

## **General Aviation Alliance**

### ***Consultation Response to the Department for Transport on:***

## **Draft Aviation Policy Framework**

### **Introduction**

The GA Alliance is a broadly-based grouping of General Aviation (GA) and Sports and Recreational Aviation (S&RA) organisations, with a total of 72,000 members in the UK, involved in a variety of aviation activities and sports. We aim to co-operate and consult with government and other organisations as stakeholders to support and progress GA interests.

The views expressed here represent the agreed core views of GA Alliance members. The individual organisation may also provide their own responses to this consultation, to highlight areas specific to their particular interests.

Our response will focus on the GA sector, in particular on the issues related to Sports and Recreational Aviation (S&RA). We will also refer to the larger context of commercial GA and Business Aviation because of the important linkages between these sectors and the interests of our member organisations.

The GA Alliance did not respond to this consultation using the online form because that form was limited in scope and addressed several issues on which GA Alliance does not claim special expertise, or wish for close engagement. We have not provided an answer to all the consultation questions, only those which we considered were relevant to our role.

### **Chapter 2 – The benefits of Aviation**

We welcome in this chapter:

1) The policy recognition of the importance of GA and recreational aviation and the mention of the EU Parliament resolution on General and Business Aviation (2.6, p14).

We believe the DfT should enhance the wording in the final policy framework, to clearly indicate that it places the recommendations expressed in this resolution at the heart of its GA policy for the UK.

2) Useful policy protection for GA aerodromes (2.75, p30) and the (rather weak) encouragement towards GA access to larger airports (2.76, p30).

We believe that flexible connectivity demands a stronger policy statement on GA access, for the reasons explained below.

3) Support for the 'CAA's review of the Regulatory Approach to Recreational Aviation which is also aimed at ensuring that UK safety regulation is proportionate' (2.77, p30),

4) Reference to the National Planning Policy Framework (2.78-79, p31) particularly the intent to ensure consideration of airfields' economic benefits to the local, regional and national economy when considering development that might affect them.

On the relevant question associated with Chapter 2:

*Do you agree with our analysis of the meaning and value of connectivity set out in this chapter?*

GA Alliance generally agrees with the analysis presented on the importance of aviation connectivity, but also believes that the importance of GA and especially of business aviation in the connectivity context has not been fully recognised in the document. Senior business and financial executives frequently travel point-to-point by private jet and helicopter. These are the real decision-makers of the business world. It is vital that the relevant facilities for GA are maintained or enhanced to ensure *flexible* connectivity. Commercial Air Transport (CAT) interests (and lobbying power) must not dominate the discussion when considering (for example) access to regional airports and the smaller London airports by business aviation.

### **Chapter 3 - Climate change impacts**

The GA alliance supports the general objectives set out in the Draft Policy Framework, as regards aviation climate change impacts. On the specific question associated with Chapter 3:

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

GA makes a very small contribution to aviation emissions compared with CAT, however the government should take positive steps to encourage UK research and development towards lower emissions from GA aircraft. There are considerable opportunities for the more widespread use of sustainable biofuels, electric propulsion, etc., in GA and especially in S&RA. At present there is little UK-based research into these areas. They represent potential opportunities for UK business, which a small amount of well-targeted pump-priming funding from DfT (or through the Technology Strategy Board) might translate into environmental and commercial benefits. GA Alliance member organisations have links to higher education institutions that could undertake such research projects.

### **Chapter 4 - Noise and other local environmental impacts**

The GA Alliance agrees with the general policy expressed in this chapter, towards reduction in noise impacts on local communities, to facilitate aviation growth. We respond to the relevant question:

*Do you agree with the approach to the management of noise from general aviation and helicopters, in particular to the use of the section 5 power?*

There is a significant re-focussing of policy as regards noise from GA aerodromes and from helicopters, (4.83-91, pp67-68), which causes us concern. The proposals seem to be based on few, if any, consultation responses (<http://assets.dft.gov.uk/consultations/dft-2011-09/summary-of-responses.pdf>, 89, p19).

