

Appendix 1: Draft Belfast City Council Response to “Developing a sustainable framework for UK aviation”

Belfast City Council welcomes the opportunity to respond to the above consultation.

In response to the questions raised in the consultation document, the responses from Belfast City Council are attached for consideration.

General comments	
	Belfast City Council is particularly interested in the development of an aviation framework. The city and wider region rely heavily on our two airports to help develop tourism and attract economic investment. As the area continues to suffer more than most from the economic downturn and an ongoing over-reliance on the public sector for employment, anything that adversely affects tourism and economic investment is of significant concern to us.
	There are particular flying slots, which are of strategic importance to the economic well-being of the city and the wider region and we would strongly advocate that these are maintained. This comment relates primarily to early morning departures and late evening return flights (within permitted timetables) from the key hub airports of London Heathrow and London Gatwick.
	In addition, there are some very specific issues for Belfast and Northern Ireland, which do not apply elsewhere across the UK. These relate, in particular, to the fact that we have a land boundary with the Republic of Ireland, which has a large international airport in Dublin – as well as a number of regional airports. These airports operate under a different taxation regime – in particular regarding Air Passenger Duty (APD) levels.
	The consultation document makes reference to aviation in the widest sense, including the aerospace industry. Again, this is of particular importance to Belfast with a significant portion of our employment and exports dependant on the aerospace industry.
	Moreover, the discussion around alternatives to air travel – principally through the high-speed rail network – is not relevant in the Northern Ireland context. The consultations on the national high-speed rail network exclude this region. As such, we are disproportionately dependent on air transportation. This issue will affect not only Northern Ireland but also other outlying areas and peripheral regions.
	Belfast City Council has been actively represented on the Consultative Forum of Belfast City Airport for a number of years and has recently been invited to participate on the forum for Belfast International Airport. Attendance at these forums is a useful mechanism for identifying the economic and environmental impact of the airport on the city and the wider region and their continued existence is supported.
Responses to specific questions (numbered according to references in the framework document)	
The aviation sector	
5.2	What do you consider to be the aviation sector’s most important contributions to economic growth and social well-being?
	Leisure and Business tourism rely heavily on the Aviation Industry. Northern Ireland’s Tourism GDP is approx 4.9% whereas ROI is 6%. The target of tourism in Belfast, a 40% increase in overnight visitors over the next 5 years, is dependent on the

	development of air routes. These routes are critical to the development of Belfast's and Northern Ireland's economy.
	The total value of direct tourism spend in Belfast during 2009 was £451 million. This level of spend supported 10,148 full time equivalent jobs. The sector is predicted to grow in future years as a result of unprecedented investments in tourism infrastructure and major events. This growth is increasingly important in the current economic climate.
	The presence of a significant local aerospace sector has 'knock on' benefits for the economy such as attracting other high value businesses, creating technical jobs and raising the local skills base, which in turn can attract inward investment from high-value industries.
	Bombardier is the largest manufacturing employer in the region, currently providing employment for around 5000 people. The establishment of an Research and Development centre at the plant and the focus on development work for the new 'C series' planes ensure that the company is firmly embedded in the local economy. This, in turn, creates opportunities within the supply chain and accounts, in some part, for the relative resilience of the manufacturing sector in the current economic climate.
5.3	Are some sub-sectors of aviation more important than others? If so, which and why?
	Tourism is extremely important in terms of both its actual and potential contribution to employment numbers and its contribution to the region's overall GDP. This will be particularly important in the coming years (2012 and 2013) when a range of major events will take place in Belfast and the city of Derry. Appropriate air routes access is vitally important to ensure the viability of the infrastructure and programming investment.
	Aerospace manufacturing is also vitally important in the local context, along with the associated research and development work, in which our local universities are directly engaged.
International connectivity and hub airports	
5.9	How important are air transport connections – both international and domestic – to the UK at both national and regional levels?
	Air travel remains the most common means of entry into Northern Ireland, with almost three quarters (74%) of overnight visitors and a third (34%) of day-trippers arriving by plane. The results of a 2009 survey indicated that access by air was the preferred method of travel for 75% of those travelling from Scotland and 90% of those travelling from England and Wales into Belfast. There were 1.7 million overnight stays in the city during 2009, an increase of 7% on the previous year. Most of these, 92% were from outside Northern Ireland.
	Northern Ireland tourism demand in terms of revenue, is forecast to increase by 2.8% per annum, in real terms over the next 10 years (Deloitte 2010). To meet and exceed these targets Belfast and Northern Ireland need to develop further air connections. Air connections to Belfast are vital to the development to the Tourism Economy. Tourism is forecast to be the 4 th fastest growth area in the UK over the next 10 years.

