

Aviation Policy Framework Comparison

Comparison

Key Question	RBWM Response	Aviation Policy Framework
<p>Do you agree with our analysis of the meaning and value of connectivity?</p>	<p>Connectivity is ‘the’ key to any future national APF, in terms of global and UK connectivity. Connectivity should relate to an integrated approach covering all modes of transport to ensure efficient dispersal of passengers and services as near to the point of requirement and demand as possible.</p> <p>This is a national ‘strategic’ aviation framework that needs to incorporate and include all transport operators and modes of transport. Early investment in inter-airport infra-structure on the mainland can only complement the UK’s aspirations to successfully access global markets and the new expanding economies. The investment in the integration of UK infra-structure must be the overriding priority. The market will determine those areas that will expand; reduce internal uncoordinated competition between the regions and share the burdens and rewards.</p> <p>Heathrow being the only hub airport in the UK is arguably</p>	<p>Partially Consistent 4/10 (According to the APF, Connectivity is fundamentally defined by breadth of activity and frequency of flights. Supplementary measurements of connectivity include the relative importance of destinations served, cost of accessing them, and service reliability). It also identifies ‘hub’ airports with increased connectivity – this is partially true, but could also be used to support the expansion of Heathrow which we oppose. It identifies connectivity as supporting industries which are vital to the UK economy.</p> <p>Partially consistent 4/10 There is consistent emphasis in the framework on strategic objectives – integration with the global economy, with the BRIC countries and other emerging markets, but little specific references to breadth of infrastructure and investment in inter-airport infrastructure. Though it descriptively references regions, the focus is very much on ‘hubs’ as the primary generator of connectivity, with the implication – given the references to industrial concentration in this region - that the South-East, if not Heathrow, remains a priority.</p> <p>2/10 (Mostly inconsistent). The section on connectivity does not</p>

	<p>self-limiting and a constraint to growth. There appears too much focus on Heathrow expansion and the South east. There needs to be a re-think on this historical strategy as it might prove to be too inflexible and even out dated given changes in global markets and mobility expectations (i.e. leisure). The UK must have a balanced aviation industry that is dynamic, flexible and responsive to growing markets and emerging economies. This necessitates regionalisation and development of airports outside the south-east such as Manchester, Birmingham, the North East and Scotland; capitalising on existing capacity and offering greater choice to both passengers and business.</p> <p>Evidence on the need for additional capacity at Heathrow and the South east is often contradictory. For example, reports by WWF suggests there is already sufficient existing capacity, seemingly suggesting the problem being the dominance of individual airports at the expense of other airports who are seeking to expand and to serve specific market niches and local economies. This might suggest the issue is one of re-allocation and/or diversion of demand. A refreshed focus upon improving UK's internal connectivity is likely to facilitate and stimulate such a shift. As the chapter states: <i>'The UK is currently one of the best connected countries in the world'</i>. Arguably, the</p>	<p>explicitly state, but strongly implies, that the development of the South-East is to be the direction of travel in terms of generating connectivity. It states the importance of the hub: "Hub airports play an important role in providing international connectivity, especially to long-haul destinations including emerging economies." It also affirms the central importance of industries which are disproportionately concentrated in the South-East: "Excellent connectivity helps sustain clusters of high-value industries in the UK, such as the financial, legal, IT consultancy and business management sectors which are increasingly global in operations". It also explicitly states that "the demand for aviation is concentrated in the South-East, a densely populated region whose economy There is a section on regional airports which appears to provide an endorsement of regionalised expansion, but stops short of affirming.</p> <p>4/10 (Partially Consistent)</p> <p>As previously mentioned, the focus in the connectivity section is disproportionately oriented towards the importance of hubs and their growth, with the implication being that Heathrow is to hold a place of central importance in the future of aviation. The centrality of Heathrow is explicitly affirmed on page 26, with statistics presented on its importance in terms of European and long-haul flights, though this section does also mention Gatwick. The importance of regional airports is also mentioned in terms of European connectivity, but it is stated that they conduct very few long-haul flights – insufficient in global terms. With reference to capitalising on emerging markets and the BRIC economies, this is</p>
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	<p>same cannot be said about the UK's relative internal transport connectivity. The five London airports collectively serve more routes than any other European city, but there is insufficient utilisation of existing capacities and over provision on 'popular' routes that is having the effect of reducing the frequency of flights to emerging markets. For example, too few destinations and connections to the PRC, now the world's second largest economy and other BRIC destinations.</p>	<p>emphasised as an important part of the future of the aviation sector, but does not offer any specific or detailed guidance. It mentions that there is space for other UK airports to conduct long-haul flights and point-to-point services, suggesting the space for growth in this direction, but this is difficult to reconcile with the previous implication that Heathrow is to maintain a position of central importance in the UK Aviation landscape and neglects to offers an argument as to why this is of importance to the UK economy.</p>
	<p>As recognised in the draft APF <i>'London is already an exceptionally well served capital city with five airports that together serve more routes than any other European city'</i>. We do agree that the UK needs to maintain its position if it is to compete successfully for economic growth opportunities. In this respect all the airports serving London should be considered as part of the London system (as opposed to the Heathrow hub) in particular Stansted and Gatwick in addition to Heathrow and that it is London itself that should serve as the main hub for the U.K. This infers there needs to be a shift in mindset and instead to consider what sort of hubs Gatwick and Stansted might be as this would affect the surface connectivity needs</p> <p>The APF refers to the development of high-speed rail (HSR) as significant in</p>	<p>Mostly consistent 6/10. Whilst the emphasis is on Heathrow – and to a lesser extent – Gatwick as potential hubs which could continue to provide long-haul flights, there is little in the analysis to suggest that London as a whole should be considered as a systemic hub. Point-to-point services are mentioned as important for the future, and that other London and non-South-East airports are potentially capable of assuming this further capability is noted.</p> <p>Partially consistent 3/10.</p> <p>This is fairly consistent with the</p>

