement of **surface access connections with airports**; and
- support for and development of **community involvement**.

[1] Department for Environment, Food & Rural Affairs webpage – Sustainable Development www.defra.gov.uk/environment/economy/sustainable/

These headline issues in more detail:-

Strategic planning

- inclusion of a spatial planning approach in order to consider the need for, extent and location of any future capacity increase;
- use of the policy resulting from the review – will it be appropriate for use as a material planning consideration, or not?; and
- anticipation of the likely impacts of the resulting national policy on local planning policy.

Calculating economic value

- the need for the Government to develop and adopt a transparent, accepted methodology for the clear and comprehensive evaluation of the sector's economic benefits *and* disbenefits.

Capturing economic benefits

- a development of the historically-accepted link between the provision of transport infrastructure and forecast economic development benefits, to include the full range of considerations required in order to actually capture those projected economic gains.

An effective 'noise envelope' that reduces actual noise impacts

- application of the ‘noise envelope’ concept in a manner that reduces the actual noise burden experienced by communities under flightpaths, not simply in a manner that tracks upwards with increasing activity in the absence of a meaningful improvement in the noise climate.

Concentration and dispersion of flights

- development of a greater understanding of the community response to aviation noise in order to inform an appropriate application of the air traffic management operational concepts of concentration and dispersion.

Night flights

- evaluation of the economic benefits *and* disbenefits and progression towards the goal of a ban on night flights where a significant number of residents are overflown.

Climate change

- compliance between the national aviation policy and national climate change policy, making any aviation growth conditional upon proven technology of lower emissions.

Rail policy

- provision for local rail improvements in coordination with high-speed rail developments.

Surface access connections with airports

- provision of new and improvement of existing surface access connections with airports, incentivised through meaningful targets in advance of aviation activity expansion.

and

Community involvement

- a constructive evaluation of successful community involvement, in order for those elements to be replicated, or new approaches to be developed in those areas where current practice does not work well.

1 Introduction

1.01 In the policy review Scoping Document, the Government indicates that some elements of the 2003 Future of Air Transport White Paper may still be relevant, but that many of its provisions are no longer fit for purpose as they fail to recognise the importance of addressing climate change and give insufficient weight to the local environmental impacts of aviation.[2] It would therefore be reasonable to expect the newly developing national aviation policy to remedy these deficiencies.

1.02 It is unclear what weight should be given to the 2003 White Paper, for example when analysing local Core Strategy documents, and an outcome from this stage of the review should be to clarify this.

1.03 It is also seen as beneficial for the review to clarify the role of regional airports, from having assessed the national network of aviation services, and having developed an understanding of the interconnections. This requires an understanding of the diversity amongst the group of airports referred to as 'regional'.

1.04 In considering the role of regional airports, we urge the Government to revisit their 'UK Aviation Forecasts'[3] to explain the purpose and standing of the figures presented there.

1.05 We support the Department's approach to this consultation, set out in the Scoping Document as seeking "…the right balance…between the economic, social and environmental costs and benefits of aviation…", stating that "…unconstrained growth of aviation is not an option".[4]

1.06 However, the Scoping Document does not consider future capacity provision by asking the vital question "Why, how and where should further capacity be provided?" In the absence of thoroughly examining this question, the review outcome will not be appropriate for use as national policy. Subsequent stages in the review process must accommodate this assessment in order to address the policy vacuum that has existed in recent years, and provide robust policy that withstands detailed examination. A national policy that lacks specific locational guidance will be almost useless to the aviation industry, the planning authorities and the public.

[2] 'Developing a framework for sustainable UK aviation: Scoping document' (March 2011), par.1.14, pg.9.

[3] 'UK Aviation Forecasts 2011' (Table 2.6, pg.43), August 2011, Department for Transport, http://www.dft.gov.uk/publications/uk-aviation-forecasts-2011

[4] 'Developing a framework for sustainable UK aviation: Scoping document' (March 2011),, par.1.2, pg.6.

1.07 The need for this strategic planning is further reinforced by the Government's 'UK Aviation Forecasts 2011' report in which it is assumed that future capacity increases ('maximum use' scenario) will all be forthcoming from 'regional' airports.[5] This expansion is being approached in that report as proceeding without consideration of the local implications, which is not an approach the Government can reasonably take.

1.08 The review process should also provide a long-term strategy. This is critical for increasing clarity over near-term conditions, guiding medium-term decisions such as safeguarding of land and reducing blight, and setting out the range within which future scenarios should fit.

1.09 The relationship between policy-making and market economics is such that where policy alone is insufficient to achieve the Government's aims, further intervention is needed, such as regulation and financial mechanisms, or an acceptance of the status quo. This relationship contributed to the failure of the 2003 Air Transport White Paper; along with the decision in favour of incremental expansion of the existing airports underlined by a flawed analysis of the bolder option – a new airport. Support in the form of Government policy is not sufficient for businesses to enact that policy; other incentives or factors must be in place too.

1.10 It is also important to understand areas that policy cannot necessarily influence, for instance the changing business models of airline operators.

1.11 The freedom with which airline operators can relocate their operations lies behind the reality that the aviation industry decides where a hub airport develops, not Government policy or direction.

1.12 The Government has a clear focus on supporting economic growth, which underlies its questioning about the benefits of aviation - considering the sector as a whole, and by sub-sector within the industry, as well as the relative importance of aviation's beneficial contributions. When asking about the local impacts of aviation, however, the Government frames these questions in terms of both positive and negative elements. A renewed economic assessment is required to more evenly evaluate environmental and economic elements, to be achieved by the Government developing a transparent and accepted methodology.

1.13 The Government's recognition that the current pace of technological change is not fast enough to reconcile growth on the scale of recent years[6] with either climate change or local environmental targets is welcomed, as these are areas requiring urgent attention.

[5] No expansion is forecast at the following airports: Heathrow, Gatwick, Stansted, London City, Belfast City, and Doncaster Sheffield ('UK Aviation Forecasts 2011' 'maximum use' capacity assumptions, Table 2.6, pg. 43).

[6] 'Developing a framework for sustainable UK aviation: Scoping document' (March 2011), par.1.10, pg.8.

1.14 Associated with this, the Government is urged to recognise that, historically, the promised technological improvements used by the aviation sector in their projections have not materialised. The damaging outcome of these over-estimations is that decisions made on the basis of such promises, for instance, expansion and capacity increases, are seriously compromised – and the promised gains not realised.

1.15 In order to actually capture the gains that are there to be achieved from aviation development, the Government needs to better understand - and challenge - the industry's predictions regarding economic development, inward investment, business growth and technological improvements.

2 National planning policy for aviation - strategic planning

Scoping document questions:-

5.4 How do you think the global aviation sector will evolve in the medium- and long-term (twenty to fifty years)? What do you expect to be the most significant changes?

5.5 How, and within what constraints, can aviation growth occur as technological developments and improved operating procedures reduce CO_2, pollutant emissions and noise impacts?

5.6 How should decision-makers address trade-offs or competing interests, where these occur both (a) between different aviation objectives, e.g. CO_2 emissions versus local noise reduction, and (b) between aviation and other sectors, e.g. airspace use versus renewable energy objectives, or the use of land for maintaining a viable network of smaller airfields versus housing development?

5.7 Should some aspects of UK aviation be considered to be of strategic national interest (e.g. certain airports, air traffic control)? If so, based on what criteria?

2.01 The Government has stated that the "…final aviation framework document will fulfil the role of a national planning policy for aviation".[7] We understand the process, aim and purpose of the Scoping Document; however, we have the following concerns:

- the review process the Government has committed to is not appropriate for producing a policy document suitable for use as a material planning consideration;
- it is necessary to set out the criteria by which all aviation development proposals should be assessed, as this is particularly valuable for requiring and providing for quality debate, investigation and analysis at Public Inquiry;
- the impact on local planning policy of this proposed use of the resulting national aviation policy has yet to be fully considered, with further complications resulting from the current overhaul and evolving direction of both the planning system and the 'localism agenda'; and
- the resulting policy must be suitable for use by the Major Infrastructure Planning Unit to appraise nationally significant[8] aviation development proposals.

2.02 It is essential that national policy be derived via a thorough and robust process, in order that that overriding level of policy accurately embodies the values of most importance so that its influence on lower tiers of planning yields acceptable, high quality development.

[7] 'Developing a framework for sustainable UK aviation: Scoping document' (March 2011), par. 2.17, pg.18.

[8] The thresholds for aviation development being regarded as 'nationally significant' are an increase of either 10 million passengers per annum (mppa) or 10,000 air cargo movements .

2.03 Strategic planning must serve to put the right developments in the right place. Amongst the range of factors that must be considered in order to make such a determination, is that of the lasting impacts of partial implementation of a development.

2.04 Impacts on the achievement of other policy goals and aims – not necessarily directly related to the development being considered - must also be anticipated, analysed, and deliberated upon in the process of strategic planning.

2.05 A clear and fair process, with meaningful involvement of interested parties at all stages, is an essential element for successful strategic planning.

CASE STUDY: Hillingdon LB & Heathrow Airport

National planning policy for aviation - strategic planning

Extracts from Planning Witness Statement, Hillingdon LB, in relation to the proposed third runway at Heathrow Airport

"1. The decision, instead of having one outcome as anticipated from the consultation, gives rise to three possible outcomes:

a. Partial implementation of the third runway, despite its marginal economic benefit;

b. Full implementation of the third runway with additional noise, air quality and surface access impacts; or

c. Non-implementation of the decision due to the failure of BAA to meet environmental pre-conditions, or a decision by BAA that it would be uneconomic, given the significant restrictions that are apparently to be placed on the facility by the decision.