5.10	As long as people and goods can easily reach their desired destination from the UK, does it matter if they use a foreign rather than a UK hub airport?
	As a capital city, servicing the region, Belfast relies on 70-90% of its tourism footfall from GB, our biggest market. A UK hub airport is vital for the sustainability and growth of air traffic from GB. To further the increase in international tourism, leisure and business visitors, there is also a need for Belfast to develop additional international links to airports beyond the UK.
5.11	Are direct connections from the UK to some international destinations more important than others? If so, which and why?
	The direct US link is of vital importance to the regional economy. The business community has developed a concerted approach to ensuring its continued existence and has recently engaged with the Chancellor of the Exchequer on this matter.
	Whilst there are a number of existing routes to holiday destinations in Spain, Portugal and France (and additional planned routes) as well as connections to Poland, which service the business and minority communities in the region, there is no direct connection with Brussels. This would provide an important business hub and significant use is made of the direct connection from Dublin.
5.12	How will the UK's connectivity needs change in the light of global developments in the medium and long-term?
	Belfast's connectivity needs will be governed by future economic global conditions and the growth of new and emerging markets. The key growth economies in recent years have been China and India, and it is predicted that this will continue to be the case in coming years. Therefore, the UK hub needs to be as close as possible to Northern Ireland and preferably a direct link from Belfast to these destinations. Sense of this statement?
Regional Connectivity and Regional Airports	
5.17	Can regional airports absorb some of the demand pressures from the constrained airports in the southeast? What conditions would facilitate this?
	Market conditions will clearly influence any decision on this matter. There may be scope for increasing direct flights into regional airports. However, consideration would need to be given to not only the financial viability but also the environmental impact of such a development.
5.20	How can regional airports and the aviation sector as a whole support the rebalancing of the economy across the UK?
	The discussion around devolving powers for APD to regional governments could make a significant impact on the regional economy in Northern Ireland. This would allow the further development of the air infrastructure in the region (within permitted parameters) to support wider economic activity.
	The draft Regional Economic Framework for Northern Ireland identifies the importance of export-led growth as a central plank of the region's future economic competitiveness. Viable air access routes are key to achieving this objective; particularly given the lack of trans-national rail linkages in Northern Ireland.
Climate change impacts.	
5.30	General comments in respect of climate change and air quality considerations connected with the UK aviation
	It is acknowledged that regional and international connectivity provided by air transport is of vital importance to the Northern Ireland economy and to the population.