	<p>terms of improving connectivity, however it is important to note that the agreed Phase 1 route of the current HS2 scheme only links London to Birmingham Airport (to date) and there have been several studies questioning the economic benefits and level of job creation that HS2 might yield. In addition, given the perceived urgency of the matter, the long timescales convey a lack of true commitment and conviction outside the South east region.</p> <p>There remain other opportunities worthy of consideration for improving connectivity, such as electrifying the route from Reading to Birmingham Airport and improving the East Coast Mainline and including a link to Doncaster Sheffield Airport, as well as other surface access links to the regional airports.</p>	<p>Borough's aim of improving access and regional growth opportunities, and also supports our sustainability strategy, but the implications of this are far from clear. The project is not due for completion until 2026, which, as was mentioned in RBWM's consultation response, is key to whether it relates to the priorities identified by RBWM. Also, from another perspective these developments could strengthen reliance on Heathrow and weaken the need for the development of regional capacity – if passengers from regions can access Heathrow in much shorter periods of time, why would they need to develop their own airports/hubs? As with the consultation responses, there is nothing in this section, either explicitly or implicitly, suggesting a rebalancing away from the South-East.</p>
<p>Do you support the proposal to extend the UK's fifth freedom policy to Gatwick, Stansted and Luton? Please provide reasons if possible.</p>	<p>Yes. This is an absolutely essential policy change to what is currently in effect a totally out of date restrictive practice upon these and other airports which has no place in today's world of open competition.</p> <p>Fifth freedom extends the choice available to passengers and improves the efficiency of airline operations by increasing capacity utilisation of aircraft. The proposal correctly states that reciprocal rights would be required and foreign airlines should not be</p>	<p>Fully Consistent 09/10.</p> <p>The Aviation Policy Framework states that the extension of fifth freedom policy would improve connectivity, reduce congestion and make more efficient use of infrastructure. The tone of the proposal is oriented towards increasing competition and liberalisation – it also mentions possible state-led restrictions intended to support competitive practice and to take secondary effects into consideration, such as if a potential case of liberalisation would clearly impact on consumer benefits or create negative externalities. This is consistent</p>

	<p>subsidised. The document states <i>“the UK has long had a general presumption in favour of liberalising fifth freedoms from airports outside the South East”</i>. It would appear inconsistent not to extend this policy to all other airports in the South east other than Heathrow Airport; or indeed any other regional airport not benefiting from these freedoms. This provides a competitive advantage to Heathrow to the detriment of the other SE airports and therefore constrains market development and growth at the other airports. The negative consequences of this are to amplify the demand and focus on Heathrow. As stated previously, this is a UK APF.</p> <p>Allowing foreign airline operators to carry passengers between Gatwick, Stansted and Luton Airports and another country, under fifth freedoms regulations would create opportunities for regional airports to benefit from increased activity and to contribute to increasing connectivity of the UK.</p> <p>The Royal Borough of Windsor & Maidenhead (RBWM) recognises the importance of connecting with the BRIC and other emerging economies in order to stimulate growth in the domestic economy, and to ensure the UK</p>	<p>with our position on connectivity, but it could be placed in more of an appropriate context – for full consistency with our position the framework would need to specify the liberalisation as an important element of the expansion of regional capacity – the emphasis is very much on London airports, not regional/national airports - and could discuss further the positive impact on the UK economy.</p>
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	maintains a strong and well connected economy in the long-term.	
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?	A complementary condition of Fifth Freedoms could be a requirement to have a stringent and robust environmental mitigation package that is consistently applied at all airports e.g. quietest aircraft; noise mitigation schemes; operational procedures; noise levels; air quality – similar in principles and composition to the T5 planning conditions.	2/10 Partially consistent. Although the proposal itself does not mention environmental mitigation, it does discuss the role of negative externalities in determining the extent of the expansion on a case-by-case basis. This opens up a space for environmental concerns to occupy during the case-by-case, bilateral negotiations, where they could be assessed based on their impact vis a vis consumers, residents and passengers.
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?	In principle 'yes' subject to the review on a case by case basis. However, it is not clear why this question only relates to airports in the South East as there should be consistent application of policy throughout the UK. Paragraph 2.43 of the APF actually states that the Government <u>will</u> seek to use bilateral relations to persuade international partners of benefits offered by airports <u>across the UK</u> to make the best use of alternative available capacity to encourage the development of new services to new destinations wherever possible. The development of regional airports is vital if any sensible redistribution of the UK economy is to be attained. There are environmental and social benefits	8/10 Mostly consistent. The position set out in the draft APF and endorsed by RBWM – “to make use of bilateral relations to persuade international partners of benefits offered by airports <i>across the UK</i> ” – is not included in the final version. As a general principle, however, it is highly consistent with our aim of distributing capacity across the UK and its regions. The discrepancy between this position and the RBWM-endorsed position is that we would support the universal application of open access, whereas the APF suggest that open access be applied on a case-by-case basis.

