

**Notes from SASIG Workshop held on 6th February 2019:  
Aviation 2050: Green Paper:  
Internal discussion of SASIG proposed response**

**Introduction:**

This workshop (held in the same meeting room as the morning meeting for members) was designed to facilitate an internal discussion for SASIG members of the Government's consultation document: 'Aviation 2050 - the future of UK aviation'. The consultation was published on 17th December 2018 and will run until 11th April 2019. Further details on this consultation plus access to the document itself and other supporting documents can be seen [here](#).

The Government is seeking views and feedback on this Green Paper which outlines proposals for a new aviation strategy and details the long-term vision for aviation to 2050. SASIG proposes to submit a response and members were asked to contribute their views, comments, thoughts and any ideas which could form part of this overall representative SASIG response.

Head of Secretariat, Chris Cain, presented an initial SASIG position paper which he had developed to the Group to stimulate discussion, highlighting issues of greatest pertinence to SASIG. In his view Chapters 2, 3 and 4 of the consultation document are those of core interest to SASIG members.

It was felt that in comparison to the 2003 White Paper the Aviation 2050 Green Paper is less structured with a tendency to dip in and out of issues in a not particularly coherent way. This seems to reflect DfT Ministers' theological approach to aviation policy which can be summarised as: it is privately run, let them get on with it, and only intervene where there are glaring examples of market failure. This may not reflect reality but it appears to be the starting point for policy. Members were also recommended to read the footnotes as throughout the Green Paper relevant information is not always published alongside the corresponding item.

Members were told that the Department is keen to obtain as many responses as possible and are therefore encouraged to submit their own responses as well as contributing towards the overall SASIG response. The Group's final document should also ensure there is adequate cross-referencing with any individual authority's response which would ultimately help ensure a well-structured and balanced overall final submission from SASIG.

It was agreed that an invite should be extended to a relevant high-level member of DfT – possibly Catherine Adams, Deputy Director, Aviation Strategy - to speak at the next SASIG full members' meeting on 10th July. The Chairman agreed to liaise with relevant DfT colleagues in order to try to arrange this. It was also agreed that it would be most useful to have the corporate backing of the LGA itself. A letter had already been sent to its Chairman, Lord Porter and this would be followed up.

*The following summary notes from the workshop should be read in conjunction with the SASIG position paper which follows these notes.*

## **Chapter 1: Overarching Philosophy and Approach**

Overall the Group felt that the policy timescales given in the green paper did not join up with related policy areas and there was concern all relevant issues would not be dovetailed coherently.

Important issues such as local and national infrastructure, secondary impacts and planning were not adequately covered – SASIG has raised these concerns with Government on previous occasions.

There is also a clear intention to prioritise policy on the airspace change process and concentrate on the needs of the south-east (particularly the expansion of Heathrow) and, again, SASIG had raised this concern before advocating a comprehensive national policy.

Most of all the Group felt that the Government's approach was to leave the responsibility for achieving national aviation objectives almost entirely to individual airport operators without providing a clear framework of policy to help them deliver. There are no clear boundaries given or parameters identified that they could work within and the 'making best use' policy, gives a largely untrammelled outline approval for new capacity on existing airports.

## **Chapter 2: Build a Global and Connected Britain**

It was acknowledged that the UK has an excellent reputation across the globe in terms of its aviation and airspace sector. There is clear evidence connectivity encourages growth in trade and other economic activity and consequently, therefore, enhancing global connections is important. SASIG members considered there is a need for the Government to take a longer term view in the White Paper which follows, rather than focusing principally on the short-medium term and South East as seems to be the case now.

But having made much of the importance of connectivity, the UK's regions must not be allowed to miss out. Global connections from UK regional airports, not just London airports, is therefore important and Government should certainly be encouraging strengthening networks out of a larger regional airport such as Manchester, Birmingham and Edinburgh.

### **Chapter 3: Ensure Aviation can grow sustainably (also refer to Annex D of the green paper)**

It was felt that there was a danger capacity needs would not be well matched to CO<sub>2</sub> emissions (would regional airports be constrained if London airport expansions use up UK aviation's emissions quota) and that other environmental impacts might be addressed generically in policy terms leading to a "*one size fits all*" approach to policy. There is certainly no clear guidance given as to how this could be avoided.