	<p>However, it is considered essential that air travel is delivered in a sustainable manner, which both secures the country's long-term economic competitiveness and addresses adverse impacts upon the environment including issues such as air quality and climate change.</p>
	<p>With specific regard to climate change and air quality, it is noted that the Department for Transport scoping document has chosen to address these as distinct issues. It is acknowledged that there are different legislative and policy drivers for addressing these environmental issues, however, it should be noted that climate change and air pollution share many common sources and interdependencies. In addition, air quality standards for ambient air pollution have been established in order to help protect public health.</p> <p>Whereas greenhouse gases are typically most active in the tropospheric region of the atmosphere, air quality tends to address the impact of ambient pollutants nearer to the earth's surface. Nonetheless, tropospheric greenhouse gases such as ozone (O₃) can also act as, or be involved in the formation of ambient pollutants. By way of example, elevated summertime temperatures can lead to the formation of ozone, which in turn, may increase the frequency and severity of summer smogs. Furthermore, ozone is involved in the formation of nitrogen dioxide (NO₂), which continues to be an ambient pollutant of concern for the United Kingdom government and the European Commission. Presently, it is the subject of an application by the Department of Food, Environment and Rural Affairs (DEFRA) to the European Commission for a time extension to compliance dates for the achievement of air quality limit values for nitrogen dioxide across the UK.</p> <p>Moreover, government research has indicated that, after many years of significant improvement, air quality benefits are becoming increasingly costly to achieve, making action difficult to justify on that basis alone. Accordingly, government is encouraging the development of policy and the assessment of the benefits of mitigation measures from both air quality and climate change perspectives. The current policy position is articulated in the DEFRA and devolved administrations March 2010 publication entitled 'Air Pollution: Action in a Changing Climate'.</p> <p>The Council acknowledges that the 'Non-CO₂ climate impacts of aviation' section of the consultation document reflects these concerns and the particular complexities of atmospheric chemistry. Furthermore, the consultation document acknowledges that ongoing scientific research is likely to lead in coming years to an improved understanding of the non-carbon effects of air travel on the environment.</p>
Local 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?
	In terms of environmental impacts, the most frequently reported adverse aspect is related to noise disturbance. This could be mitigated, however, through technical aircraft advances and improvements in airport operational procedures.
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?
	It has been suggested that local communities can feel that they are not adequately

	<p>represented on airport consultative committees. However, airports can find it difficult to recruit representative community groups onto their consultative committees and it is difficult to get a balance between genuine representation and a workable management structure with accountability mechanisms.</p> <p>Could more be done to improve community engagement on issues such as noise and air quality? If so, what and by whom?</p> <p>It should be noted that Airport Master Plans are non-statutory documents and often strategic in nature. In addition, there is no statutory control over their contents or the degree of community and / or stakeholder consultation required as part of their development. Airports operations often vary from their published Master Plans.</p> <p>Better community engagement may result in more tolerance from affected communities but it is considered that the responsibility for better engagement should lie with the airport operator. It is acknowledged, however, that it can be difficult for airport operators to undertake meaningful engagement with local communities although the production of guidelines on this topic would ensure a consistent approach to consultative forums across the UK.</p>
5.43	<p>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?</p>
	<p>In principle, the setting of a noise envelope would allow for comparison of the airport’s annual contour report and envelope contour, thus transparently demonstrating the airport’s level of performance and / or compliance. This approach would encourage airport operators to make use of technological and operational advances in order to offset airport development.</p> <p>The decibel level chosen for the envelope perimeter will be fundamental to its effectiveness. A 57dB_Laeq (16 hour) level has been suggested but research suggests that this level fails to protect those living within the envelope against reported health effects of noise exposure below this level. In 2010, the European Environment Agency published a Technical Report by the Expert Panel on Noise (EPoN), in which the panel identified the effects of noise on health and well-being for which there was “sufficient evidence”. This includes annoyance and self-reported sleep disturbance starting to occur at a threshold of 42 dB Lden, performance starting to be affected in terms of learning and memory at a threshold of 50 dB Leq, reported health effects and hypertension starting at a threshold of 50 dB Lden, and ischaemic heart diseases starting at a threshold of 60 dB Lden.</p> <p>It has been suggested also that the Laeq nomenclature may not be the best assessment criteria for annoyance, and it is possible that more frequent but less noisy flights would result in a similar Laeq but would be more annoying to the local community.</p> <p>If Laeq (16hr) is used, very busy and thus noisy times such as early mornings and before nighttime closure are ‘averaged’ into the rest of the day. Consequently, it may be necessary to use shorter Laeq measurement periods in order to prevent higher levels of annoyance at sensitive times. The use of weighted Lden, Lnight and Lday could help in this situation.</p> <p>Consideration should be given to the requirements of the Environmental Noise Directive and the need for Noise Action Plans and Noise Mapping exercises to be conducted and reported in Lden.</p>