It is difficult to tell what will happen at Heathrow, not least because of the long history of "broken promises" referred to in other witness statements. However, the decision introduces a huge amount of additional uncertainty. If (a) transpires then the areas will suffer all the disbenefit in terms of demolition and blight, but significantly reduced "benefits" in the terms of the Consultation Document. If (c) transpires then huge areas will be blighted for long periods with no certainty as to what happens next. It will, however, result in significant regeneration costs, that will have to be borne, at least in part, by local communities."

"18. The Government's failure to consult has also meant that local planning authorities have been unable to give proper consideration to the impact of this decision, which has effectively blighted areas of Hillingdon and other West London Boroughs, despite the fact that this development may never go ahead.

19. Whilst in Hillingdon a 'business as usual' approach has been adopted to dealing with planning applications in the decision area, it is our view that the area is now blighted. The level of blight extends well beyond those houses and land directly located in the areas set aside by the Government for a third runway.

……continues……

20. Of particular concern, is the impact the decision will have on planned improvements to local schools as part of the programme for *Building Schools for the 21st Century* as well as other local infrastructure improvements to parks and open space, and other local community facilities. This makes it difficult to deliver on existing local policies let alone achieve the anticipated vibrant local communities anticipated through the delivery of the Community Strategy and Local Development Framework.

21. Had Hillingdon Council been consulted, the potential regeneration costs in this blighted area if BAA fails to meet the preconditions set out in the decision, could have been taken account in the decision-making process. As we were not given this opportunity, it raises concerns as to whether proper weighting has been given to the environmental impacts of the decision."

CASE STUDY – Cornwall Council and Newquay Cornwall Airport

National planning policy for aviation - strategic planning

A national strategic plan for UK aviation should take into account the characteristics, pressures and needs of peripheral areas of the country. As a Local Authority in one such area, Cornwall Council is seeking to maximise upon the potential of the Council-owned airport at Newquay, to address some of the existing limitations experienced as a 'peripheral area'.

Some features of peripheral areas are:

- poor connectivity in terms of transport and communications;
- low population densities, leading to 'thin' catchment areas for transport development; and
- poor economic performance.

There is capacity at Newquay Cornwall Airport to take advantage of growth potential in the aerospace industry. To this end, an application for Enterprise Zone (EZ) status was submitted, approval for which was received in August 2011. The associated proposal for 'Newquay Aerohub Enterprise Zone' focuses on job creation and economic growth in support of the Local Enterprise Partnership (LEP) priorities.

3 Evaluating the aviation sector's benefits in the context of its burdens

Scoping document questions:-

5.1 How does the aviation sector as a whole benefit the UK? Please consider the whole range of aviation activities including, for example, air freight, General Aviation and aerospace?

5.2 What do you consider to be the aviation sector's most important contributions to economic growth and social well-being?

5.3 Are some sub-sectors of aviation more important than others? If so, which and why?

5.6 How should decision-makers address trade-offs or competing interests, where these occur both (a) between different aviation objectives, e.g. CO_2 emissions versus local noise reduction, and (b) between aviation and other sectors, e.g. airspace use versus renewable energy objectives, or the use of land for maintaining a viable network of smaller airfields versus housing development?

5.7 Should some aspects of UK aviation be considered to be of strategic national interest (e.g. certain airports, air traffic control)? If so, based on what criteria?

5.40 What do you consider to be the most significant impacts – positive and negative - of aviation for local communities? Can more be done to enhance and / or mitigate those impacts? If so, what and by whom?

3.01 The Government's commendably thorough approach to illustrating aviation's economic benefits must be replicated to illustrate aviation's economic costs, along with environmental & social costs and benefits.

3.02 SASIG's approach to the 'economics of aviation' is two-fold:

i/ **CALCULATING** AVIATION'S ECONOMIC BENEFITS - 'net' figure, not 'gross'; and

ii/ **CAPTURING** AVIATION'S ECONOMIC BENEFITS - associated provision essential for realisation of 'paper-based' assessments.

3.03 SASIG expects the Government to use the accurately assessed benefits of the aviation sector to assist rather than damage local economies, by supporting and promoting a mix of economic sectors and jobs, recognising and addressing the causes of an 'overheated' local economy and the opportunities of an under-developed local economy.

3.04 These two elements of an **improved economic assessment of aviation** – '**calculating**' and '**capturing**' – are discussed in more detail in sections 4 and 5 below.

4 Calculating economic costs and benefits

Scoping document questions:-

5.1 How does the aviation sector as a whole benefit the UK? Please consider the whole range of aviation activities including, for example, air freight, General Aviation and aerospace?

5.2 What do you consider to be the aviation sector's most important contributions to economic growth and social well-being?

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5.40 What do you consider to be the most significant impacts – positive and negative - of aviation for local communities? Can more be done to enhance and / or mitigate those impacts? If so, what and by whom?

4.01 An accurate calculation of the economic benefits *and* economic disbenefits of the aviation sector requires the production of a clear, transparent and accepted methodology that yields a balanced figure, explicitly incorporating the costs of aviation in expression of the benefits.

4.02 This should move us away from the unbalanced headline figures quoted to date, which are gross figures, not net, as they do not take into account the costs of impacts such as:

- compulsory purchase of properties, along with the associated loss of community and impacts of blight;
- opportunity costs of sterilised land, i.e. reduced or zero development potential, compulsory safeguarding of land for future airport development;
- mitigation & compensation payments for noise impacts;
- social cost of noise-induced health and welfare impacts;
- provision of associated surface access;
- actions to manage associated air quality conditions;
- market price of emissions embedded in energy consumption/fuel usage;
- actual reduction of local unemployment;
- impact on the UK's tourism deficit;
- availability of land for business development attracted to the airport; and
- associated social provision (housing, health, education & recreation).

CASE STUDY – Broadland DC & Norwich Airport

Improved economic assessment of aviation - calculating economic costs & benefits

Significant expansion in the form of an urban extension to the northeast of Norwich is proposed in the Council's adopted Core Strategy. The Core Strategy was prepared jointly with neighbouring Authorities and represents a considered and shared view of the way to meet development pressures in the area. However, the presence of Norwich Airport in the northern urban fringe will have some restrictive effects on the scope and nature of development in this area. The public safety zone (PSZ) will clearly prevent development within its defined area, however, there are areas outside the PSZ that might well have been considered for development had the PSZ not disrupted their connectivity with the urban fringe.
The foregone development opportunities will impact on the landowners not on the airport operator, and compromise the ability of Local Authorities to allocate land for appropriate development. In many ways, this is a disguised economic cost.

Scoping document question:-

5.7 Should some aspects of UK aviation be considered to be of strategic national interest (e.g. certain airports, air traffic control)? If so, based on what criteria?

4.03 A mix of economic and employment generators is required in each locality across the country in order to yield a strong and vibrant national economy. The reliance of a locality on any one dominant employer should be avoided, to mitigate against the damaging effects of a major employer ceasing to trade, relocating, or downsizing; not least in recognition of the multiple, complex factors that can combine to result in such losses, which cannot necessarily be externally controlled or anticipated.

4.04 The benefits of the aviation sector should be reported alongside the sector's ranking in relation to other UK sectors operating. Analysis by the UK Office for National Statistics (ONS) (see **Annex B**, pg.43) in the 2009 Annual Business Survey[9] ranks the aviation sector as:

- seventh amongst the 18 classifications, when comparing gross value added (GVA)[10]; and
- fourth of the five sectors within the 'Transport & Storage' classification that incorporates the 'air transport' sector.

[9] UK Office for National Statistics (ONS) 2009 Annual Business Survey, www.statistics.gov.uk/abi/downloads/abs-sections-a-s.xls

[10] Gross value added (GVA) is an economic measure of the value of goods and services produced in an economic sector/industry/area, consisting of 'output' minus 'intermediate consumption'.

Extract from UK Office for National Statistics (ONS) 2009 Annual Business Survey

Standard Industrial Classification (Revised 2007) Section Division Group Class	Description (£ million)	Approximate gross value added at basic prices (2009)
Transport and Storage total =	**57,512**	**a + b + c + d + e**
Ranking of aviation sector ("c") in relation to sectors in same class:		**a > d > e > c > b**
Land transport and transport via pipelines	22,038	**a**
Warehousing and support activities for transportation	19,701	**d**
Postal and courier activities	8,439	**e**
Air transport	5,087	**c**
Water transport	2,246	**b**

4.05 An accurate price for carbon must be included in an improved economic assessment. In conjunction with this, costs for the full range of climate change emissions attributable to the aviation sector must be included, as informed by emerging scientific understanding of their relative impacts on the global climate.

4.06 SASIG is aware of the difficulties of evaluating qualitative impacts, such as those that impact on 'quality of life', and therefore we would expect the Government to use and develop upon existing methodologies. One such methodology is the 'social return on investment'[11], which improves upon previous appraisal methods:

(i) stakeholders' views determine the outcomes and values for the assessment;

(ii) elements identified as those that matter are valued in the assessment, alongside elements that lend themselves to being easily monetised; and

(iii) the "triple bottom line" of social, environmental and economic returns is used.