With regard to noise it was felt that the Government had engaged well on this issue and there were some signs of progress but:

- Adoption of WHO standards
- Night noise regimes
- Mitigation and compensation approaches, and
- Safeguarding of land likely to be exposed to unacceptable levels of noise

are all areas where there is no settled policy view. SASIG members also highlighted the impact of additional noise on areas of tranquillity and protected landscape as an important issue that should be flagged in the Group's response.

Noise action plans were considered an important tool but unlike elsewhere in the EU where statutory authorities have a greater role, they have been left to airports to develop and consult upon and adopt. This left open the question of who would be responsible for verifying them. The Group felt this should not be left to local authorities but should sit with another independent public body.

The Group's view seemed to be that it was important that environmental mitigation can deliver enough impact reduction to allow growth needs to be met. The Green Paper also asks for a proposed partnership for sustainable growth balance realising the benefits of aviation with addressing environmental and community impacts but offers no clue as to what these partnerships are or who they are with.

### **Chapter 4: Support Regional Growth and Connectivity**

It was agreed that all relevant processes and ensuing decisions are needed at a strategic level therefore the Government does need to give more direction and better guidelines. For example, what sort of engagement would they look for from local authorities when planning around a new runway and developing the accompanying infrastructure (offices, houses, etc.).

Regions would again be looking for links to the capital (preferably Heathrow), but also direct to overseas destinations and therefore the Government should not be focused on more and more capacity in the south-east, but on helping regional airports to build their route networks.

Airports, ports and the internet were the main forms of international connectivity in the modern global age, and therefore, ensuring the infrastructure they require is fit for

purpose in all parts of the country is a key area of responsibility where Government must now be seen to give more direction.

### **Chapter 5: Enhance the Passenger Experience**

The Group agreed that this was an important issue for the Government to consider but it was not a prime concern for SASIG to consider within its final submission to this consultation.

### **Chapter 6: Ensure a Safe and Secure Way to Travel**

Again, although this topic is, of course, an important one, it holds little in the way of a mainstream focus for Local Authorities.

### **Chapter 7: Support General Aviation**

The profile of General Aviation has enjoyed a resurgence in recent years which, members agreed, was well-deserved. There is currently a lot of pressure on GA airfields to develop. Additionally over the next few years, many military airfields have been identified for closure and these could and should be considered within the boundaries of developing support for GA.

Nevertheless, the green paper delivers little on how the role of smaller regional and commercial airports as opposed to GA airfields, could be expanded and this is felt to be of greater importance overall.

### **Chapter 8: Encourage Innovation and New Technology**

Drones, electric aircraft and the Aerospace Sector Deal were all discussed by the Group who felt that any new technologies should also be tied in with environmental impacts.

### **Annex A: Legislation to Enforce the Development of Airspace Change Proposals**

The Group acknowledged the importance of current work being undertaken by the Government to develop new Airspace Change Proposals.

The SASIG position paper presented by Chris Cain ended with the inclusion of a list of other issues that it is felt the Aviation White Paper should also be addressing aside from the generic questions contained within the green paper.

**Members are now invited to submit any comments, etc. to the Secretariat at: [secretariat@sasig.org.uk](mailto:secretariat@sasig.org.uk) by the 28th February 2019.**

(SASIG Position Paper shown at the SASIG Workshop: 6th February 2019)

# Aviation 2050 Green Paper Consultation

## 1. Overarching Philosophy and Approach

Aviation has an important role to play in the future of our country. It is key to helping to build a global Britain that reaches out to the world. It underpins the competitiveness and global reach of our national and our regional economies. There are many challenges that aviation faces, such as meeting rising passenger demand while addressing environmental impacts and making the most of new technologies. The government supports the growth of aviation, provided that this is done in a sustainable way.

### Key Statements

- As we leave the European Union, the UK's future prosperity depends on our ability to reach out to the rest of the world, to forge new trade links, to connect and compete.
- The UK needs to be well positioned to take advantage of the expected changes to the global economy, which could more than double in size between now and 2050.
- The changing nature of the goods and services we trade means that aviation freight is becoming increasingly significant to the economy, transporting high value, high tech products, medicines and just in time deliveries.
- Infrastructure development is the key to unlocking growth potential; it highlights the need for further capacity – delivered sustainably and in a way that benefits the whole country.
- This is why the government is supportive of the development of a third runway at Heathrow Airport. ....
- It is also supportive of airports throughout the UK making best use of their existing runways, subject to environmental issues being addressed.
- However, there is a need for clarity on what the future framework will be for providing additional capacity to meet demand, while managing environmental and community impacts.

