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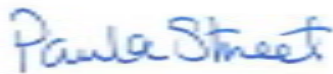
Dear Sir/Madam,

Sustainable framework for UK aviation

I refer to the above consultation and GATCOM welcomes the opportunity to comment on the future direction of aviation policy for the UK. Over the past few months GATCOM has undertaken much consultation with its members on the formulation and nature of its response to the consultation and attached is GATCOM's response to the consultation questions for your consideration.

I trust our comments will be taken into account.

Yours faithfully,



Assistant Secretary

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GATCOM's Response to: Sustainable Aviation Scoping Document Consultation Questions

General Comment

The real issue in considering a long term strategy for aviation is to strike a balance between the economic benefits of meeting demand and the needs of the industry with the impact this has on local communities and the environment. It is essential that airports work in harmony with the local communities around them.

It is however disappointing that other than making the best use of existing capacity and stating that meeting unconstrained demand is not an option, there is no significant discussion of longer term capacity issues in the Scoping Document. This is of concern as longer term capacity issues should form a key element of the new aviation framework.

Gatwick is the busiest single commercial runway in the world and currently has some capacity to grow. Gatwick Airport Limited has plans to make small increases in peak hour movements and has opportunity to grow in the off-peak when the existing runway is not fully utilized. However in the wake of the Coalition Government's decision to cancel a third runway at Heathrow and to rule out additional runways at Gatwick and Stansted, the UK lacks a realistic policy for meeting the growing demand for air travel in the longer term. If this issue is not addressed, there is a real possibility that some of London's major financial institutions could relocate to Paris or Amsterdam, whose respective airports provide direct and reliable routes to a wider range of international destinations.

GATCOM notes from the DfT's recently published UK Aviation Forecasts that the central forecasts suggest that without new runways the three largest London airports will be at capacity by 2030, and all growth beyond 2040 will occur at regional airports. It is therefore felt that the first draft of the aviation framework needs to clearly address the issue of the level of demand and therefore capacity that will need to be met by airports on a national basis in the medium to long term. The approach to the issue of airport capacity and passenger demand is key in relation to the need or not to provide additional runways at particular airports and/or whether safeguarding for longer term future provision should be continued.

There is also no indication of the timeframe that the aviation framework should cover other than it will be "long term". It is important to take this into consideration in relation to future passenger demand and capacity and the issue of safeguarding land. If additional runway capacity is required then the aviation framework will need to indicate the location where the capacity should be provided. If there is the potential in the long term of capacity being required then the document should provide clear guidance on where land should be safeguarded. The issue of safeguarding land for additional runways is an important matter for local planning authorities, the airport operator and local communities. Certainty on this issue is critical as safeguarding land affects development decisions and the issue of property blight.

The aviation sector

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.

The aviation sector offers a significant range of benefits to the UK, primarily economic as it enables the import and export of goods and enables UK plc to compete on a global

scale. It also contributes to global trade by facilitating business travel across the world and has a key function in the tourist industry, and socially, bringing visitors into the UK and facilitating travel abroad. The aviation sector also provides an opportunity for humanitarian relief during times of national disaster or civil unrest.

It should be noted that, as an island nation, UK airports have a critical role to play in the transport of people and goods, as evidenced by the disruption caused earlier this year by the closure of UK airspace as a result of the eruption of a volcano in Iceland.

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

As discussed above, aviation is an important contributor to economic growth by ensuring the mobility of goods, services and people. It also contributes towards social well-being by making it easier to keep in touch with family members around the globe.

Again, it is worth making the point that, as an island nation, the UK is particularly dependent on air transport for the movement of people and goods.

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

All sub-sectors need to be considered and work together to help achieve a sustainable framework. Business travel has the greatest impact on job creation in any economy; leisure travel is important for social well-being with inbound tourism to the UK contributing to economic growth; and freight allows time-critical & high-value assets to be moved around the world.

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?

In the long term, extensive use of longer range, more efficient aircraft may alter the type of demand at airports all around the world, including the UK, as there is likely to be greater demand for 'point to point' services.

There are likely to be significant changes to the industry in terms of addressing climate change i.e. managing the amount of the emissions directly from aircraft (non-airport initiatives) as well as initiatives of airport operators to reduce their carbon footprint and emissions. The present emphasis on tackling transport emissions to and from airports, and the emissions from airport buildings can only go so far in reducing the level of greenhouse gases emitted, therefore a more direct solution may be required. However it is highly likely that aviation will continue to grow, but only in markets where there is financially viable opportunity. It is imperative that the UK is seen as competitive to both aviation & non-aviation businesses.

5.5 How, and within what constraints, can aviation growth occur as technological developments and improved operating procedures reduce CO₂, pollutant emissions and noise impacts?

Flexibility should be incorporated into any future approach to exploit the benefits of technological advances and changes to global resources/government priorities. The industry is committed to reducing aircraft and airport emissions and noise impacts and technological advances are being developed but it will take time for the benefits to be realised. Measures to further incentivise airlines to invest in new fuel efficient, "cleaner" aircraft could be achieved through the implementation of greater differentials in the structure of landing charges at airports but it is acknowledged that this would be controversial particularly in the current economic climate.

5.6 How should decision-makers address trade-offs or competing interests, where these occur both (a) between different aviation objectives, e.g. CO₂ 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?

Trade-offs between different aviation environmental objectives is a complex and difficult issue to address. It must be recognised by all interests that a balance must be struck to ensure a sustainable future for aviation. It is important to minimise noise and CO₂ impacts and decision makers have to take account of national targets on CO₂ emissions and whether aviation objectives would breach these. Targets should however be considered within the wider framework of transport and not purely the aviation sector; they should form part of a strategic overarching approach. As part of this, the Government will need to continue to put downward pressure on both noise and emissions in a challenging but realistic way so that airlines can make commercial decisions on what types of aircraft to purchase and operate.