	<p>associated with reducing the need for air passengers and freight to travel long distances to reach larger UK airports and for providing additional capacity away from congested South East airports.</p>	
<p>Do you have any other comments on the approach and evidence set out in Chapter 2?</p>	<p>The key to success is the internal connectivity between the airports offering greater choice, convenience and accessibility to all customers. Without such pre-requisites, the encouragement to open new routes and facilities is likely to be severely constrained.</p> <p>The Slot allocation system needs to be reviewed, particularly in respect of “grandfather rights”. Future focus and priority must be given to ensuring good connectivity with BRIC and other emerging economies rather than outgoing tourist traffic which results in a very substantial financial deficit to UK plc.</p> <p>If Gatwick is to be developed as an Inter-continental hub, a rail connection to Ebbfleet needs to be considered, together with improvements from locations West and North of Gatwick.</p> <p>The Council is unlikely to be supportive of a policy that impacts negatively on regional airports.</p> <p>Additional research is required into the benefits</p>	<p>Not consistent 0/10. As previously addressed, the emphasis on internal connectivity is lacking – there is strong focus on the development of hubs, and mention of the potential of non-SE airports, but no significant emphasis or concrete proposals.</p> <p>5/10 Partially consistent. The position on the Slot allocation system is discussed on pages 34 and 35, affirming the APF’s continued support for transparency and independence in slot allocation procedures as a means to fairness and equal access, which is consistent with the RBWM position. It is then stated that incremental improvements, through a market-based, commercially-oriented process and engaging with EU-level actors, is to be pursued. There is no mention of prioritising or focusing on emerging economies.</p>

	<p>and costs for regional airports to be produced before being able to fully address this question.</p>	
<p>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?</p>	<p>The greatest source of localised air pollution around airports is road transport. Tackling this needs to be the first priority in respect of meeting EU AQ standards and improve the health of those living in such areas. The provision of subsidised bus services which follow indirect and time wasting routes to serve many communities are not attractive to airport passengers and workers and as a result private car use is not significantly reduced. A network of express bus services with convenient interchanges would appear to be a more realistic means of reducing air pollution.</p> <p>The second priority ought to be the continued development and encouragement of the use of modern technology negating the need to fly.</p> <p>The third priority is to address the CO₂ (and NO_x) emissions from aircraft and the amplified impact on green house gas effects. A carbon levy might act as an</p>	<p>9/10 – Mostly Consistent.</p> <p>Transportation emissions are explicitly addressed in the APF – it appears to be their goal to ensure that airport activity as a whole, not simply aviation, is assessed when taking into account the environmental damage from airports. For example it is stated on page 64 that “emissions from transport, including at airports, may not be visible” and “to seek to reduce emissions from airports and vehicles to and to work with airports and local authorities as appropriate, to improve air quality, including encouraging HGV, bus and taxi operators to replace or retrofit with pollution-reducing technology older, more polluting vehicles.” Although the APF does not directly mention any of the services mentioned in the RBWM response, the spirit, if not the letter, of their position is in line with RBWM’s .</p> <p>09/10 – Fully Consistent. In point 2.43, the issue of applying technology to encourage a reduction in unnecessary flying is addressed. It is stated that there is solid evidence for this, and references the government’s investment in universal broadband provision. A deficiency in this position is that it seems to assume that investment in technology will cause a reduction in unnecessary flights, and subsequently does not recommend concrete action or strategic guidance to ensure this actually happens.</p> <p>8/10 Mostly Consistent. The report consistently mentions European-level action being key to solving the problem of both CO₂ and non-CO₂ emissions. Their emphasis on collective</p>

	<p>incentive to use modern fleets and be consistent with the 'polluter pay principle' but this would at the very least have to be consistent across Europe. There are serious doubts about the effectiveness of the present system due to the low price of the carbon levy on the international market. The Fifth Freedom criteria referred to previously would complement such an approach.</p> <p>Inclusion of aviation in the EU ETS will not automatically lead to a reduction in emissions from aviation. The onus must be on the airline operators to reduce emissions rather than accept, as it does in the APF they will be net purchasers of emission allowances from other sectors. Government needs to take a more decisive approach and to provide analysis of how the EU ETS will impact on the aviation industry and emissions' reductions once the period of free permits is complete.</p> <p>In order to reconcile aviation growth forecasts with climate change targets, and bring the aviation sector in line with all UK sectors required to reduce their climate change emissions, the Government needs to:</p> <p>revisit their passenger demand and carbon dioxide emission forecasts to explain discrepancies; assess and verify projected claims of technological gains prior to making policy and expansion decisions based on such claims; and validate the</p>	<p>action, non-discrimination and not simply distributing carbon emissions elsewhere would seem to suggest a rebalancing away from carbon emissions trading and towards state (as opposed to market) led global solutions. The strong focus on European-level action as a practical, operationally feasible course of action is consistent with the RBWM response – It does however endorse the further exploration of market-based solutions, which is reasonable given that this implies open-mindedness towards positive solutions, whether the means to arrive at them is through states or markets.</p> <p>3/10 Mostly inconsistent.</p> <p>The four pillars of the EU approach– (1) reduction of emissions at source; (2) research and development; (3) modernisation of air traffic management and market-based measures and (4) market-based measures seem to be mostly at variance with RBWM's approach, although some of them are consistent. The policy measures included in the EU-ETS are directed towards achieving these outcomes. For example, in 2.16, an annual emissions cap of 95% of emissions (2013) included in the scheme is mentioned, a measure which includes a carbon-trading option. EU-wide action is consistent, but the market-based component is not as it is likely to lead to redistribution of emissions and not their elimination. For example, 2.19, it is stated that the difficulty of reducing aviation emissions means that under the EU-ETS the aviation industry is likely to "purchase allowances or credits from other sectors". The APF estimates that the inclusion of aviation into the EU-ETS means will reduce CO2 emissions by around 480 million tonnes by 2020. There appears to be no tangible change in the way that emissions are considered. The</p>
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	<p>credentials of bio-fuels prior to progressing policy in this area to reflect the associated issues: land take – avoiding exacerbation of deforestation and not competing with food supply; lifecycle analysis of production techniques – resource inputs and pollution outputs; and safe fuel mix proportions for aviation</p>	<p>APF also continues to support the development of the various ICAO measures for collective, market-based action, which is consistent with RBWM’s focus.</p>
<p>Do you have any other comments on the approach and evidence set out in Chapter?</p>	<p>It is unclear as to how consultees are best able to respond in areas where Government have yet to make a decision or a policy commitment. These include, for example:</p> <ul style="list-style-type: none"> – Inclusion of aviation emissions in the UK national carbon budgets – Whether to retain a national emissions target for aviation that has yet to be made and no timescales are given as to when this will happen – The potential use of bio-fuels. <p>RBWM would support the further use of ‘sustainable’ bio fuels e.g. where their production does not lead to negative social, economic or environmental impacts. Greater government (international cooperation) assistance towards research and development on bio fuels producing better yields i.e. more energy per gram of weight and on bio fuels with a lower freezing point allowing aircraft to fly higher and so reduce fuel consumption.</p> <p>Differential landing and</p>	<p>Mostly consistent 9/10.</p> <p>The APF expresses support for the sustainable use of bio-fuels in aviation, stressing that they have a large role to play in reducing emissions provided they: (1) lead to a reduction in full life-cycle CO₂ emissions; (2) and take into account indirect land use change. It emphasises the further development of ‘frameworks’, rather than specific actions, related to bio-fuel development, and references a government bio-energy strategy (published April 2012) that contains little reference to aviation. In general, the position on bio-fuels is consistent with RBWM’s stance.</p> <p>There is no mention in the paper of differential parking and landing charges applied to fuel efficiency - the only mention of these charges is related to reducing noise pollution.</p> <p>Chapter 4 contains references to and proposals for local engagement.</p>