4.07 SASIG is eager to work with the Government on these issues, and we urge the Government to build upon the experience to be gained where improved economic assessment methodologies that embrace the valuation of less-easily monetised elements have been applied. The 'Green Book' discussion paper on valuing social impacts produced by HM Treasury and the Department for Work and Pensions (DWP) is one such piece of work.[12]

[11], http://www.neweconomics.org/projects/social-return-investment; from 'Grounded. A new approach to evaluating Runway 3', new economics foundation (nef), April 2010.

[12] HM Treasury and Department for Work and Pensions (DWP) Green Book discussion paper on valuing social impacts, http://www.hm-treasury.gov.uk/data_greenbook_news.htm

CASE STUDY – Improved economic assessment of aviation

Independent expert panel to produce transparent, accepted methodology

The Department for Transport (DfT) 'Air Quality (AQ) Technical Panel' agreed a methodology and part of the process for the air quality dispersion model used to assess proposals for a third runway at Heathrow Airport. The value of this process was having an independent group of experts collaborate on the methodology, set the parameters, agree the inputs and explain the assumptions used in the model. A similar process would lend itself to development of an improved economic assessment of the aviation sector.

The purpose of such collaboration would be to provide an agreed transparent methodology. The group would need to be kept in place throughout the assessment process to ensure application of the methodology was subjected to the same transparent process.

In order to obtain an accepted methodology, it is essential that no one party is involved more than another, as this jeopardises the transparency of the process and fosters mistrust.

4.08 The UK tourism trade imbalance, as illustrated in the UK 'Government Tourism Policy' (March 2011)[13] (see **Annex C,** pg.45), must be included. The existence of, and the impact of policy decisions on, this deficit must be explicit in an improved economic methodology.

4.09 The national economic implications of providing capacity for increased outward tourist flights and the implications of the loss of inbound tourism as a result of a lack of capacity near London have to be clearly evaluated to help determine future policy.

4.10 Inclusion of the social costs of blight on communities is needed. By means of illustrating the impact of blight, the purchase of residential units by operators of airports at which expansion programmes are anticipated leads to an increase in the number of people renting rather than purchasing properties, with the associated turnover of residents, and commensurate reduction of investment in such properties, which results in the loss of 'community' in these areas.

[13] UK 'Government Tourism Policy', March 2011, http://www.culture.gov.uk/images/publications/Government2_Tourism_Policy_2011.pdf

5 Capturing economic benefits

Scoping document questions:-

5.1 How does the aviation sector as a whole benefit the UK? Please consider the whole range of aviation activities including, for example, air freight, General Aviation and aerospace?

5.2 What do you consider to be the aviation sector's most important contributions to economic growth and social well-being?

5.3 Are some sub-sectors of aviation more important than others? If so, which and why?

5.6 How should decision-makers address trade-offs or competing interests, where these occur both (a) between different aviation objectives, e.g. CO_2 emissions versus local noise reduction, and (b) between aviation and other sectors, e.g. airspace use versus renewable energy objectives, or the use of land for maintaining a viable network of smaller airfields versus housing development?

5.20 How can regional airports and the aviation sector as a whole support the rebalancing of the economy across the UK?

5.40 What do you consider to be the most significant impacts – positive and negative - of aviation for local communities? Can more be done to enhance and / or mitigate those impacts? If so, what and by whom?

5.01 There is a complex relationship between aviation developments and the gains of that activity in terms of job creation, business attraction and regeneration.

5.02 An increase in aviation operations does not automatically lead to the projected gains of that activity being realised.

5.03 The extent to which the economic benefits of aviation are actually captured would be enhanced by evaluation of the costs of related provision on which the aviation operations rely being taken into account at the options appraisal stage. Such provision covers the local transport network, labour force, land availability & market need for businesses, housing, and health, recreation & education facilities.

5.04 In producing an accurate evaluation of aviation's economic benefits, the various elements that are required in order for those benefits to actually be captured must have been (i) detailed in the evaluation; and (ii) had their deliverability assessed as fully as possible.

5.05 The interconnections between an airport and its surroundings, and the parties involved in the operation and management of those interconnections, require further attention and coordination – on an airport-by-airport basis.

5.06 Surface access is a prime example. If provision is not made for this in the economic evaluation, and working arrangements begun to supply the associated rail, coach, bus, and other, services, the local transport network will not necessarily be able to support efficient operations at airports, resulting in congestion and delays on the local network - including for those journeys not associated with the airport - and the resulting pollution impacts.

5.07 Land use around airports is another element, with demands being placed on land allocation and suitability for: business premises (offices, warehousing, etc.), all elements of social provision for the airport and airline workforce living in the locality, and a need for less-noise sensitive uses to be located in the most heavily overflown areas.

5.08 In order to achieve an actual reduction of local unemployment the economic evaluation needs to not simply supply a figure for the number of jobs created, but to include the types of jobs in terms of permanency, skills required, and whether or not they are essential for the processing of passengers or in addition to this primary role.

5.09 The permanency and activity level of predicted jobs also need to be elaborated upon if we are to achieve transparent economic evaluations of aviation. For instance, will the jobs constitute 'banks of staff', i.e. staff only occasionally or infrequently employed in the sector?

5.10 In order to achieve an actual reduction of local unemployment the economic evaluation needs to not simply supply a figure for the number of jobs created, but to include the types of jobs in terms of permanency, skills required, and whether or not they are essential for the processing of passengers or in addition to this primary role.

5.11 Such a breakdown clarifies those jobs directly related to the aviation industry, and those that are of a more transferable nature, i.e. retail jobs from outlets other than those at airports.

5.12 SASIG recognises the relationship between passengers' experience of using an airport and the retail opportunities provided at the airport, however, a distinction should be made between the number of people involved in getting passengers on and off planes, and those who work in ancillary activities such as retail outlets at airports.

5.13 This is also a consideration in the business model for operating an airport, due to the 'dual till' and 'single till' options for the supply of revenue, with UK airport operators currently able to receive revenue from the retail outlets hosted at their airports.

5.14 It is essential to define accurately jobs that are 'indirect' and 'induced' with respect to the aviation sector. The value of these indirect and induced jobs will not necessarily be lost from the UK economy were the jobs not being provided by the aviation sector, as the value of these non-directly aviation-related jobs can be exploited by other UK sectors.

5.15 Caution must be applied in order to avoid 'double-counting' the indirect and induced jobs reported as associated with the aviation sector when making a similar assessment of other sectors.

5.16 In terms of protecting the aviation sector, the 'direct' jobs are the most vital for its continuation.

5.17 The economic methodology needs to be able to reflect changing airline operator business models; for instance, as staffing levels are reduced at check-in desks with the rise in online check-in; and as new aircraft maintenance centres are opened/closed, the quantity & location of associated jobs needs to be reflected. There is a need for a separate analysis for each airport locality.

5.18 The two case studies presented here serve to illustrate the importance of understanding the factors that both block and facilitate the capture of economic benefits.

5.19 At a large, well-established airport in a rural location close enough to London to be treated as serving the capital city, operated in 2010 at 18.6 million passengers per annum (mppa) (142,993 annual air transport movements (ATMs) in 2010), growth has been sanctioned on the basis of an increase in passenger numbers, however, the predicted growth in associated employment of airport, airline and support staff has not materialised. There remain permitted and unoccupied commercial premises intended for airport- and airline-related uses.

5.20 The other airport was recently converted from military to civilian use, operated in 2010 at 0.9 million passengers per annum (mppa) (6,926 annual air transport movements (ATMs) in 2010), is sited in the north of England, and has been actively promoted by a partnership of the local Council, the airport operator, regional funding body and airport-related employers. There has been valuable growth at this airport in aviation-related development: training of aviation engineers; a live maintenance, repair and overhaul (MRO) facility; and a national military, apprentice training centre.

5.21 These case studies illustrate the differing experiences associated with a small airport at which growth has been in ancillary aerospace uses as opposed to marked increases in passenger numbers and/or aircraft movements, with a short history as a civilian airport – and the commensurate improvement in the noise climate from the cessation of military overflights – backed up by a positive relationship with surrounding communities, compared with an airport at which there are 18 times as many passengers, and 20 times as many air transport movements, and a long history of stepped increases in both of these over the life of the airport.

CASE STUDY – Uttlesford DC & Stansted Airport

Improved economic assessment of aviation - capturing economic benefits

In 2001, BAA Stansted Ltd. submitted an outline planning application to expand the airport from 15 million passengers per annum (mppa) to 25 mppa. The supporting material[14] stated that in 1999 there were 8,770 direct on-airport employees for a throughput of about 9.4 mppa. In the same document, it was estimated that the number of direct on-airport employees would be 16,000 in 2010 for a 25 mppa throughput.

On the basis of this anticipated near doubling of the number of direct on-airport employees by 2010, the outline application included a second office building near to the terminal for airport staff and cabin crew, and a second office building for airline staff and other support functions. Provision was also made for additional flight catering and airline support accommodation a third phase of the industrial development previously permitted in that location. The outline application was approved.

It was anticipated[15] that all this extra accommodation would be required to support throughput of 25 mppa by 2010, and that long-haul passengers would be 17% of the passenger market mix at 25 mppa in 2010[16]. The reality has proved very different.

In 2006, when passenger throughput reached 23.7 mppa, direct on-airport employment was only 11,500[17]. This represented 2,060 passengers/employee compared with the figure of 1,562 anticipated for 2010 in the 2001 application, and reflected 2 main factors. Firstly, a considerable leap in the efficiency of airport operations, brought about to a large degree by the way that low fares airlines operate and, secondly, the almost total absence of long-haul services, reducing the need for cabin crew and on-aircraft catering staff.