GATCOM is very supportive of enabling trade-offs to be agreed at the local level and being captured in airport master plans, surface access strategies and local agreements. The partnership work and local agreements in place with local authorities at Gatwick are a good example of how this can be achieved.

Regarding the network of airfields versus housing development, provided there is an indication of which airfields are important in order to maintain a national network, it is imagined that housing can be accommodated without conflict when viewed at a national scale.

Such an approach would however lead to increased commercial activity and inward investment in the areas surrounding these airports leading to a need to have in place supporting infrastructure and public services. The Government must recognise the implications of this.

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?

Collectively London airports have flights to more destinations than any other European city. Maintaining London's direct connections to key international locations and emerging market destinations are likely to encourage business and inward investment, thereby supporting the UK economy. London's airports are therefore of strategic national importance so the future aviation policy framework must recognise this and address their future capacity constraints.

5.8 How might the cost of regulation to the aviation sector be reduced, while achieving the Government's objectives of promoting sustainable aviation, improving the passenger experience at airports, and maintaining high standards of safety and security for passengers and freight?

Passenger experience is considered wider than just the airport itself and should encompass travelling to and from the airport as part of the overall experience. Therefore, joint working with organisations, such as train and bus operators, to ensure the whole passenger experience is improved should form part of any proposal. In addition, ensuring airports have different owners will increase competition in the market as each will strive to attract customers by offering a better experience.

The proposed reform of the regulatory framework for airports includes new duties to be placed on the CAA and a system of airport licensing. It is felt that this will help improve the efficiency and effectiveness of regulation and hopefully reduce costs. Placing the passenger at the heart of the new regulatory regime together with clearer environmental duties and constructive partnership working with the industry, will help the Government to achieve its objectives.

The pending Aviation Regulation Bill should base new regulations on best practice in other sectors. A simplicity of purpose should be the guiding principle.

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?

The importance of the UK position in international aviation is recognised and there is a role for government working as a partner with the industry to safeguard national interests in the face of growing competition from Europe. The objective must be to maintain a prominent position in the international market, but not necessarily the dominant one that it has enjoyed in the past. It must be recognised that without good connectivity the UK will become removed from global markets and jobs will be lost. A core objective of the Government should be to make a positive choice for a global hub in the UK complemented by greater interlining between the regional hubs. This would help the UK to compete with other European airports and support economic growth in the UK.

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?

Direct travel from a UK hub airport is probably preferable for most UK passengers be they business or leisure. There are also economic benefits linked to both people and goods, through the potential creation of jobs. There is concern that if businesses are directed through foreign hub airports they will choose to do business in those countries rather than the UK.

5.11 Are direct connections from the UK to some international destinations more important than others? If so, which and why?

Potentially direct connections to key international locations are likely to encourage business, thereby supporting growth in the UK economy. It must be recognised that inward investment decisions are easier to achieve where there is a direct route. There is also likely to be some merit in supporting strong geo-political links through direct connections too.

5.12 How will the UK's connectivity needs change in the light of global developments in the medium and long term (twenty to fifty years)?

There will be a greater need to ensure connectivity to emerging markets in the BRIC (Brazil, Russia, India and China) nations if the UK is not to lose out to international competitors.

5.13 What are the benefits of maintaining a hub airport in the UK?

A major benefit of hub airports is that they allow destinations to be served that could not be served on the basis of local demand alone. They permit a greater frequency of flights on important trade routes (e.g., to New York and Hong Kong) and allow the use of larger aircraft. The economies of scope and scale enable greater differentiations of services to passengers and result in lower fares being available. This puts air travel within the

reach of more people including small businesses wishing to trade internationally and increasing the number of VFR (visiting friends and family) group.

Airport hubs have developed in response to strong competition and the need to be efficient and respond to the needs of passengers. They make efficient use of available airport capacity as larger aircraft are used and so generally carry more passengers per air transport movement.

The maintenance of a hub airport within the UK will ensure that the UK remains a significant player in the international aviation industry and will ensure future connectivity and global awareness of the UK as a business destination. In the long term, extensive use of longer range, more efficient aircraft may alter the demand for 'hubs' all around the world, including the UK, particularly demand for 'point to point' services at airports.

The changing characteristics of future demand and route development need to be considered in forming future public policy.

5.14 How important are transfer and transit passengers to the UK economy?

Transfer and transit passengers are often considered less important than those travelling point-to-point since they do not contribute greatly to the economy unless they can be persuaded to spend time and money in transit. However, they generate significant revenues for UK-based airlines and contribute to there being a greater range and choice of flights and fares available to local passengers.

Longer haul passengers are more likely to be encouraged to use the UK as a 'stop-over' destination for longer journeys, thereby benefiting the UK and local economy.

5.15 What are the relative merits of a hub versus a point-to-point airport?

It should be recognised that the number of destinations served by an airport can make the area surrounding that airport more desirable for both business and people.

5.16 Would it be possible to establish a new 'virtual' hub airport in the UK with better connectivity between existing London and / or major regional airports? Could another UK airport take on a limited hub role? What would be the benefits and other impacts?

No comment.

Regional connectivity and regional airports

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

Potentially, however it would need to be carefully managed and the surrounding road/ rail network would need to be able to accommodate the increased volume of customers without having significant impact on other receptors such as air quality. It must however also be recognised that the market, particularly business passengers, may not want to fly to regional airports.

