Draft Aviation Policy Framework

A consultation
by the Department for Transport

Response from the British Air Transport Association (BATA)
October 2012

Introduction

The British Air Transport Association (BATA) welcomes the opportunity to submit a response to the consultation being undertaken by the Department for Transport on its Draft Aviation Policy Framework.

BATA is the trade body for UK-registered airlines, with members representing all sectors of the industry. In 2011, BATA members employed 73,000 people, operated four-fifths of the UK commercial aircraft fleet and were responsible for some 96% of UK airline output, carrying 129 million passengers and 1.1 million tonnes of cargo. The ten BATA member airlines are: British Airways, DHL, easyJet, Flybe, Jet2.com, Monarch, Titan Airways, Thomas Cook, Thomson Airways and Virgin Atlantic.

Summary

It is vital for the UK’s economic prosperity that we have an aviation policy that addresses the needs of all the UK, without continuing delay. BATA calls on the Government to ensure that the composition and terms of reference of the Davies Commission attract cross party support to prevent the continuation of the see-saw of aviation policy we have experienced over recent decades.

UK business is increasingly strident in its calls for the UK to develop its international connectivity in order to attract inward investment thus boosting economic prosperity and creating new jobs. If we are to capitalise on our emergence from recession, the Government must show willingness to unlock and encourage private investment in infrastructure at airports to allow capacity expansion where it is most urgently needed.

As the Government recognises, the UK’s economy needs to compete in both established and emerging markets. This requires excellent aviation connectivity right across the country, ensuring the UK has both vibrant point to point airports and sufficient world class hub capacity that meets the needs of the entire aviation sector. This means prioritising a favourable planning and regulatory regime and developing a bold aviation policy. To ensure there is no further erosion of the UK’s competitive position, the Government must set a clear timetable for action and this needs cross-party support.

We are glad that the Draft Framework recognises the importance of economic growth and the role aviation can play in achieving this.

As an island nation, the UK possesses limited options for facilitating international connectivity compared with our competitors and this fact must be at the core of government aviation policy.
Aviation responds to and meets the demands of the globalised ‘just in time’ economy and the expectations of customers. The reliance on aviation by business and the public was clearly demonstrated during the disruption to services caused by the Icelandic ash cloud and the knock-on effects to the wider economy and people’s travel arrangements.

Aviation and the services our member airlines provide are crucial in delivering and sustaining links to emerging markets, inward tourism and foreign direct investment to UK.

The work of Sustainable Aviation and efforts of individual organisations across the aviation sector illustrate how seriously aviation takes its responsibilities in regard to climate change and noise.

Given the global nature of aviation, international action is required and is most effective. Unilateral, UK only action, will impact on UK jobs, businesses and economic growth. Reducing aviation’s impact on the environment has to be viewed and dealt with in a global context. Reducing emissions in the UK by restricting aviation growth while the rest of the world continues to build more airports and add new runways will serve only to damage the UK’s economic interests and do nothing for the environment.

Unlike other modes of transport or indeed other industries, aviation does not receive a subsidy from the UK taxpayer. The industry pays for its own infrastructure, creates and supports high skilled jobs, contributes to the Treasury and enables the UK to trade with the rest of the world.

- Aviation is a significant contributor to the UK economy: a driver of the wider economy; and a benefit to society
- We recognise that while aviation can have an adverse impact on the lives of the those living around airports and under flight paths, it can also bring many benefits to local and regional economies in terms of inward investment and jobs
- The aviation industry is committed to reducing its local and global environmental impact. Substantial progress has already been made and more is in the pipeline.
- Airport expansion is, where required, vital for the UK.

Chapter 2: The benefits of aviation

Connectivity:

1. Do you agree with our analysis of the meaning and value of connectivity, set out in Chapter 2?

We agree with the following statement contained in the document:

“aviation connectivity is a combination of destinations served and frequency of flights: the broader the range of destinations served and the higher the frequency of flights to and from those destinations, the better connected an airport, city of country is. The value of connectivity is affected by other characteristics, such as the relative importance of the destinations served, the cost of accessing them, which is the end-to-end journey time and cost including the price of air travel, and the reliability of the services”.

We also note the recognition that the “UK must be able to connect with the countries and locations that are of most benefit to our economy”.

2
Fifth freedoms:

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

No, we do not support this proposal. Although UK airlines have supported and welcomed the liberalisation of air services per se, we feel this specific proposal does not reflect the realities and experience of the market or current practice and fails to include comprehensive safeguards to ensure that our members could compete on equal and fair terms with foreign airlines.

3. Are there any other conditions that ought to be applied to any extension of the UK’s fifth freedom policy to Gatwick, Stansted and Luton?

See above – answer to 2.

Airports outside the South East:

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

No. The UK should not unilaterally offer open access to foreign airlines as this will put UK airlines at a competitive disadvantage, which in turn will place UK jobs and businesses at risk. For obvious reasons, UK based airlines directly employ significantly more people in the UK than foreign airlines do and many of these are highly skilled roles such as pilots and engineers. Throwing open airports to all comers on a unilateral basis with no reciprocal or multilateral agreements will endanger UK jobs, businesses and economic growth – threatening the long term health and viability of the UK air transport industry.