Even as 25 mppa was approached, no further applications were submitted by BAA Stansted Ltd. for use of the extra accommodation for airport and airline staff and support functions. Although, applications have been submitted by the operator to temporarily lift airport occupancy conditions, which were refused by Uttlesford Council.

Throughput has now dropped to about 18.4 mppa in the economic recession. The ongoing lack of demand for aviation related office and industrial accommodation is evidenced by the long-term vacant floorspace in office and support accommodation.

In summary, the employment uplift anticipated back in 2001 has not been realised due to market conditions and the way in which Stansted Airport now operates compared to how it was envisaged it would operate.

BAA Stansted Ltd., 2001 outline planning application to increase from 15 to 25 million passengers per annum (mppa):-

[14] Environmental Statement (Volume 7) - Employment Effects
[15] Environmental Statement (Volume 3) - Project Description
[16] Environmental Statement (Volume 2) - Air Traffic Data

BAA Stansted Ltd., 2008 planning application - Generation 2 second runway project:-
[17] Environmental Statement (Volume 7) – Employment

CASE STUDY: Doncaster MBC & Robin Hood Airport Doncaster Sheffield (RHADS)

Improved economic assessment of aviation - capturing economic benefits

Robin Hood Airport Doncaster Sheffield (RHADS) opened as a new international airport in 2005. The conversion of the former RAF Finningley base into civilian use included the opportunity to redevelop the airport camp adjacent to the new passenger terminal for a range of business uses including air related, office, training and marketing, residential and general business parks.

Doncaster MBC in partnership with the airport owner, Peel Holdings Ltd., and the Regional Development Agency, Yorkshire Forward, has been proactive in establishing RHADS as a major catalyst for regeneration based around three themes:

1) skills and training;

2) marketing and inward investment; and

3) improving infrastructure.

1) Skills and training

As part of the planning agreement when the airport opened there was a requirement for the airport operator to support activity designed to capture the local economic and social benefits of the airport.

Peel Holdings Ltd. agreed to lease former RAF offices to support this initiative and an informal partnership of key employment and training providers was established in order to respond effectively to the emerging employment and training opportunities arising from the development of RHADS. The initiative was branded 'Directions Finningley'.

With £750,000 of funding provided by Yorkshire Forward the office was remodelled to provide an operational base for the jobs and training facility, which included a common reception area, meeting, seminar and training rooms.

The broad range of services provided included information, advice and guidance, initial handling of all employment enquiries, matching enquiries to notified vacancies, customised recruitment services for employers, access to on- and off-site training provision, work experience and placement opportunities.

'Directions Finningley' established strong relationships between the airport operator, airport-related employers and key delivery agencies. This placed them in a unique position to gain intelligence in relation to new and emerging economic development opportunities within aviation and to make connections with relevant agencies and initiatives beyond the initial employment and training focus for which 'Directions' had been established.

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Through one such connection with Marshall Aerospace, 'Directions' became aware of skills shortages within the aviation sector, particularly in relation to qualified certifying engineers and other aspects of aviation engineering. The developing relationship with Marshall Aerospace and others gave RHADS a specific opportunity to redevelop a derelict hangar to provide a specialist environment for the training of aviation engineers in parallel with the creation of a 'live' aircraft maintenance, repair and overhaul operation (MRO).

This concept, funded by the Regional Development Agency, embraced aviation education and training within a setting capable of providing high-level operational experience within an expanding industrial sector. The concept evolved into what became a National Aviation Training Academy, supported by 'Directions' originally in partnership with Marshall Aerospace and now operated by BAE Systems, who have established their national training centre at RHADS and are putting all their apprentices through the facility prior to being seconded to military air bases throughout the UK.

2) Marketing and inward investment

Since its initial inception, Doncaster MBC, has always recognised Robin Hood Airport as a strategically important catalyst for the future economic prosperity of Doncaster with the aviation sector being an important driver for new employment and training opportunities.

In 2008, the Council launched a funded programme called 'Take off at the Airport'. This programme was a three-year investment and supply chain initiative aimed at bringing new inward investment into the 100 acres of 'aviation-related' development land surrounding Robin Hood Airport and ensuring that Doncaster businesses and residents benefit from these new investments.

A team was formed, headed up by professionals recruited from within the aviation industry who worked proactively to bring forward new aviation-focused companies on-site at RHADS. The team travelled and exhibited world-wide and made contact with many key individuals within the aviation sector including the British Aviation Group[18], a number of regional aerospace alliances and key businesses.

The team managed to land a number of key successes on-site including 'Bespoke Training Services', 'Redline Aviation', 'Kinch Aviation', 'ACT Technicians Ltd', 'BAE Systems', and the 'Vulcan to the Skies Trust', all forward-thinking aviation-related companies who have seen Robin Hood Airport as an ideal location to support their future growth. In addition, the team - although not concentrating activity on new route development - have supported the airport operator, Peel Airports Ltd., with funding and route development activities that resulted in new routes and increased business from Easyjet and Air Lingus.

Robin Hood Airport is an airport that right from its inception has been developed in partnership between the airport operator and local support agencies. Based on the above it can clearly be seen that airports can act as a catalyst for significant public and private sector investment and regeneration.

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[18] The British Aviation Group (BAG) is the leading representative body for UK companies involved in the airport and aviation development sector, http://www.adsgroup.org.uk/pages/87011355.asp.

3) Improving infrastructure

Recognising the role of RHADS as a catalyst for growth in the Sheffield City Region, a submission was made to the Government's first round of Regional Growth Fund (RGF) bidding for the 'Gateway to the Sheffield City Region' project, which along with opportunities at the airport will deliver:

- a new strategic road/rail interchange adjacent to the M18 motorway;
- expansion of business parks adjacent to the airport;
- regeneration of a major brownfield former colliery site; and
- new residential developments.

The City Region was able to put forward such a comprehensive package because of the interest and confidence of national private sector companies to commit to major regeneration in this area on the back of the commitments made at the airport.

Collectively these investments are planned to create:

- one million square metres of business space;
- 24,000 private sector jobs;
- 5,000 new homes;
- £1.7bn of private sector investment; and
- £1.1bn added to the region's GVA[19] economic value by 2030 – an uplift of 3% from 2009[20].

In recognition of the above outputs, the Department for Business, Innovation & Skills (BIS) has conditionally offered Doncaster Council and its private sector partners £18m of funding for transport infrastructure to connect the airport to the national motorway network.

[19] Gross value added (GVA) is an economic measure of the value of goods and services produced in an economic sector/industry/area, consisting of 'output' minus 'intermediate consumption'.

[20] Experian regional economic model used to inform the Regional Growth Fund (RGF) bid.

6 A 'noise envelope' to reduce actual noise impacts

Scoping document questions:-

5.5 How, and within what constraints, can aviation growth occur as technological developments and improved operating procedures reduce CO_2, pollutant emissions and noise impacts?

5.6 How should decision-makers address trade-offs or competing interests, where these occur both (a) between different aviation objectives, e.g. CO_2 emissions versus local noise reduction, and (b) between aviation and other sectors, e.g. airspace use versus renewable energy objectives, or the use of land for maintaining a viable network of smaller airfields versus housing development?

5.22 Can we extract more capacity out of the UK's existing airport infrastructure? Can we do this in a way which is environmentally acceptable? To what extent might demand management measures help achieve this?

5.40 What do you consider to be the most significant impacts – positive and negative - of aviation for local communities? Can more be done to enhance and / or mitigate those impacts? If so, what and by whom?

5.43 What are your views on the idea of setting a 'noise envelope' within which aviation growth would be possible, as technology and operations reduce noise impacts per plane? What do you consider to be the advantages and disadvantages of such an approach?

5.44 Is it better to minimise the total number of people affected by aircraft noise (e.g. through noise preferential routes) or to share the burden more evenly (e.g. through wider flight path dispersion) so that a greater number of people are affected by noise less frequently?

5.45 What is the best way to encourage aircraft manufacturers and airlines to continue to strive to achieve further reductions in noise and air pollutant emissions (notably particulate matter and NOx) through the implementation of new technology?

6.01 The Government has introduced the phrase 'noise envelope'[21], within which aviation activity would increase as noise impacts per plane are reduced through technological and operational improvements.

6.02 This is not an entirely new concept, as noise contours, quota count allocations and movement limits are each a form of 'envelope'.

[21] 'Developing a framework for sustainable UK aviation: Scoping document' (March 2011), par.4.16, pg. 33 & 34.

6.03 The main considerations for deriving a 'noise envelope' are:

- the definition and extent of the 'envelope';
- the need for the 'envelope' to provide an improving noise climate, resulting in an actual reduction of the noise burden experienced by overflown communities;
- greater understanding of the community response to noise and application of this in policy;
- the incorporation of a range of metrics: Lden (used in the European Environmental Noise Directive (END); Lmax (maximum noise of each flight); L_{90} (background noise); and 'n' (number of flights);
- recognition that the quantity and frequency of events is as important a feature as sound levels resulting from aviation activity;
- inclusion of on-airport activities resulting in 'ground noise';
- effective monitoring and enforcement;
- the need for the Government to have challenged and verified the projected technological and operational improvements in advance of basing any 'envelope' on such projections; and
- once verified, technological and operational improvements must be embedded and accepted as normal practice prior to growth being sanctioned, in order that the noise burden is not increased.