There could be opportunities to use peripheral airports for cargo. This would require good transport and nearby warehousing and storage links. However, some 70% of all freight enters the UK in the bellyhold of passenger aircraft. All the major freight-forwarding companies are based near Heathrow for that reason.

Each airport would have to be considered on its own merits and might require considerable investment in wider infrastructure provision if operations were to expand

significantly. Freight will need to be trucked to freight distribution centres by road and such impacts on surface access and emissions will need to be factored into such considerations.

Gatwick is not considered to be a constrained airport since there is scope for further capacity development (currently operating at c. 78%).

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

As well as future transport infrastructure, such as a High Speed Rail 2 (HS2), any scoping exercise must look to assess how best to improve the integration of the UK's existing road and rail infrastructure with airports. The improvement of the end-to-end passenger experience is one of the overarching themes of aviation policy.

The experience at Gatwick is that there are a number of barriers to improving such integration, which are outside the remit of the airport operator, but within the scope of the Government to remove. GATCOM has noted however that one of the key points emerging from South East Airports Taskforce's deliberations on surface access issues is that the Government intends to take a less prescriptive approach to rail and that the onus would continue to rest with airport operators to make representations to Network Rail and franchise bidders/operators on airport services. There is currently no clear steer from the Government on the importance of surface access to airports. It is therefore vitally important that the Aviation Policy Framework sets out high level objectives in this area.

It is acknowledged that there may be scope for airport operators to redress the balance by paying for services or infrastructure which they feel are critical to the airport but it is questioned whether it is right for aviation to subsidise the building of rail infrastructure which benefits the wider region and nation as a whole.

In terms of encouraging a shift from air to rail, there are three key criteria to help decision making when balancing alternative modes of transport.

Pricing structures need to change due to the fact that environmentally it is not sustainable to continue to fly short distances therefore prices need to reflect this. Rising oil prices are also likely to be a contributing factor; however governmental 'pressure' in the form of general taxation and further investment in the rail network will also be required.

Travel time by rail needs to be closer to that of air transport to further assist this modal shift. HS2 will have a key role in helping to achieve a modal shift provided the high speed network has the right connections at key airports and centres of commerce and industry. The Government must however recognise that for the far regions of the UK air transport is the only viable option to connect to London and other regions of the UK. It is vital therefore that domestic air links from those regions are maintained and able to grow

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

The Government has confirmed that the construction of HS2 will go ahead and that a direct connection will be provided to Heathrow Airport. Unfortunately, this is not scheduled until 2035. In parallel, the development of a high-speed rail network has been a key factor in the Government's decision on additional runways at London's airports and has stated that HS2 will provide a viable alternative to having many short-haul flights and will relieve congestion at airports.

HS2 could complement the aviation industry by providing an alternative to less profitable internal UK flights, meaning the aviation industry could concentrate on longer journeys. This will be important if carbon emissions become capped (the aviation industry can 'save' emissions for longer journeys).

However, there appears to have been little or no assessment as to the economic benefit to be gained from providing either a direct, or indirect, link to HS2 to other London airports apart from Heathrow or what the impact on competition between London's airports might be as a result of only one London airport having a direct connection to the route.

There has to be sufficient links connecting the high speed rail service to both the airport itself and also other key destinations within the UK. The broad timetable and regularity of the high speed rail service should complement the aviation timetable to facilitate connections for passengers.

If a direct connection to the West London Line is provided at Old Oak Common, then Gatwick could possibly be reached in a similar timeframe to that of the Heathrow – Birmingham International Airport link. The value of the proposed HS1/HS2 link must also be realised in providing valuable links from the far South East of England.

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

It is a fallacy to assume that better air services to the regions will promote regional development. They are equally likely to enable more firms based in the South East to supply goods and services. The Government must recognise that aviation does not exist to correct an economic imbalance, it exists to fulfil a need of travel for those who live and work where they reside. GATCOM does not support financial penalties or incentives on aviation that will encourage investment away from London and the South East.

GATCOM is also disappointed that whilst the Scoping Document considers the role of aviation with regard to the national economy, it does not fully consider the role airports play in the local economy. There is discussion in the document about the importance of aviation to the UK economy in general both in terms of aerospace companies themselves and the connectivity they provide which supports the operation of the wider economy. The future policy framework must fully consider the role of airports in the local economy.

Every airport of size is an economic hub in its own region.

Making better use of existing capacity

5.21 To what extent do UK airports meet the needs of their customers? How might those needs be more effectively met within existing capacity? What is the right balance between competition and regulation?

The question of airport capacity in the South East must be addressed and planned for the medium to longer term. Competition will build the market and it is hoped that the new regulatory framework will not distort competition but will enable it to grow in a sustainable way.

However careful consideration needs to be given to the impact of the Competition Commission's decision that required BAA to sell Gatwick and Stansted as it is feared by local communities and environmental interests that increased competition may result in a deterioration in the environment. There will be a tendency for each airport to increase its profitability and its capital value by seeking to attract more, and perhaps noisier, more polluting aircraft. Therefore regulations to protect the environment, for example those to limit noise, night flights, and pollution, must be strictly monitored and where necessary enforced.

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?

Whilst it may be feasible to expand capacity through the provision of more flights and larger aircraft types and move services to other smaller airports, this would have associated environmental and social impacts. As new technologies in aircraft design develop and can reduce the noise impact, this could facilitate additional aircraft movements in the future whilst minimising disturbance levels. Demand management measures could also be used whereby passengers are encouraged to make more local journeys by train thereby freeing up capacity for other flights. This will require joint working between rail companies and the airports. However demand management will need careful consideration and its impact fully assessed as so as not to drive demand to other countries resulting in the UK losing its international competitiveness.