But

- We need to keep asking some fundamental questions. How can we manage the impact of growth on the environment – particularly carbon emissions, air quality and noise?

*“As this consultation makes clear, the government supports aviation industry growth. However, growth must be coupled with steps to mitigate environmental damage such as carbon emissions, noise and air quality. We must also minimise the impact of growth on local areas and make journeys to and from airports cleaner, smarter and quicker”.*

### Strategic objectives:

- Help the aviation industry work for its customers
- Ensure a safe and secure way to travel
- Build a global and connected Britain
- Encourage competitive markets
- Support growth while tackling environmental impacts
- Develop innovation, technology and skills

### Generic Questions

There are seven generic consultation questions which relate to the strategic theme addressed by each chapter: They are as follows:

- How could the **policy proposals be improved to maximise their impact and effectiveness** in addressing the issues that have been identified?
- How should the **proposals described be prioritised, based on their importance and urgency?**
- Are you aware of any relevant **additional evidence** that should be taken into account?
- What **implementation issues** need to be considered and how should these be approached?
- What **burdens, both financial and regulatory**, are likely to need to be managed and how might those be addressed?
- Are there any **options or policy approaches that have not been included** in this chapter that should be considered for inclusion in the Aviation Strategy?
- Looking ahead to 2050, are there any other **long-term challenges** which need to be addressed?

### Draft SASIG Position

- a. Agree with overall approach of supporting sustainable growth.

- b. Recognise need for additional capacity in the South East – acknowledge Parliament’s preference for new runway at Heathrow, but reserve position until judicial review processes complete.
- c. Relationship of NPS vs White Paper needs clarity (e.g. several NIPS).
- d. Support “making best use” approach subject to environmental constraints.
- e. Concerned at continued South East focus in GP +2030 - emphasis should be on development of existing infrastructure in ‘reliever airport’ roles.
- f. Lack of pro-active approach to existing/new capacity outside South East for economic re-balancing.

## 2. Build a Global and Connected Britain

**Aviation is vital to the government’s goal of building a global and connected Britain. The government wants the UK to be best placed to build new connections in rapidly growing aviation markets, and to use our international influence to lead the way on liberalisation, security and safety standards, and environmental measures including robust, environmentally effective emissions reduction measures.**

### Key Statements

- Aviation is vital for building a global Britain that is outward looking and is connected to the world. The UK plays a prominent role in aviation on the world stage. We have:
  - the biggest aviation network in Europe and currently the third largest in the world.
  - the second largest aerospace industry in the world and manufacture some of the most advanced aviation technology.
  - The UK is a leading provider of components within the global supply chain for aviation products.
- Want to use the leverage we have internationally to build connectivity and pursue our objectives on environmental measures and liberalisation.
- The government is working to:
  - maintain and improve the UK’s global connectivity
  - establishing an ambitious new relationship with the European Union (EU)
  - support UK aviation exports, including tackling barriers to aviation-related exports
  - seek more liberalised arrangements, including free trade agreements
  - provide global leadership – working to improve standards

### Additional Questions

How should the UK use its global leadership and international influence to further the aims of the UK aviation sector?

What should the UK's priorities be for strengthening existing connections and establishing links with emerging markets?

### Draft SASIG Position

- a. Recognise and support significance of UK air transport and aerospace sectors and importance of enhancing global connectivity, stimulating exports and retaining global leadership and influence.
- b. Consider greater emphasis needed in promoting a sustainable approach to aviation and taking leadership in this aspect particularly.



### 3. Ensure Aviation Can Grow Sustainably

**Aviation provides significant economic and social benefits to the UK. .... Forecasts show that demand for aviation will continue to rise in the period up to 2050. The government welcomes the industry's future expansion. However, its growth must be sustainable – with affected communities supported and the environment protected. It is therefore vital that the government, the regulator, the industry and other interested parties work in partnership to achieve this shared goal.**

#### Introduction

Government welcomes growth in the sector, but this growth must be sustainable. Achieving this requires a partnership between the government, the regulator, the industry and other interested parties working within a comprehensive policy framework to better manage the environmental impacts of the sector.