6.04 For any ‘noise envelope’ to be effective in terms of minimising and reducing noise impacts from aviation, it must be accepted that a quieter aircraft remains a noisy aircraft and each audible experience of an aircraft can be the cause of disturbance, annoyance and stress. The gains achieved within the aviation industry from the production of quieter aircraft over the past few decades have been overwhelmed by the increase in the number of flights over the same time period. This reinforces the need for meaningful movement limits to be a feature of any 'noise envelope'.

6.05 In order to develop an effective 'noise envelope', more resource must be put into social survey research in order to assess the community response to aviation noise. The conditions at, and communities around, each airport must be considered on a case-by-case basis. The different noise characteristics and sound levels from different aircraft and helicopters must also be considered.

6.06 If appropriately developed and applied, an advantageous role of a 'noise envelope' could be the setting of the maximum noise levels a community would expect to experience. A 'noise envelope' could also be a route through which to achieve the progressive reduction and potential phase-out of night flights where residents are overflown at night.

6.07 A 'noise envelope' relating to an increased level of activity at a point in the future should be supplemented with interim ‘envelopes’ to indicate how activity and noise levels will be limited in the intervening period.

6.08 Effective policy-making regarding noise management and reduction must be based on scientifically-derived evidence, and must move us beyond reliance on 'total noise'. An essential pre-requisite is a better understanding of the impacts of noise on overflown communities. This would embrace the number of flights, timing of flights – day/night, predictability of flightpaths, etc.. Aggregation of impacts through the use of 'total noise' does not adequately address localised impacts.

6.09 It is notable that the drive to reduce carbon emissions through technological improvements could lead to a deleterious change in the noise environment, and this must be avoided. Aircraft design and operations should be optimised for the reduction of noise in the stage of flight up to 5,000 feet.

6.10 Helicopter activity should be included in a new noise management regime, to address the associated impacts. Impacts from helicopter flights are related to the fact that the craft are flown using visual reference to the layout of buildings, transport routes, open spaces, etc. on the ground ('visual flight rules'), i.e. not along any predefined routes; the craft tend to be flown at lower altitudes than aircraft; and helicopters have specific noise characteristics.

6.11 The evolving noise management regime must also include a component to deal with the tonality of aviation noise, and to assess unregulated aviation activity that is considered to be a problem, e.g. a turboprop aircraft being used for parachutists.

6.12 All these issues are particularly pertinent in the context of reform of the planning system. New, up to date guidance is required to replace the outdated PPG 24 – Planning Policy Guidance note 24, 'Planning and Noise'. Threshold criteria for noise reduction and management associated with aviation – both noise-producing developments and noise-receiving developments – must be produced as national guidance.

6.13 For any 'noise envelope' to have worth there must be fully inclusive involvement in the agreement of effective monitoring and enforcement measures, which must be in place from the outset of the 'noise envelope' being put into effect.

7 Impacts of concentration and dispersion of flightpaths

Scoping document questions:-

5.40 What do you consider to be the most significant impacts – positive and negative - of aviation for local communities? Can more be done to enhance and / or mitigate those impacts? If so, what and by whom?

5.41 Do you think that current arrangements for local engagement on aviation issues, e.g. through airport consultative committees and the development of airport master plans, are effective? Could more be done to improve community engagement on issues such as noise and air quality? If so, what and by whom?

5.44 Is it better to minimise the total number of people affected by aircraft noise (e.g. through noise preferential routes) or to share the burden more evenly (e.g. through wider flight path dispersion) so that a greater number of people are affected by noise less frequently?

5.45 What is the best way to encourage aircraft manufacturers and airlines to continue to strive to achieve further reductions in noise and air pollutant emissions (notably particulate matter and NOx) through the implementation of new technology?

7.01 The 'noise envelope' concept also incorporates the issues of concentration and dispersion of flightpaths. The policy approach in recent years has been towards 'concentration' meaning the same portion of the population experience the full burden of the overflights although the number of people affected is minimised. The use of a range of departure flightpaths constitutes 'dispersion', thus affecting each overflown community for less time overall, but a greater number of people in total.

7.02 The debate now covers the issue of concentration or dispersion within 'noise preferential routes' (NPRs) - concentration within the NPR, e.g. along the centre line, or dispersion across the whole NPR. There is the added possibility of more concentration of routes within or around an NPR that could be used at different times.

7.03 The development of more accurate aviation navigation technology - 'P-RNav' - has enabled the operation of such precise flightpaths. The use of such technology must be informed by social surveys to capture the views of the populations likely to be affected by the activity. Conditions in each area and input from the affected populations must become a routinely included element in airspace management, in a manner that means this input is used as a decision-making factor.

7.04 The technological improvement achieved by aircraft manufacturers in reducing the noise certification level for aircraft types is not in itself capable of providing sufficient reduction in the noise burden of aviation activities.

7.05 Minimising noise nuisance is the priority at lower flight levels - below 5,000ft.

7.06 The comprehensive discussion of noise management issues undertaken at the Public Inquiry (PI) for Terminal 5 at Heathrow Airport covered the effect that the number of flights has on overflown communities, indicating the importance of this feature alongside noise certification controls. The Government's stated intention[22] for their 'Attitudes to Noise from Aviation Sources in England' (ANASE) study derived from that debate and sought to assess the limitations of the noise index 'Leq'[23], as well as informing any future consideration of the air transport movement (ATM) condition applied at Heathrow.

7.07 Due to the Government's subsequent dismissal of their ANASE study, noise management policy has not moved on in the UK, and has not addressed those same points discussed at the Heathrow Terminal 5 Public Inquiry in such detail more than a decade ago. Further research that moves us on from ANASE, and the 'Aircraft Noise Index Study' (ANIS, 1984) is essential for informing concepts such as a satisfactory 'noise envelope'. In Europe, aviation noise policy has been advanced in recent years and therefore the Government should look to European examples of best practice.

7.08 A supplementary paper – 'New evidence on aircraft noise annoyance'[24] - is being submitted with this SASIG response. This paper was written by Mike Rickaby, Environmental Protection Officer at Hillingdon LB, and a previous version has been published in the Institute of Acoustics Bulletin. This research identifies that UK aviation noise policy underestimates the scale of annoyance likely to result from aviation noise impacts, and that the objectives of the ANASE study remain unmet – the suitability of the noise metric 'LAeq, 16h' as an indicator of community annoyance, the importance of the quantity of flights, the relative importance of aviation activity at different times of day and night, and determining people's 'willingness to pay' to reduce annoyance from aircraft noise. There remains an urgent need for the Government to update noise policy and further investigate the annoyance relationship for aircraft noise.

7.09 Advice supplied to the Government to date – notably at the Heathrow Terminal 5 Public Inquiry – has yet to be enacted, and in fact, has been considerably subverted by the previous Government's concerted efforts to remove movement limits from legislation when the Civil Aviation Act 2006 was being drawn up. It remains clear that the historical 57 dB Leq noise contour is now inadequate as a noise measure.

7.10 The need for controls on the number of air transport movements is also relevant when considering the air traffic management practices of either concentrating or dispersing flightpaths.

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[22] Secretary of State for Transport, Local Government & the Regions - Stephen Byers.

[23] L_{eq} - equivalent continuous sound level.

[24] 'New evidence on aircraft noise annoyance', Oct. 2011, Mike Rickaby, Environmental Protection Officer, Hillingdon LB.

7.11 A greater understanding of the community response to aviation noise is an essential prerequisite for an improved aviation noise management and reduction regime. We recommend that the Government resource annual studies in order to inform, educate, advise and record this relationship, supplying robust annual surveys capable of supporting policy-making. In this context, the 'Government' should include the Department for Transport (DfT), Department for Environment, Food & Rural Affairs (Defra), Department for Communities and Local Government (DCLG) and Department of Health (DoH). In addition, an appropriate way in which to involve the Research Councils and academic institutions should also be considered.

7.12 The noise contours at which noise management policy is applied should in the first instance be extended further from airports to more accurately cover the affected population, then be progressively supplemented with mapping of the affected population, thus moving away from the use of modelled, averaged impacts in policy-making. The advantage of Leq noise contours in terms of the ability to make historical comparisons should not be lost, i.e. data for Leq contours should continue to be collected and presented. However, these should have reduced prominence in policy-making.

7.13 Flightpaths should not be moved from the existing noise preferential routes (NPRs) without full consultation of the communities affected. Whether concentration on specific paths within NPRs or dispersal routes across NPRs is preferable will vary between airport locations and between NPRs. These operational measures should be determined locally, by airport, in accordance with the communities affected. It must be recognised that different airports will need different policies.

7.14 Where there is local preference for any particular system, the providers of air traffic control and airspace management should be required to facilitate implementation.

8 Progression towards a ban on night flights where residents are overflown

Scoping document questions:-

5.40 What do you consider to be the most significant impacts – positive and negative - of aviation for local communities? Can more be done to enhance and / or mitigate those impacts? If so, what and by whom?

5.43 What are your views on the idea of setting a 'noise envelope' within which aviation growth would be possible, as technology and operations reduce noise impacts per plane? What do you consider to be the advantages and disadvantages of such an approach?

5.46 What are the economic benefits of night flights? How should the economic benefits be assessed against social and environmental costs?

5.47 How can the night flying regime be improved to deliver better outcomes for residents living close to airports and other stakeholders, including businesses that use night flights?

5.48 Should extended periods of respite from night noise be considered, even if this resulted in increased frequency of flights before or after those respite periods?

