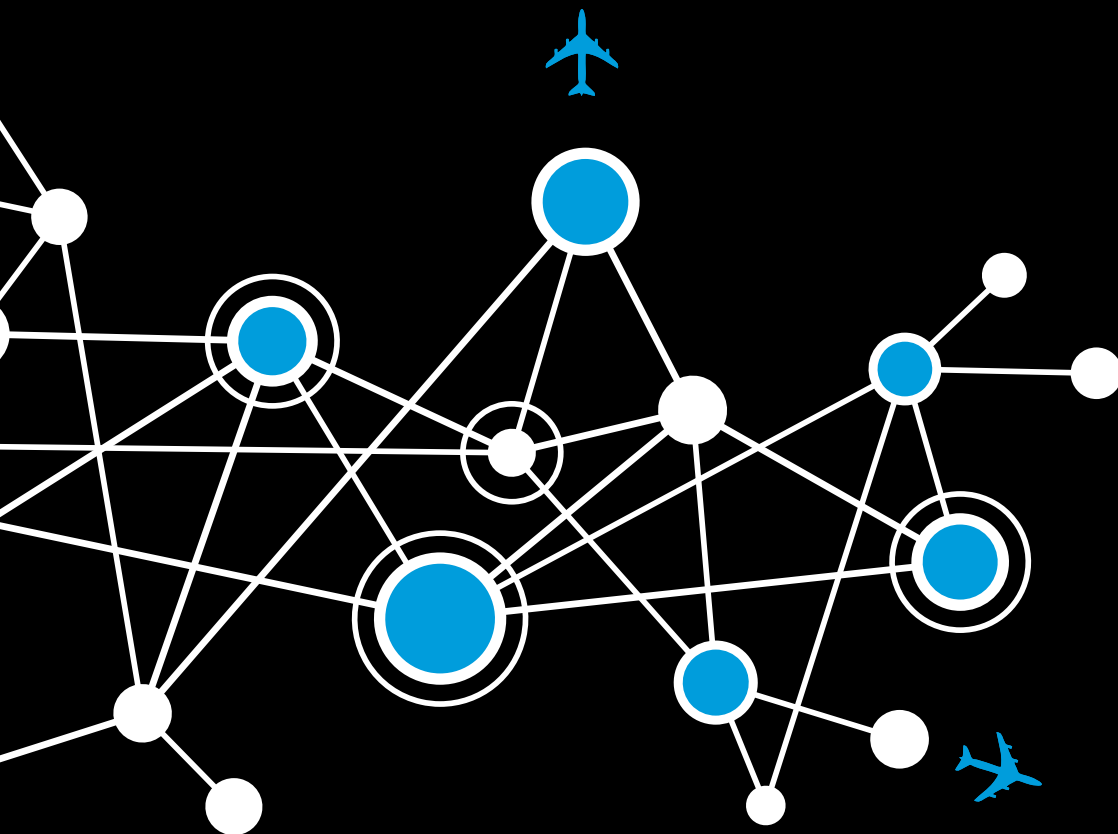
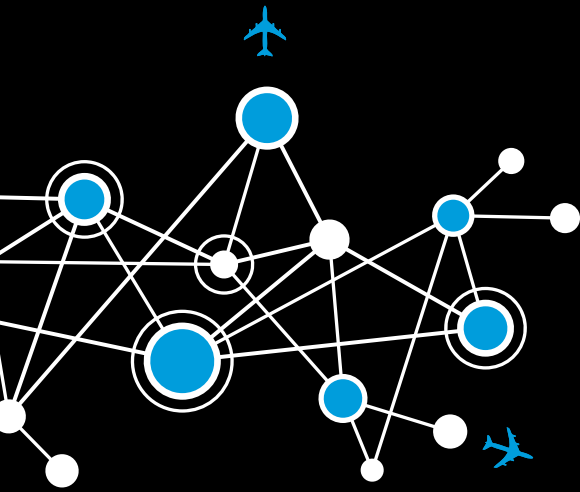


THE AOA REVIEW OF THE UK GOVERNMENT'S AVIATION POLICY FRAMEWORK

OCTOBER 2013





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ABOUT US

The Airport Operators Association (AOA) is the national voice of UK airports. We are a trade association representing the interests of UK airports, and the principal such body engaging with the UK Government and regulatory authorities on airport matters.

FOREWORD



NOT SINCE THE GREAT DEPRESSION OF THE 1930s HAVE DISCUSSIONS ABOUT HOW TO STIMULATE ECONOMIC GROWTH BEEN SO IMPORTANT – AVIATION CAN HELP.

We made this statement in our foreword to the Airport Operators Association's (AOA) 'Integrated Policy Framework for UK Aviation'¹ in October 2012. We still believe aviation is crucial to delivering success for UK plc. It enables jobs to grow and businesses to flourish, and it provides the domestic and international connectivity we need as a nation to win in the 'global race'. What is more, a vibrant and growing aviation sector can be achieved whilst also dealing with its carbon and noise impacts.

Whilst the AOA welcomes the overall thrust and sees a number of positive outputs from the Aviation Policy Framework (APF), it is clear that some areas require further work. Specifically, there needs to be additional consideration to the policy and regulatory framework to enable airports to improve the passenger experience, clarify the planning regulatory framework and develop a fairer level of aviation taxation.

The AOA also supports the work of the Sir Howard Davies Airports Commission, as it develops recommendations to maintain the UK status as an international hub for aviation.

The AOA believes that the UK needs vibrant point-to-point airports and sufficient world class hub capacity to link to existing and emerging markets, both now and in the future. The AOA is keen to work with the Government to ensure aviation policy in the UK delivers not just for our sector, but also to benefit UK plc, its economy and its connectivity, in the years ahead.



Ed Anderson
AOA Chairman



Darren Caplan
AOA Chief Executive



1. See <http://www.aoa.org.uk/media/7284/aoa-an-integrated-framework-for-uk-aviation-report.pdf>

EXECUTIVE SUMMARY

The overall thrust, positive approach and support provided by the APF are positive. Specifically, the recognition in the APF of the economic benefits aviation brings to the UK, the clarification on the Government's approach to climate change and priorities to address on noise are valuable, and we and our members will work with the Government in making the APF work. However, it is clear that some areas require more detail. There needs to be additional consideration to the regulatory framework to enable airports in improving the passenger experience, further clarity to improve the planning regulatory framework and resolving the issue of aviation taxation. Moving forwards the AOA believes a much more holistic approach inside Government needs to be taken regarding aviation. This is to ensure all departments involved with aspects of aviation are working together and are aware of the role and activities each other are collaborating on with the aviation industry.

To judge the effectiveness of this APF the AOA has compared it against 'An Integrated Policy Framework for UK Aviation', a document it published in October 2012.² This set out what we believe a bold and integrated aviation policy should look like. It took a cross-Government-Departmental view on what is needed for UK aviation, detailing how aviation boosts UK jobs and growth, and set out 25 deliverable policy recommendations, which we believe the Government should take to bring this about. The outcome of this comparison is summarised next, using a traffic light model assessing where a recommendation is in the process of being delivered (green), is partially being delivered (amber), or requires actioning (red).

Rating	Number achieving rating	Per cent per rating
Recommendation addressed in APF	8	32%
Recommendation partially addressed in APF	8	32%
Recommendation not addressed in APF	9	36%
Total	25	100%

On this basis we conclude that the APF has a number of good points but clearly a number of areas where the Government needs to do more to enhance the aviation sector.

Please see on the following pages a summary of the AOA's analysis, and a more detailed version in Appendix A at the back of this report.

2. Op cit.

STRENGTHS OF THE APF

The APF and other work streams across Government are delivering eight of the AOA's recommendations and the Government is right to continue its support across these activities.

3	Track regulatory “ins” and “outs” for key economic infrastructure sectors like aviation.
4	Create a Joint Task Force, focused on cutting unnecessary regulation, to work in partnership with the aviation sector.
5	Revise the Aviation Policy Framework (APF) to signal clearly support for sustainable airport development (see Annex).
6	Incentivise Local Enterprise Partnerships to carry out high quality analysis of future aviation needs.
8	Ensure the Sir Howard Davies Independent Commission on the UK's hub status considers all options thoroughly; takes wide advice from experts throughout the country in industry, business and academia; gives clear direction in its 2013 Interim Report; and presents a clear way ahead by its final deadline of 2015.
10	Enhance the benefits of Enterprise Zones centred on airports.
19	Increase efforts to secure a global carbon-trading scheme and reject unilateral UK targets.
21	Incentivise better aircraft technology.





DEVELOPING THE APF

However, the following areas need further work. Below we outline exactly what Government needs to do to support airports to deliver a viable framework for economic growth and sustainability.

The AOA APF Recommendation	Immediate actions Government must undertake
----------------------------	---

RECOMMENDATIONS ON AIR PASSENGER DUTY AND RED TAPE

1	Consider urgently conducting macro-modelling work on APD's effects on the whole UK economy.	The Department for Transport urgently needs to review evidence of APD impact on UK economy and tourism and work with the Treasury to develop an action plan to address negative economic impacts and risks.
2	Refrain from any further increases in APD, with immediate effect.	The Treasury must halt further APD rises until the review and action plan recommended above are developed and implemented.

Recommendations on a framework for Airport Growth

7	Ensure Local Authorities integrate Airport Master Plans in their Local Plans	The Department for Transport should send the Aviation Policy Framework to all relevant Local Authority planning departments with a cover letter from the Secretary of State for Transport pledging the Government's support in principle for airport expansion that complies with the National Planning Policy Framework (NPPF). The NPPF states a clear presumption in favour of sustainable development and any airport which wants to grow and meets the NPPF's checks and balances, including sustainability criteria, should be able to do so.
9	Commit to acting on the Independent Commission's advice.	Both parties in the Coalition Government need to back their own Commission. AOA would expect all political parties to show their commitment to the aviation sector by committing to act on the Commission's recommendations in their 2015 manifestos.
11	Allow greater scope to offset the Community Infrastructure Levy (CIL) for existing buildings.	The Department for Transport should work with the Department for Communities and Local Government to review CIL and its operation in relation to existing airport buildings, and update airports on their conclusions.
12	Accelerate implementation of the recommendations of the Penfold and Killian Pretty Reviews, to speed up and reduce the regulatory burden on planning applications. (The Penfold Review examined the impact of non-planning consents and the Killian Pretty Review examined the planning application process.)	This issue is not addressed in the APF but the NPPF does seek to reduce red tape. The Department for Communities and Local Government should regularly evaluate the impact of the NPPF to ensure it delivers a more efficient planning application process. It should work together with industry to develop a more responsive planning system that supports Business Aviation and General Aviation aerodromes.
13	Freeze planning fees.	The Department for Communities and Local Government should review planning fees and explore alternative options to make it easier for airports that need to grow, to benefit the local and national economy.
14	Implement financial incentives for Local Authorities to approve applications efficiently.	The Department for Communities and Local Government should explore and implement solutions. As in Recommendation 13, this will enable airports to grow without undue delay.

The AOA APF Recommendation	Immediate actions Government must undertake
15	Provide model guidance in the APF on safeguarding land for future development, noise and land use planning (so that new housing developments are not built too close to airports).
16	Guidance is due to be produced by Government and the CAA. The Government must investigate ways of helping potential vendors inform themselves of possible noise impacts close to airports, either through ensuring that noise contours become part of Local Authority environmental searches, or through developing a noise certification standard for UK properties.
17	The Department for Communities and Local Government must treat this as a priority to help ensure an effective planning service that delivers economic growth.
18	No activity is underway to examine thresholds for Environmental Impact Assessments. As this is an EU Directive this would be difficult for the Government to do, unless it is part of its renegotiation with the UK. This should be a priority so that costly and disproportionate Environmental Impact Assessments do not delay airports growing.
18	Extend its review of rail access to airports, covering information, ticketing, and rail franchises.
	The Department for Transport should identify the level of public transport infrastructure connecting UK airports and where there are gaps. They should move towards a more integrated transport network and ensure the surface access projects successfully align airport rail access with airport policy.

Recommendations on making Aviation Sustainable

20	Incentivise the scale up of aviation sustainable fuels.	Following the conclusion of the EU Commission on Indirect Land Use Change, Government departments should work together to ensure sustainable fuels are incentivised as part of review of Renewable Energy Incentive and level playing field with bio-diesel. (The Renewable Heat Incentive is the Government's long-term financial support programme for renewable heat.)
22	Ensure Local Planning Authorities take a long-term approach to land use planning near airports.	The Department for Communities and Local Government must ensure robust land use planning guidance is established and used by Local Authorities and monitor its use and effectiveness

Recommendations to improve the Passenger Experience

23	Task the UK Border Force to produce a clear vision and long-term strategy for its activities at airports and provide the resources to deliver it. This should include a more ambitious approach to maximum waiting times to clear immigration.	The Department for Transport should take a proactive lead on driving forward airport border security efficiency at UK airports by bringing the UK Border Force; the CAA and industry together and to draw up a work programme that delivers improvements and moves towards an outcomes focused airport security regime.
24	Develop a clear plan to move towards outcomes focused airport security and provide the resources to implement it.	Some security functions have been transferred to the CAA, which provides an opportunity to move towards outcomes focused security, but there is no specific work programme underway either in the Department for Transport or the CAA to move this forward. This must be a priority so that airports can conduct security ever more effectively and have more say over how to achieve the outcomes Government requires.
25	Review thoroughly UK-only security measures with the aim of harmonising them as far as possible with other EU countries.	The US is the main focus of security measure activity in the Aviation Policy Framework. No work is underway to harmonise security measures with other EU countries, yet this needs to happen if we are to have a more effective security regime.