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?

No comment.

5.24 How important is increased resilience at the UK's major airports to reduce delays? How best could resilience be improved with existing capacity, e.g. how might trade-offs between existing capacity and resilience play a role in this?

Very important. Gatwick is the busiest single runway commercial airport in the world. Air traffic control does a skilful job in scheduling take-offs and landings at the shortest possible intervals, allowing for the differing wake vortices created by different types of aircraft. But inevitably this system is not resilient, and the minor disruption as a result of adverse weather or other incidents can result in delays. When delays occur, aircraft are required to fly elongated approach paths or to stack, causing increased noise and climate change damage. One solution could be direct routing as described in the CAA's Future Airspace Strategy. Another would be to place a limit on the number of flights scheduled to use the runway in any one hour. However this would be highly contentious and could reduce capacity further.

Regulation could have a role in minimising delays and ensuring the airfield and airspace is used as efficiently as possible. The CAA's congestion delay term at Heathrow and Gatwick does focus the airports' attention on making best use of the airfield infrastructure and resilience planning is key to ensure that disruption is handled efficiently and delays kept to a minimum.

The experience of resilience planning at Gatwick during the severe winter weather conditions in 2010/11 was that it worked well and lessons learned have been taken forward. Aviation is an integral part of the UK's transport infrastructure and other transport modes also need to be as resilient.

Improved resilience at airports is also reliant on punctual and efficient surface transport and inter-modal connectivity. The severe winter weather conditions in 2010/11 saw surface access networks around Gatwick recover at a slower pace than the airport resulting in airport staff and passengers not being able to access the airport. This had implications for flight schedules outside the control of airports and airlines.

The efficiency of inter-modal connectivity is also an issue that needs consideration. At Gatwick, the decision of a train operator to install ticket gates at Gatwick Station will lead to more congestion on the station concourse and delays for passengers both

arriving at and departing from Gatwick. Government policies are therefore needed to ensure that all transport operators work together to recognise the needs and special characteristics of air passengers.

5.25 Could resilience become an issue at regional airports? If so, how might this be avoided?

No comment.

5.26 Could existing airport capacity be more efficiently used by changing the slot allocation process, for example, if the European Commission were to alter grandfather rights? If so, what process of slot allocation should replace it?

EU slot regulations provide a demand management mechanism since airlines must first obtain slots at a capacity constrained airport. Given the capacity limits already in evidence, a far greater use of regional airports should be an early feature of fresh policy. Judgements need to be made about the relative importance of business and leisure fliers. Services from the regions to South East airports need some protection. In addition to High Speed Rail 2, there is scope for improving other rail services from the regions and for encouraging more direct international flights from regional airports – although local demand for the latter is often insufficient to enable a viable service to be developed. It should be noted that Gatwick Airport is predominantly a regional airport on the basis of the points of origin in South East England of the significant majority of its passengers.

In view of the pressure on runway slots in the South East the time is right for a major rethink about how the best use is made of available capacity. The current EU regulation on slot allocation facilitates entry of and competition between airlines. This will not however necessarily relieve the pressure at heavily congested airports such as those in the South East Region.

If it were decided that some slots should be ring-fenced for flights from the regions, this should only be from regions where there is no easy rail route. People who wish to travel from Manchester or Newcastle to central London can take the train. On the other hand people who wish to travel from Belfast to Beijing have a need for access to Heathrow or Gatwick.

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

Given previous comments, it is considered essential to take a holistic approach to transport and the linking of services over all areas, including public transport links to and from the airport.

5.28 What provision, if any, should be made for General and Business Aviation access into congested airports?

No comment.

5.29 What is the role of airspace design and air traffic management in making better use of existing capacity?

Airspace design and air traffic management have a vital role in making best use of capacity and minimizing environmental and climate change impacts. There is a need to reduce the amount of stacking and delays in UK airspace. Other factors to be considered include the need to provide scope for resilience and flow control procedures within any such design and operation.

Airspace in the South East is constrained, with Heathrow being the most constrained airport. It is noted that this issue has been considered by the South East Airports Taskforce and that the overall conclusion was that the airports in the South East were operating well considering the constraints.

Opportunities to optimise operational procedures will need to be fully investigated and any potential impacts on local communities assessed before implementation with adequate weighting given to the environmental disbenefits. Whilst welcoming the intention to give greater weight to environmental issues, GATCOM has raised concern about the CAA's Future Airspace Strategy in that insufficient consideration has been given of the need to inform and consult affected communities and individuals in a timely manner if changes are to be made. Commensurate with maintaining a "Just Culture", the needs of non-airspace users must be given an appropriate weighting at the outset rather than through the application of mitigation measures after decisions have been taken

Climate change impacts

5.30 What do you consider to be the most significant impacts of aviation, including its non-CO₂ emissions, on climate change? How can these impacts best be addressed?

A substantial amount of research is underway on alternative fuels, and testing has been begun. GATCOM is encouraged that Gatwick has committed to reduce emissions by 50% by 2020 as opposed to 1990 levels. Many other sectors, including the energy generation sector, receive fiscal incentives in order to adapt, change and move towards reducing their overall emissions, rather than simply being taxed for them. Any policy framework on sustainable aviation must therefore determine the best approach towards reducing the contribution of aviation as part of the transport sector and whether the approach should be effectively punitive, incentive-based, or a mixture of both.

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?

Aviation has a key role in reducing greenhouse gas emissions; however one sector is not necessarily more important than another as climate change is a joint responsibility, therefore each sector should seek to reduce its emissions as far as possible.