	<p>departure charges related to fuel efficiency might offer a consistent approach to incentivise the aviation and aerospace sectors to reduce emissions.</p> <p>Both government and airport operators need to engage more fully with local authorities and residents in developing local policies and action plans related to aviation and climate change. RBWM welcomes the Government's recognition that further detailed analysis of aviation's non-CO₂ emissions impacts is needed in order to provide a more consistent analysis of the impacts of policy measures. RBWM welcomes reference in the APF to initiatives such as superfast broadband designed to reduce the need to travel, as well as investment in cleaner modes of travel such as high-speed rail.</p>	
<p>Do you agree that the Government should continue to designate the three largest London airports for noise management purposes? If not, please provide reasons</p>	<p>Yes.</p> <p>There is a growing argument in support of <u>all</u> airports over a certain size being designated for noise management purposes and not merely restricted to Heathrow, Gatwick and Stansted –. This would secure greater consistency of approach; a level playing field between airports; and complement the proposed revised remit of the CAA's new independent role for policy development, regulation and enforcement; or indeed any other independent body set up to conduct this role in the future.</p>	<p>6/10 Mostly consistent.</p> <p>The APF states on page 57 that Heathrow, Gatwick and Stansted will remain designated for noise management purposes, with all other airports subject to local control – the example of a local authority, as a condition of granting planning permission to a new airport, to consider instituting noise control measures. There is no suggestion of expanding the noise management designation outside of the three airports mentioned, making the approach only partially consistent with RBWM's universalist stance.</p>
<p>Do you agree with the Government's overall</p>	<p>Yes, RBWM supports and agrees in principle with the</p>	<p>Mostly inconsistent 2/10. In terms of the spirit of the</p>