INTRODUCTION

The AOA welcomes the publication of the Government's Aviation Policy Framework 2013 (APF) as a critical part of setting a structure in which aviation can grow, to realise its potential to create jobs, and to increase social and economic prosperity for the UK. A summary of the APF is provided in **Appendix A** of this paper. In particular the AOA welcomes and supports the objectives made in the APF:

KEY OBJECTIVES STATED IN THE APF

- To ensure that the UK's air links continue to make it one of the best connected countries in the world. This includes increasing our links to emerging markets so that the UK can compete successfully for economic growth opportunities.
- To ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions.
- To limit and where possible reduce the number of people in the UK significantly affected by aircraft noise.
- To encourage the aviation industry and local stakeholders to strengthen and streamline the way in which they work together.

This AOA report analyses the Government's new approach defined in the APF and assesses what it means for UK airport operators and the aviation sector in general.

It also looks at some of the key concerns that have been raised by the Airport Operators Association (AOA) in recent years and assesses how this framework and other Government activities are

responding to those needs and where there is still progress to be made.

A traffic light system has been used in the report to assess progress on 25 recommendations made in the AOA's 'An Integrated Policy Framework for UK Aviation: Connecting the Economy for Jobs and Growth' publication, published in 2012. The key to this system is shown below.

	Recommendations made by the AOA have been addressed in the APF
	Recommendations made by the AOA have been partially addressed in the APF
	Recommendations made by the AOA have not been addressed in the APF



For each recommendation failing to score a green light, we suggest a way forward and, at the end of this report, state how we intend to assess the Government's progress and work with them to ensure success. The AOA commit to ensure our engagement with Government on this matter is proactive and in the spirit of co-operation along the lines of the recent 'Red Tape' working group we are participating in.

The UK will only have an effective aviation policy in 2015, once the Airports Commission publishes its final report and a path for growth has been identified. Between now and then the Government needs to show commitment to the success of the aviation sector and the AOA will be monitoring their progress in doing so.



THE AOA RESPONSE TO THE APF

In this section the AOA presents its response to the APF using the approach set out in the introduction. We have split the response into five key areas based on the template we adopted in 'An Integrated Policy Framework for UK Aviation':

- **GENERAL COMMENTS**
- **AIR PASSENGER DUTY (APD) AND RED TAPE**
- **SETTING A FRAMEWORK FOR AIRPORT GROWTH**
- **MAKING AVIATION SUSTAINABLE**
- **IMPROVING THE PASSENGER EXPERIENCE**

GENERAL COMMENTS

THE ROLE OF GOVERNMENT

The new role of Government in aviation policy set out in the APF represents a major change, and the implications of this will be carefully and fully considered by airport operators not least because any airport expansion requires significant and sustained investment over a period of time.

One of the objectives of the previous Aviation White Paper, in 2003, was for the Government to remove some uncertainty from the planning process through providing a clear strategic view – over a 30-year period – on where it felt that new airport capacity would be required. This sought to address some of the perceived shortcomings in the UK planning process and in so doing make the system work more effectively for both aviation investors and local communities.

The 30-year proposals enabled the industry to plan for the future and ensure local communities were provided with certainty on where expansion was likely to take place. It was also expected that when a planning application for expansion was submitted this would be conducted from a position of knowing the Government's thinking; and meant that all the analysis had been conducted strategically to determine what was in the national interest.

In the new aviation policy document the Government states that it believes that UK aviation needs to grow, subject to sustainability criteria being met. This is an important recognition and is a very welcome message from the Government. The key question for the aviation sector, the Department for Transport (DfT) and Local Authorities now is how the APF is implemented in practice and what role the Government plays in the process.

In general the APF is a positive and welcome document in that it supports sectoral growth, to the benefit of the UK's economy and connectivity. It would be even better if stakeholders – including airport operators, Local Authorities, and business and community groups – could see how the policy will be implemented. A published work plan to accompany the APF with milestones and a review process at six-monthly intervals would help the industry to work with the DfT on delivering many of the aspirations outlined in the document.



ECONOMIC VALUE OF AVIATION

The AOA welcomes the recognition in the APF of the contribution aviation makes to the economy from the premise that the UK is an island nation that has always prospered and benefitted from international trade. The APF does a good job of summarising the benefits of aviation.

However, we dispute the figures presented in the document which underestimate the value of aviation. An Oxford Economics report published in 2011 found that the aviation sector contributes £49.6bn to the economy whilst accounting for 3.6% of GDP. This is made up of flight activity, the aviation supply chain, spending by aviation

employees and the boosting of inbound tourism by aviation³. Furthermore, UK aviation contributes close to a million jobs and the average employee generates £66,178 in Gross Value Added (GVA) every year, twice the UK average⁴. So whilst the APF figures are a positive recognition of the contribution of aviation to the economy, it could be argued that they significantly understate that case.

In addition, the APF clearly signals support for sustainable airport development, which the AOA has called for previously. This previous recommendation by the AOA is therefore identified as green.

Rating	The AOA Policy Recommendation	Outcome of APF Review
5	Revise the APF to signal clearly support for sustainable airport development (see Annex A)	The APF clearly states support for the sustainable growth of airports throughout the UK.

³. Oxford Economics (2011), Economic Benefits from Air Transport in the UK

⁴. ibid and ONS/IATA

AIR PASSENGER DUTY (APD) AND RED TAPE

AVIATION TAXATION

The AOA is concerned that the aviation operating environment has changed significantly since 1994 and the level of APD paid by the industry has also increased from £84m in 1994 to £2.78bn in 2012/13⁵. This is an increase of 3,216% in the amount taken through this form of taxation.

There is growing evidence that APD is having a drag effect on UK growth and competitiveness. The Treasury has already responded to calls by the Northern-Ireland Administration to devolve APD, which has effectively led to its abolition from some flights. The initial calls for devolution of APD were sparked by concerns that Continental Airlines would end its Belfast to New York service as APD made the service unviable⁶. Further evidence has emerged that suggests this taxation has reached unsustainable levels. In a report for the British Chambers of Commerce (BCC) in 2011, Oxera found that increases in APD were having a knock on effect on jobs and growth.

A more recent report by Pricewaterhouse Coopers (PWC) published earlier this year showed that cutting or abolishing APD would have led to the economy being around £16bn larger between 2013-2015, through GDP growth of around 0.45 per cent in the first 12 months and just under 0.3 per cent per annum between 2013-2015. This GDP increase would raise the level of UK economic output permanently.⁷

The APF makes passing reference to APD as if this is solely the realm of the Treasury and not the DfT, by stating; *'the Chancellor keeps all taxes under review'*. However, it should be noted that in July

2013 the DfT responded to the Transport Select Committee Inquiry into Aviation, stating its views on APD.⁸ Continued insight in to the DfT's thinking of APD would be appreciated.

In addition to economic impacts, rising levels of APD affect connectivity, the ability of passengers to travel efficiently and the ability of airlines to invest in more efficient, lower noise and lower emission aircraft. This goes to the very core of air travel in the UK and it is absolutely vital for the Government to fully understand these impacts.

In the absence of any Government economic analysis on aviation taxation impacts and the growing evidence that points towards lower levels of competitiveness and job opportunities missed, the lack of Government action on this issue is striking. APD is a counterproductive tax that flies in the face of Government objectives on growth, export promotion and tourism. If the Government believes this mounting evidence to be wrong, it is time to prove it. We therefore continue to call on the Government to urgently consider and conduct a study into the impact APD has on the wider economy - until this work is completed, it should refrain from any further increases in APD.

The AOA would therefore welcome the DfT being much more proactive in this area and to urge the Treasury to conduct this macroeconomic work, or alternatively, find the means to do it itself. As there is no Government activity underway to understand the economic impacts of APD, the previous AOA recommendations are identified as red and remain valid.

5. HM Revenue and Customs, Air Passenger Duty (APD) Bulletin - March 2013

6. BBC News, 'George Osborne confirms NI air passenger duty cut', 27 September 2011 - see <http://www.bbc.co.uk/news/uk-northern-ireland-15072772>

7. The Economic Impact of Air Passenger Duty, PWC, February 2013 - see <http://corporate.easyjet.com/-/media/Files/E/Easyjet-Plc-V2/pdf/content/APD-study-full.pdf>

8. Aviation strategy: Government Response to the Committee's First Report of Session 2013-14 - Transport Committee, 22 July 2013 - see <http://www.publications.parliament.uk/pa/cm201314/cmselect/cmtran/596/59604.htm>

Rating	The AOA Policy Recommendation	Outcome of APF Review
1	Consider urgently conducting macro-modelling work on APD's effects on the whole UK economy.	The policy paper is dismissive of the effects of APD on the economy. Stating that it is a matter for the Treasury.
2	Refrain from any further increases in APD, with immediate effect.	The Government has recently implemented increases in APD. There are no further increases planned, but neither is there any work underway to understand that impact of the current APD levels on the UK economy. Instead the Government is fire fighting responding to issues as they have a clear negative impact, such as in Northern Ireland where APD has now been devolved.

Moving forwards the AOA recommends that the impact of aviation taxes on the economy and tourism are considered in the round including looking at 'double taxation' (eg EU ETS and double APD rates for UK journeys) and how this is impacting on economic growth. DfT and the Treasury need to work together to establish reliable evidence and a subsequent course of action on taxation, to ensure it does not impede economic growth.



STREAMLINING THE AIRPORT PLANNING APPLICATION PROCESS

For an airport investment that requires planning approval to proceed, it is worth considering that there are three general elements to fulfil even before submitting a planning application:

- **The development of a sound business case;**
- **Raising sufficient finance to develop and deliver the project often over a sustained period; and**
- **Certainty - a realistic prospect that the project will obtain planning consent within a reasonable timescale.**

Airport operators throughout the UK need to be able to plan for the future, develop the business case, raise finance and have a realistic chance of obtaining planning consent. The AOA believes that for the APF to be implemented there should be a presumption in the planning process in favour of airport expansion provided that sustainability criteria are also met.

To ensure that planning authorities are aware of the Government's position in support of growth, the AOA recommends that the DfT send a copy of the APF to every Local Authority planning department. It should be accompanied by a cover letter jointly from DfT and DCLG to chief planning officers introducing the APF and highlighting that airport expansion proposals in the UK should be supported provided that sustainability

criteria are met. In the case of any airport expansion recommended by the Airport Commission, whilst it may be national Government which ultimately makes decisions on major schemes, Local Authorities should still be guided by a presumption in favour of sustainable development in terms of its input in to the planning process, even if the Local Authority is not the final arbiter or decision-maker.

This proactive action by the DfT would help to give confidence to airport operators that the Government is prepared to implement the APF through signalling its support, in principle, for expansion and a better service for passengers.

The AOA has on behalf of its members raised a number of issues in the past that aim to deliver improvements in the planning process. The APF forms part of the progress of work on this area, but there are also other activities in other Government departments underway to address Red Tape. For example, the Department for Business, Innovation & Skills has responded positively to previous calls by the AOA to take action to reduce regulatory burdens by establishing a Joint Government Industry Task Force to identify areas where there are opportunities to reduce regulatory impacts. This is a very welcome and positive approach. It puts in place a process to identify areas where regulation can work more efficiently. These previous AOA recommendations are progressing well and are therefore identified as green.



Rating	The AOA Policy Recommendation	Outcome of APF Review
3	Track regulatory “ins” and “outs” for key economic infrastructure sectors like aviation.	Work underway in BIS to address the impact of regulation on airports
4	Create a Joint Task Force, focused on cutting unnecessary regulation, to work in partnership with the aviation sector.	Task force established by BIS to address the impact of regulation – AOA Red Tape Working Group. BIS committed to working with industry to lobby other departments and seek changes in priority areas.

SETTING AN INTEGRATED FRAMEWORK FOR AIRPORT SECTORAL GROWTH

There are many areas of aviation policy that are connected with other Government departments. For example: security, delivered by the CAA and Home Office; tourism, promoted by the Department for Culture Media and Sport (DCMS); climate change targets set by the Department of Energy & Climate Change (DECC); planning, by the Department for Communities and Local Government (DCLG); and, as aforementioned, APD set by the Treasury.

The AOA welcomes strong leadership from the DfT in driving forward improvements in the key areas covered by the 25 recommendations, set out in the AOA’s ‘Integrated Policy Framework for UK Aviation’. Through working groups, reports and studies and encouraging other Government departments to deliver change, the DfT should be the driving force of aviation initiatives across Government to deliver real and lasting improvements.

For example, the AOA welcomes the recognition in the APF of Government

targets to attract visitors to the UK. It is important that the work the DCMS is taken forward and proactively supported by the Department for Transport. The AOA members would welcome the opportunity to contribute to this strategy and to work with DfT and DCMS to address some of the barriers tourists face when coming to the UK, for example on visas. A way forward, would be for DfT to establish a joint forum with DCMS to address some of these issues on a regular basis.

As aviation is an important enabler of economic growth there are many areas of policy across Government that the aviation sector directly affects or is affected by. With that in mind the AOA would welcome the DfT becoming stronger advocates in Government on behalf of aviation to deliver a more integrated and effective transport system. This means DfT developing cross Government working to deliver greater integration and to make things happen.