The relevant proposals include the prospect of bringing in previously unused CAA Act (1982) Section 5 powers using secondary legislation, to 'specify' GA aerodromes and require aircraft noise minimization measures. The document also states that 'a number' of smaller airports and GA aerodromes will be required to develop new Noise Action Plans (NAPs).

We are concerned on two counts: firstly, that both these proposals are very loosely defined at present. If insensitively implemented, they might adversely impact many GA aerodromes located near large towns. One unintended consequence might be for such GA aerodromes to become unlicensed, with adverse consequences for safety and business.

Secondly, we are concerned that this policy could become a charter for local noise activists and campaign groups. Noise activists are often few in number, but persistent and vociferous. Their intention may be to close the aerodrome entirely. Our member organisations have experience of aggressive campaigns against aerodromes which had

little merit, yet caused great expense to the operators. Such highly-motivated activists and groups will certainly seize all opportunities offered by the CAA to place pressure on GA aerodromes for noise minimization.

On the basis of these concerns, we would seek further consultation between GA stakeholders and the DfT (or CAA), to define these proposals more fully, and welcome the consultation process indicated in the Draft Policy Framework (4.89).

We were also concerned at the particular focus on helicopter noise in the draft Policy Framework. Police helicopters, whilst they provide an essential service, do generate more perceived noise (due to height and area concentration) and often hover low over built up areas. Any policy of developing operating restrictions for private and commercial helicopters based on the noise impacts of Police helicopters (who would not be bound by them) would be unfortunate.

Over London, a large proportion of helicopter noise is generated by Police helicopters, who are airborne much of the time and do not follow the helicopter routes. The Helicopter Club of Great Britain (HCGB) estimates that Police helicopters generate about 65% of the helicopter noise over London, military flights about 20%, commercial about 10% and private helicopters 5%. The HCGB also believes that military helicopter flights over London, especially by foreign military, are sometimes made for crew interest rather than operational need. They are often flown in large noisy helicopters and could easily be rerouted. Generally commercial and private helicopters are quieter, while recent types such as the EC120, EC130, EC135 and Notar employ noise reduction technology, so lessening the environmental impact.

In contrast to the proposals for consultation indicated for the GA aerodromes, there is no suggestion (4.91) of consultation with representative bodies such as the HCGB and British Helicopter Association on these policy proposals. GA Alliance believes that CAA and NATS must consult with these key stakeholders before introducing changes to helicopter routes and operational parameters, and that the final Policy Framework must indicate this consultation intent.

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

Considering GA aerodromes, GA Alliance member organisations are well aware of the importance of noise control, and encourage voluntary NAPS and codes of conduct for aerodrome operators. Such measures are already in place at most GA aerodromes. The CAA offers valuable guidance in its guidelines for improving the effectiveness of voluntary noise reduction schemes. The monitoring of compliance and impacts of NAPS, etc. on perceived noise is perhaps the weakest element in a fairly comprehensive voluntary framework. However, it is difficult to introduce measures to improve local feedback without presenting a platform for activists and campaign groups.

## **Chapter 5: Working together**

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

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

The implication of the second question is that Airport Consultative Committees (ACCs) might be extended to smaller airports and GA aerodromes, beyond the 51 currently designated. ACCs often work well for larger airports, but would represent a significant administrative burden for the small businesses that operate many GA aerodromes. While recognising that ACCs may help to provide a balanced view from various local stakeholders, GA Alliance considers that the operators of smaller GA aerodromes should be protected from the unnecessary imposition of such obligations.

## **Chapter 6: Planning**

GA Alliance welcomes the Safeguarding proposals (6.6-6.8) for airports, and considers that in many cases these proposals apply also to GA aerodromes. To clarify this position, a clear statement of the position for larger GA aerodromes should be included in the final Policy Framework.

Prepared by James Tannock for GA Alliance 30/10/12