<p>objective on aviation noise?</p>	<p>government's aspirational statement '<i>to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise</i>'. However, in the absence of a credible scientifically robust calibration system for assessing how to specifically measure and evaluate those '<i>significantly affected</i>', this aspiration will be extremely difficult to attain.</p> <p>Furthermore, RBWM is increasingly frustrated by the stonewalling and apparent lack of commitment on behalf of government to address such a significant and flawed weakness such as the current measurement of disturbance related to noise. The averaging systems currently in use do not appear to accurately reflect the level of community annoyance; yet there is plenty of time to review any shortcomings in the now discredited "ANASE" report. If there is in fact no intention to follow up with a new study, then in consideration of the government's stated commitment to transparency a full explanation should be provided.</p> <p>Moreover, until such a review is conducted there can be no confidence that any defined limits to baseline values or noise contours properly addresses the level of disturbance. This seriously questions the value of any 'Noise Envelope', 'Quiet Areas', 'Contours' and such similar initiatives as they are all based on very suspect baseline data and criteria. Therefore, the 480000 atm annual limit at Heathrow must be retained indefinitely in accordance with the</p>	<p>objective, it is mostly consistent with RBWM's position on noise reduction, but some significant difficulties remain. Firstly, there is ambiguity surrounding the definition of 'significantly affected by aircraft noise' – this could benefit from further clarification, as an equivocal interpretation of the phrase could be used against RBWM's interests. The final APF does not specify a scientific and objective way of defining this crucial phrase, with confusion for all parties resulting – in order to achieve the APF objective, much more clarity regarding not only the meaning of the phrase but how the research base being used to justify it is viable needs to be included.</p> <p>Adding to the problem is the fact that the current method of measurement of noise disturbance is insufficient. The 'ANASE' report is flawed in many ways –for example, it, and other government methods of measurement, do not use the correct research methods. A major flaw is that respondents are asked directly about the level of noise, and played sounds of aircraft noise, when an effective survey would have 'creeped up' on the participant and asked aviation-related questions in a very subtle way. Until the problem of baseline data is addressed there can be little progress in this area.</p> <p>The lack of scientific measurement leads to erroneous conclusions being drawn and subsequently articulated in the report. For example, when the report states that "There is evidence that there are people who consider themselves annoyed by aircraft noise who live some distance from an airport in locations where aircraft are at relatively high altitudes. Conversely, some people living closer to an airport seem to be</p>
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	<p>original T5 commitment.</p> <p>There should also be an additional objective - namely to ensure that nobody in a residential setting is exposed to aircraft noise at 69dBL_{Aeq16 hr} or above after 2020.</p>	<p>tolerant of such noise” this is probably due to an inconsistent methodological approach which gives too much weight to individual, momentary sensitivity to noise and not enough to actual annoyance generated within a particular area. The Airports Commission is aware of this issue, and it is possible that they may seek to provide additional information relating to optimal measurement in the future.</p>
<p>Do you agree that the Government should retain the 57 dBL_{Aeq16 hr} contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance?</p>	<p>Absolutely not! – see expanded comments on ANASE; WHO Community Noise standards; the urgent need for further calibration study to establish baseline community response thresholds</p> <p>No. All the evidence from Europe is that the 57 dBL_{Aeq16 hr} contour is seriously out of calibration as a benchmark for defining the onset of unacceptable noise emission. In our view we do not believe it has any future value in a UK aviation policy context - in short it should be retired.</p> <p>The EU is currently developing its own environmental noise limit values based upon a number of studies in member states and unless the UK government is willing to fund further repair work on ANASE so that its findings can be considered robust enough to inform policy the UK, as a member of the EU, should adopt emerging EU standards.</p>	<p>Inconsistent 0/10. The Aviation Policy Framework does not even explore the possibility of altering the 57dBL_{Aeq16 hr} contour. Their justification for this is ‘historical continuity’, with the problems associated with the ANASE study not mentioned at all, and subsequently the conclusion reached is not one based on any objective standard. This is completely opposed to the RBWM position, which sees ANASE as redundant and in need of urgent replacement. There is also no mention of the emerging EU noise limit values, and shows no intention of harmonising the UK position with our European neighbours (by, for instance, replacing or repairing ANASE).</p>
<p>Do you think that the Government should map noise exposure around the noise designated airports to a lower level than 57 dBA? If</p>	<p>Absolutely! At the T5 Inquiry local authorities argued in favour of lower noise levels down to 54dBL_{Aeq16 hr} given the discredited 57 dBL_{Aeq16 hr} threshold for community</p>	<p>The APF states on pages 57/58 that, for the purposes of “historical continuity”, the government will continue to map</p>

<p>so, which level would be appropriate?</p>	<p>annoyance, forcing the production of such despite strong resistance.</p> <p>The use of the $57\text{dB}_{\text{LAeq } 16\text{h}}$ to mark the onset of significant community annoyance to aircraft noise has already been demonstrated to seriously underestimate the extent of the aircraft noise problem. This significantly changes the extent of the negative impacts of Heathrow. Consequently the Government commissioned the ANASE study. This too has since been discredited and interpreted as 'inconclusive', that is seen by many as expedient, leaving the UK with no credible threshold levels as we move into a long term APF.</p> <p>Without a credible alternative, the WHO Community Noise Guidelines should form the basis of the thresholds given they are well researched and represent the most up to date internationally accepted limit values.</p> <p>There are also issues around the noise index that should be used. The UK appears to be wedded to $\text{dB}_{\text{LAeq } 16\text{ hr}}$ values, whilst the EU to the $\text{dB } L_{\text{den}}$ index.</p> <p>The sensitive 'shoulder' and night time period values need to become established features of any revised noise contouring regime. The technology and means are already available to meet this requirement.</p> <p>Another indication that the extent of the aircraft noise problem is underestimated is given by use of the L_{den} noise indicator as required by EU Directive 2002/49/EC. The Directive requires estimates of the number of people exposed to aircraft noise in noise bands commencing at $55\text{dB } L_{\text{den}}$, and consideration of noise reduction measures commencing at $55\text{ dB } L_{\text{den}}$. This suggests that $55\text{ dB } L_{\text{den}}$ is used in the Directive to indicate the noise level at</p>	<p>noise designated airports at 57dBA. The flawed research base of this policy is apparent in seemingly contradictory statements such as – “However, this does not mean that all people within this contour (57dBA) will experience significant adverse effects from aircraft noise. Nor does it mean that no-one outside of this contour will consider themselves annoyed by aircraft noise” that cast doubt on the relevance of demarcating a noise limit in this way.</p> <p>The APF does state that it is open to new ways of measuring noise disturbance, but still does not take into account the flawed status of the research, stating instead that “people do not experience noise in an averaged manner and that the value of the LAeq indicator does not necessarily reflect all aspects of the perception of aircraft noise.” The lack of specificity is disappointing, but the fact that they are considering the need for new evidence – “The objective should be to ensure a better understanding of noise impacts and to inform the development of targeted noise mitigation measures” – is marginally positive and suggests openness to adjustment, a firm nudge towards which could be supplied by the results of the Airports Commission. There is no reference to harmonising UK noise guidelines/indexes with either its WHO or EU equivalents.</p>
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which noise becomes an issue. The 55dB L_{den} contour for Heathrow in 2010 covers an area of 222.3 sq km in which 712,100 people live. In contrast, the 57 dB $L_{Aeq, 16h}$ contour for Heathrow in 2010 covers an area of 106.3 sq km in which 224,550 people live. Use of the 55dB L_{den} contour suggests that more than three times as many people are affected by aircraft noise as previously recognised using the 57dB $L_{Aeq, 16h}$ contour. RBWM believes that the 55dB L_{den} contour gives a more realistic indication than the 57dB $L_{Aeq, 16h}$ noise contour of the geographic extent of the area in which aircraft noise is a problem.