The AOA calls on DfT to become the champions of aviation in Government and to work in an increasingly integrated way with:

- DCMS on resolving any aviation barriers that may affect UK Government's success in attracting 4m additional tourists to the UK.
- Treasury to address APD concerns
- BIS to reduce regulation and Red Tape
- DECC to enable sustainable aviation fuels and global ETS
- DCLG to deliver a planning process for moving forward the sustainable development of airports
- DEFRA to optimise environmental impact assessment, noise mapping and air quality management processes in relation to airports
- Home Office to deliver a better security regime for passengers;

and in driving forward the actions listed above, to deliver a more efficient, responsive and integrated transport system.



AN AVIATION PLANNING SYSTEM FIT FOR THE 21ST CENTURY

Airport operators have invested in good community relations in recent years and where possible have been proactive in responding to local concerns. Planning remains a key issue for airport operators and the AOA is therefore pleased to see this key issue addressed in the APF.

The AOA welcomes some of the clarification about how the APF should be considered in relation to planning decisions. The AOA recommends that there should be of a presumption in favour of development at an airport providing sustainability criteria are met.

The House of Commons Transport Select Committee findings are an interesting contribution to the discussion at this time, as they were considering many of the issues that the Airports Commission is exploring in a lot more depth.⁹

As the APF makes clear, aviation is an important contributor and enabler of economic activity. It is likely that any changes to capacity will meet with some degree of local opposition. Airport expansion is perhaps unique in terms of transport projects since it is funded by

the private sector. It therefore requires companies, often with shareholders, to make a significant investment of capital funding. A responsible company can only do this where there is a realistic chance of the project moving ahead successfully. If the Airports Commission concludes that expansion is required, the Government will need to work in the national interest and positively support the implementation of the proposals.

The APF states that following the publication of the Commission's conclusions the Government will consult on and draft a National Policy Statement for Airports. **In addition, the APF should be updated at this time to take account of the recommendations of the Airport Commission into maintaining the UK's hub status. The APF needs to be part of a comprehensive and integrated Aviation policy approach.**

The AOA is pleased that the Airports Commission's work is advancing and has therefore marked this previous AOA recommendation as green. The Commission is expected to publish their interim findings in 2013 and the final results will be available by 2015.

⁹. House of Commons Transport Committee Report on Aviation Strategy, May 2013, see <http://www.parliament.uk/documents/commons-committees/transport/Aviation%20Strategy%20Volume%201%20.pdf>



**THE AOA RESPONSE
TO THE APF**



Rating	The AOA Policy Recommendation	Outcome of APF Review
8	Ensure the Sir Howard Davies Independent Commission on the UK's hub status considers all options thoroughly; takes wide advice from experts throughout the country in industry, business and academia; gives clear direction in its 2013 Interim Report; and presents a clear way ahead by its final deadline of 2015.	The Airports Commission work is underway with publication of numerous discussion papers and initial public evidence sessions. It has established a wide ranging expert advisory panel. The Aviation policy framework makes clear reference to it. The APF also provides a clear steer that additional airport capacity is required in the UK. The Airports Commission will also deliver its interim report in 2013 with the final report delivered in 2015.

In terms of a previous AOA recommendation about the implementation of the Commission's findings, this is on amber, because not all political parties have committed to the outcomes of the Commission's findings.

Rating	The AOA Policy Recommendation	Outcome of APF Review
9	Commit to acting on the Independent Commission's advice.	The AOA have not received confirmation from all political parties that they will commit to action on the Airports Commission advice. The Conservatives have said that they hope and expect to implement the findings of the Commission. The Lib Dems and Labour have not committed to a position yet.

This is concerning, as capacity in the South East is under such strain that UK economic growth is put at risk by further delay. **The AOA therefore continues to urge all political parties to commit to acting on the findings of the Aviation Commission.**

CONNECTIVITY

Airports throughout the UK contribute to providing connections throughout the world through both direct and indirect flights to a host of international destinations. **The AOA would expect DfT to move from a monitoring role, to a more proactive role in short order to ensure that UK policy is delivering the links to international destinations it requires.** This is another reason why it would be sensible to update the APF following the publication of the Aviation Commission's reports.

AVIATION DEMAND FORECASTS AND MEETING CAPACITY

Whilst it is debatable as to whether growth over the next 30 years will remain at the low or mid range levels suggested in the APF, the most significant point for policy makers and for the DfT is that using central forecasts, UK airports are expected to be full by 2040.¹⁰ Given that 73% of people travelling to the UK arrive by air¹¹ and that aviation is such an important economic, business and social enabler, it is essential that capacity issues are addressed with realistic and timely solutions.

The UK has been a global leader in the liberalisation of air services. **The AOA welcomes the Government's activities in this area and encourages the DfT to strengthen its work and to report back on the progress made during APF progress reports and when updating the APF.**

BUSINESS AND GENERAL AVIATION

Business and General Aviation covers a wide range of activities, from corporate business jets and commercial helicopter operations through to recreational flying in small private aircraft, including

gliders. In addition, Business and General Aviation airports and aerodromes also complement commercial air transport and increase capacity to important destinations.

It is however essential that the APF recognises the fundamental differences between Business and General Aviation. Business Aviation is essentially a division of commercial aviation that allows business travel to be conducted on an as required basis and into areas of the world or at times that may not be adequately served by traditional airline routes. This is an important feature in accessing emerging markets. General Aviation is more focussed towards leisure, recreational and flying training activities. Both Business and General Aviation are key contributors to economic activity.

The APF addresses some of the planning issues that are associated with General Aviation. For example, it states that when a planning application is made that could affect an aerodrome, the economic benefit of the aerodrome and its value to the overall aerodrome network as well as the economic benefits of the development will be considered as part of the application process. The experience of the General Aviation community, however, is that it is difficult to get Local Authorities to make favourable planning decisions. So it is important that there is sufficient support for light aviation in the government's planning guidance.

There is some concern amongst the Business and General Aviation community that there is no protection for aerodromes against nearby development, in particular under the approaches to runways. The Government recently attempted to encourage airports to improve their facilities for airport users, but if aerodromes are to invest in the cost of improving infrastructure, there needs to be stronger protection

10. DfT Passenger Forecasts, January 2014: "Section 5.17 - The central forecasts suggest that all the South East airports would be at capacity at around 2030 and the larger airports outside the South East from about 2040..."

11. Visit Britain, Inbound Tourism - updated April 2013 <http://www.visitbritain.org/insightsandstatistics/inboundtourismfacts/>

for those facilities. As an example of an issue that could arise, it is very expensive to lay an asphalt runway but there is nothing to prevent a neighbouring landowner from planting trees at the end of the runway. Once the trees grow, if the airport cannot persuade the owner to trim them, the airport operator would have to introduce a displaced threshold and reduce the available runway distances to maintain a safe operation. This is one example amongst many of unintended consequences that potentially compromise the viability of the aerodrome.

The AOA recommends Government and industry work together to develop a more responsive planning system that supports Business Aviation and General Aviation aerodromes.

SURFACE ACCESS

PUBLIC TRANSPORT IMPROVEMENTS

The APF states that proposed airport investment or expansion must be accompanied by surface access

proposals that demonstrate how the airport will ensure ease of access to the airport for passengers and increase the use of public transport. The practice has grown over the years that where there has been an airport development the airport operator has also delivered new public transport infrastructure.

The Airports Commission is also examining surface access infrastructure as part of its work on international connectivity. This is a good start, but it needs to go much further, the AOA believes that as many UK airports as possible should be accessible by public transport. The DfT should undertake a thorough review of good practice including international comparisons, and compile a list of airports that are not connected to public transport infrastructure, to identify opportunities for improved public transport access.

In addition, The AOA had called for a review of rail access, but there is only limited evidence of any activity underway with High Speed Rail 2. Consequently, the AOA has scored its previous request to review rail access to airports as amber.

Rating	The AOA Policy Recommendation	Outcome of APF Review
18	Extend its review of rail access to airports, covering information, ticketing, and rail franchises.	Current rail services to airports are not directly considered in the APF despite the need for improvements. The whole range of rail links, including local, express and high speed, should be considered, in particular in policies which emerge from the Airports Commission's recommendations.



On the matter of airport surface access strategies the AOA members have many examples of best practice on promoting and working with bus, coach and rail companies to offer the best services to enable staff and passengers to access their airports on public transport. This is in addition to provision of cycle ways, foot paths and car share incentive schemes. Whilst airport operators remain committed to continuing this good work, more help from Government to support integrated transport opportunities at airports is needed.

The AOA believe it is difficult to see how Air Transport Forums can implement a strategy of increasing the number of public transport journeys to an airport, without the resources to deliver this. The AOA believes that the Government should take a stronger leadership role on this important issue and should seek to implement an integrated transport system by using rail franchise specifications and rail industry and other funding mechanisms to ensure that airport rail access is aligned with airports policy.

Moving forwards the AOA believes more needs to be done by Government on surface access and makes the following recommendation:

The AOA recommends DfT identify the level of public transport infrastructure connecting UK airports and where the gaps are to move towards a more integrated transport network including ensuring the outcomes for the surface access projects.

WORKING TOGETHER

AIRPORT CONSULTATIVE COMMITTEES

The AOA welcomes the views express in the APF regarding Airport Consultative Committees (ACC) and looks forward

to ACCs taking a larger role in the noise management process.

AIRPORT MASTER PLANS

The AOA welcomes the intent of the APF in encouraging airports to explore opportunities to develop master plans, noise action plans and surface access strategies over similar time periods. The AOA will continue to work with our members to assist this process.

IMPROVING INFORMATION

The new role of the CAA in ensuring good aviation environment information to the public is supported in principle by the AOA. This support assumes two important points. Firstly that any information produced by the CAA is seen as truly independent to the public and secondly that the information produced does not duplicate or confuse existing information provided by the airports and wider aviation industry.

PLANNING

The comments in this section refer to general planning requirements to enable economic recovery and airport growth. Further comments on planning relating to sustainable aviation growth will be made later.

THE STATUS OF THE APF IN THE PLANNING PROCESS

Local Authorities are responsible for dealing with local applications at airports but are required to have regard to policies, such as the APF, issued by the Secretary of State for Transport. That is why the AOA has recommended that the APF should be sent to all relevant Local Authorities, highlighting that there should be a presumption in favour of airport expansion, where sustainability criteria have been met.



Rating	The AOA Policy Recommendation	Outcome of APF Review
7	Ensure Local Authorities integrate Airport Master Plans in their Local Plans	The APF recognises that Local Authorities should have regard for policies and advice issued by the Secretary of State and in particular the National Planning Policy Framework (NAPF), but the document does not go far enough. It does not provide the clarity and certainty that is needed for large-scale infrastructure investments such as airports. DCLG should be integrated into this report. There is little point DfT describing the planning world around them, they should be trying to make it work most effectively for transport. That means engaging with DCLG, which has responsibility for planning.

SAFEGUARDING

The AOA supports the messages in the APF regarding safeguarding. The AOA members will continue to work with their local authorities to identify and protect sites and routes that could be critical to developing infrastructure. To achieve the best result in this, the need for clarity in Government aviation policy and infrastructure provision in the longer term are crucial. Overall the AOA believes progress is being made but more work is still required, particularly regarding minimising the number of people exposed to higher levels of noise.

PUBLIC SAFETY ZONES

The AOA members will continue to work with local authorities to achieve the principle that there is no increase in

the number of people living, working or congregating in public safety zones.

ENTERPRISE SAFETY ZONES

As the APF acknowledges airport operators have been active in contributing to their Local Enterprise Partnership (LEP). As LEPs have become more established and what they can achieve locally becomes more evident, additional airport operators will no doubt want to get more involved.

The AOA considers the progress on its previous recommendations as well underway and identifies these as green.

Rating	The AOA Policy Recommendation	Outcome of APF Review
6	Incentivise Local Enterprise Partnerships to carry out high quality analysis of future aviation needs.	The APF provides highlights that there is scope for LEPs to 'develop local strategies to maximise the catalytic effects of airports.' In addition, the Government encourages airport operators to work with LEPs to ensure that airports are fully integrated into the LEPs' overall economic strategy for the area. AOA is pleased that there are 12 UK airports that are already closely involved with their LEPs ¹²
10	Enhance the benefits of Enterprise Zones centred on airports.	The APF highlights the benefits of Enterprise Zones that have already been established around airports and the success that they are delivering, citing Manchester, Newquay and Cardiff as some examples of good practice in this area.

FURTHER OPPORTUNITIES TO DELIVER EFFICIENCIES IN THE PLANNING PROCESS

It is good to see the DfT capture much of the activity that is underway which involves other parts of Government. There are further opportunities to deliver improvements to the planning process and the AOA would like to encourage the DfT to drive forward some of these improvements in Government.

The AOA has made a number of recommendations on planning in its 'Integrated Policy Framework for UK Aviation' report in October 2012, but little progress has been made. **It is likely that this does require cross Government cooperation particularly on Environmental Impact Assessments and reducing the burdens more generally. The AOA calls on the Government to work with industry to resolve these recommendations in a timely manner.**

¹². Aberdeen Airport; Birmingham Airport; Blackpool Airport; Bristol Airport; Gatwick Airport; Leeds Bradford International Airport; Liverpool John Lennon; London Luton Airport; Manston Kent International Airport; Robin Hood Doncaster Sheffield; Newcastle International Airport; Newquay Cornwall Airport; Stansted Airport.