Any other comments:

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

No.

Chapter 3: Climate change impacts

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

UK airlines have made enormous strides in reducing both fuel burn and emissions as well as improving their environmental impact. A vigorous, competitive industry will continue to seek out new technology and procedures in order to help reduce fuel burn. Government can assist by ensuring a level playing field and the removal of barriers - demonstrating support for the industry rather than by holding it back.
The cost of fuel is one of the biggest overheads an airline faces. This financial burden creates a strong economic incentive to invest in cleaner technology as soon as it becomes available. The inclusion of aviation in the EU ETS from the beginning of 2012 has added a further financial incentive for airlines to reduce emissions.

Competition and the market will increase the optimal conditions and environment for the development and adoption of technologies and procedures to improve the performance of aircraft and reduce emissions.

We do not subscribe to the view that yet more regulation or legislation is required.

As a member of ‘Sustainable Aviation’, BATA believes that the aviation industry will reduce its actual carbon emissions through a combination of:

- Technology
- Sustainable alternative fuels; and
- Operational improvements

In its recent CO₂ Road Map, SA concludes that UK aviation is able to accommodate significant growth to 2050 without a substantial increase in absolute CO₂ emissions. SA supports the reduction of net CO₂ emissions to 50% of 2005 levels through internationally agreed carbon trading.

The Government will play a key role in supporting research and development in aerospace technology, encouraging the introduction of sustainable biofuels, delivering on infrastructure projects such as the Single European Sky initiative and working with other countries to establish a global sectoral approach. We do not support unilateral UK targets and measures, as they would be unnecessary and counter-productive. Such measures would deliver no environmental benefit, but would result in carbon leakage, market distortion, and the loss of economic benefits to our international competitors.

Recent and future developments in aircraft and engine technology will play a major role in reducing the UK’s carbon intensity. We anticipate absolute CO₂ emissions will continue to fall post-2050 due to the ongoing penetration into the fleet of new wide-body aircraft types entering service from around 2035 onwards. The same technologies will also be deployed on a world-wide basis, with a correspondingly greater CO₂ mitigation impact.

Overall, BATA and SA believe that the Government should:

- support the development of more efficient aircraft and engine technologies which will be deployed on a worldwide basis;
- support the development and large-scale deployment of sustainable aviation fuels offering very significant life-cycle CO₂ savings relative to conventional fossil-based fuels;
- work with international partners to enable more efficient air traffic on non-domestic routes, within the context of increased capacity requirements;
- press for agreement on and support implementation of a global carbon-trading solution, encompassing all of aviation and ensuring a level playing field for all participants.
Any other comments:

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

No.

Chapter 4: Noise and other local environmental impacts

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

Yes. But the restrictions must be tailored to local needs and not further tightened simply as a means of demonstrating HMG’s environmental credentials.

9. Do you agree with the Government’s overall objective on aviation noise?

We agree with the aims and context set out in paragraph 4.20 of the document:

“The Government’s policy on noise is set out in the Noise Policy Statement for England (NPSE). This contains a long term vision of promoting good health and good quality of life through the effective management of noise in the context of Government policy on sustainable development. It is supported by three aims relating to health and quality of life; avoiding significant adverse impacts where possible; mitigating and minimising adverse impacts that do occur; and where possible, contributing to an improvement in health and quality of life”.

We also agree with the high-level policy objective, as stated in paragraph 4.22:

“The existing high-level policy objective in aircraft noise, set out in paragraph 3.11 of the previous administration’s 2003 white paper, ‘The Future of Air Transport’, is an objective to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise.”

10. Do you agree that the Government should retain the 57 dB LAeq, 16h contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance?

We agree it should be retained, but would like to take this opportunity to stress the need to ensure effective planning controls to manage the development of land around airports (and the role of government in that process) in order to restrict noise sensitive development within noise contours.

11. Do you think that the Government should map noise exposure around the noise designated airports to a lower level than 57 dBa? If so, which level would be appropriate?

No. 57 dBa remains the recognised threshold for noise disturbance. It is not clear why aviation should be subject to any such additional mapping to lower noise levels when there is no similar requirement for roads, rail and maritime infrastructure. There must be equitable treatment of transport or other industrial infrastructure to preclude aviation being unfairly vilified as the sole or principal source of extraneous background noise in an industrialised society.
12. *Do you agree with the proposed principles to which the Government would have regard when setting a noise envelope at any new national hub airport or any other airport development which is a nationally significant infrastructure project?*

In general, yes – but industry should be involved in working with Government and CAA in the process of developing any metrics used and establishing and measuring such envelopes. A ‘one size fits all’ approach is not appropriate as different airports will have different noise impacts depending upon the types of flights operated, density of housing nearby and local awareness and perceptions of noise. There must be flexibility in the design of any scheme.