The aviation industry could perhaps research alternative technologies as far as possible or offset emissions through alternative solutions such as the provision of renewable energy to feed into National Grid. Whilst the environmental impact of the aviation sector is recognised, it also has significant benefits for the economy and the difficulty is the balance between these two concerns.

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?

There has been general support from the aviation industry over the years of the inclusion of aviation in the EU ETS. By imposing stringent emissions caps and, most importantly, giving the industry the flexibility to choose how to meet them, emissions trading is not only beneficial to the environment but it also establishes a market-driven solution to carbon mitigation and fuel efficiency. However, the scheme will place a significant cost burden upon airlines which must be recognised by the Government especially in determining the level at which air passenger duty is set. Until the scheme is up and running, and the results of the monitoring regime are known, it is not clear how beneficial the EU ETS will be in reality. There is a risk that it could just offset the problem to another location.

Additionally, the objections of other key nations (China, India and USA) and threat of legal action renders the situation uncertain.

5.33 What is the best way to define and quantify the UK's share of the CO₂ emissions generated from international aviation?

No comment.

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?

GATCOM acknowledges that this is an area for further research and development and its benefits need to be proven. Sustainable biofuels have a role but the Government will need to consider whether further assistance should be given to the aviation industry to help create the right infrastructure for the provision of fully sustainable biofuels that are sourced in a sustainable way and that do not deplete global land use for food supply. Matters that the Government could further consider are:

- Changing the definition of biomass to include biojet
- Amending the EU ETS legislation to allow an airline to purchase blocks of fuel and be credited with that fuel even though it may not actually use any of it
- Amending the surface transport priority under the Renewable Energy Directive (RED)¹ to allow sustainable aviation biofuel to be made. At present, the RED is diverting expertise and sustainable products away from developing alternative aviation biofuels.

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?

No comment.

5.36 Which technologies (e.g. for aircraft and air traffic management) have the most potential to help reduce aviation's CO₂ emissions (noting potential trade-offs with local environmental impacts)?

No comment.

5.37 What more could be done to encourage the aviation industry to adopt new technology to reduce its climate change impacts?

The current very high cost of fuel and its variability already places a strong economic incentive on airlines to minimise the use of fuel. Inclusion of aviation in the EU ETS will add to such incentives. The lack of a viable alternative fuel is an issue and Government mechanisms to support the development and adoption of new fuels in the aviation industry should be considered once problems in the assessment of sustainability have been addressed.

The industry is committed to reducing growth in aircraft and airport emissions and Sustainable Aviation is continuing to assess the opportunities for CO₂ and NO_x reductions through airside operational efficiencies. Sustainable Aviation's third progress report advises that the industry is on track to meet the ACARE 2020 goal for emission reductions. However there is always scope to do more.

¹ Under the RED, suppliers must provide proof of the sustainability of their processes and meet criteria stipulated by the European Parliament and Council. Guarantees are required that the production of its biofuel is not in direct competition with food production and that no rainforests are destroyed.

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)?

See answer to 5.30 above. Better public transport links to the airport would also assist in this issue as would employee training and education, environmental management systems for all onsite businesses.

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)?

There is a reasonable level of scope to ensure modal shift providing there is a will to do so from national government and the aviation and other transport sectors. Better communications such as video conferencing may also help minimise the need for some journeys. Airport surface access strategies are valuable in setting out the airport's modal split targets and action plans to achieve targets.

In order to encourage passengers to use rail for their journeys to and from the airport it is necessary to provide facilities which enable use of this mode by individuals, families and those with reduced mobility. This requires rolling stock that is fit for purpose and includes easy boarding access, adequate provision for luggage and a time allowance for the longer ingress and egress that travelling with luggage and families necessitates.

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?

The most significant positive impact local communities receive is the economic benefits associated with the direct and indirect employment opportunities generated by air transport. A major international airport brings economic diversity as well as opportunity. There are significantly more jobs that are not related to airport or airline operation than there are in direct employment. An airport makes an area economically vibrant and attractive to inward investment and must be supported by the local community.

Negative impacts tend to be social and environmental, for example aircraft noise, air pollution and traffic congestion near to the airports. Enhancing the economic benefits of an area is probably in direct conflict with the negative impacts. Negative impacts can be mitigated to some extent for example through the location of housing development, controls on flight times/numbers/routes. Modal shift to public transport to access the airport also assists with addressing traffic congestion.

The impact of noise and, in particular, air quality (pollution) on local communities has both social (disturbance and distress to well-being and learning) and health (individual and cost to the community) implications. Considerable evidence has been gathered over the last decade on the effects of noise on health and child development both in the UK and Europe. Any review of the environmental impacts of aviation should include guidance based on this new evidence and not solely rely on the 57dBA onset of community noise.

The results of the ANASE study provided an interesting insight into aircraft noise disturbance but it was concluded that the results could not provide a reliable way of attaching a monetary figure to the impact of aircraft noise. What the study did reveal is that people are more annoyed by all levels of aircraft noise than they were in 1985, when the last major study in this field was carried out. It was also found that there is no

identifiable threshold at which noise becomes a serious problem. Even relatively low levels of noise could cause some annoyance, which rises as the noise increases. There is a need therefore for a clearer understanding of the causes of annoyance to help develop future policy on possible mitigation measures. GATCOM therefore suggests that further studies into this be undertaken.

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?

Airport operators should not focus exclusively on the needs of passengers and airline customers. The economic and environmental consequences of an airport's operation are significant, and they do impact on the well-being of local communities and regions. These consequences include airport related noise, air quality, and the role in local labour markets. For many airports, 'Section 106' agreements with local authorities already establish a basic framework in which issues are addressed. Gatwick already makes significant efforts to formulate a joint approach to local impact issues through GATCOM, its statutory consultative committee. GATCOM provides a valuable forum for a wide range of interests to engage and discuss issues of concern and provides advice and recommendations not only to the airport operator but to the Government, the CAA, transport providers and the industry.