8.01 Any 'noise envelope' for night flying where residents are overflown should be part of a staged phasing out of night flights, thus progressing towards an eventual night flight ban.

8.02 Once a transparent, accepted economic methodology has been developed, its application to night flights can inform this phase-out.

8.03 The economic analysis of night flights needs to include costs for the negative health impacts of night flights: people not being able to get to sleep; once asleep, being disturbed; having been disturbed, not being able to get back to asleep again; and being woken early. One way in which these costs could be illustrated is to relate them to lost economic output resulting from the impaired productivity of a workforce comprising sleep-deprived, stressed and unwell employees.

8.04 In the improved economic analysis, airline business models using night flights should be assigned a negative weighting to represent the more damaging impacts of such flights, with the aim that this be part of the package of penalties supporting the phase out of night fights where residents are overflown.

8.05 As already discussed, movement limits are an essential feature of controls as they closely represent one feature of the impacts on communities the controls should be protecting. The dual features of the current night flying regime at the three airports designated for such controls – Heathrow, Gatwick & Stansted – must be retained, i.e. both 'movement limits' and noise 'quota counts'. This scheme must however be improved, as the case study below illustrates how ineffective the scheme has been in terms of reducing noise impacts.

8.06 The specification of any night flying regime must be founded on a positive, productive relationship between an airport operator and the resident, business and other populations around their airport. This provides for variation in regimes between airports, as determined locally and reflecting the characteristic operations at each airport.

9 Integration with climate change policy

Scoping document questions:-

5.30 What do you consider to be the most significant impacts of aviation, including its non-CO_2 emissions, on climate change? How can these impacts best be addressed?

5.32 How effective do you believe the EU ETS will be in addressing the climate impacts of aviation? Should the UK consider unilateral measures in addition to the EU ETS? If so, what?

5.33 What is the best way to define and quantify the UK's share of the CO_2 emissions generated from international aviation?

5.34 What is the potential for increased use of sustainable biofuels in aviation and over what timeframe? What are the barriers to bringing this about?

5.35 What mechanisms could the Government use to increase the rate of uptake of sustainable biofuels in the aviation sector? In particular, how can we accelerate the successful development of second generation biofuels?

5.30 What do you consider to be the most significant impacts of aviation, including its non-CO_2 emissions, on climate change? How can these impacts best be addressed?

5.31 What role should aviation play relative to other sectors of the economy in reducing greenhouse gas emissions in the medium and long term?

5.32 How effective do you believe the EU ETS will be in addressing the climate impacts of aviation? Should the UK consider unilateral measures in addition to the EU ETS? If so, what?

5.39 What scope is there to influence people and industry to make choices aimed at reducing aviation's climate change impacts, e.g. modal shift, alternatives to travel, better information for passengers, fuller planes, airspace management (which can also help reduce local environmental impacts)?

9.01 The Government's response to the Committee on Climate Change (CCC) advice that aviation growth to 2050 should be no more than a 60% increase on 2005 passenger numbers (55% on 2005 air transport movements (ATM)) did not clearly articulate an appropriate course of action to comply with the CCC advice.

9.02 In order to reconcile aviation growth forecasts with climate change targets, and bring the aviation sector in line with all UK sectors required to reduce their climate change emissions, the Government must:

- revisit their passenger demand and carbon dioxide emission forecasts to explain discrepancies;
- assess and verify projected claims of technological gains prior to making policy and expansion decisions based on such claims; and
- validate the credentials of biofuels prior to progressing policy in this area to reflect the associated issues: land take – avoiding exacerbation of deforestation and not competing with food supply; lifecycle analysis of production techniques – resource inputs and pollution outputs; and safe fuel mix proportions for aviation.

9.03 We would like to question the evidence the passenger demand and carbon dioxide forecasts are based upon and ask what purpose they have been developed for.

9.04 We call on the UK Government to supply a clear, concise statement on their position in relation to aviation and climate change in order that it can be used in local planning considerations.

9.05 How will activity be managed across all UK sectors in order to achieve a fair spread across the available carbon budget?

9.06 Climate change commitments tie-in directly with considerations of airport capacity, which have yet to be considered in this policy review.

9.07 As discussed already, an improved economic assessment should include accurate costs for the full range of aviation's climate-changing emissions, as informed by emerging scientific understanding. The marginal abatement cost (MAC) curve analysis is a useful tool for understanding the possible impacts of certain policy options on reducing CO_2 emissions. Although the qualitative assessment included noise and air quality impacts, further detailed analysis of these non-CO_2 emissions impacts is needed in order to provide a more consistent analysis of the impacts of policy measures.

9.08 Addressing the deficiency of the previous aviation policy in terms of the exclusion of climate change considerations is very overdue, and it is reasonable to expect the newly developing national aviation policy to remedy this.

9.09 The scheme that is intended to deal with managing carbon emissions, the EU Emissions Trading Scheme (EU ETS), still has major hurdles to pass if it is to begin operating, let alone be effective in reducing carbon emissions. A legal challenge from US airline operators, the availability of free allocations, and the level at which the emissions cap is to be set, all combine to severely jeopardise any improvements towards the goal of climate stabilisation.

9.10 It remains the fact, too, that the EU ETS is designed to only consider carbon emissions, not the other climate change emissions produced by the aviation sector. There remains the need to introduce a mechanism through which these emissions are reduced.

9.11 Due to fuel forming a considerable proportion of the airline operating costs this constitutes a clear incentive for airline businesses to minimise their fleet fuel consumption. A commensurate reduction in carbon emissions comes from reduced fuel consumption; however, this is easily negated in circumstances of increasing aviation activity. The expression of fleet fuel efficiency 'per passenger km' belies the total amount of fuel consumed along with the associated emissions.

9.12 We accept that climate change is important, however, in the context of securing an improvement overall, noise must be prioritised at lower altitudes of flight. For the section of flight up to 5,000ft, improvement efforts should focus on reducing noise, not climate change, impacts.

9.13 Some degree of demand management will be needed in order for the aviation sector to meet the required targets for avoiding the most damaging effects of climate change. This should be supported by investment in cleaner modes of travel and alternatives to travelling such as videoconferencing.

9.14 As climate change is an international issue, we urge the UK Government to continue seeking agreement at this level, not to allow the EU ETS to be presented as a reason to delay international action, and to set international aviation emissions targets via the UK Climate Change Act.

10 Integration with national rail policy

Scoping document questions:-

5.5 How, and within what constraints, can aviation growth occur as technological developments and improved operating procedures reduce CO_2, pollutant emissions and noise impacts?

5.17 Can regional airports absorb some of the demand pressures from constrained airports in the south-east? What conditions would facilitate this?

5.18 What more can be done – and by whom – to encourage a switch from domestic air travel to rail?

5.19 How could the benefits from any future high speed rail network be maximised for aviation?

5.20 How can regional airports and the aviation sector as a whole support the rebalancing of the economy across the UK?

5.22 Can we extract more capacity out of the UK's existing airport infrastructure? Can we do this in a way which is environmentally acceptable? To what extent might demand management measures help achieve this?

5.23 How can we support Heathrow's hub status within the constraints of its existing capacity? Can we do this in a way which is environmentally acceptable?

5.27 What provision, if any, should be made for regional access into congested airports?

5.40 What do you consider to be the most significant impacts – positive and negative - of aviation for local communities? Can more be done to enhance and / or mitigate those impacts? If so, what and by whom?

5.41 Do you think that current arrangements for local engagement on aviation issues, e.g. through airport consultative committees and the development of airport master plans, are effective? Could more be done to improve community engagement on issues such as noise and air quality[+]? If so, what and by whom?

[+] *and* surface access

10.01 SASIG has long been a proponent of integrated transport hubs being developed at airports – for use by non-aviation related travellers, as well, of course, for airline and airport staff and passengers.

10.02 The absence from the policy review so far of assessing aviation capacity provision compromises such integration. The development of aviation policy needs to be coordinated with other national transport policies, in particular that for high-speed rail (HSR).

10.03 When considering such integration it is important to recognise that not all journeys, start, finish or pass through London.

10.04 Although a number of UK airports have direct rail services, the quality of overall provision is substandard. SASIG wishes to see minimum standards for air passenger provision set in rail franchise contracts – for instance, timetabling in coordination with airline schedules, services covering early morning and late night periods, and secure luggage storage and transfer.

10.05 The provision of surface access associated with airports is an area that lends itself to the application of practical constraints within which aviation growth can occur, such as:

- surface access target(s) based on a ratio of 'air passenger numbers' to 'trips by public transport';
- surface access target(s) based on a ratio to take account of local highway conditions in terms of capacity & congestion; and
- surface access target(s) tied to passenger numbers not air transport movements (ATMs), as the use of larger planes results in more surface access trips to and from airports for the greater number of passengers using the airport, yet a target linked to ATMs does not accommodate the need for more provision and use of public transport surface access trips.

10.06 A greater understanding of the scale of impacts in terms of surface access needs to be embedded in consideration of aviation activities. This is essential not only for future provision, but also to address the existing conditions.

10.07 A specific element of the new aviation policy must be the requirement of financial provision on an ongoing basis from airport and airline operators for the supply and improvement of passenger and staff surface transport services. For instance, a levy on each car journey or car parked at an airport could be imposed, with revenue raised being used to promote and provide alternative services replacing the need for such trips to be made by private car. It is not acceptable that such services have to be provided by local operators with airport operators choosing whether or not to provide supporting finance.