The Green Paper consultation:

- outlines the government's preferred approach for developing a framework for sustainable growth and the respective roles for the government and the industry
- makes the case for making the most efficient use of infrastructure, including by considering the system for slot allocation at airports and continuing to support the industry in improving resilience
- describes the approach being taken to modernise airspace to deliver capacity and environmental benefits
- sets out a robust policy framework and package of measures to reduce the harmful effects of aviation on the environment, such as carbon emissions, air quality and noise
- sets out the government's expectations that communities living close to airports should benefit directly from growth

#### Airspace Change:

- Big emphasis on modernising airspace infrastructure. NATS has confirmed that sufficient airspace exists to meet all potential future demands based on new emerging technology.
- Decisions on concentration vs dispersal and respite should be based on local circumstances and informed by local consultation.
- The new Independent Commission on Civil Aviation Noise (ICCAN) is to be asked to help locals understand technical jargon and analysis.
- Lead policy option would allow the Secretary of State for Transport to direct an airport or airspace provider to bring forward an airspace change. DfT and CAA have asked NATS to work with key stakeholders to develop a co-

ordinated implementation plan and timeline for airspace changes (or airspace change masterplan) that will be required in the future in the SE (See Annex)

- Airports should create opportunities for community engagement, especially on surface access, airspace change and noise. The government intends to produce guidance on minimum standards for community funds.

## Climate Change

- International action is the first priority for tackling international aviation emissions. The government will maintain its current policy not to mandate sector specific emission reductions to ensure reductions are made wherever it is most cost effective. Re non-CO2 emissions, the government will continue to review and reassess.
- Planning applications for capacity growth should provide a full emissions assessment and demonstrate that the proposal will not have a material impact on the government's ability to meet its carbon reduction targets (*as per ANPS for Heathrow R3*).
- Airport surface access strategies to set sustainable travel targets which meet government ambition and which are monitored by the respective Airport Transport Forum.

## Noise

- There is evidence that the public is becoming more sensitive to aircraft noise, and that there are associated health costs. *The government is considering the new WHO guidelines, agrees with the ambition to reduce noise and minimise health effects, but wants policy to be underpinned by the most robust evidence on these effects, including the total cost of action and recent UK specific evidence which the WHO did not assess.*
- Consultation on the next night flights regime will start in the second half of 2019, ready for November 2022 introduction.
- Noise reduction commitments must be proportionate to the local situation, such as the number of movements and overflow population density.
- A new objective is being set to *"limit and where possible, reduce total adverse effects on health and quality of life from aviation noise"*.
- Routinely setting noise caps as part of planning approvals, and having those caps periodically reviewed to ensure they remain relevant and balanced. Planned noise reduction at airports not covered by a noise cap.
- Given the government's growth agenda, it is unrealistic to expect that new homes will not be built in areas affected by noise to some extent. Proposes tailored guidance for housebuilding in noise sensitive areas near airports, and

improved flight path information for home buyers. *This would be the proportionate replacement for PPG24).*

- New measures to improve noise insulation schemes:
  - Extend policy threshold to 60dB LAeq 16hr
  - Require all airports to review effectiveness of existing schemes
  - New best practice guidance on insulation schemes
  - New minimum eligibility threshold of an increase of 3dB LAeq which leaves a household in the 54dB LAeq 16hr contour, which would apply to airspace changes leading to significantly increased overflight
- Industry can support growth within existing night noise limits by using quieter and more environmentally friendly cargo aircraft, and the government encourages their early adoption wherever possible.

Helicopter activity can be particularly intrusive as they tend to fly at low altitudes and can hover for some time at a single location.

### Air Quality

- Improved monitoring and information on air quality aviation-related issues.
- Require all major airports to develop air quality action plans to manage emissions within local air quality targets.
- Support development of cleaner fuels.

**The partnership for sustainable growth is a long-term policy framework and will need to be flexible enough to respond to new information, developments and changing circumstances, while providing sufficient long-term confidence for the industry and communities.**

### Additional Questions

To what extent does the proposed partnership for sustainable growth balance realising the benefits of aviation with addressing environmental and community impacts?