**THE AOA RESPONSE
TO THE APF**



THE AOA RESPONSE
TO THE APF



Rating	The AOA Policy Recommendation	Outcome of APF Review
11	Allow greater scope to offset the Community Infrastructure Levy for existing buildings.	Not addressed in APF
12	Accelerate implementation of the recommendations of the Penfold and Killian Pretty Reviews, to speed up and reduce the regulatory burden on planning applications.	Not addressed in APF, although the National Planning Policy framework has sought to reduce Red Tape in planning application processes.
13	Freeze planning fees.	Not addressed in APF
14	Implement financial incentives for Local Authorities to approve applications efficiently.	Not addressed in APF - Matter for DCLG
16	Put in place a low-cost arbitration for planning application validation disagreements.	Not addressed in APF - Matter for DCLG
17	Raise the trigger threshold for Environmental Impact Assessments.	No activity to underway to examine thresholds for Environmental Impact Assessments. (As this is an EU Directive this would be difficult for the Government to do, unless it is part of its renegotiation with the UK).



MAKING AVIATION SUSTAINABLE

A REALISTIC APPROACH TO CLIMATE CHANGE

The AOA welcomes the clarification of the Government's approach to sustainable aviation on CO₂ emissions, which is a preference for international action and where this is not possible, action at a European level as a step towards international agreement. We do not support unilateral action at UK level. Aviation is already taking significant proactive steps to address environmental issues, such as: changes in operating practices; investment in new aircraft, engine and fuel technology; greater Corporate Social Responsibility reporting; and the tough ambitions set out by the Sustainable Aviation (SA) initiative, particularly in relation to the SA CO₂ Road-Map.¹³ The Road-Map explains how governments and the aviation industry can achieve the industry target of halving CO₂ emissions by 2050, compared with 2005 levels.

The scale of the aviation industry's commitment to address CO₂ emissions is huge. The aerospace sector is, for example investing millions of pounds to improve and develop new aircraft and engines. As a result UK industry is playing a leading role in the development of this technology. As part of this leadership work the AOA welcomes the Government commitment in recently launching the £2bn Aerospace

Technology Institute, which will drive the development of lower noise and emission aircraft.

Much is also occurring at an airport level. Many of the AOA's members now have detailed CO₂ reduction plans covering such areas as reducing energy usage, investing in low carbon on-site energy centres, replacement of vehicles with lower emission ones, development and improvement of staff travel plans including discounts for use of public transport and production and monitoring of airport wide carbon footprints.

There is also cross aviation industry collaboration to explore improved aircraft operating practices to reduce emissions which led to the publication of *'Reducing the Environmental Impacts of Ground Operations and Departing Aircraft - An Industry Code of Practice.'*¹⁴

EMISSIONS TRADING

Regarding emissions trading, the AOA welcomes the balanced and measured approach by the Government in support of a global emissions reduction scheme and rejection of a unilateral UK target.

The AOA continues to support the development of an effective emissions trading scheme, supporting the EU ETS are a good first step towards this process. As a result of this approach by Government the AOA are marking their previous recommendation as green.

13. Sustainable Aviation is a long term strategy which sets out the collective approach of UK aviation to tackling the challenge of ensuring a sustainable future for our industry. A world-first, Sustainable Aviation was launched in 2005 and brings together the main players from UK airlines, airports, manufacturers and air navigation service providers (<http://sustainableaviation.org.uk/>). For the SA CO₂ Road-Map, see <http://www.sustainableaviation.co.uk/wp-content/uploads/SA-CO2-Road-Map-full-report-280212.pdf>

14. See <http://www.sustainableaviation.co.uk/wp-content/uploads/DCOPractice2012approvedhi-res.pdf>



Rating	The AOA Policy Recommendation	Outcome of APF Review
19	Increase efforts to secure a global carbon-trading scheme and reject unilateral UK targets.	The Government continues to outline its support for global action to address carbon trading and to reject unilateral action. In December 2012 the Government agreed to defer imposing a UK target for international aviation in their carbon budgets to encourage the development of a global carbon trading scheme.

SINGLE EUROPEAN SKY (SES PROGRAMME)

The Single European Sky programme is integral to the ability of the aviation sector to reduce both noise and emissions from aircraft and to deliver a more efficient transport system for passengers. The delivery of a Single European Sky is outside the control of AOA members, so it is welcome to see in the APF that the Government places a strong emphasis on supporting the successful implementation of the SES across the EU. The AOA members will continue to support this initiative going forwards.

The leadership role that the UK has taken by establishing the first Functional Airspace Block (FAB) in Europe is also very welcome and it is encouraging to see that this has already delivered real reductions in CO₂ emissions and is projected to deliver annual savings of £31.2m, including 35,000 tonnes of fuel and 111,000 tonnes of CO₂ by 2020. It is good that the UK-Ireland FAB is working to actively enhance its links with air navigation service providers in other EU countries and we will continue to support this work where possible through our role in Sustainable Aviation.

CAA FUTURE AIRSPACE STRATEGY (FAS)

The AOA supports the ambitions of Future Airspace Strategy (FAS) which sets out a plan to modernise airspace by 2020. On the environment FAS aims to drive the implementation of air traffic management (ATM) improvements that reduce greenhouse gas emissions from aircraft and contribute to minimising aviation's environmental impact. The FAS also provides an opportunity to re-assess existing principles underpinning the treatment of aircraft noise and tranquillity in the context of new ATM technologies and operational concepts.

Airports operators are only too aware of airspace limitations around their airports which preclude the optimum flight path for aircraft arriving to or departing from their airports. **Whilst the AOA and its members will continue to work with airline and air traffic partners, as well as the CAA, to progress FAS, we call on the Government to assist in this process to ensure opportunities to reduce emissions can be realised as soon as possible.**

SUSTAINABLE AVIATION

The AOA and our members have been

signatories to Sustainable Aviation since it was established in 2005. The AOA remain committed to playing its part in delivering the opportunities outlined in the CO₂ Road-Map to halve net emission by 2050 compared to 2010. As part of this Road-Map however there are a number of actions that the UK aviation industry sets for the Government. The AOA would like to see continued efforts from Government to achieve these.

AVIATION TECHNOLOGY AND SUSTAINABLE FUELS

In our 'Integrated policy framework for UK aviation: connecting the economy for jobs and growth', the AOA called for the Government to provide incentives for the scale up of aviation sustainable fuels and better aircraft technology. In the most recent budget announcement the Government set out plans to invest £1bn in the development of new aerospace technology, which is aimed at producing

the next generation of more efficient, lower emissions aircraft. The investment will be matched by industry, which brings total UK investment in new technology to £2bn over seven years.

On sustainable fuels specifically, the APF sets out the Government's support for their use and development, but the Government is holding off on any interventions until the outcome of negotiations with the European Commission have been concluded on indirect land use change (ILUC). The AOA strongly encourages the Government to take a leadership role in accelerating the scaling up of sustainable aviation fuels. **Initially, the AOA asks that Government consider the recent updated SA paper on sustainable aviation fuels.**¹⁵

Reflecting this position the AOA accepts that the Government is seeking to meet the technology recommendation but has not met the sustainable fuels one.

Rating	The AOA Policy Recommendation	Outcome of APF Review
20	Incentivise the scale up of aviation biofuels.	The Government are awaiting the outcome of negotiations with the EU Commission on Indirect Land Use Change (ILUC), which affects crops that are grown and the full life-cycle CO ₂ emissions. The APF does not provide the incentives to scale up sustainable aviation fuels.
21	Incentivise better aircraft technology.	Government has earmarked £1bn investment for a new Aerospace Technology Institute, which will develop new technology for the next generation of aircraft that will be used globally.

15. See http://www.sustainableaviation.co.uk/wp-content/uploads/SASFWG__sustainable_fuels_final_doc-150713.pdf

AN OPPORTUNITY TO DELIVER NOISE AND OTHER LOCAL ENVIRONMENTAL IMPROVEMENTS

In April 2013 Sustainable Aviation (SA) launched its Noise Road-Map,¹⁶ which demonstrated that through the introduction of new aircraft and quieter engines to airline fleets, a near doubling of growth in UK flights can be achieved by 2050 without increasing noise.

The Road-Map also provides a toolkit for UK airports to consider as part of their noise action plans. These tools cover a range of issues from quieter aircraft operational techniques to land use planning controls around airports and better engagement and communication work with local communities on noise.

The AOA is championing this Road-Map across its membership but also calls on Government to respond to the specific requests made in the document for support. In regards to land use planning the AOA recommends that the APF should ensure local planning authorities take a longer term view to permitting development around airports. The SA Noise Road-Map provides data to show the risks and likely effect of increasing the number of people exposed to higher noise levels and potential annoyance if encroachment is allowed to happen. The AOA believes progress in this area is being made but not yet complete: consequently we have rated the APF amber against our original recommendation.

Rating	The AOA Policy Recommendation	Outcome of APF Review
22	Ensure Local Planning Authorities take a long-term approach to land use planning near airports.	The National Planning Policy Framework makes clear that local planning authorities should 'identify and protect where there is robust evidence, sites and routes which would be critical to developing infrastructure to widen choice.' The APF states that this could apply to airport infrastructure. Airport operators are required by DfT Circular 01/2003 to maintain safeguarding maps to reflect potential proposals for future development of airports and ensure they are certified by the CAA.

16. See <http://www.sustainableaviation.co.uk/wp-content/uploads/SA-Noise-Roadmap-Publication-version1.pdf>



In addition the APF highlights that residents have a duty to inform themselves about local airport noise impacts before moving to an area. This is an important statement from Government, but further work from Government must support the aviation industry to look at how information about noise from airports can be made more readily accessible to people who are considering such a move. There are a number of options that could be looked at such as ensuring that noise contours are a standard part of Local Authority, or Environmental searches that are usually conducted in the course of purchasing a property. Or alternatively, looking at a more comprehensive mechanism such as noise certification, similar to energy certificates which must be made available when marketing a property for sale. Measures such as this would be enormously beneficial to the local community living close to airports. The Government needs to help – and be given the means – to make this happen: vendors of property will not change behaviour because of the APF.

The AOA recommends that Government investigate ways of helping potential vendors inform themselves of possible noise impacts close to airports.

MEASURES TO REDUCE OR MITIGATE AIRCRAFT NOISE

The AOA is aware of a substantial range of planning conditions and obligations negotiated between airport operators

and local authorities as part of securing permission to grow. This is in addition to a wide range of voluntary measures agreed between airports, airlines and air traffic providers to reduce aircraft noise, plus the commitment airports make to local communities in managing complaints about such aircraft noise. Whilst the AOA understands the Government's desire to see firmer measures such as tighter noise limits or greater differential charging schemes we would also seek the Government's understanding that using an ever larger 'stick' to address noise may not be the best way forward. **The AOA would like the Government to do more to support the aviation industry reduce noise by incentivising faster airspace change processes –enabling quieter operations or supporting manufacturers in producing quieter aircraft; and finally in supporting Local Authorities apply land use planning controls around airports to prevent unnecessary exposure to noise by local residents.** In line with the SA Noise Road-Map, the AOA sees operating restrictions only as a last resort to address noise issues.

NOISE ENVELOPES

The AOA cautiously welcomes the details provided in the APF on noise envelopes. The concept has much benefit but how successful they will be in addressing noise concerns is still uncertain. As AOA had previously called for greater clarity in the APF on noise and land use planning, we judge the APF to have delivered some progress in this area so our recommendation is identified as amber.



THE AOA RESPONSE
TO THE APP

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BERLIN-

POLBIA

CALVI

LONDON-ST

AMSTERDAM

WIEN

RJJEKA

Rating	The AOA Policy Recommendation	Outcome of APF Review
15	Provide model guidance in the APF on safeguarding, noise and land use planning.	Government to publish guidance on noise in its National Policy Statement in response to the Airports Commission. CAA will also produce guidance on the use and types of noise envelopes. Solutions to improve guidance to Local Authorities to help them control developments around airports to reduce public exposure to noise from aircraft operations around airports remain weak.

AIRSPACE

The AOA agrees with the Government's preferred approach to airspace management as defined in the APF. A number of AOA members are already trialling innovative arrival and departure procedures to offer predictability or respite to aircraft noise. It is clear that in all these cases local solutions differ depending on the make-up of the local community concerns. A particular concern of the AOA is how long it appears to take for these trials to be established and, if they are successful, how long it then takes to turn the trial into standard operational practice. The AOA will continue to promote this approach with our members moving forwards but we do call on the Government to support the industry by finding ways to improve how quieter operational procedures or airspace change programmes can be implemented more efficiently.

INFORMATION

The AOA accepts the challenge set out in the APF for airport operators to work with local communities in understanding noise impacts and the airports performance against agreed targets. Many AOA members are already

actively involved in this process through production of noise action plans, noise complaint handling and joint discussion of aircraft noise issues between local communities, airport consultative committees, airlines and air traffic control providers. The SA Noise Road-Map devotes a chapter to the issue of noise communication and community engagement which the AOA fully supports. The AOA will promote the best practice techniques outlined in the Road-Map with our members but we do call on the Government to continue to work with the industry on this to ensure the best results. With regards to using the CAA as a vehicle to provide noise information for the public the AOA sees some merit in this in terms of producing independent data on noise, but does want to ensure the CAA does not repeat existing work being conducted at an airport level.