The Council notes the Impact Assessment accompanying the APF outlines two options in relation to drawing contours at a lower noise level:

Policy Option 1c: *“Draw noise contours at a lower noise level of 55dB_A L_{den} for the noise designated airports (currently Heathrow, Gatwick and Stansted).”*

The benefits of Policy Option 1c identified in the Impact Assessment are:

- extending the contour acknowledges that some people who currently live outside the 57dB L_{eq} contour could also be annoyed by aircraft noise;
- the 55 L_{den} measure also takes account of night time noise - this may inform future decisions on measures taken to mitigate noise;
- useful to have noise contours at the lower lever to monitor the number of people potentially affected by aircraft noise, and to measure reductions in the number of people who are affected by noise; and
- the choice of 55 L_{den} is consistent with the obligation to carry out five yearly mapping of noise under European law.

Policy Option 1d: *“Draw noise contours at a lower noise level 54dB $L_{Aeq, 16h}$ with an 8-hour night L_{Aeq} for the noise*

	<p><i>designated airports (currently Heathrow, Gatwick and Stansted)."</i></p> <p>The benefits of Policy Option 1d identified in the Impact Assessment are:</p> <p>measuring noise at the lower level will acknowledge that some people who currently live outside the 57dB L_{eq} contour could also be significantly annoyed by aircraft noise; and it could mean that future airport policy is considered to be more credible with respect to noise and based on sound evidence. Given the international framework within which aviation operates, it is more sensible to opt for Option 1c</p> <p>RBWM welcomes the Government's recognition that <i>"...frequency of movements can be a source of annoyance for some people living in areas exposed to lower average levels of noise across the whole day."</i></p> <p>This supports retention of movement limits in aviation night noise policy, and highlights the need to incorporate this feature in any regime for management of daytime aviation noise.</p> <p><u>General Comment:</u> RBWM was a major contributor to the T5 Public Inquiry. Evidence presented comprehensively covered the effect and impact of the number of flights upon over-flown communities, indicating the importance of 'number' alongside noise certification controls. We believe the Government's stated intention for their <i>'Attitudes to Noise from Aviation Sources in England' (ANASE)</i> study, derived from that debate, sought to assess the limitations of the noise index 'L_{eq}', as well as informing any future consideration of the air transport movement (ATM) condition applied at Heathrow.</p> <p>Due to the Government's subsequent dismissal of their ANASE study, noise</p>	<p>The Aviation Policy Framework presents a position which is mostly consistent with RBWM's position, but contains no indication that this is to serve as a basis for future action. The statement above relating to alternative ways of measuring noise is the only semi-tangible action resulting from the framework – it would have been preferable, from RBWM's perspective, to have more on an extended contour or alternative contour rather than non-technical ways of measuring noise disturbance.</p>
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	<p>management policy has not moved on in the UK, and consequently has not addressed those same points discussed at the Heathrow Terminal 5 Public Inquiry more than a decade ago. It is essential that a follow up study is commissioned if the UK is to have a credible baseline determinant and before consideration can be given to concepts such as a satisfactory 'noise envelope'. In contrast aviation noise policy in Europe has been advanced in recent years and therefore the Government should look to Europe for examples of best practice. There is mounting evidence to suggest that the historical 57 dB L_{Aeq} noise contour is now inadequate as a noise measure. RBWM urges the government not to base a long term noise policy on flawed, un-calibrated or inconclusive data. There is an urgent need for the Government to update noise policy and further investigate the annoyance relationship for aircraft noise.</p> <p>A greater understanding of the community response to aviation noise is an essential prerequisite for an improved aviation noise management and reduction regimes.</p>	
<p>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?</p>	<p>In principle 'yes', however, this relies entirely on having a calibrated threshold for the onset of community annoyance. As stated above, this is currently not the case.</p>	<p>7/10 Mostly consistent.</p> <p>The government clearly states its intention to use noise envelopes, which is a concept that RBWM is happy to endorse. However, in terms of specificities, it defers authority to a later document – a National Policy Statement following the Davies Commission results. There is no mention of developing a new threshold, which RBWM considers important, but it is possible that this may emerge from the Davies Commission and the subsequent central</p>

		<p>government policy documents. It also states that the CAA are likely to provide a guidance position.</p>
<p>Do you agree that noise should be given particular weight when balanced against other environmental factors affecting communities living near airports?</p>	<p>Yes. There is little doubt that noise is the most obvious perceived environmental problem for those living in close proximity to airports and/or under the flight paths and therefore should be weighted accordingly. However, there are also a number of other factors that could be of equally important significance in some locations. Therefore, it is suggested a 'basket of measures' might be a better approach for deriving a cumulative impact measure. For example, in respect of noise, use of WHO criteria over a range of activities and situations. This approach has already been adopted by government for Quality of Life indicators and a measure of community sustainability in recent years.</p>	<p>9/10 Mostly consistent. Noise occupies a central position in the catalogue of environmental impacts to which the APF refers, with a fairly comprehensive noise mitigation strategy (despite all its flaws) outlined in the document. RBWM's position, which was more comprehensive ('basket of measures') in approach and implies measures capable of being applied on a case-by-case basis, was not even suggested at in the APF. However, it does recognise (P65) that other environmental effects – such as air quality impact – can override noise concerns in some local areas.</p>
<p>What factors should the Government consider when deciding how to balance the benefits of respite with other environmental benefits?</p>	<p>The motive or intention behind this question is not clear as it is hard to reconcile why 'the benefits of respite' should need to be balanced with 'other environmental benefits'. This suggests there is some incompatibility yet the two appear synonymous. The key issue is one of equality of opportunity for all communities around an airport to be afforded some respite i.e. using the</p>	<p>The APF states its intention to "explore options for respite which share noise between communities on an equitable basis, provided this does not lead to significant numbers of people newly affected by noise". There is little mention of respite in the paper, and no direct mention of an incompatibility between respite and other environmental benefits. There is some mention of the importance of using respite in relation to local communities, but</p>