How regularly should reviews of progress in implementing the partnership for sustainable growth take place and are there any specific triggers (for example, new information or technological development) that should be taken into account?

## Draft SASIG Position

- a. Regional capacity should not be at the end of the carbon budget – CO2 emissions permissible under Kyoto used up by Heathrow resulting in constraints elsewhere.
- b. Avoid one size fits all approach – smaller airports less impact in absolute terms than larger airports; careful not to discriminate by imposing same requirements of mitigation and compensation.
- c. “*Limit and where possible reduce*” impacts on health and quality of life could still mean that total adverse effects are increased. Support strengthening of approach closer to WHO guidelines. But, acknowledge that aviation noise impacts on health and quality of life is welcome).
- d. Managing night noise effectively should be a high priority.
- e. Should not discriminate aviation vs other modes on key environmental parameters (e.g. standards to be met, tax); need consistent approach.
- f. Not clear how in practical terms the form of the *Partnership for Sustainable Growth* and how it will deliver Government objectives.

Any others?

## 4. Support Regional Growth and Connectivity

**Airports are vital for local economies, providing domestic and global connectivity, employment opportunities, and a hub for local transport. The government wants to maximise these benefits through markets that operate for consumers and local communities. It wants to support airports that deliver the connectivity regions need, an industry that provides high quality training and employment opportunities to all, and a freight sector unburdened by unnecessary barriers.**

### Key Statements

- Airports can directly support thousands of jobs and generate economic benefits beyond the airport fence. Core and specialist aviation services, freight companies, logistics hubs and aerospace investment are often located close to airports, creating jobs in the local area.
- Regional airports also act as wider magnets attracting non-aviation businesses due to the air connections the airport offers but also the strong road and rail access links that support the airport. They act as a gateway to international opportunities for the regions of the UK.
- Airports have a crucial role to play in their regions. They are hubs for growth within and beyond the region in which they are situated.
  - *Local airports*, such as Newquay, Norwich and Prestwick serve their immediate catchment area, offering domestic and short-haul destinations.
  - *Regional airports*, such as Bristol, Belfast International, Newcastle and Glasgow, serve larger catchments and offer extensive short-haul network and some key long-haul routes.
  - *National airports*, to which passengers are willing to travel further, offer an extensive range of short and long-haul destinations.

### Regional connectivity

- The UK aviation market operates predominately in the private sector.
- A study on regional air connectivity has demonstrated that domestic and international air connectivity is strong across the UK. Analysis showed that 97% of the population of the UK is within two hours of an airport offering a direct connection to one or more major destinations on a daily basis (Consultants Study)
- Heathrow Airport acts as an important hub for regional airports to facilitate connections onto long-haul destinations. However, there has been a fall in domestic air connectivity into Heathrow in recent years due to the lack of capacity. This has partly been offset by improvements in rail and road connectivity throughout the UK and increased direct connectivity from regions to overseas destinations, including foreign hub airports.
- The government recognises the value of domestic air connectivity and an expanded Heathrow will provide an unprecedented opportunity to strengthen and develop these links, enabling all UK regions to develop new business, tourism and cultural links across the globe.

- The government wants to see, through the Aviation Strategy, that these benefits are maximised, by ensuring that:
  - markets are functioning effectively for consumers and local communities
  - airports are delivering the connectivity that regions need to maximise their potential
  - the industry continues to provide high quality training and employment opportunities
  - barriers to the air freight industry are reduced
- The government recognises the importance of rebalancing the UK economy through economic growth of the regions and ensuring that the UK remains competitive after we leave the European Union. Airports have a crucial role to play as hubs for growth within and beyond the region in which they are situated. The government is committed to working with the industry to develop appropriate and practical policies that support the industry's ambitions. The Aviation Strategy consultation focuses on:
  - regional connectivity
  - regional transport hubs
  - supporting freight
  - regional employment, training and skills
- The government will consider ring-fencing slots and PSOs where appropriate, although direct financial support for PSOs into Heathrow following expansion is unlikely to be required.
- It is important that government intervention is driven by evidence to ensure market distortion is kept to a minimum as supporting regional air routes can have unintended negative effects on the market as a whole.
- The government proposes to continue to provide policy support for lifeline services that connect regions
- The government believes that reserving slots at appropriate times at Heathrow will secure hub connectivity for the UK's nations and regions for the long term. This will deliver economic benefits across the country, without the distortionary effects of PSOs.
  - continue to support PSOs to London for routes vital for social or economic development that are in danger of being lost, but that funding contributions should increasingly be provided locally
  - expand the scope of PSOs to support routes into airports, such as Manchester or Edinburgh, where this is justified through evidence of onward connectivity benefits that open up long-haul opportunities for international trade and tourism. These will be assessed on an 'airport to airport' basis, with a preference for routes without a government funding requirement
- Industry welcome to submit evidence on the impact APD has on international competitiveness or route economics.