A further need which the AOA seeks Government support with is the matter of independent research into noise annoyance. The SA Noise Road-Map developed a noise challenge diagram which highlights the complexity, as the industry sees it, between an aircraft noise event and how annoyed someone may be as a result. It is clear that current research in this area is inconclusive

making it hard for the AOA's members to respond in the best way possible.

NIGHT NOISE

The AOA understands that night flights create noise concerns to people living around airports and is committed to promoting best practice solutions. The AOA strongly supports the need for night flights in the UK, which take place in response to public and business need based on a range of reasons. The AOA provided a detailed response to the recent DfT consultation on the night flying regime for airports designated for noise purposes part of which is re-provided in the **Appendix B** to this report.

NOISE INSULATION AND COMPENSATION

Where issues of aircraft noise cannot be addressed through the introduction of quieter aircraft, improved operational procedures, land use planning controls or information the AOA fully supports the development of appropriate noise insulation and compensation schemes.

The AOA seeks Government assurance however that flexibility in the scope and applicability of any schemes developed around airports is maintained. This is to ensure that the scheme meets the needs of those affected which a single national scheme will likely fail to deliver.

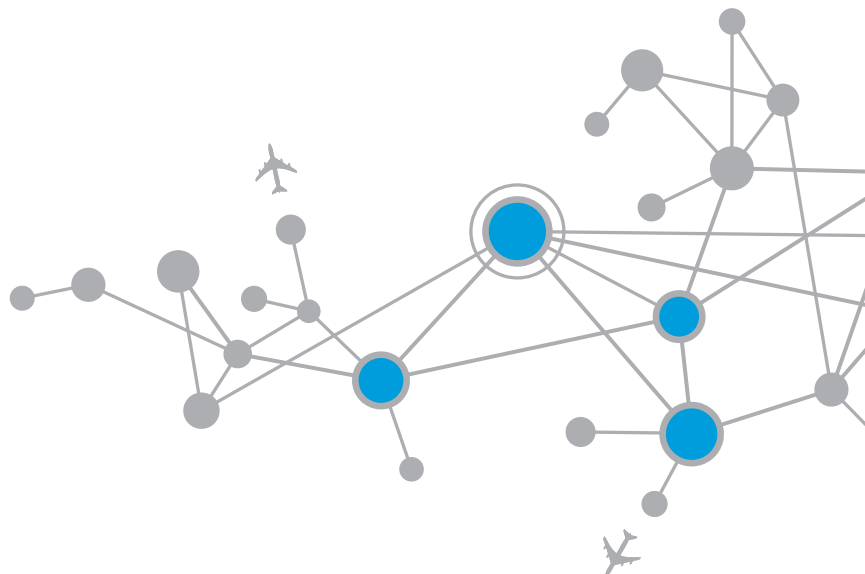
GENERAL AND BUSINESS AVIATION

The AOA welcomes the clarification in the APF of a light-touch approach to noise for General and Business Aviation.

AIR QUALITY AND OTHER LOCAL ENVIRONMENTAL IMPACTS

The AOA fully supports the Government's approach in the APF regarding compliance with European air quality standards. The AOA members conduct many examples of best practice to reduce air pollutants. This ranges from reducing on-site energy usage, working with airlines and air traffic to minimise taxi times, reducing aircraft taxiing with all engines operating, and reducing use of aircraft generators whilst aircraft are parked, to working through local transport forums to reduce traffic congestion in and out of the airport, and incentivising passengers and staff to use public transport to access the airport.

Regarding the judging of any new airport capacity in regards to air quality, the AOA believes that the Government needs to not only assess air pollutant risks from airports but from the wider area. In many cases air quality at an airport is made up of a range of emission sources, many of which can be non-airport related.



IMPROVING THE PASSENGER EXPERIENCE

SECURITY FOR OUTBOUND PASSENGERS AND BORDERS FOR INBOUND PASSENGERS

Given the focus on security and borders in the APF is quite limited, and some security functions have recently transferred from the DfT to the CAA, the AOA expected to see greater clarity in the APF on where DfT would like CAA to place emphasis.

Border controls are an important issue to the AOA members and even though they are mentioned in the APF, comment is descriptive and does not set direction for future policy on the issue.

The AOA would like to see more determination from the DfT to be the champion of a good aviation passenger experience in Government. When it comes to security this means pressing the Home Office, CAA and other Government departments to deliver a more efficient and effective system. This is of particular significance, as the industry will now be paying more for security provision at airports.

As the customer in this new relationship, the AOA is keen to see the development of a more responsive system and in particular a commitment from the Government to move towards an outcomes focused airports security system, with the resources to implement it. This is a

recommendation that the AOA has previously made to Government and the AOA is disappointed that little progress has yet been made. The AOA recognises that some security functions have recently moved to the CAA and this presents an ideal opportunity for work to progress. However, until there is significant movement on an outcomes focused security approach this AOA recommendation from the AOA's 'Integrated Policy Framework for UK Aviation' is identified as red.

Previously, the AOA has called for the UK Border Agency to produce a long-term vision with a more ambitious approach to reducing waiting times. The UK Border Agency does have some initiatives underway at selected airports to pre-check low risk, regular travellers and automation is helping where it is introduced. However, the AOA members would like to see much more ambition and progress in these areas and would encourage the DfT to champion this cause in Government and work with the Home Office to ensure that security and immigration controls operate at maximum efficiency. The AOA considers the progress on the previous recommendations on security to be at amber, which means that work is underway, but there are further opportunities to make more progress.



THE AOA RESPONSE
TO THE APF

Rating	The AOA Policy Recommendation	Outcome of APF Review
23	Task the UK Border Agency (UKBA) to produce a clear vision and long-term strategy for its activities at airports and provide the resources to deliver it. This should include a more ambitious approach to maximum waiting times to clear immigration.	Relations between UK airports and UK Border Agency are improving and better service level agreements are being agreed. UKBA have announced intentions to become the best in the world and recognise need for national prosperity as well as national security. Selected airports have smart zone checks, which allow people to be pre-checked on low risk routes providing a lighter-touch screening process. Automation means that low risk passengers can be checked more efficiently.
24	Develop a clear plan to move towards outcomes focused airport security and provide the resources to implement it.	Some security functions have been transferred to the CAA, which provides an opportunity to move towards outcomes focused security, but there is no specific work programme underway either in the DfT or the CAA to move this forward.
25	Review thoroughly UK-only security measures with the aim of harmonising them as far as possible with other EU countries.	The US is the main focus of security measure activity in the Aviation Policy Framework. No work is underway to harmonise security measures with other EU countries.

To deliver progress more quickly the AOA recommends that DfT establish working groups with the Home Office and UK Border Agency, that drives forward improvements to deliver a more efficient border operation at all UK airports.

The AOA would like to see DfT to take a proactive lead on driving forward airport border security efficiency at UK airports by bringing the relevant bodies; UK Border Agency; CAA and industry together and to draw up a work programme that delivers improvements and moves towards an outcomes focused airport security regime.

IMPROVING PERFORMANCE, RESILIENCE AND THE EU PASSENGER EXPERIENCE

The AOA supports the work streams outlined in the APF where the Government is keen to see improvements. These activities are a good example of where the DfT is driving forward changes to improve the passenger experience and to make capacity work more effectively. The AOA would like to see this kind of activity replicated in some of the other areas of the APF, which have already been highlighted.

The AOA sees the DfT as the champion of aviation in Government. If something is not working as well as it could, or there are barriers being created such as in security, or planning, it should be the role of DfT to fight the corner of aviation and to ultimately deliver a better experience for the passenger.

If there are constraints on what the DfT can progress on aviation, these should be set by the Government's leadership and other departments and not the DfT. The DfT should be the primary champion of transport, including airport sector, improvement, and should not be constraining itself.



RECOMMENDATIONS AND NEXT STEPS FOR THE GOVERNMENT

The APF concludes with the next set of Government priorities, which are to:

- 1. Revise guidance to the CAA on its environmental objectives in relation to Air Navigation functions.**
- 2. Work with the CAA to develop the concept of noise envelopes, aiming to produce guidance, which can be used for future airport expansion proposals.**
- 3. Review guidance to Airport Consultative Committees.**
- 4. Allow the Airports Commission to complete its work and publish an interim report by the end of 2013 and publish its final report by 2015.**

The AOA has provided ratings and comments against the 25 criteria put to the Government to develop an integrated policy framework for UK aviation throughout this paper. The table below re-provides this summary and also details the actions we expect Government to deliver on going forwards.

The AOA appreciates that it is not always possible to move forward every activity in concert, but a work plan that makes clear that it is the Government's intention to be proactive in those areas that cannot be taken forward immediately, will help to provide clarity and reassurance that this intention is delivered.





A NEW PLAN TO MOVE THE APF FORWARDS

In the table in the Executive Summary, the AOA suggests actions Government should undertake to ensure their aviation policy is successful. We have identified the following priorities:

- **Urgent need to resolve the negative impacts on economic aviation growth of APD**
- **Taking action to resolve the planning processes to support airport development subject to sustainability criteria being met**
- **Need for DfT to ensure a joined up approach to aviation across differing Government departments**
- **Address the passenger experience recommendations to ensure airports can deliver acceptable levels of customer service**
- **Work with the industry to enable the noise and carbon reduction potential identified in the Sustainable Aviation Road-Maps**

APPENDIX A: A SUMMARY OF THE APF

The Government's Aviation Policy Framework 2013 (APF) replaces the Air Transport White Paper published in 2003.

The APF sets out the Government's high-level objectives and policies on aviation and brings together many work-streams and activities. It covers the issues that affect aviation in depth by looking at air travel as an economic enabler, demand for aviation and connectivity. It also looks at the external environment that aviation operates in with climate change; noise and local and community relations important considerations as well as the planning framework, which is the process where economic, social and environmental concerns most commonly meet.

KEY OBJECTIVES STATED IN THE APF

- To ensure that the UK's air links continue to make it one of the best connected countries in the world. This includes increasing our links to emerging markets so that the UK can compete successfully for economic growth opportunities.
- To ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions.
- To limit and where possible reduce the number of people in the UK significantly affected by aircraft noise.
- To encourage the aviation industry and local stakeholders to strengthen and streamline the way in which they work together.

THE NEW ROLE OF GOVERNMENT

One of the key distinctions made by the Secretary of State for Transport in the foreword of the report is how this policy framework differs from the approach by the previous Government. They state:

"The role of Government has also changed in the past decade. The 2003 Air Transport White Paper set out in detail which specific development would be supported at particular airports across the UK. The Aviation Policy Framework does not seek to do this. It sets out the Government's objectives and principles to guide plans and decisions at the local and regional level to the extent that it is relevant to the area".

THE ECONOMIC CASE FOR AVIATION

In recognising the strong benefits of aviation to the economy; trade;

employment; cultural exchanges; tourism and growth the Aviation Policy Framework (APF) puts forward a good case for expansion at every airport in the UK, with the jury still out on the South-East of England until the Airports Commission concludes its findings in 2015. It also sets out the Government's wider ambitions for the UK to achieve economic growth, attract 4 million more tourists and to enable business to compete more effectively in international markets.

The APF recognises the contribution aviation makes to the economy from the premise that the UK is an island nation that has always prospered and benefitted from international trade. The policy framework also sets out the importance of aviation 'as an enabler of activity in many other sectors of the economy', as well as contributing directly to GDP, employment and providing cultural links.



The APF summarises the benefits of aviation to include:

- **Aviation's £28bn turnover generating £10bn of economic output and 120,000 direct jobs in the UK.¹⁷**
- **Air freight transported by air to non-EU nations, worth £116bn, representing 35% of the UK's extra-EU trade by value.**
- **Express freight alone contributed £2.3bn to UK GDP in 2010; facilitates £11bn of UK exports a year and employs 38,000 directly whilst supporting 43,000 jobs in other parts of the economy.**
- **UK airports provided air travel to over 50 million business passengers in 2011 and provided direct access to over 360 international destinations¹⁸.**
- **Goods worth £115bn were shipped by airfreight between the UK and non-EU countries in 2011 accounting for 35% of the UK's extra-EU trade by value.**

The APF also stresses the benefits of sectors associated and inspired by a thriving air transport sector such as the UK being home to the largest aerospace industry in Europe, in addition to contributing to productivity and growth through tourism. General and Business Aviation, is also estimated to contribute £1.4bn to the economy each year. In general, aviation is recognised as improving connectivity; lowering transport costs and facilitating quicker deliveries as well as facilitating inward investment and the movement of goods, people and ideas both within the UK and to and from the rest of the world.

The APF cites the Government's ambitious tourism policy¹⁹, which aims to attract four million extra visitors to England alone over the next four years, this is set out in the Department of Culture Media & Sport (DCMS) paper; the Government Tourism Policy. The APF states that; *'overall the Government believes continuing to make UK tourism more attractive is a better approach both for residents and attracting new business'*.²⁰

The APF sums up well the scale of the challenge ahead with pressures on existing airport capacity already being felt. The UK hub airport for example, reached capacity in 2011 and has seen

the number of destinations it serves fall from 175 in 2006 to 157 in 2010. This is a worrying trajectory, but whilst there is still room at other airports in the South East passengers will continue to find other ways to get to their destinations.

Capacity constraints remain in sharp focus for the long term as even under the cautious growth forecasts in the APF of between 1 – 3%, airport capacity is expected to be reached at all major airports in the South East of England as well as Birmingham, Bristol, East Midlands and Manchester by 2030.