GATCOM welcomes the Government's endorsement of the valuable role played by the airport consultative committees (ACCs) in the Scoping Document and in the report on the South East Airports Task Force. It is recognised that there is a need to update the existing guidance for ACCs in view of the fact that the role of ACCs is now far wider than in 2002 when the guidelines were last updated.

GATCOM benefits from a Secretariat provided by West Sussex County Council the funding for which is met by Gatwick Airport Limited. This invaluable support enables GATCOM to effectively engage with the various interests concerned with the operation and future growth of Gatwick as well as acting as a critical friend to Gatwick Airport Limited and providing advice and views to the Government, the CAA, transport providers and other agencies.

GATCOM has and will continue to work with the DfT and the CAA in reviewing best practice in the way we work and will fully participate in the review of the guidelines. GATCOM would however urge the Government to ensure that the guidance continues to be non-prescriptive and flexible as what works well for one ACC might not be appropriate for another. It is therefore important that there should be sufficient flexibility in the reviewed guidance to reflect the variations between airports.

The areas where GATCOM feels greater clarity and guidance could be given are:

- Complaints handling - the guidance should clearly emphasise that ACCs should not be a forum for resolving individual complaints (from passengers and local residents) but that the ACCs' role is to consider trends and justification for further investigation. This would also need to reflect the role of the CAA in handling passenger complaints, and the new Aviation Consumer Panel. GATCOM has experienced a particular problem with unreasonable vexatious local resident complaints about aircraft noise and despite GATCOM's investigation of the issues of concern, and conveying its conclusions to the complainants and wider community, individuals continue to complain to GATCOM and are critical of the way in which the matter has been considered.
- Passenger representation on ACCs – although GATCOM benefits from an effective and engaging Passenger Advisory Group with its own group of passengers representing a cross-section of airport users, there is very little guidance provided about what ACCs should consider to enhance passenger representation.

Airport Master Plans are valuable to the wider community in that they set out the growth forecasts, development proposals and aspirations of the airport operator over a set timeframe and can therefore be taken into account by planning authorities, developers, businesses and local people in decision making.

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?

Like airport master plans, airport surface access strategies are valuable documents as they provide a guiding framework, modal split targets and action plans for the airport operator and transport providers to work towards. At Gatwick, there has been significant progress in increasing the number of people accessing the airport by public transport (staff and passengers) and Gatwick has recently achieved its 40% modal split target which is to be commended.

Whilst there is significant scope for the parties within an Air Transport Forum to work together on local and regional plans there remains a role for central Government to ensure that international airports are properly connected to the national infrastructure.

Gatwick has a strong performance in surface access provision but there are a number of barriers that need to be overcome. If airports are to be made better not bigger, co-ordinated action and investment by the Government is needed so as to encourage a greater number of passengers and airport workers to access the airport by public transport.

As an international gateway with 33 million passengers annually, Gatwick is London's best connected airport by rail. The airport rail station has 900 trains arriving and departing each day and serves over 12 million rail users annually; making it one of the busiest rail stations in the UK.

The scale of demand for surface access to and from the airport is growing. Over 10 million journeys are made by people who work on the airport campus every year. There are also a significant number of journeys made by suppliers and service providers. Gatwick is well connected to the motorway network via the M23 and M25.

Improving surface access is an integral part of the sustainable growth of the airport. Effective, efficient and resilient surface access to the airport benefits not just passengers but also the local community and helps to manage the airport's overall environmental impact. Rail is the largest single mode of passenger access to and from Gatwick and there is strong evidence that this demand will continue to grow in the future. However, there is limited capacity on the London to Brighton main line which prevents additional services being introduced to support demand on the part of air passengers. This is a major barrier to the effective provision of rail services to a major airport. Some air carriers may downgrade dedicated air-rail links as a result. Obviously, a limited service will result in the end-to-end air passenger experience being directly affected.

Due to limited capacity, the dedicated Gatwick Express service has effectively been removed in peak hours and turned into a commuter service to Brighton. This has obvious implications in terms of the quality of rail provision to and from the airport. There are also plans by the train operating company as part of its franchise agreement with the DfT, to ticket gate Gatwick Station by the end of the year. This will also further diminish the premium Gatwick Express service as the purchase of tickets on board the train and the removal of train staff to assist air passengers will be lost and will exacerbate queuing for tickets on the station's concourse.

In addition, the level of direct connectivity between Gatwick and both the local and national rail networks has declined substantially in recent years. Locally, rail access to the east and west of Gatwick is a challenge. The loss of a direct link to Kent is of particular concern both to passengers and the local community, as Gatwick Station is a regional rail hub.

On a national level, links between Gatwick and the UK's major cities and conurbations have reduced significantly in recent years. Gatwick has lost its direct routes to Oxford, Birmingham, Manchester, Watford and Kent. To support sustainable access, airports need direct rail services both for increasing access to international gateways and to reduce the carbon impact of surface access. As regards the role of HS2 in providing better connectivity, see responses to questions 5.18 and 5.19.

The long-awaited upgrade to Gatwick Station, with an additional Platform 7, is now at the design stage and a third party funding package agreed. However, the station concourse will continue to have limited capacity for passenger growth even after the currently proposed enhancement project. If Gatwick's status as a major international gateway is to be maintained, and the overall passenger experience is to continue to be enhanced, improvement work to the station should be on-going rather than subject to a near thirty-year interval, as was the case until mid-2010.