## Supporting Air Freight

The three main airports for handling air freight in the UK are Heathrow, East Midlands and Stansted. Collectively they account for around 85% of the total amount of freight handled at UK airports. The benefits of air freight to the UK, however, are not restricted solely to the areas around those airports.

*The government supports continued growth of the air freight sector particularly making best use of existing capacity at airports, to continue to facilitate global trade for UK businesses and consumers.*

Heathrow R3 will nearly double the capacity for freight at the airport to 3 million tonnes per year.

Government is committed to removing or reducing any unnecessary barriers to air freight and the global trade that it supports, including in non-aviation areas of policy.

## Regional Employment, Training and Skills

The aviation industry in the UK will need to address a number of challenges in the years ahead to ensure that it has the skills it needs to succeed. These include:

- continuing to address the current science, technology, engineering and mathematics (STEM) skills shortage
- keeping pace with technological developments and the changing nature of aviation jobs
- an ageing workforce and inspiring the next generation of young people to consider careers in aviation
- realising aviation's potential to deliver social mobility, including through maximising the benefits of apprenticeships
- improving diversity and inclusion in the industry

## Additional Questions

To what extent do these proposals provide the right approach to support the complex and varied role that airports play in their regions?

To what extent are the proposals on skills the right approach to ensuring the aviation sector is able to train and retain the next generation of aviation professionals?

## Draft SASIG Position

- a. Surface access – particularly the fact that airports are part of the national infrastructure and as such should be appropriately connected to the national

rail and road network, and that it should be an obligation on Railtrack, Highways England and Devolved Administrations to ensure this.

- b. The failure of the draft NPS to recognize that there may be other airport developments of national significance that it should also address (e.g. Luton to 38mppa, LGW standby runway, major surface access improvements needed to achieve this, safeguarding for a second runway at Edinburgh).
- c. Absence of any paper or mechanism (e.g. growth partnerships, growth funding) to optimise the relationship between airports and the city and regional growth agenda.
- d. The importance of recognising the regional dimension to aviation policy and the contribution airports of all sizes will make to connecting their local and regional economies to global markets and trading opportunities post Brexit.
- e. The importance of smaller and regional airports in contributing to:
  - strategic national needs (e.g. non-passenger activities – military access, emergency services, diversions, pilot training, aircraft testing, spaceports and UAVs, locations for aerospace activities); and
  - materially to regional economic growth, by providing enhanced market connectivity, economic anchors/employment clusters, high skilled jobs, strong agglomeration and spillover effects and other major catalytic benefits.
- f. Aviation is not just a private industry – public authorities significant direct interest in airports and supporting connectivity; local authorities in the environmental and secondary resourcing impacts it creates and the business sector and public in its resilience, quality of service etc. Seems to be an ideological rather than pragmatic/need driven approach to Government engagement and intervention in policy.
- g. Skills and training – not a lot in the way of specifics about interventions to improve the need agenda set out. Show us the money?



## 5. Enhance the Passenger Experience

All passengers should have the confidence to fly. Airlines and airports are generally responsive to the needs of their customers but improvements should be made for passengers with additional needs and when things go wrong. The government is committed to making flying a more positive experience for everyone. The proposed Passenger Charter aims to promote best practice and create a shared understanding of the required service levels for passengers.

### Introduction

This chapter:

- sets out the **scope of a new Passenger Charter** for aviation
- sets out a range of **new measures for passengers with reduced mobility** and additional needs
- outlines measures to tackle the **problem of disruptive passengers** associated with alcohol
- describes the government's approach to **improving the operating model at the border** to enhance the passenger experience
- details proposals for **simplifying and improving complaints and compensation procedures**
- sets out government proposals for ensuring that **consumers have timely access to the information** they need to make informed choices

### Additional Questions

To what extent does the proposed Passenger Charter adequately address the issues that are most important to passengers?