The APF seems in many senses to set out an almost overwhelming case for airport expansion, but the document stops somewhat short of reaching such a clear conclusion. For now, the Government will focus on the other matters outlined in the APF and there are some real opportunities for improvements in the issues and work streams highlighted and the AOA is keen to see progress move ahead quickly.

**SUPPORTING AIRPORTS
ACROSS THE UK**

The APF recognises the importance of regional airports and the contribution that they make to the spread of economic opportunities throughout the UK. It provides examples of airports

¹⁷. pp. 16, Turnover, economic output (GVA) and employment figures are from Annual Business Survey, ONS, 2011 (provisional), Section H: Transport and Storage, adding SIC 51 (air transport) and SIC 52.23 (service activities incidental to air transportation)

¹⁸. pp. 27, Aviation Policy Framework, 2013

¹⁹. Government Tourism Policy, DCMS, March 2011

²⁰. pp. 19, Aviation Policy Framework, 2013

that contribute to their local economies through direct jobs and by being an integral part of growth plans through Local Economic Partnerships (LEPs) and Enterprise Zones. Examples cited include Aberdeen Airport; Birmingham Airport; Bristol Airport; Leeds Bradford International Airport and Manchester International Airport.

The policy framework makes clear that the Government supports the growth of airports in; Northern-Ireland, Scotland, Wales and airports outside the South-East of England:

The recently published Aviation Strategy, by the House of Commons Transport committee has gone a step further and offered a preferred way forward in its Aviation Strategy where it sets out that additional capacity is required at the UK's hub airport. This committee examined a number of options and does not believe the time is right to build a new hub airport in the Thames estuary as it would require significant public sector investment to make it commercially viable. It also identifies environmental problems and states this would only be viable if Heathrow were to close. It has sympathy towards Gatwick's ambitions to expand and supports a business case being developed for this, but believes this will not be an alternative to expanding the UK's hub airport²¹.

AIRPORTS COMMISSION

The APF sets out how the Airports Commission fits into the context of UK aviation policy making. It explains that this body was established to determine how the UK could maintain its status as a global aviation hub, as well as making best use of capacity in the shorter term. The APF dove tails into the Airport Commission's work by setting out the parameters in which the Commission must work.²²

AIR CONNECTIVITY TO LONDON

The APF sets out the Government's policy in relation to protecting aviation connections into London through Public Service Obligations (PSOs). It states that it will be inclined to support applications by regional bodies to establish PSOs that comply with EU law. The document goes on to make clear that when judging whether a PSO application from a Devolved Administration or Local Enterprise Partnership should be supported, the five main London airports will be considered as a whole suggesting that connections to the UK hub will not be considered as a higher priority than connections to the UK capital.

CONNECTIVITY

Connectivity is highlighted as an important priority in the APF.

Hub airports are highlighted as providing connections to a combination of destinations and providing higher frequency of flights to and from destinations. Good connectivity is viewed as important to sustain clusters of high-value industries such as the financial, legal, IT consultancy and business management sectors, which are knowledge intensive and increasingly global in their outlook.²³

The APF states that the UK is currently one of the most well connected countries in the world, with direct connections to over 360 international destinations. It stresses that demand for airport capacity is highest in the South-East of England with two-thirds of all aviation passengers travelling from one of the five London airports (Gatwick, Heathrow, London City, Luton and Stansted). It also reports that airports outside the South East serve nearly 150 destinations in mainland Europe.

²¹. Aviation Strategy, House of Commons, Transport Committee, first report of session 2013-14, Volume 1

²². pp.8, Aviation Policy Framework, 2013

²³. Aviation Services and the City - 2011 update, City of London Corporation, January 2011

FUTURE CONNECTIVITY

The APF recognises that the success of the UK economy depends on the UK's continued ability to be able to connect with the countries and locations that are of most benefit to the economy. It emphasises the importance of maintaining existing links as well as growing connections to emerging economies to allow the UK to remain competitive in the global economy.

The document touches on the levels of connectivity and notes that there has been an increase in the number of flights to emerging economies over the last decade with the total number of flights to Brazilian, Russian, Indian and Chinese (BRIC) economies more than doubling²⁴. In addition, the number of destinations served by the UK hub airport has fallen from 175 in 2006 to 157 in 2010 but there remains scope for expansion at other airports to expand and serve a broader range of destinations. DfT commits to monitoring these trends over time to determine the impact on overall connectivity.

AVIATION DEMAND FORECASTS

The APF sets out that the DfT expects demand for aviation to grow at a slower rate than it has over the last 40 years with a growth rate of between 1 - 3% over the next 15 years. Even at this lower level of growth it is anticipated that all the major airports in the South East of England as well as Birmingham, Bristol, East Midlands and Manchester will be full by 2030. Heathrow reached its maximum capacity in 2011.

SECURITY

The focus on security and borders in the APF is quite limited.

IMPROVING PERFORMANCE, RESILIENCE AND THE EU PASSENGER EXPERIENCE

The APF outlines a number of other areas where the Government is keen to see improvements delivered in the operation, management and rules governing aviation. These include:

- Improving performance, resilience and the passenger experience by taking forward the recommendations of the South East Airports Taskforce (SEAT) through:
 - working to deliver improvements at Heathrow through operational freedoms. The results of a trial that was overseen by the CAA will be consulted on later in the year before any decision is made on whether to make these changes permanent.
 - End the Cranford agreement to improve operation and distribute noise impacts more evenly. A planning application is anticipated by Heathrow Airport Ltd to implement these changes.
 - The CAA is expected to take forward the recommendations on airport performance charters and capacity utilization, which was recommended by a working group of the South East Airports Taskforce. The charters are intended to motivate an airport to take decisions based on the interests of the whole airport system by setting out the level of service that airlines should expect to receive.
 - US pre-clearance – the Government will seek to introduce US pre-clearance at UK airports, which could improve the overall

²⁴. pp28, Aviation Policy Framework, 2013 and DfT analysis of CAA Statistics, 2011



- passenger experience for those travelling to the US.
- Border controls – the Government has committed to improving efficiency at the UK's borders and to rolling out the UK's registered traveller IRIS (Iris Recognition Immigration System) from spring 2013.
 - Supporting passengers during disruption at airports – airlines have obligations under EU law to ensure passenger welfare. The CAA is working to ensure compliance.

ENCOURAGING NEW ROUTES AND SERVICES

The APF sets out some of the advantages that have been gained from the liberalisation of air services and notes in particular the impact that this has had on the range and cost of flights. The UK Government has developed new relationships with China, Vietnam and Indonesia and is looking to update agreements with Russia, and Egypt.

The DfT are also working with the European Commission and other Member States to seek liberalised air transport agreements with other nations to allow UK airlines greater access to foreign capital and greater freedom to invest in foreign airlines.

BUSINESS AND GENERAL AVIATION

The APF recognises the importance of business and general aviation to the UK. Its value to the UK economy is estimated at £1.4 billion per annum. The APF also importantly recognises that this sector delivers *'vital services, including search and rescue, mail delivery, life-saving (organ) transport, law enforcement, aerial survey and environmental protection flights, as well as underpinning the training of future pilots, ground-based aircraft engineers and technicians.'*

INTEGRATING AIRPORTS IN THE WIDER TRANSPORT NETWORK

The APF outlines the projects already underway to improve surface access links to airports including the Thameslink services to Gatwick and Luton, delivery of electrification in the North of England and a new funding line between the Great Western Main line and Heathrow, delivering improved connections from the Thames Valley to the West of England and Wales. The DfT is also working with the rail industry to identify further opportunities to improve rail surface access.

The APF also refers to a number of projects that are underway to improve surface access such as projects at Luton and Doncaster Airports that have received funding through the Regional Growth Fund (RGF). In addition, there are road improvements that are underway and planned which will help improve journey times to East Midlands and Heathrow Airports.

DELIVERING A NATIONAL HIGH RAIL NETWORK

The Government sets out its ambition to deliver a new High-Speed Rail line providing linking services to Manchester, the East Midlands, South Yorkshire and Leeds, which overall reduce journey times to Scotland, the North-West, South Yorkshire and Leeds.

In relation to High-Speed 2, the Government is awaiting the report from the Airports Commission and has put work on the Heathrow spur, on hold until this time.

ENVIRONMENTAL IMPACTS

CLIMATE CHANGE

The APF notes that the aviation sector is responsible for 1 to 2% of global greenhouse gas emissions. In the UK, aviation accounts for 6% of total

emissions and 22% of the transport sector's emissions. The majority of transport sector emissions come from automotive at 40%²⁵.

The APF goes on to state that carbon dioxide emissions pose the greatest risk to climate change in the longer-term and that the '*complexities of atmospheric chemistry mean that the total impacts of aviation are greater than those from its CO₂ alone*'. The APF also recognises that non-CO₂ aviation emissions can have both cooling and warming effects on the climate and there is no consensus on how to mitigate negative impacts. The Government's focus therefore remains on CO₂ emissions, whilst at the same time supporting efforts to understand non-CO₂ impacts.

The Government's desire to see UK aviation make a significant and cost effective contribution towards reducing climate change is set out in the APF with an emphasis on global action, with action in Europe alone as the next best option.

The Government has deferred the inclusion of aviation in the Climate Change Act 2008 until June 2016 and signalled its opposition to setting a national target for UK aviation emissions at this time, preferring instead to allow international negotiations on EU Emissions trading to conclude.

The APF also describes the activities that are underway at the International Civil Aviation Organisation (ICAO) including the global aspiration of carbon neutral growth from 2020, through the use of technology, operations, alternative fuels and economic efficiency and progress towards a global market based measure for addressing CO₂.

On the progress of the EU Emissions trading scheme, which aviation is part of as a prelude to a global scheme the APF outlines using emissions data from between 2004 - 2006 aviation had an emissions cap of 97% in 2012 stating

this will fall to 95% in 2013. Airlines affected by the scheme, have the option of reducing emissions or purchasing carbon-credits to allow them to exceed their allocation. '*The Government believes that the EU ETS is a cost-effective means of achieving a specified level of emissions*'²⁶.

The Government also explains that they expect UK aviation to find it more difficult than other sectors to reduce emissions and recognise that this will lead to aircraft operators buying credits from other sectors in the short to medium-term.

The APF rejects calls to introduce aviation taxation on fuel, due to international and European agreements on aviation, which rule out VAT on international flights.

It also refers to the move by the Government in 1994 to introduce the revenue raising Air Passenger Duty (APD) because at the time aviation was perceived to be under-taxed.

The Government signals its support in the APF for the Future Aviation Strategy (FAS) which aims to introduce new systems and technologies that lead to better management of existing airport capacity. The CAA is leading the strategy and is required to authorise and consult on any changes to flight paths. It is also up to industry to fully implement the improvements through the use of new equipment and management techniques.

The Government welcomes the industry's extensive programme to halve noise and emissions from aviation by 2050 through technological improvements, encouraged by carbon trading and other economic factors. The APF urges the industry to strive towards these objectives and over time to raise its level of ambition.

On environmental information and reporting, the Government signals its support for greater transparency

²⁵. Domestic and international aviation emissions on the basis of bunker fuel sales in the UK to the aviation sector. UK Greenhouse Gas Emissions, Department of Energy and Climate Change, 2011.
²⁶. pp 43, Aviation Policy Framework, 2013

and welcomes the work already done by industry to provide consumers with information through Corporate Responsibility reports.

NOISE

The APF recognises that noise is the main concern of residents close to airports and as England has one of the highest population densities in the world it is inevitable that aircraft noise is a particular issue.

The APF clarifies the Government's policy approach on noise, which is to be consistent with international approaches and to ensure compliance with relevant European laws. **It is the Government's overall goal to limit and where possible, reduce, the number of people in the UK significantly affected by aircraft noise.**

Furthermore, the positive economic impacts of a growth in flights should be shared with the local community. This means that the industry must *'continue to reduce and mitigate noise as airport capacity grows'* and when noise levels fall with technology improvements the aviation industry should be expected to share the benefits of these improvements.

The APF acknowledges the work done by the industry to develop the Sustainable Aviation Noise Roadmap to demonstrate the industry's work-plan to reduce aviation noise emissions from aviation up to 2050 and also notes the UK success in contributing to new technology that limits noise impacts. One such example of this work is the A380 aircraft, which recently won an award from the Noise Abatement Society for its innovations in quiet technology.

Role of Government

In addition to setting the overall policy for aviation noise, the Government also has powers to set noise limits at airports that it designates for noise management under the Civil Aviation Act 1982.

Heathrow, Gatwick and Stansted airports have been designated for many years for these purposes and will continue to retain this status.

The APF highlights that other airports can have noise controls set locally and suggests that some Local Authorities may wish to consider whether to set controls as part of a planning condition on a new airport development.

Noise Action Plans

Airports that are required to produce Noise Action Plans under EU legislation should do so at least every five years when plans are reviewed. In addition, the Government commits to continuing to produce noise exposure maps down to a level of 57dB LAeq 16 hour and they also intend to extend this to ensure separate night noise contours are produced for designated airports for the eight-hour period between 11pm – 7am.

The Airports Commission has already recognised that there is no firm consensus on the ideal way to measure the noise impacts of aviation. The DfT will therefore keep its approach under review.