10.08 The provision of new high-speed rail services for the UK must not be allowed to consume all available funds, Government time and consultation efforts to the expense of achieving improvements to the existing network. For instance, minor changes could improve connectivity on the East Coast Mainline for both freight and passenger trips.

10.09 The table below illustrates the generally slow progress in improving the use of public transport for accessing airports, as recognised to be the case in the Government's 'Low Carbon Transport to Airports Project Report' (July 2011)[25].

Public Transport Usage at Selected UK Airports - 2006-2009

Year	2006		2007	
Airport	PT %	No. pax (millions)	PT %	No. pax (millions)
Gatwick	35.4	12.1	35.1	12.3
Heathrow	35.6	24.0	38.4	26.1
Luton	30.1	2.8	29.9	3.0
Manchester	9.6	2.1	10.8	2.4
Stansted	39.6	9.4	44.6	10.6

Year	2008		2009	
Airport	PT %	No. pax (millions)	PT %	No. pax (millions)
Gatwick	36.2	12.4	37.5	12.1
Heathrow	38.0	25.4	40.0	26.4
Luton	33.8	3.4	31.0	2.8
Manchester	10.4	2.2	13.0	2.4
Stansted	46.9	10.5	47.3	9.4

Sources: Civil Aviation Authority (CAA) Passenger Surveys (http://www.caa.co.uk/default.aspx?catid=81&pagetype=90&pageid=7640)

Civil Aviation Authority (CAA) Traffic Statistics (http://www.caa.co.uk/default.aspx?catid=80&pagetype=88&sglid=3)

These results are based on a departure survey only. The assumption, for weighting purposes, is that arriving and departing passengers share the same modal characteristics.

Detailed modal splits are available: aviation.intelligence@caa.co.uk, (020) 7453 6282.

[25] 'Department for Transport Low Carbon Transport to Airports Project Report', July 2011.

CASE STUDY: Cornwall Council and Newquay Cornwall Airport

Integration with national rail policy

The connectivity provided by an airport such as Newquay Cornwall Airport - located within the peripheral region of Cornwall – can be of significant importance in an area with otherwise poor transport infrastructure. This is further compromised by the distance from key markets, acting as a constraint on business and therefore growth, productivity and competitiveness.

In relation to those parts of the country that are proposed to be connected via a new high-speed rail line, this increased connectivity serves to further emphasise the general lack of connectivity – and hence importance of aviation services – in a region such as Cornwall.

The significant Government investment being put in to developing plans for high-speed rail (HSR) between London and Birmingham, with later extensions further north, will not actually help a peripheral region such as Cornwall. The extent to which HSR, as proposed, further exacerbates the region's lack of connectivity should be recognised.

CASE STUDY: Integration with national rail policy

Manchester Airport

The integrated transport hub at Manchester Airport, ' The Station', links local and national coach, bus, train – and in 2016, tram – services. 'The Station' is linked to the terminal buildings by 'Skylink' moving walkways.

There is a network of local and regional buses running daily from early morning to late night, including weekends and Bank Holidays, providing a 24-hour bus service operating to/from Manchester Airport.
National Express, the UK's largest operator of scheduled coach services, operates direct to and from 'The Station'.
There are frequent, direct rail services running 24 hours a day, 7 days a week. Up to 9 trains an hour link the airport to Manchester Piccadilly station in the city centre, where connections can be made to fast rail services countrywide.

A metrolink to Manchester Airport also features in package of 15 transport schemes in Greater Manchester that were awarded a special fund of £1.5 billion in May 2009. This tram line is due to open in 2016 and will provide a tram every 12 minutes between Manchester Airport and Manchester City Centre. In addition to linking with rail services from Manchester Airport, improved links with bus services will be provided through the new interchange at Wythenshawe town centre.

http://www.manchesterairport.co.uk/manweb.nsf/Content/Train
http://www.metrolink.co.uk/futuremetrolink/airport-line.asp

11 Provision and improvement of surface access connections with airports

Scoping document question:-

5.5 How, and within what constraints, can aviation growth occur as technological developments and improved operating procedures reduce CO_2, pollutant emissions and noise impacts?

5.38 What more can the UK aviation industry do to reduce the climate change impact of its ground operations and surface access to and from the airport (which can also help reduce local environmental impacts)?

11.01 Surface access has often tended to be overlooked, insufficiently resourced, and regarded as an after thought following on-airport developments. This results in congestion, delay and poor air quality associated with surface access trips around airports whether or not they are associated with aviation activities.

11.02 The complex issue of airport surface access has a range of characteristics that are represented in the agreed SASIG principles, prepared in order inform the production of Airport Surface Access Strategies, and achieve greater gains in the provision of improved surface access associated with airports. The 'SASIG Principles for Airport Surface Access Strategies (ASAS)' are presented as a supplementary report to this consultation response.

11.03 Practical suggestions for meaningful constraints are:

- surface access target(s) based on a ratio of 'air passenger numbers' to 'trips by public transport';
- surface access target(s) based on a ratio to take account of local highway conditions in terms of capacity & congestion; and
- surface access target(s) tied to passenger numbers not air transport movements (ATMs), as the use of larger planes would result in more surface access trips to and from airports for the greater number of passengers using the airport, yet a target linked to ATMs would not require more provision and use of public transport surface access trips.

CASE STUDY: Hounslow LB, Hillingdon LB, Windsor & Maidenhead RB, Slough BC, Spelthorne BC & Heathrow Airport

Provision and improvement of surface access connections with airports

In support of the Heathrow expansion proposals for a third runway and new terminal, a 6% increase in the modal share of non-transfer passengers using public transport was proposed (comparing 2004 levels with those forecast for 2030). This use of a target based on '% modal share' masks the huge number of non-transfer passengers forecast to be accessing the airport by car. Over the same time period, 28 million passengers accessed the airport by car in 2004, with this figure forecast to rise to 53 million passengers accessing the airport by car in 2030 accounting for a third runway and sixth terminal. The implications of this considerable impact on the road network were simply overlooked. How can the local road network be expected to cope with such an increase when there are existing congestion, delay and air pollution issues?

12 Community involvement

Scoping document questions:-

5.39 What scope is there to influence people and industry to make choices aimed at reducing aviation's climate change impacts, e.g. modal shift, alternatives to travel, better information for passengers, fuller planes, airspace management (which can also help reduce local environmental impacts)?

5.40 What do you consider to be the most significant impacts – positive and negative - of aviation for local communities? Can more be done to enhance and / or mitigate those impacts? If so, what and by whom?

5.41 Do you think that current arrangements for local engagement on aviation issues, e.g. through airport consultative committees and the development of airport master plans, are effective? Could more be done to improve community engagement on issues such as noise and air quality? If so, what and by whom?

5.42 Do you think that current arrangements for ensuring sustainable surface access to and from airports, e.g. Airport Transport Forums and airport surface access strategies, are effective? Could more be done to improve surface access and reduce its environmental impacts? If so, what and by whom?

12.01 Experience from the SASIG membership regarding community involvement, in its many and varied forms, has been mixed.

12.02 With respect to **Airport Consultative Committees (ACCs)**, their effectiveness is very strongly influenced by the Chairman and Committee representatives, with the Committee being negatively compromised in instances where some big personalities dominate the agenda & debate.

12.03 ACCs are also open to abuse as simply being sources of information, as there are few built-in incentives for the operator to take action, nor for productive input from attending representatives.

12.04 It seems that too much - but also too little - has been expected of ACCs; as with all fora, there are inherent limitations and flaws.

12.05 One such limitation is that the good relationships that have been built up over recent years can all be lost virtually overnight where airport operating companies change ownership or management personnel.

12.06 To the other extent, community involvement, including financial support, should be a requirement not an optional extra for airport operators.

12.07 The 'airport' is a business, and the operator is therefore quite right to want to run their business as well as possible according to their business needs. ACCs can be a window into that business if the airport operator supports that. The Government should not misunderstand that 'window' as necessarily constituting greater involvement, influence or acceptance on the part of the Committee representatives.

12.08 It should be recognised that there is no 'standard' way in which ACCs operate and the role and operation of ACCs differ according to the airport operator and the circumstances of the airport.

12.09 The requirement that airport operators provide consultative facilities is welcomed, however, this has limited value if there are no tangible outcomes from such consultation; the requirement to consult is not in itself an outcome.

12.10 A failing of ACCs is that aspirations get falsely raised, with the value of ACCs being lessened in situations where:

- the airport operator "consults" on a development where the basic decision had already been taken, e.g. a second runway at Stansted Airport;
- the community want a change in airport operations but that change is not in the airport operator's business interests, the operation is properly permitted, and therefore no change occurs, e.g. AirAsia night flights at Stansted Airport; and
- the community expects more from the airport operator than they are willing, or able, to provide, e.g. Noise Action Plans (NAPs) and Airport Surface Access Strategies (ASASs).

12.11 This is the context in which the potential advantages of Consultative Committees have been recognised, for instance:

- the supply of regular – and, ideally, timely – information from the airport operator on areas of interest to the Committee;
- the opportunity for representatives to raise the issues that they wish to see addressed; and
- a route through which greater accountability could be required of an airport operator.

12.12 All ACCs should be required to supply and maintain up to date, easy to use websites for the provision of public information, including agendas, reports and minutes of meetings.

12.13 SASIG welcomes the Government's commitment in the Scoping Document to proceed with a review of Airport Consultative Committees; these comments will be of use in this regard as the role and value of ACCs is revisited. We would be grateful if the Department for Transport were to add detail to what their programme might be for this review of ACCs.

