



DFT Draft Aviation Policy Framework 2012

Consultation Response

Chapter: Executive summary

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 may adversely affects tourism and economic investment is of significant concern to us.

While we appreciate that the focus of this consultation is not around the question of UK and international connectivity; we must mention that 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.

Chapter 2: The benefits of aviation

Connectivity:

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

Yes. Though it is fairly simplistic as described. For example no recognition is given to the fact that the 'value' (both relative and actual) of the connection will vary from region to region (though the paper does discuss this in later sections 2.6-2.7). As presented, it suggests that value is being considered only in terms of the headline UK value, which will continue to overly bias policy towards the South East.

Fifth freedoms:

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

Yes on the basis that it is monitored. If it is found to be unsuccessful it can then be withdrawn following a reasonable trial period. If it is successful it should be considered for roll out in a suitable form to other UK airports where there is demand.

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

No comment.

Airports outside the South East:

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?



Yes.

Any other comments:

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

The paper does not mention the effect of airport, passenger and airline taxes on competitiveness. In particular, Northern Ireland has 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. This issue is being considered elsewhere but it should also be referenced under this framework.

Different taxation rates may also become an issue if fifth freedoms are extended.

Chapter 3: Climate change impacts

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

We appreciate the steps the Government has taken to address this issue and the difficulty of balancing the need for UK action against the potential for undermining our competitiveness against global players who may not enforce the same standards. However, we would not want the 'global problem' mentality to become an easy excuse for not pushing improvements in UK standards.

Any other comments:

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

The evidence seems to give a reasonable overview and picks up on comments we made in response to the original scoping document.

Chapter 4: Noise and other local environmental impacts

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

Agree.

Do you agree with the Government's overall objective on aviation noise?

Agree that the objective should remain to limit and where possible, reduce the number of people in the UK significantly affected by air craft noise.

Do you agree that the Government should retain the 57 dB LAeq16h contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance?

Agree that Government should retain the 57 dB LAeq 16 hr contour but should be mindful of research which indicates that significant community annoyance now occurs at lower levels.



Do you think that the Government should map noise exposure around the noise designated airports to a lower level than 57 dB(A)? If so, which level would be appropriate?

Airports which fall under the remit of the Environmental Noise Directive are already required to map their 55dBA Lden contour once every 5 years and if the government wish to acknowledge that people are annoyed by lower levels of noise than the 57dB LAeq it may be wise to use the Lden nomenclature as this is likely to be in line with future EC requirements. The Lden is also better weighted to capture night time flights.

The size of the area within the contour, the number of people living therein, the time and the number of ATM's and their associated Lmax all need to be considered when assessing the likely noise impact and annoyance.

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?

Agree

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

There is an argument to do so as noise is the environmental factor which is most often complained about by the communities surrounding airports and thus weightings should reflect this.

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

No comment.

Air Quality, fuel efficiency and the preservation of tranquil areas.

Do you agree with the Government's proposals in paragraph 4.68 on noise limits, monitoring and penalties?

Agree

In what circumstances would it be appropriate for the Government to direct noise designated airports to establish and maintain a penalty scheme?

There is merit in the introduction of a penalty scheme at all airports where there is a significant noise burden on the local community.

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?

Designated airports should be demonstrating best practice and thus if it is deemed that noise monitors could facilitate better noise management they should be required to operate them.

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



By introducing higher airport fees at night and weighing them against noisier aircraft, airports would be encouraging operators to land fewer flights at night and to use quieter aircraft where possible.

Do you think airport compensation schemes are reasonable and proportionate?

Some airports have chosen perhaps as part of their planning agreement that compensation should be made available at lower levels. There would appear to be some grey area around the allocation of compensation schemes with some schools/ homes reporting that they have been assessed as applicable for compensation and then being placed on a waiting list to receive the grant.

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 comment

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

No comment

Do you have any further ideas on how the Government could incentivise the aviation and aerospace sector to deliver quieter planes?

No comment

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

No comment.

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

No comment.

Chapter 5: Working together

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

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.

The additional powers for the CAA to promote access to information seem sensible and are welcome.

Is there a case for changing the list of airports currently designated to provide consultative facilities?



Of course, most airports *should* be encouraged to have a CAA but it would be sensible to develop criteria to determine if an airport *must* have a CAA or not. This should be based on factors such as the volume of air traffic, local population density etc.

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

Yes, although the role should be more about identifying good practice and providing arbitration. Of course it may be that the public would not see the CAA as neutral in this matter and regard them as being pro-aviation. Consequently an independent body may be better suited to an oversight role.

Do you agree with the Government's overall objective on working together?

We agree with the stated objective “to encourage the aviation industry and local stakeholders to strengthen and streamline the way in which they work together.” However, while recognising that it should be obvious, we think that it should be strengthened by adding the higher purpose. That is “to encourage the aviation industry and local stakeholders to strengthen and streamline the way in which they work together to maximise the benefits from aviation whilst minimising any negative impacts.” Although this may seem obvious, we think it is important as it shows that both sides are expected to collaborate to achieve each other’s objectives.

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

E.2 Forecasts – This section should also provide any information that is available in relation to expected job creation and the wider economic benefits.

E.8 – the final bullet should be amended to read “Bodies representing relevant local interest groups such as walkers, cyclists, disabled people, wildlife groups, environmental groups etc.

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

Yes.

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

Yes.