How should the operating model for border service be designed to improve the passenger experience?

### Draft SASIG Position

- a. This Chapter is focused on issues which are primarily the interest of airports, airlines, regulators and passenger groups.
- b. Recommended SASIG does not offer views on these aspects.

## 6. Ensure a Safe and Secure Way to Travel

**The UK is a global leader in aviation security and safety, with one of the safest and most secure aviation systems in the world. The government and the CAA share knowledge and expertise with other nations, encouraging them to adhere to international standards and implement improvements with industry to make the skies safer for everyone.**

### Issues Covered

- Safety
  - Concentration on safety risks – Human and cultural factors, General Aviation
  - Emerging risks – Drones, Lasers, electronic conspicuity
  - Improving data and reporting
  - Responding to global variations in safety standards
  
- Security
  - Threat to aviation
  - Driving Global Action
  - Cyber threat to aviation
  - Regulatory Burden
  - Commitments

### Additional Question

To what extent do these proposals sufficiently address existing and emerging safety and security risks in order to maintain business and passenger confidence in the UK aviation industry and in the UK as a destination?

### Draft SASIG Position

- a. Not involve mainstream Local Authority responsibilities, but support policies that will maintain the high standards of safety and security that have been achieved.
- b. Since some of our members own smaller airports, SASIG is concerned to ensure the regulatory burden falling on the operators of smaller airports because of disproportionate costs associated with the flat rate - fixed cost requirements imposed by both regulatory authorities (e.g. EASA, CAA) and Government agencies (Environment Agency, Border Force, HMRC) imposed upon them is properly addressed.
- c. Smaller airports are typically less environmentally impactful locally than larger ones, play important strategic aviation roles outwith mainstream commercial passenger air transport and typically generate much bigger national and local economic benefits than General Aviation airfields.
- d. The aim should be, therefore, to find ways they can be made less of a burden on the purse of public authorities and private interests that own or manage them and ensure a level playing field is created on a unit cost

basis so that they can compete and serve their catchment areas – which are typically remote and peripheral and have poorer access to air services than major urban areas – effectively.

## **7. Support General Aviation**

**The government aims to ensure that there are appropriate and proportionate policies in place to protect and support General Aviation (GA) and its contribution to GDP and jobs. The government recognises that the needs of GA have to be seen in the wider context of civil and military aviation. In areas such as the use of airspace and the allocation of slots it is important to balance the needs of private flying, commercial GA and scheduled aviation, so that all classes of aviation are properly and proportionately considered and the benefits GA can be supported.**

### **Issues Covered**

- Reduce the Regulatory Burden on GA
- GA Strategic Network and Planning
- Supporting new and existing Commercial Activities
- Airspace
- Safety
- Safeguarding for Safe Development
- Training and Skills
- Environmental Impact of GA
- Refreshing the 2015 GA Strategy

### **Additional Question**

To what extent do these proposals strike the right balance between the needs of General Aviation and the rest of the aviation sector?

### **Draft SASIG Position**

Recognise the needs of the GA sector should be properly reflected in policy:

- a. support for a strategic network of airfields – balances demand, regional coverage, range of activities etc
- b. should be a presumption against the closure/re-development of existing airfields (exemption to the brownfield land rule), unless a replacement facility or site is identified nearby capable of serving same function/activities
- c. all military airfield identified for closure should first be considered in the context of (a) and (b), and feasibility as GA or smaller commercial airfield considered before disposed for other purposes
- d. requires airfields to respect land use policies and manage local environmental impacts
- e. support initiatives to improve training and skills provision to the sector

## 8. Encourage Innovation and New Technology

**Promoting the development of innovation and technology will be a core part of the Aviation Strategy. The government wants the sector to make the best use of new technology for the benefit of consumers and to build on the aviation sector's track record of success in encouraging innovation.**

### Issues Covered

- Opportunities for Innovation
  - Automation – UAV's, Drones
  - Hybrid and fully-electric aircraft
  - Digitalisation and data sharing
- Overcoming barriers to innovation
  - The importance of agile regulation
  - Meeting the public acceptance challenge
  - Anticipating future developments
- Aligning policy and investment
  - Aerospace Sector Deal
  - Enhancing cross-government working

### Additional Questions

To what extent are the government's proposals for supporting innovation in the aviation sector the right approach for capturing the potential benefits for the industry and consumers?