Land-use planning and management

The Government's National Planning Policy Framework (NPPF) expects local planning policies and decisions to ensure that new developments are appropriate for a location. This means considering the effects of an amenity on noise, health and the natural environment. It does not mean that a development cannot occur in an area that experiences aircraft noise. The APF makes clear there can be good economic or social reasons for noise sensitive developments.

Importantly, it also highlights that people considering moving to an area, which may be affected by existing aircraft noise, have a responsibility to inform themselves of the likely impacts before moving.

The APF makes clear that the Government places the highest priority on noise over and above all other external aviation impacts. This means that airport operators and airlines are encouraged to reduce noise even if this results in higher carbon dioxide emissions. Where this does occur industry is encouraged to capture the data and to ensure this is fed into an overall sector approach.

The APF also highlights that residents have a duty to inform themselves about local airport noise impacts before moving to an area.

Measures to reduce and mitigate noise – the role of industry

The APF states that the Government believes that UK airports should place the highest priority on mitigating noise impacts in the local area, even if this results in greater emissions (with the exception of mandatory EU air quality targets). Any negative impacts that noise control measures have on CO₂ emissions should be tackled as part of the UK's overall efforts to reduce aviation emissions.

The APF outlines the measures that the Government would like the industry to consider using to provide incentives to quieter aircraft. These include:

- Using powers and proportionate penalties to set and enforce suitable noise controls, such as departure noise limits, minimum height requirements, noise-preferential routes, and continuous descent approach.
- Differential landing charges for quieter aircraft.

The Government has asked the CAA to investigate the use of differential landing charges and they will be publishing the outcomes of these findings later in the year.

Noise Envelopes

The APF states that the Government would like to take forward the concept of noise envelopes to give certainty to local communities and airports on how they can use their airports.

Airspace

The APF sets out the Government's preferred approach to airspace management as being; to limit the number of people affected by aircraft noise, through reducing the number of flight paths, except in close proximity to airports, where through discussion it has been agreed with local communities to share noise on an equitable basis. Where noise is shared, those planning how airspace is used should ensure predictability is afforded, where possible. Further guidance will be available when the DfT updates its guidance to the CAA on environmental objectives.

Information

The APF explains that the Government expects airport operators to work with local communities to help them understand noise impacts and their performance against targets.

Night Noise

The APF identifies night noise as the least acceptable form of aircraft noise, whilst also recognising that certain flights, such as freight may only be viable if they operate at night. For that reason, the Government expects the industry to use 'best in class' aircraft to reduce the effect of aircraft noise and welcomes voluntary approaches by the industry such as the 4:30am curfew at Heathrow preventing aircraft landing before this time.

Noise insulation and compensation

The APF sets out the circumstances where airport operators are expected to help households move, or offer help with

acoustic insulation.

- Those experiencing noise levels in excess of 69LAeq, 16h or more, should be offered assistance moving.
- Schools and hospitals exposed to 63 db LAeq, 16 hours or more should be offered acoustic assistance.

Where no scheme is in place airport operators should consider implementing one. Where expansion plans are being considered compensation schemes should be reviewed to ensure they are offering appropriate levels of support. Airports operating night flights may wish to consider a specific scheme.

General and Business Aviation

The APF draws a distinction between smaller aerodromes used for Business and General Aviation and believes it would not be appropriate for the Government to intervene to set noise levels at smaller aerodromes.

AIR QUALITY AND OTHER LOCAL ENVIRONMENTAL IMPACTS

The APF stresses that the Government is committed to full compliance with European air quality standards and before taking any decisions on new airport capacity they will want a full understanding of the local environmental impacts of such proposals.

WORKING TOGETHER

The APF recognises the importance of positive and proactive community relations between airport operators and those who live in close proximity to airports. The APF aims to encourage the aviation industry and local stakeholders to continue to work together whilst strengthening and streamlining the way that they work.

It makes specific recommendations to achieve this, including to:

- review relevant committee membership and terms of reference

to ensure full representation and to remove duplication.

- review consultative timetables to align issues where possible and to reduce the burden on those responding.
- combine Air Surface Access Strategies into published master plans.

AIRPORT CONSULTATIVE COMMITTEES

The Government intends to update the guidance to Airport Consultative Committees, with the aim of helping them work more effectively. The guidance will remain flexible, proportionate and non-prescriptive and will consider how the CAA might support the work of consultative committees. One change the Government is specifically looking at is ACCs playing more of a role in the noise management process.

AIRPORT MASTER PLANS

Thirty airports in the UK have Airport Master Plans. The APF encourages airports to continue to produce these and to update them on a five yearly basis. Where possible master plans should coincide with Noise Action Plans and Surface Access Strategies to reduce the burden on those commenting.

AIRPORT TRANSPORT FORUMS

All airports in England and Wales with more than 1,000 passenger air transport movements a year are advised to set up air transport forums.

AIRPORT SURFACE ACCESS STRATEGIES

The APF recommends that Air Transport Forums and Airports should produce airport surface access strategies setting out targets for:

- Increasing the proportion of total journeys to and from the airport by public transport.

- The strategy to achieve those targets.
- A system for the forum to oversee the implementation strategy.

The APF also states that the Government will work with the AOA and individual airports to play an oversight role in surface access developments and to continue to hold best practice forums on surface access.

IMPROVING INFORMATION

The APF explains the new role that the CAA has in ensuring that good information is in the public domain about the environmental effects of civil aviation. The CAA will shortly publish a document of policy on how it will take forward these functions. This will be the subject of a public consultation

PLANNING

STATUS OF THE AVIATION POLICY FRAMEWORK

The Government clarifies the status of the Aviation Policy Framework in relation to planning. Aviation policy is approached from a national perspective as a resolved matter, while planning and surface access policies are devolved. Where the framework deals with matters that are devolved it is with the consent of the relevant administrations in Belfast, Edinburgh and Cardiff.

It clarifies that the APF replaces previous Government guidance and associated documents on aviation, these documents are:

- Air Transport White Paper, 2003
- Guidance on the Preparation of Airport Master Plans (DfT, July 2004)
- Airport Transport Forums – Good Practice Guide (DETR, April 2000)
- Guidance on Airport Transport Forums and Airport Surface Access Strategies (DETR, July 1999)

The APF is likely to be affected by the

outcome of the Airports Commission, the APF states that when the Commission publish their report the Government will draft and consult on a National Policy Statement for Airports. The Government has also asked the Commission to provide materials to support the preparation of this statement to accelerate the resolution of any future planning applications.

SAFEGUARDING

The APF explains that it is the role of Local Authorities to 'identify and protect' sites and routes that could be critical to developing infrastructure to widen choice. This is stated in the National Planning Policy (NPPF). The APF states that this part of the NPPF, could be applied to airport infrastructure and that land outside existing airports that may be required for airport development in the future needs to be protected from incompatible development until the Government has published its response to the Airports Commission.

The APF also explains that airport operators affected by DfT Circular 01/2003 are required to maintain safeguarding maps, which reflect potential proposals for future developments. This will ensure that the operator is contacted by the Local Authority in the event that a planning application is made that potentially affects the airport operation or future growth.

SURFACE ACCESS

The APF states that proposed airport investment or expansion must be accompanied by surface access proposals that demonstrate how the airport will ensure ease of access to the airport for passengers and increase the use of public transport. The practice has grown over the years that where there has been an airport development the airport operator has also delivered new public transport infrastructure.

**APPENDIX A:
A SUMMARY OF THE APF**

The Airports Commission is also examining surface access infrastructure as part of its work on international connectivity.

PUBLIC SAFETY ZONES

The APF sets out the principle that the Government does not want to see an increase in the number of people living, working or congregating in Public Safety Zones, the areas of land at the ends of runways and the busiest airports. The details of how this is achieved is set out in DfT Circular 01/2010, Control of Development in Airport Public Safety Zones.

ENTERPRISE SAFETY ZONES

The APF explains that a number of Enterprise Zones and 24 Local Enterprise Partnership (LEP) have been established across England. The APF describes how some LEPs have integrated aviation into their local plans and where Enterprise Zones have been established around Manchester, Newquay and Cardiff airports they have seen success in attracting interest from businesses and overseas investors.

The Government would like to see airport operators engaging actively with their LEPs to ensure they are integrated into their LEPs overall economic strategy and maximise local benefits to the economy.



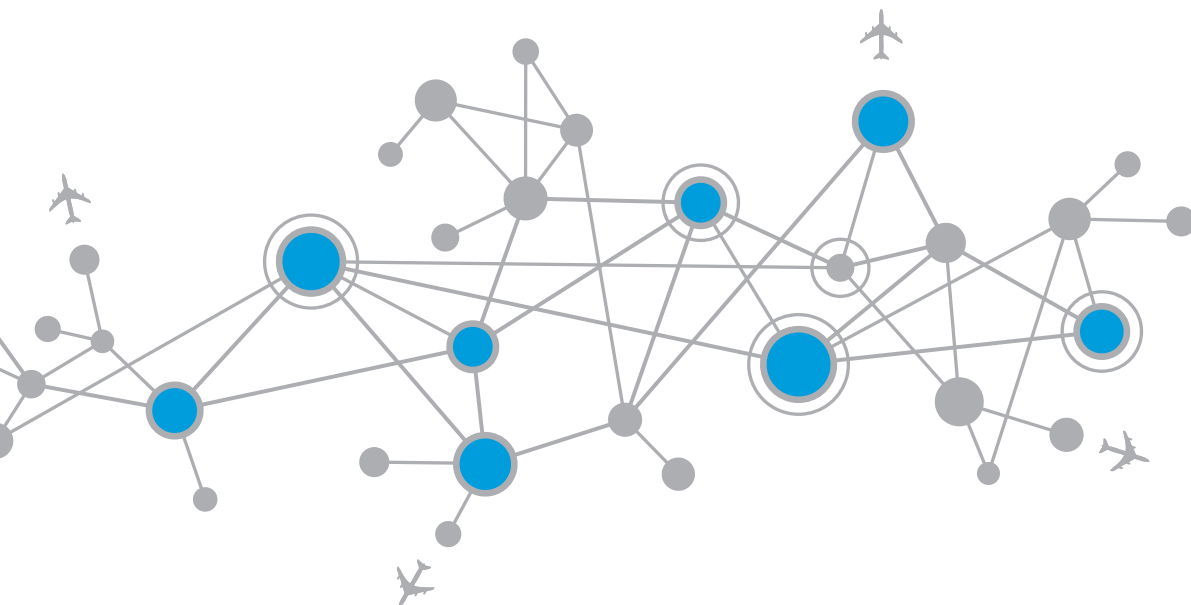
APPENDIX B: EXTRACT FROM THE AOA RESPONSE TO THE DFT NIGHT FLYING REGIME CONSULTATION FOR AIRPORTS DESIGNATED FOR NOISE (APRIL 2013)

Night flights occur today in response to a need from the public and businesses for a range of reasons as summarised below.



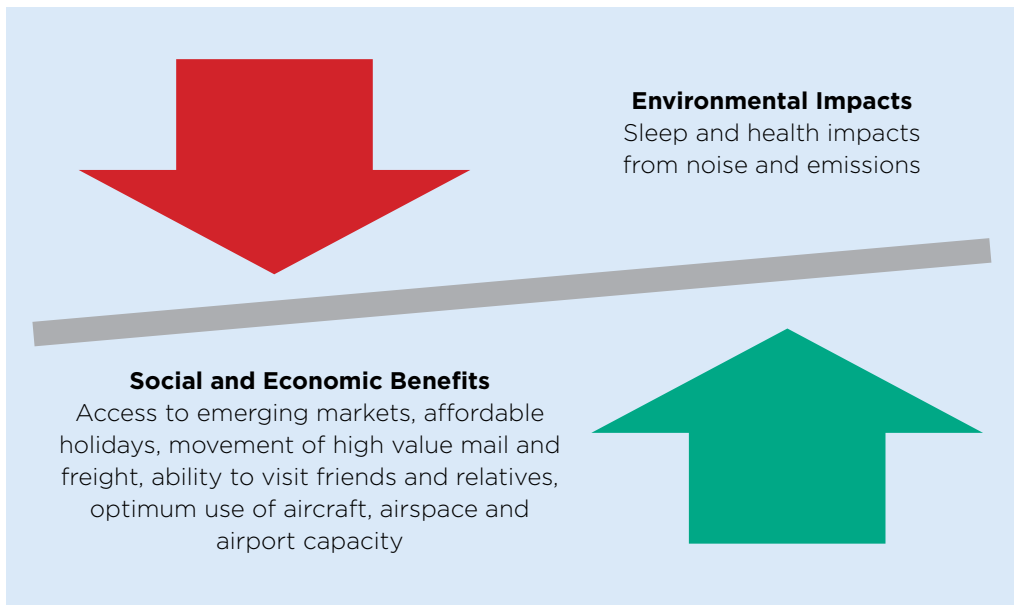
APPENDIX B:
EXTRACT FROM THE AOA RESPONSE TO THE DFT NIGHT FLYING REGIME
CONSULTATION FOR AIRPORTS DESIGNATED FOR NOISE (APRIL 2013)

- The UK public and businesses generate demand for express mail deliveries, especially delivery of critical medical supplies, 1st class mail and urgent machinery parts. Without night flights in the UK we would lose the ability to provide a 1st class mail service to all parts of the country.
- In response to customer requirements, UK and non UK businesses require the movement of larger air freight at night because there is not sufficient capacity or ability to move it during the day. Examples of goods that rely on air freight are perishable products such as fresh fruit and vegetables, technology products such as mobile phones and TV and audio equipment.
- The UK public rightly demand the opportunity to have an affordable holiday. To enable this however airline operators need to operate their aircraft as efficiently as possible, including flying during the night. No night flights is likely therefore to result in more expensive foreign holidays.
- The UK public and businesses rightly demand the ability to fly from the UK to the rest of the world. Accommodating large time zone changes and time restrictions at non UK airports means airlines need to arrive early in the morning or depart late in the evening from the UK. No night flights and current capacity limits are likely to reduce access to key business destinations in the Far East.
- The aviation industry needs to spread public and business travel demand to meet capacity limits and ensure efficient use of aircraft over a full 24 hour period. Operating at times of the day where capacity permits and flying the aircraft for as long as possible is key to achieving this. Given the current capacity constraints at some major UK airports this requires night flights.
- Some night flights occur in response to emergencies. The critical needs for these flights speak for themselves.