As regards the Strategic Road Network, Gatwick is located close to very congested parts of the motorway network; the south-west quadrant of the M25 motorway and the M23. Safe, reliable and resilient access to Gatwick, given its significant international gateway status, is economically and operationally critical. There is a need to expedite the introduction of active traffic management and selected hard shoulder running schemes on key sections of motorway to support reliable access to Gatwick.

As mentioned in response to question 5.18, there is a vital need for the Government to set out high level objectives for surface access to airports and bring together all the transport providers to agree priorities for future improvement and investment in transport networks supporting the sustainable growth of airports.

It would be useful if guidance for the preparation of surface access strategies could include the requirement for the consideration – on all modes of transport - of the needs of passengers with reduced mobility (PRMs) who, thanks to improvement in the facilities provided by airports and airlines, are travelling in increasing numbers. Equally, airport design and facilities should include elements that facilitate the travel and transfer of families and young passengers.

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?

It needs to be understood that an 'envelope' does not necessarily equal an 'Leq contour' and that imaginative and meaningful envelopes may need to be adopted. Envelopes just provide a boundary for something - both the night quotas and movements limits are envelopes. Care needs to be taken with this approach as noise is not the only impact from aircraft. Unlimited development up to a certain noise threshold would still have other effects for example increased transport requirements. Any development would also need to meet other legislative controls for example air quality and planning controls. It could also prove controversial attempting to derive the target.

There is also concern that properties that fall within the hypothetical contour/envelope would be blighted so the issue of compensation would need to be considered alongside such an approach. There may also be wider economic implications which would need to be considered, for example house prices in these areas could suffer, potentially creating socially undesirable areas. The upwardly mobile residents of these areas could also move

away resulting in a loss of individuals with certain skill sets; again this could then adversely impact the wider economy.

Noise contours currently provide a good measurement tool in identifying both the environmental effects of aircraft noise, and the scale and location of impact. There should be clear noise targets embodied in formal agreements with remedial measures included. A noise cap could be appropriate provided it was set in a way that would encourage action to minimise the noise impact.

In addition to minimising the impact of noise on local communities the shape of a noise envelope could also indicate where and how development could occur in the aviation sector. If there is no growth incentive for the airport then there is no incentive for investment.

Whilst any noise envelope would, by definition, be specific to a given airport and hence be local in application, the wider implications for the aviation industry - which operates under international rules - should be understood.

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?

On balance it is considered that it is probably preferable to minimise the total number of people affected by aircraft noise through the use of noise preferential routes, as additional design features could be used in these areas to minimise the direct impacts where possible, for example the use of treble glazing in existing and new housing. This approach is likely to make it easier to identify areas affected and adequately plan suitable land uses or incorporate mitigation measures to minimise disturbance.

The Government must however recognise that there are impacts flowing from the introduction of new technological advances such as the use of direct routing/PRNAV. As navigational accuracy has improved, what was a relatively wide swathe of aircraft trajectories has increasingly narrowed. This has resulted in fewer people being overflown but an increasing number of overflights for a specific number of people, causing disturbance and distress. The increased navigational accuracy through the implementation of PRNAV will exacerbate this situation. The majority of direct routing flight paths are expected to be at high level for the foreseeable future with little impact on those on the ground. However, longer term developments indicate a possibility that these routes could be lower, and closer to airports, and so result in aircraft overflight of people who have not previously been overflown and who may have purchased their house following research into existing flight paths.

GATCOM would like to see further research into the potential of greater dispersal within existing noise preferential route swathes and arrival paths so as to share more evenly the burden amongst those already suffering disturbance.

Noise disturbance from aircraft arriving at Gatwick, particularly from areas further away from the airport, is an area of growing concern amongst local communities around Gatwick. The main noise abatement measure identified for arrivals is set out in the Code of Practice for Continuous Descent Approach (CDA). In addition to aiding noise reduction, CDA also reduces fuel burn thereby cutting emissions and producing an overall environmental benefit. GATCOM supports the use of CDA because of the overall environmental benefits achieved but in view of the disturbance still suffered by those local communities under the arrivals flight paths further away from the airport, we would like the Government to consider whether the use of steeper approaches could feature in the Code.

It is recognised that implementing steeper approaches at Gatwick could be problematic because it is an international airport and the ICAO international standard is for a 3° approach. Nonetheless GATCOM would welcome studies to determine whether there are possibilities available. Even a slight increase in the steepness of approach would result in aircraft being higher for longer and thus help reduce the noise impact.

Noise Action Plans also have a key role in predicting and demonstrating an actual reduction in noise levels. To give local communities confidence that action is being taken to reduce the noise impact around airports, there is a need to demonstrate hard results, not just be a list of 'soft undertakings'.

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?

One of the key problems in assessing the local impact of airports on air quality is the lack of emissions data in relation to auxiliary power units (APUs). At Gatwick APU emissions are calculated to be responsible for around 11% of the NO_x pollution at properties with the highest NO₂ concentrations, compared to 18 % from aircraft (LTO cycle).

As APU emissions are potentially a significant local source of pollution (and one of the easiest pollution sources to tackle on airport through the provision of ground power and preconditioned air) it would be helpful if APU manufacturers were compelled to make public emissions data for NO_x and PM₁₀ / PM_{2.5} for their products, so that a more accurate assessment of APU emissions could be undertaken to inform policy on reducing emissions from these sources.

At a local level a simple way of improving air quality could be to introduce voluntary initiatives to cap NO_x (and if appropriate PM) emissions from an airport up to 3000m, that also covers a defined area of the road network for airport related road traffic. This then gives the airport the flexibility to make emissions improvements in areas where it is cost effective to do so, to off-set a growth in emissions in other areas of the airport should the airport operator wish to expand.