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

It is important that economic benefit (especially at a local level in terms of jobs etc) should also be taken into account. It is also essential to take into account that there is freewill in the decision by rational individuals as to whether or not to reside near an airport or any other source of noise. There is also little evidence of property blight except in extreme circumstances. Airlines and airports take seriously their responsibility to be “good neighbours” and have a proven record of taking action to minimise and reduce over time noise from aircraft operations. However, many individuals who choose to live near airports do so because they gain employment from the airport or the airlines that operate from them. It is erroneous to assume therefore that all local residents oppose airport expansion and there is no evidence that localised noise action groups are representative of the majority.

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

We recognise that there are diverse views on this issue and would ask Government to carefully consider and evaluate any decisions on the matter, in conjunction with stakeholders. Sustainable Aviation is currently developing a ‘Noise Roadmap’ which will include a policy tool-kit setting out a range of actions which airports and airlines can take to limit and reduce noise. We would urge the Government to support this collaborative and proactive approach.

When considering the need for respite, consideration should also be given to the social and economic benefits of aviation. As with other questions in this consultation, we believe that an appropriate balance needs to be struck between the needs of local communities and those of the wider UK economy and wider public.

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

No. We believe the current voluntary measures are effective and that the introduction of further regulation is unnecessary. However, if the Government is determined to pursue this policy, we urge close consultation with the industry and other stakeholders.
16. In what circumstances would it be appropriate for the Government to direct noise designated airports to establish and maintain a penalty scheme?

We do not believe that additional government intervention to direct noise designated airports to establish a penalty scheme is necessary and that individual airports should be allowed to adopt whatever approach is most appropriate for them and their local community – something that should be developed through a collaborative process.

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

We do not believe a formal order is necessary. The designated airports already voluntarily operate noise monitors and the ACCs are engaged with this process and share the noise measurement reports.

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

Airlines, including BATA members, have a strong track record in investing in and delivering quieter aircraft over many decades. Proposals to ‘better utilise ‘differential landing fees run the risk of severely impacting upon operations at some airports – especially those which are capacity constrained and possess insufficient slots in relation to demand.

19. Do you think airport compensation schemes are reasonable and proportionate?

Yes, we believe current schemes are reasonable and proportionate. Airports could also be allowed to purchase properties in the very noisiest areas to establish a ‘buffer zone’. Designated airports operating in near monopolistic conditions should not be able to increase airline charges simply to institute extravagant compensation schemes.

20. Do you agree with the approach to the management of noise from general aviation and helicopters, in particular to the use of the section 5 power?

No opinion.

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

No opinion.
22. Do you have any further ideas on how the Government could incentivise the aviation and aerospace sector to deliver quieter planes?

Competition and the market will create the optimal conditions and environment for the development and adoption of such technology.

We do not believe that yet more unilateral regulation or legislation from the UK Government is required. Government support for research and development (through the allocation of taxation from aviation) could also further incentivise new technologies. Supporting the development of quieter and cleaner aircraft technology is a real economic opportunity for the UK.

We would also encourage the Government to continue to work with Sustainable Aviation to explore and understand the trade-offs and interdependencies that exist between noise, NOx and carbon improvements and help develop new initiatives and best practice.

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

Yes.

Air quality is not an issue at most UK airports with the exception of Heathrow. Studies show that the influence of oxides of nitrogen (NOx) emissions from airport activities falls rapidly with distance from the airport boundary. Road traffic remains the main the problem with regard to NOx in the UK. The industry is committed to playing its role in reducing emissions from airport-related sources of nitrogen dioxide (NO2). Government should continue to focus its efforts on reducing emissions from road traffic.

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

We do not believe that it should be integrated.

Chapter 5: Working together

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

Yes, they should play a stronger role, by developing their involvement in work to improve the passenger experience at airports. As indicated in the draft Framework, this could be achieved by closer links with the CAA and its new Consumer Panel. We look forward to the forthcoming consultation on ACCs where we expect to confirm our support for the proposals for appointment of an independent chairman for a fixed term, but would also recommend that any committee requires effective support from the airport in question and an independent secretary. We repeat the point we made our response to the Scoping Document consultation regarding the membership of ACCs in that it should be balanced and restricted to local stakeholders and those who have a commercial interest in the operation of the airport.
26. *Is there a case for changing the list of airports currently designated to provide consultative facilities?*

No. The current list is sufficient.

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

This would appear to be a sensible approach, as long as noise management issues are considered in the round and do not take precedence over the interests of passengers, business and the aviation community.

28. *Do you agree with the Government’s overall objective on working together?*

Yes. We agree with the objective contained within paragraph 5.3:

“Our objective is to encourage the aviation industry and local stakeholders to strengthen and streamline the way in which they work together.” We also welcome the recognition that a “one size fits all” approach for local engagement is not appropriate as well as the desire to avoid the duplication of activity and to see a reduction of the consultation burden.

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

Yes.

30. *Do you agree that master plans should incorporate airport surface access strategies?*

Yes, where feasible, practical and sensible to do so.

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

Yes, where applicable, but the element of flexibility should be retained.

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**British Air Transport Association**  
**October 2012**