Do the proposals in this chapter sufficiently address the barriers to innovation?

### Draft SASIG Position

- a. Support new technologies that:
  - help address environmental impacts of aviation – noise, emissions
  - keep UK aviation sector globally competitive
  - allow faster journey times or spaceflight using non-fossil fuels (e.g. Hypersonic engines based on hydrogen)
- b. All aircraft (including drones) to have either in-built constraints on the airspace they can use or transponders so they can be readily identified.

- c. Support better information being made publicly available about the industry on a statutory/voluntary basis.
- d. Encourage better engagement between the industry, statutory authorities, community representatives and the public about the value/problems with new technologies and how they should be regulated.

# **Annex A: Legislation to Enforce the Development of Airspace Change Proposals**

## Introduction Airspace modernisation objective

The Government's overall stated objective for airspace modernisation is to deliver quicker, quieter and cleaner journeys and more capacity for the benefit of those who use and are affected by UK airspace. It is planned to deliver this within the following parameters:

- create sufficient airspace capacity to deliver safe and efficient growth of commercial aviation;
- progressively reduce the noise of individual flights, through quieter operating procedures and, in situations where planning decisions have enabled growth which may adversely affect noise, require that noise impacts are considered through the airspace design process and clearly communicated;
- use the minimum volume of controlled airspace consistent with safe and efficient air traffic operations;
- in aiming for a shared and integrated airspace, facilitate safe and ready access to airspace for all legitimate classes of airspace users, including commercial traffic, General Aviation and the military, and new entrants such as drones and spacecraft not in conflict with national security requirements (temporary or permanent).

Government has identified the potential for conflicting Airspace Change Proposals (ACP's) from different Airspace Service Providers (ASPs) and is seeking:

- a. To direct NATS en route (NERL to come up with and airspace change 'masterplan' that delivers the Airspace Modernisation Strategy
- b. To take legislative powers to:
  - direct ASPs to bring forward ACPs in line with the masterplan proposals,
  - require them to co-operate with NERL to do so, or
  - some combination of both.

Annex D goes on to discuss potential sanctions for the failure of an ASP to initiate a required ACP (without one, it may not be possible to bring forward others because they need to integrate with other changes nearby), or for delays in delivering requisite proposals

This in turn raises issues such as enforcement orders and appeals.

## Additional Questions

Should the government legislate for powers to direct individual ACPs identified as necessary in a masterplan to be taken forward?

What are your views on the scope for the use of the powers?

What are your views on the proposed sanctions and penalties regime?

What are your views on the best approach to funding an airspace change where a small airport may need financial support to do so?

### Draft SASIG Position

- a. Support government powers but note that the associated bureaucracy is the inevitable price of privatisation of airspace design and management.
- b. Want to ensure full consultation with strategic stakeholders like SASIG on NERLs Airspace Masterplan and on subsequent ACPs and associated directions.
- c. The Airspace Masterplan and ACPs should not solely be focused on providing new capacity but must also be seen to respond to poor environmental performance resulting from existing airspace design.
- d. Agree smaller airports should be given support to bring forward required ACPs,  
  
but
- e. Local authorities, either singly or collectively, should also be given the opportunity to bring forward their own proposals for airspace improvements and funded/given the technical support to be able to do so (to improve the airspace environment particularly as it relates to noise and areas of tranquillity, overflight of substantial built-up areas, areas of natural beauty).
- f. SASIG believes there should be a priority to different interests in airspace design in the following order:
  - i. larger airports with passenger numbers above 15 million;
  - ii. commercial airports with passenger numbers less than 15 million;
  - iii. business aviation airports;
  - iv. heavily used general aviation airfields;
  - v. recreational flying strips.



## **Other Issues the Aviation White Paper should be Addressing**

- a. Changes to land use planning policy relating to airports.
- b. Costs of discharging responsibilities to local authorities – access to expertise, handling resources.
- c. Lack of any coherent plan for recognising and addressing interdependency.
- d. Bringing joined up Government to bear on maximising economic benefits (e.g. Industrial Strategy, Growth Funding, City Deals) and improving UK wide connectivity to global markets.