The government should also be pressing for an absolute reduction in NO_x emissions from aircraft engines at all thrust settings, in addition to the planned CO₂ reductions, as this has benefits for both climate change (NO_x impact) and also local air quality.

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

The question of night flights will be a difficult issue for the Government to address. It is recognised that night flights can be disruptive to many people and, as a result, there is a need for policies to be based on the essential demands of the UK's economy whilst taking account of the environmental impact. Two aspects of night flying which must be taken into account when balancing environmental and economic issues are the demands of passengers travelling to Europe and long haul passengers travelling from airports in Asia and beyond, as well as the essential role of the freight and express parcel industry which serves most sectors of the UK's economy.

Express and freight carriers, as well as scheduled services for air freight, need to fly at night in order to meet the next-day delivery needs of modern business. Perishable goods and mail are two examples of key products that form part of this business.

Connecting traffic is also important to the international competitiveness of long haul services. London's unique and unrivalled network of international air services could be degraded if night flying was severely restricted as it would no longer be seen as a key

interchanging hub. This would jeopardise London's position as a leading world city resulting in businesses relocating to major Continental hubs, such as Charles de Gaulle or Schiphol.

The UK is not alone in dealing with the environmental impacts of night flights. The complex interrelationship of airline schedules with differing time zones around the world means that communities around airports in other countries experience similar pressures. The scope for the potential of substitution of night flights therefore needs detailed consideration especially in terms of facilitating additional airport capacity during the day if it is concluded that night flights are to be further restricted. For a significant proportion of aircraft movements at night, economic and social factors determine that there is no alternative but to operate during the night quota period and substitution to daytime hours is not possible. These should be classed 'critical' night flights. However, for some aircraft movements at night, substitution to daytime hours might be possible – so called 'non-critical' night flights. In developing a new night flights regime there is a vital need to strike the right balance of critical and non-critical flights, assessing their benefits to the UK economy against the need to achieve improvements in the night noise climate and other disturbance suffered by local communities.

The balance of economic, social and environmental issues is already assessed in processes such as EIA, SEA, planning and these processes should continue, particularly as the identification of mitigation measures to ameliorate impacts is part of the process.

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?

Since the current night flights regime was introduced there has been a downturn in aviation owing to the economic recession. This has given rise to the perception that the current night flight controls are not 'strict'. Currently at Gatwick there is much headroom in both the Winter quota and movements limit for historical reasons and it is viewed by some that the restrictions have no purpose or effect at all. The end of season figures for the winter season 2010/11 revealed that 62.2% of the noise quota was used and 66.5% of the movements limits used. This is due to a reduction in overall demand for slots. In terms of the summer season 2010, 75% of the available quota count points and 88% of the available movements were used. The original aim of the regime was to seek to reduce noise levels progressively.

Whilst any reduction is to be welcomed and it is acknowledged that the regime has incentivised airlines to update their fleets with quieter, less polluting aircraft, the actual improvement to the night noise climate for local residents has been minimal. Further, controls to progressively reduce noise levels need further consideration - such as the commencement of phasing out some of the now older, noisier Chapter 3 aircraft in the night time period. A review of departure noise limits would also be welcome.

Additionally, it is suggested that:

- Night-time slots should be available only to the quietest classes of aircraft.
- There should be fines for night-time failure to follow prescribed tracks.
- Night-time noise quotas should be progressively reduced.

Greater consideration could be given to improving the effectiveness of the night flights regime by linking it to the latest World Health Organisation (WHO) guidelines which suggests the use of other criteria in addition to the LAeq measurement.

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?

This is an issue that should be discussed with the affected communities and decided in conjunction with them rather than it being imposed from central Government. There would be opposition to a 'respite period' in the middle of the night if that meant more flights at the beginning and end of the night. Night flights are at their most annoying at the start of the night when people are trying to get to sleep, and at the end of the night when they cause people to wake up too soon, and prevent them going to sleep again. By comparison the centre of the night is when most people are in deep sleep and are less likely to be disturbed.

It is suggested that if respite periods are proposed that they should be trialled in the first instance to see if it is effective or not, and then continually monitored.

There is a view amongst local residents that the present length of the night quota period, when the number of night flights is limited, from 2330 to 0600 is not long enough for a proper night's sleep. Similarly the period when the noisiest aircraft are banned, from 2300 to 0700, is long enough to fit in eight hours sleep. In an ideal world the aim would be for a longer night quota period but if this were to mean more aircraft in the shoulder periods before 23.30 and after 0600 it is doubtful that there would be benefit.

It should be noted that the option for an extra rotation for low cost carriers carries significant commercial benefit and that the parameters governing night flights are significant in the context of connecting flights and freight operations.

Any other comments

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.

- Should the consultation on the draft framework include a fourth theme of consumer needs/choices?
- The issue of planning and noise is an area in need of review and has not been mentioned in the Scoping Document. The current *Planning Policy Guidance Note 24 (PPG 24)* is outdated and is long overdue a review. PPG 24 was issued in 1994 and does not reflect or complement current noise legislation such as the EU's *Environment Noise Directive* which requires the production of strategic noise maps and noise action plans.

GATCOM notes that PPGs will be abolished under the planning reforms and the proposal is to rely on the Noise Policy Statement for England 2010 (NPS). That states that it is not possible to have a single noise-based measure that can be applied to all sources of noise in all situations. It also acknowledges that further research is needed but that in the meantime the NPS will provide flexibility until further evidence and suitable guidance is available. However there is a need for overarching guidance for fairness and consistency when dealing with planning and development matters around airports.