12.14 **Air Transport Forums (ATFs)** are appropriate for discussing local issues, however, not for national issues. ATFs have the potential to be a route through which transport links to and from airports could be improved, and they need to be used in this manner.

12.15 **Airport master plans (AMPs)** are business development bids in which the scale and nature of an airport operator's aspirations for their business should be clearly set out. The absence of this information can result in greater uncertainty, which is an unwanted dimension in the development of open, productive working relationships. Where uncertainty can be minimised, progressive communications can be maximised. The use of an airport operator's AMP by Local Planning Authorities as a material planning consideration is at the discretion of each LPA. SASIG agrees with the Government that AMPs are "non-statutory documents"[26]. Airport master plans (AMPs) need to be flexible and reviewed frequently. The development of a standard content framework for airport master plans (AMPs) would be welcomed.

12.16 **Airport Surface Access Strategies (ASASs)** provide the opportunity for airport operators to set out how they will deal with the surface access implications of their operations. Produced in consultation with the Local Authorities, local operators and local communities, they can address the issues and provide a strategy for the provision of services. New passenger transport services require financial backing both to start and for promotion and the ASAS can provide the strategy for investment where the airport operator is willing to make the necessary contribution.

12.17 Submitted with this consultation response is a supplementary paper setting out the 'SASIG Principles for Airport Surface Access Strategies (ASAS)', to be used to inform the production of ASASs.

CASE STUDY: Broadland DC & Norwich Airport

Community involvement – Airport Consultative Committee (ACC) experience

The Norwich Airport Consultative Committee has been of value for engaging the local community through the Parish Councils and other stakeholders; however, the ACC has been of less value to the District Council. The airport spans administrative boundaries and on this basis a Norwich Airport Joint Advisory Committee has been set up, consisting of the airport operator, Broadland DC and Norwich City Council. It must be acknowledged that the advantage of this Joint Advisory Committee (JAC) derives from the involvement of both Local Authorities covered by the administrative overlap, and therefore their joint working with each other and the airport operator on common issues. Another benefit of this additional JAC is that regular dialogue is promoted.

[26] 'Developing a framework for sustainable UK aviation: Scoping document' (March 2011), par. 4.7, pg.31.

CASE STUDY: Tandridge DC & Gatwick Airport

Community involvement – Airport Consultative Committee (ACC) experience

Gatwick Airport Consultative Committee (GATCOM) membership has been increased yielding a higher number of representatives across the industry and locally. This obviously leads to a difficulty for the Secretariat in producing papers or responses to consultation that all would agree with. However, the presentation of such papers to this broad representation provides an opportunity for reactions and positions to be aired and discussed, even if consensus cannot be reached.

Good debate does ensue and there is often concord, particularly when it comes to treatment by the rail authorities of the Gatwick Express.

The Committee works well as the representatives try to balance the advantages of the airport against its disadvantages.

Other issues for consideration

Scoping document question:-

5.49 If you have comments on any strategic issues not covered in this scoping document, which you consider to be relevant to the development of the aviation policy framework, please include them in your response.

13 Compensation for physical development of airports

13.01 The current process for parties to claim compensation for the physical development of airports is the Land Compensation Act, through which payments are made when the development is brought into use. This has worked well for road and rail developments, however, in relation to airports, there can be a long delay between land being taken for development and that development coming into use. The compensation process must be improved to address this unreasonable delay.

Annex A

SASIG Membership

Aylesbury Vale District Council
Broadland District Council
Bromley LB
Buckinghamshire County Council
Canterbury City Council
Cheshire East Council
Cornwall Council
Crawley Borough Council
Doncaster MBC
Ealing LB
East Herts Council
Essex County Council
Hammersmith & Fulham LB
Hampshire County Council
Harlow District Council
Hertfordshire County Council
Hillingdon LB
Hounslow LB
Luton Borough Council
Mole Valley District Council
Newham LB
North West Leicestershire District Council
Reigate and Banstead Borough Council
Richmond upon Thames LB
Slough Borough Council
Southend on Sea Borough Council
Spelthorne Borough Council
Surrey County Council
Tandridge District Council
Uttlesford District Council
West Midlands Joint Committee:
Birmingham City Council
Coventry City Council
Dudley Metropolitan Borough Council
Sandwell Metropolitan Borough Council
Solihull Metropolitan Borough Council
Walsall Metropolitan Borough Council
Wolverhampton City Council
Windsor and Maidenhead RB
Wokingham Borough Council

Annex B

OFFICE FOR NATIONAL STATISTICS - ANNUAL BUSINESS SURVEY (ABS) 2009; SECTION H 'TRANSPORT AND STORAGE'

Release Date 14/06/11; data has been collected under SIC (2007); please see ABS 'Background Information' for further details.

ANNUAL BUSINESS SURVEY; SECTIONS A-S WHOLE ECONOMY
Release Date 14/06/2011
Data has been collected under SIC (2007).
Please see ABS Background Information for further information.

Standard Industrial Classification (Revised 2007) Section Division Group Class	Description	Approximate gross value added at basic prices
		2009; £ million
A-S [1]	Agriculture, fishing, production, construction, distribution and service industries	910,739
G	Wholesale and retail trade; repair of motor vehicles & motorcycles.	149,450
C	Manufacturing	130,227
M	Professional, scientific and technical activities	104,788
J	Information and communication	86,583
F [1]	Construction	70,599
N	Administrative and support service activities	66,584
H	Transport and storage	57,512
K (Part)	Financial and insurance activities	55,138
I	Accommodation and food service activities	29,818
D	Electricity, gas, steam & air conditioning supply	29,191
L	Real estate activities	26,517
Q	Human health and social work activities	23,839
B	Mining and quarrying	23,023
R	Arts, entertainment and recreation	17,055
E	Water supply, sewerage, waste management, & remediation activities	15,168
S	Other service activities	13,732
P	Education	9,982
A (Part)	Agriculture, forestry and fishing	1,533

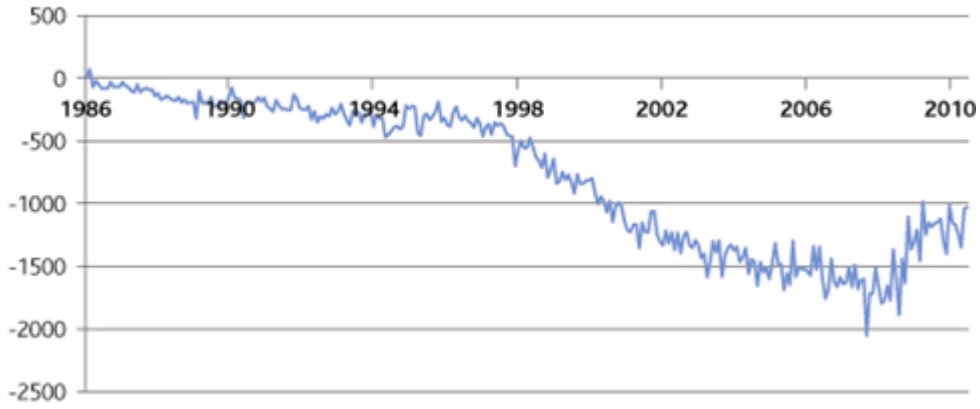
[1] Gross value added for Group 41.1 (Section F) – Development of building projects, is included to meet user needs although not considered a National Statistic.

ANNUAL BUSINESS SURVEY (ABS); SECTION H 'TRANSPORT AND STORAGE'
Release Date 14/06/11; data has been collected under SIC (2007); please see ABS 'Background Information' for further details.

Standard Industrial Classification (Revised 2007) Section Division Group Class	Description (£ million)	Approximate gross value added at basic prices (2009)
Transport and Storage	**57,512**	**a + b + c + d + e**
Ranking of aviation sector ("c") in relation to sectors in same class:		**a > d > e > c > b**
Land transport & transport via pipelines	22,038	**a**
Passenger rail transport, interurban	2,747	(a)
Freight rail transport	305	(a)
Other passenger land transport	7,590	(a)
Urban and suburban passenger land transport	5,321	(aa)
Taxi Operation	885	(aa)
Other Passenger land transport n.e.c	1,384	(aa)
Freight transport by road and removal services	11,077	(a)
Freight transport by road	10,675	(aa)
Removal services	402	(aa)
Transport via pipeline	319	(a)
Water transport	2,246	**b**
Sea and coastal passenger water transport	902	(b)
Sea and coastal freight water transport	1,307	(b)
Inland passenger water transport	22	(b)
Inland freight water transport	14	(b)
Air transport	5,087	c
Passenger air transport	4,879	(c)
Freight air transport and space transport	208	(c)
Freight air transport	208	(cc)
Space transport	-	(cc)
Warehousing & support activities for transportation	19,701	**d**
Warehousing and storage	4,162	(d)
Support activities for transportation	15,540	(d)
Service activities incidental to land transportation	5,803	(dd)
Service activities incidental to water transportation	2,214	(dd)
Service activities incidental to air transportation	3,656	(dd)
Cargo handling	528	(dd)
Other transportation support activities	3,340	(dd)
Postal & courier activities	8,439	**e**
Postal activities under universal service obligation	*	(e)
Other postal and courier activities	*	(e)

Annex C

Tourism's Trade Imbalance — UK spend abroad, less foreign spend in UK



Source: International Passenger Survey illustrated in 'Government Tourism Policy' (March 2011)