	<p>government term <i>'to share the noise burden'</i> or any other negative impact.</p> <p>It is important that scheduled periods of relief should be provided. The procedure for runway alternation should be considered at any airport when additional runways are built and airport capacity limited accordingly. Otherwise it is dependent on the relative impact of the environmental benefits. Predictable periods of respite are one of the single most effective noise amelioration measures available upon which local communities plan their daily routines.</p>	<p>it is supplementary at best and does not bridge the consistency gap between either the government's own position or that of RBWM. However, there does not appear to be any evidence that the application of the previously quoted principle would <i>necessarily</i> conflict with the ending of the Cranford Agreement or the alternation arrangements – the language is suggestive, and given its context seems to imply that other priorities – such as ending Cranford et al – will take precedence over its application.</p>
<p>Do you agree with the Government's proposals in paragraph 4.68 on noise limits, monitoring and penalties?</p>	<p>The principles are sound, but to coin a phrase 'the devil is in the detail' and there is little information provided at this stage.</p> <p>This Council has long argued that to be meaningful and relevant to present day operations, Infringement levels, monitoring and non-compliance penalties should include both departing and arrival aircraft and that these should be routinely reviewed on a planned basis (e.g. as per night flight regime) every 5 years, perhaps even at the same time given the close relationship.</p> <p>Low flying approaching flights tend to follow the same closely controlled final flight paths for approximately 15 nautical miles in relation to each runway, thus generating an unrelenting greater noise impact on a far larger area than steeper</p>	<p>Consistent Referred to CAA and to publish findings during 2013.</p> <p>Referred to CAA and to publish findings during 2013.</p> <p>Referred to CAA and to publish findings during 2013.</p>

	<p>climbing and rapidly dispersing departing flights. There should be an aspiration to amend the current 3 degree Constant Descent Approach (CDA) angle to 4 degrees to increase the height and thereby decrease the resulting noise of arriving aircraft.</p> <p>Penalties for breach of limits should not be imposed for revenue raising purposes and should have some relationship to the seriousness of the breach with the proceeds re-invested to fund community mitigation packages. To be effective this requires the levels of penalty for justified cases to be set at realistic levels to act as both a deterrent for non-compliance and an incentive for the introduction of less noisy aircraft.</p> <p>The principles of greater transparency and independent monitoring and evaluation in the regulation and enforcement of noise limits is warmly welcomed and supported. RBWM assumes this relates to the proposed enhanced and expanded role of the CAA?</p> <p>In this respect, one of the greatest concerns of RBWM residents is the issue of night flights. At Heathrow most of the sensitive period flights are arrival aircraft. However, unscheduled departures in the middle of the night are also particularly disturbing. There is a very real need to address the fact that the Night Flight Quota Number is usually doubled by the</p>	<p>Consistent</p> <p>Refers to Night Flying Restrictions consultation and seeking evidence on the costs and benefits of night flights.</p> <p>Recognises the importance to the UK economy of express freight services, which may only be viable if they operate at night.</p> <p>Commends voluntary approaches such as the curfew at Heathrow which ensures that early morning arrivals do not land before 0430h.</p>
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	<p>number of unscheduled early arrivals from about 4.20 a.m. There is concern that the claimed benefits to business activity should be more fairly balanced against the proven detrimental effects of sleep disturbance specifically from aviation. This Council has repeatedly called for the gradual phasing out of night flights and will continue to do so.</p> <p>RBWM has also repeatedly called for the introduction of arrival noise limits, to be met with the consistent response that safety considerations on approach override noise concerns. However, such controls exist at other overseas' airports and the level of technological sophistication of modern fleets would suggest such a response is out dated and inconsistent.</p> <p>This Council believes it is time local communities around the UK's major airports are further protected by not only the review of the long standing departure noise limits but also by the introduction of maximum noise limits for landing aircraft.</p>	
<p>In what circumstances would it be appropriate for the Government to direct noise designated airports to establish and maintain a penalty scheme?</p>	<p>A two part question.</p> <p>In respect of establishing a penalty scheme, in all cases as a matter of course.</p> <p>In respect of maintaining a penalty scheme i.e. on-going regulatory function and enforcement, where there are breaches of any noise amelioration measures designed to protect local communities are significant, avoidable and repetitive. This</p>	<p>The APF appears to grant discretion to individual airports in mitigating their noise levels through penalty-based action. For example, it states that "As a general principle, the Government expects that at the local level, individual airports working with the appropriate air traffic service providers should give particular weight to the management and mitigation of noise, as opposed to other environmental impacts, in the immediate vicinity of airports, where this does not conflict with</p>