The AOA believes a more balanced discussion regarding night flight operations in the UK is required. This needs to be fact based and fairly reflect both the positive and negative effects of night flights. The AOA is all too aware of the negative impacts of night flights as the Government has detailed in its consultation on the night flying regime for the three designated London airports. However, there is regularly a loss of the economic and social benefits these flights enable in the debate. The diagram below summarises this picture.



The AOA fully respects the need to be a good neighbour and accepts that noise disturbance from night flights is seen as the most significant impact to some people living close to airports. In recognition of this the AOA is taking direct action through its full support to the commitments made in the Sustainable Aviation Noise Road-Map. This means that although there will be more flights, the planes will actually be even quieter than they are now.

Respecting these commitments, the AOA expects Government and Local Authorities to engage with us and our members to responsibly manage and develop night flights moving forwards.



APPENDIX C:

DELIVERING AN INTEGRATED AVIATION POLICY FRAMEWORK – THE NEXT STEPS

Recommendation rating	The AOA APF Recommendation	Assessment of the APF against the AOA recommendation	Actions Government must undertake from 2014 onwards
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RECOMMENDATIONS ON AIR PASSENGER DUTY AND RED TAPE

1	Consider urgently conducting macro-modelling work on APD's effects on the whole UK economy.	The policy paper is dismissive of the effects of APD on the economy, stating only that it is a matter for the Treasury.	The Department for Transport urgently needs to review evidence of APD impact on UK economy and tourism and work with the Treasury to develop an action plan to address negative economic impacts and risks.
2	Refrain from any further increases in APD, with immediate effect.	The Government has recently implemented increases in APD. There are no further increases planned, but neither is there any work underway to understand that impact of the current APD levels on the UK economy. Instead the Government is fire fighting responding to issues as they have a clear negative impact, such as in Northern Ireland where APD has now been devolved.	The Treasury must halt further APD rises until the review and action plan recommended above are developed and implemented.
3	Track regulatory "ins" and "outs" for key economic infrastructure sectors like aviation.	Work underway in BIS to address the impact of regulation on airports	Continue to deliver against current set up
4	Create a Joint Task Force, focused on cutting unnecessary regulation, to work in partnership with the aviation sector.	Task force established by BIS to address the impact of regulation – AOA Red Tape Working Group. BIS committed to working with industry to lobby other departments and seek changes in priority areas.	Integrated Aviation approach across Government, led by DfT DfT to strengthen its activities on the liberalisation of air services and to report back on the progress made in the interim report on the APF. DfT to move from a role as a monitor of connectivity to proactively address gaps in UK connectivity.

Recommendations on a framework for Airport Growth

5	Revise the Aviation Policy Framework (APF) to signal clearly support for sustainable airport development (see Annex).	The APF clearly states support for the sustainable growth of airports throughout the UK.	Publish an implementation plan for the APF goals and objectives clearly setting milestones and a six month review process. Promote APF to local authorities Update the APF following interim and final reports from Airports Commission Update the APF to reflect the National Policy Statement for Airports
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APPENDIX C:
DELIVERING AN INTEGRATED AVIATION
POLICY FRAMEWORK – THE NEXT STEPS

Recommendation rating	The AOA APF Recommendation	Assessment of the APF against the AOA recommendation	Actions Government must undertake from 2014 onwards
6	Incentivise Local Enterprise Partnerships to carry out high quality analysis of future aviation needs.	The APF provides highlights that there is scope for LEPs to <i>'develop local strategies to maximise the catalytic effects of airports.'</i> In addition, the Government encourages airport operators to work with LEPs to ensure that airports are fully integrated into the LEP's overall economic strategy for the area. AOA is pleased that there are 12 UK airports that are already closely involved with their LEPs. ²⁷	Monitor progress and intervene where required
7	Ensure Local Authorities integrate Airport Master Plans in their Local Plans	The APF recognises that Local Authorities should have regard for policies and advice issued by the Secretary of State and in particular the National Planning Policy Framework (NPPF), but the document does not go far enough. It does not provide the clarity and certainty that is needed for large-scale infrastructure investments such as airports. DCLG should be integrated into this report. There is little point DfT describing the planning world around them, they should be trying to make it work most effectively for transport. That means engaging with DCLG, which has responsibility for planning.	The Department for Transport should send the Aviation Policy Framework to all relevant Local Authority planning departments with a cover letter from the Secretary of State for Transport pledging the Government's support in principle for airport expansion that complies with the National Planning Policy Framework (NPPF). The NPPF states a clear presumption in favour of sustainable development and any airport which wants to grow and meets the NPPF's checks and balances, including sustainability criteria, should be able to do so.
8	Ensure the Sir Howard Davies Independent Commission on the UK's hub status considers all options thoroughly; takes wide advice from experts throughout the country in industry, business and academia; gives clear direction in its 2013 Interim Report; and presents a clear way ahead by its final deadline of 2015.	The Airports Commission work is underway with publication of numerous discussion papers and initial public evidence sessions. It has established a wide ranging expert advisory panel. The Aviation policy framework makes clear reference to it. The APF also provides a clear steer that additional airport capacity is required in the UK. The Airports Commission will also deliver its interim report in 2013 with the final report delivered in 2015.	Update the APF following interim and final reports from Airports Commission
9	Commit to acting on the Independent Commission's advice.	The AOA have not received confirmation from all political parties that they will commit to action on the Airports Commission advice. The Conservatives have said that they hope and expect to implement the findings of the Commission. The Lib Dems and Labour have not committed to a position yet.	Both parties in the Coalition Government need to back their own Commission. AOA would expect all political parties to show their commitment to the aviation sector by committing to act on the Commission's recommendations in their 2015 manifestos.

²⁷ Aberdeen Airport; Birmingham Airport; Blackpool Airport; Bristol Airport; Gatwick Airport; Leeds Bradford International Airport; Liverpool John Lennon; London Luton Airport; Manston Kent International Airport; Newquay Cornwall Airport; Newcastle International Airport; Robin Hood Doncaster Sheffield; Stansted Airport.

Recommendation rating	The AOA APF Recommendation	Assessment of the APF against the AOA recommendation	Actions Government must undertake from 2014 onwards
10	Enhance the benefits of Enterprise Zones centred on airports.	The APF highlights the benefits of Enterprise Zones that have already been established around airports and the success that they are delivering, citing Manchester, Newquay and Cardiff as some examples of good practice in this area.	Maintain support for enterprise zones and assist airports where required to realise benefits.
11	Allow greater scope to offset the Community Infrastructure Levy (CIL) for existing buildings.	Not addressed in APF	The Department for Transport should work with the Department for Communities and Local Government to review CIL and its operation in relation to existing airport buildings, and update airports on their conclusions.
12	Accelerate implementation of the recommendations of the Penfold and Killian Pretty Reviews, to speed up and reduce the regulatory burden on planning applications.	Not addressed in APF, although the National Planning Policy framework has sought to reduce red tape in planning application processes.	This issue is not addressed in the APF but the NPPF does seek to reduce red tape. The Department for Communities and Local Government should regularly evaluate the impact of the NPPF to ensure it delivers a more efficient planning application process. It should work together with industry to develop a more responsive planning system that supports Business Aviation and General Aviation aerodromes.
13	Freeze planning fees.	Not addressed in APF	The Department for Communities and Local Government should review planning fees and explore alternative options to make it easier for airports that need to grow, to benefit the local and national economy.
14	Implement financial incentives for Local Authorities to approve applications efficiently.	Not addressed in APF - Matter for DCLG	The Department for Communities and Local Government should explore and implement solutions. As in Recommendation 13, this will enable airports to grow without undue delay.
15	Provide model guidance in the APF on safeguarding, noise and land use planning.	Government to publish guidance on noise in its National Policy Statement in response to the Airports Commission. CAA will also produce guidance on the use and types of noise envelopes. Solutions to improve guidance to Local Authorities to help them control developments around airports to reduce public exposure to noise from aircraft operations around airports remain weak.	The Government must investigate ways of helping potential vendors inform themselves of possible noise impacts close to airports, either through ensuring that noise contours become part of Local Authority/Environmental searches, or through developing a noise certification standard for UK properties.
16	Put in place a low-cost arbitration for planning application validation disagreements.	Not addressed in APF - Matter for DCLG	The Department for Communities and Local Government must treat this as a priority to help ensure an effective planning service that delivers economic growth.

Recommendation rating	The AOA APF Recommendation	Assessment of the APF against the AOA recommendation	Actions Government must undertake from 2014 onwards
17	Raise the trigger threshold for Environmental Impact Assessments.	No activity to underway to examine thresholds for Environmental Impact Assessments. (As this is an EU Directive this would be difficult for the Government to do, unless it is part of its renegotiation with the UK).	This should be a priority so that costly and disproportionate Environmental Impact Assessments do not delay airports growing.
18	Extend its review of rail access to airports, covering information, ticketing, and rail franchises.	Current rail services to airports are not directly considered in the APF despite the need for improvements. The whole range of rail links, including local, express and high speed, should be considered, in particular in policies which emerge from the Airports Commission's recommendations.	The Department for Transport should identify the level of public transport infrastructure connecting UK airports and where there are gaps. They should move towards a more integrated transport network and ensure the surface access projects successfully align airport rail access with airport policy.

RECOMMENDATIONS ON MAKING AVIATION SUSTAINABLE

19	Increase efforts to secure a global carbon-trading scheme and reject unilateral UK targets.	The Government continues to outline its support for global action to address carbon trading and to reject unilateral action. In December 2012 the Government agreed to defer imposing a UK target for international aviation in their carbon budgets to encourage the development of a global carbon trading scheme.	Continue to engage and support industry in need for global solution
20	Incentivise the scale up of aviation sustainable fuels.	The Government are awaiting the outcome of negotiations with the EU Commission on Indirect Land Use Change (ILUC), which affects crops that are grown and the full life-cycle CO ₂ emissions. The APF does not provide the incentives to scale up sustainable aviation fuels.	Following the conclusion of the EU Commission on Indirect Land Use Change, Government departments should work together to ensure sustainable fuels are incentivised as part of review of Renewable Energy Incentive and level playing field with bio-diesel.
21	Incentivise better aircraft technology.	Government has earmarked £1bn investment for a new Aerospace Technology Institute, which will develop new technology for the next generation of aircraft that will be used globally.	Maintain support

Recommendation rating	The AOA APF Recommendation	Assessment of the APF against the AOA recommendation	Actions Government must undertake from 2014 onwards
22	Ensure Local Planning Authorities take a long-term approach to land use planning near airports.	The National Planning Policy Framework makes clear that local planning authorities should 'identify and protect where there is robust evidence, sites and routes which would be critical to developing infrastructure to widen choice.' The APF states that this could apply to airport infrastructure. Airport operators are required by DfT Circular 01/2003 to maintain safeguarding maps to reflect potential proposals for future development of airports and ensure they are certified by the CAA.	The Department for Communities and Local Government must ensure robust land use planning guidance is established and used by Local Authorities and monitor its use and effectiveness

RECOMMENDATIONS TO IMPROVE THE PASSENGER EXPERIENCE

23	Task the UK Border Agency (UKBA) to produce a clear vision and long-term strategy for its activities at airports and provide the resources to deliver it. This should include a more ambitious approach to maximum waiting times to clear immigration.	Relations between UK airports and UK Border Agency are improving and better service level agreements are being agreed. UKBA have announced intentions to become the best in the world and recognise need for national prosperity as well as national security. Selected airports have smart zone checks, which allow people to be pre-checked on low risk routes providing a lighter-touch screening process.	The Department for Transport should take a proactive lead on driving forward airport border security efficiency at UK airports by bringing the UK Border Force; the CAA and industry together and to draw up a work programme that delivers improvements and moves towards an outcomes focused airport security regime.
24	Develop a clear plan to move towards outcomes focused airport security and provide the resources to implement it.	Some security functions have been transferred to the CAA, which provides an opportunity to move towards outcomes focused security, but there is no specific work programme underway either in the DfT or the CAA to move this forward.	The Department for Transport and the CAA must treat this as a priority so that airports can conduct security ever more effectively and have more say over how to achieve the outcomes Government requires.
25	Review thoroughly UK-only security measures with the aim of harmonising them as far as possible with other EU countries.	The US is the main focus of security measure activity in the Aviation Policy Framework. No work is underway to harmonise security measures with other EU countries.	The Department for Transport and the CAA must treat this as a priority if we are to have a more effective security regime.





THE AOA REVIEW OF
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