	<p>It is anticipated that there would be difficulty in agreeing a suitable envelope size. Almost certainly, airport operators would consider the envelope too small whereas local communities and environmental groups would argue the reverse. In addition, Noise Envelopes should not be presented purely as a mechanism to permit the growth of an airport. They have an enforcement role and exist to enable authorities to require airports to manage effectively their operations.</p> <p>It would be necessary to have agreed guidelines and a clear regulatory framework around the establishment of noise contours and their enforcement. In addition, enforcement responsibility would need to be agreed and allocated between the various enforcement authorities and they too should be monitored to ensure consistency of approach. In Northern Ireland, in particular, a review of the number of enforcing authorities and their powers should be considered. A more transparent enforcement regime would improve public confidence in an airport's ability to manage its impacts and in the enforcement authorities themselves.</p> <p>It may be possible to set the envelope at an area smaller than the existing 57dBLa_{eq} contour and agree a time frame within which the airport would apply technical advances and improved operating procedures to reduce the 57dBLa_{eq} contour to a more appropriate envelope size.</p>
<p>5.44</p>	<p>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?</p>
	<p>The location of an airport will dictate whether it is better to use preferential routes or not. At George Best Belfast City Airport, there is an obligation on the airport operator to maintain a bias in favour of approaches and climb outs over Belfast Lough. The purpose of the bias obligation is to reduce the effect of aircraft generated noise over the most densely populated areas of the city. However, it is acknowledged that this type of condition will not be applicable in all airport locations.</p>
<p>5.45</p>	<p>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 NO_x) through the implementation of new technology?</p>
	<p>With specific regard to the air quality section of the consultation document and in particular, the issues connected with nitrogen dioxide and particulate matter emissions, it should be noted that within Northern Ireland, Part III of the Environment Order places a duty upon councils to periodically review and assess air quality within their districts against a series of national air quality objectives. These objectives reflect broadly health based limit values established latterly by the European Commission via Directive 2008/50/EC on ambient air quality and cleaner air for Europe. Where, as a result of the review and assessment, a local authority determines that an air quality objective is unlikely to be achieved within the compliance year, it is required to designate the geographic location as an Air Quality Management Area and to develop subsequently an action plan in pursuit of the objective.</p> <p>Belfast City Council has declared already four air quality management areas across the city connected with emissions of nitrogen dioxide and particulate matter from road</p>

	<p>transport and has published an Air Quality Action Plan for the city. Although these air quality management areas are not immediately in the vicinity of George Best Belfast City Airport, passengers travelling via the airport are likely, nonetheless, to contribute to background and roadside nitrogen dioxide and particulate matter concentrations across the city. As highlighted already, the Belfast Metropolitan Urban Area is part of the government's application to the European Commission for a time extension to the deadline for achieving the limit values for nitrogen dioxide. It is essential, therefore, that these limit values be achieved by 2015 and maintained thereafter. Accordingly, the Department is advised that the Council will continue to monitor ambient pollution levels and to manage air quality in the vicinity of the airport. If it appears that air quality objectives or limit values are likely to be exceeded in the vicinity of the airport, then the Council may be required to declare the airport as an Air Quality Management Area and introduce appropriate control measures.</p> <p>In order to cut emissions from road transport and to help protect public health, the European Commission has introduced a series of successive exhaust pipe emission standards for new vehicles sold in EU member states. As the contributions from road transport and other prescribed sources continue to be reduced, so the contribution from aviation may become locally more significant. Indeed, residents living in the vicinity of the airport have already expressed their concerns to the Council regarding ambient pollution and odours connected with airport operations. It is gratifying to note, therefore, that the Committee on Aviation Environmental Protection (CEAP) is continuing to work towards establishing NO_x and particulate emission standards for new aircraft types. It is considered that the introduction of successively tighter emission standards for aircraft will encourage manufacturers to develop and introduce technological advances leading towards reduced emissions of ambient pollutants.</p>
5.46	What are the economic benefits of night flights? How should the economic benefits be assessed against social and environmental costs?
	<p>"Night Noise Guidelines For Europe" and new World Health Organisations report "The Burden of Disease from Environmental Noise", link unacceptable night time noise levels to ill health and economic burden.</p>
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?
	<p>Night time respite has proven popular where introduced but it must be acknowledged that this approach may lead to busy periods directly preceding and immediately after the respite period.</p>