	<p>should include landing noise as stated above as well as departure noise level infringements and also non compliance with NAP targets, poor CDA, track keeping performance and NPR compliance. The regime should be a balanced combination of deterrence, penalties and incentivisation and administered by an independent agency (CAA). Self regulation and voluntary schemes are likely to be far less effective and receive less community support and confidence. We understand the UK is the only EU state which devolves the monitoring of airport NAPs to the airport operators and in some quarters is likened to appointing a poacher as the gamekeeper.</p>	<p>the Government’s obligations to meet mandatory EU air quality targets” – though not explicitly stated, it is implied that ‘management’ includes the capacity for punishment. It also states that airports should “where appropriate to enforce these (infringements) with dissuasive and proportionate penalties”</p>
<p>In what circumstances would it be appropriate for the Government to direct noise designated airports to establish and maintain a penalty scheme?</p>	<p>A two part question.</p> <p>In respect of establishing a penalty scheme, in all cases as a matter of course.</p> <p>In respect of maintaining a penalty scheme i.e. on-going regulatory function and enforcement, where there are breaches of any noise amelioration measures designed to protect local communities are significant, avoidable and repetitive. This should include landing noise as stated above as well as departure noise level infringements and also non compliance with NAP targets, poor CDA, track keeping performance and NPR compliance. The regime should be a balanced combination of deterrence, penalties and incentivisation and administered by an independent agency (CAA). Self regulation and voluntary</p>	<p>Mostly consistent 8/10.</p> <p>The APF position is that penalty schemes are applicable when aircraft are not complying with noise controls, and elsewhere states that the penalties should be proportionate to the offence and reviewed regularly. It states that this is an appropriate area for government to intervene in – but does not mention whether this is central government directly, or an independent agency (the CAA). It is consistent in the general sense that it suggests the application of punishment to offenders through proportionate punishment, and suggests a role for central government in this (moving away from self-regulation) but the absence of specific details such as the agency responsible for enforcement and the capacities of the individual airports in designing their schemes.</p>

	<p>schemes are likely to be far less effective and receive less community support and confidence. We understand the UK is the only EU state which devolves the monitoring of airport NAPs to the airport operators and in some quarters is likened to appointing a poacher as the gamekeeper.</p>	
<p>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?</p>	<p>A fundamental requirement of an effective regulating and enforcement regime is the operation and maintenance of a credible noise monitoring system where those affected have easy access to transparent data and reports that can be scrutinised. This is consistent with the commitment within the APF that advocates greater collaborative working between airports and local authorities.</p> <p>A suggested way of demonstrating such a commitment would be for the airports to approach LAs requesting them to host and</p>	<p>Mostly consistent 8/10. The RBWM position is that airports operating noise monitors and producing measurement reports is beneficial, but must be accompanied by high levels of transparency and scrutinisation. This is mostly consistent because (A) the APF is in favour of government intervention and (B) it states that “the government expects (<i>expects, not requires</i>) airports to help local communities understand these noise impacts and performance against relevant targets or commitments through monitoring, provision of information and communication designed around the specific noise impacts and the needs of the community.” It also states that the Civil Aviation Act 2012 gave new powers to the CAA to produce and share information with local authorities, and the APF states that “we encourage the CAA to consider how it can use its information functions to share good practices in how airports monitor, report and communicate their noise impacts.” This is firmly consistent with RBWM’s position, but as it does not <i>require</i> transparency it is not fully consistent.</p> <p>Mostly consistent 8/10.</p> <p>See above – the <i>expectation</i> and <i>encouragement</i> demonstrates consistency with the council’s</p>

	<p>manage remote monitoring sites; share data and regularly discuss the local monitoring data. This would foster better working relationships.</p> <p>Another circumstance would be failure of the airport operator to respond to requests for specific monitoring by representatives of the relevant airport consultative committee backed up by a request from the regulator.</p>	<p>position, but given that RBWM identifies this as a “fundamental requirement” then full consistency would necessitate the inclusion of a tangible requirement, not simply encouragement.</p>
<p>How could differential landing fees be better utilised to improve the noise environment around airports, particularly at night?</p>	<p>The principle behind differential landing fees is to incentivise the use of less noisy (and cleaner) aircraft and reflects the relative impact upon the local community. Therefore, the size of aircraft should not be material as it is the noise it emits and its negative impact is what the scheme is intended to regulate. It follows, if a larger aircraft is chosen to operate at night but in doing so emits a higher noise level then it should be expected to incur an increased landing <u>and</u> departure fee as compensation for the increased noise i.e. ‘Polluter Pays Principle’.</p> <p>Another option for utilising incentivisation principles especially at night would be to devise a passenger weighting to avoid a large number of small quiet aircraft, rewarding greater occupancy rates. Linking schemes to variants of occupancy rates needs further investigation.</p> <p>Alternatively increasing landing and departure fees for all aircraft 23:00 to 07:00 (and also weighted to other times of the day) that are</p>	<p>Mostly inconsistent 4/10.</p> <p>The only statement in the APF regarding differential landing charges is: “As part of the range of options available for reducing noise, airports should consider using differential landing charges to incentivise quieter aircraft” – this is consistent in the sense that it encourages differential landing fees, but inconsistent because it does not include any reference to the specific applications suggested by RBWM. However, it does reference the emerging CAA research on the use of differential charging, which is due later on in 2013.</p> <p>Mostly inconsistent 4/10. (See above).</p>

	<p>retrospectively applied based on 'actual' monitored noise rather than the more general ICAO Noise Certification Classification. This is preferable as ICAO uses manufacturer's anticipated performance data which, as accepted in the context of Night Noise Quota limits, for specific aircraft such as aging Boeing 747's actual levels are far noisier than assumed by their classification.</p>	
<p>Do you think airport compensation schemes are reasonable and proportionate?</p>	<p>No - the UK airport compensation scheme are woefully inadequate and require a root and branch review, to be carried out by the regulator in consultation with other stakeholders</p> <p>Current mitigation packages are perceived to be derisory, out-dated, overly bureaucratic, un-calibrated and insufficiently hypothesized.</p> <p>New standards of entitlement should be determined and based upon referenced standards e.g. WHO and EU Noise standards for the protection of human health.</p>	<p>Mostly consistent 7/10 The emphasis on assisting with the cost of moving, ensuring insulation, offering insulation assistance to noise-sensitive buildings, and government expectations of operators providing financial assistance to significantly noise-exposed residential households. Whilst this is positive and mostly consistent with RBWM's position (of coherence with WHO and EU standards) there are problems associated with it and it is not fully consistent.</p>