



ABTA response to the Department for Transport UK Airspace Policy: a framework for balanced decisions on the design and use of airspace

Introduction

ABTA – The Travel Association - was founded in 1950 and is the largest travel trade association in the UK, with around 1,200 members and over 4,500 retail outlets and offices. Our Members range from small, specialist tour operators and independent travel agencies specialising in business and leisure travel, through to publicly listed companies and household names, from call centres to internet booking services to high street shops. ABTA's focus is ensuring that Members can operate their businesses in a sustainable and successful manner, enabling their customers to travel with confidence.

The success of ABTA Members' businesses is directly reliant on the UK's aviation infrastructure; several of ABTA's larger Members are themselves part of groups that own airlines. ABTA Members provide 90% of the package holidays sold in the UK, with Members also selling millions of independent travel arrangements. Annually, ABTA Members' turnover is in excess of £33 billion. The business of our Members is the provision of quality, efficient and competitively priced passenger travel.

ABTA Members have been involved the preparation of this response.

General comments

ABTA welcomes the publication of the Department for Transport's proposals to modernise the way UK airspace is managed.

ABTA supports the work of the campaign group *Sky's the Limit* calling on the Government to:

- Prioritise and support industry efforts to deliver airspace modernisation as set out in the existing Future Airspace Strategy.
- Deliver a stable, long-term noise and airspace policy which recognises the need to modernise airspace, provides clear guidance on the balance of priorities in airspace design and enables modernisation in the forthcoming Aviation Policy Framework.
- Include airspace, as a critical part of the UK's national infrastructure which requires long term strategic decision making, in the remit of the National Infrastructure Commission.

With airspace modernisation, aircraft would be able to fly quieter and more efficient routes. This will not only benefit the local communities in the vicinity of the airport but lead to consumer benefits by way of reduced costs that would be reflected in air tickets and to less delays for those passengers.

ABTA shares the *Sky's the Limit's* concern that without redesign of the UK's network of flight paths and airways, it simply won't cope with the growth in traffic forecast over the coming years.

Changes to Airspace (Chapter 4)

ABTA supports the suggested three-tier approach to managing changes to airspace and the way in which airspace is used.

ABTA believes that Airport Consultative Committees (ACC) should be consulted about all airspace changes relating to their local airport. The ACCs represent inter alia airlines, passengers, local authorities and communities, and environmental interests, and are well placed to provide input.

Airspace changes should be subject to a suitable policy on transparency, engagement and consideration of mitigations as set out by the Civil Aviation Authority.

ABTA believes that airspace change compensation should be updated in line with the modernisation of airspace. The details of such a package would need to be discussed and agreed amongst stakeholders.

Assessing Noise in Airspace Decisions (Chapter 5)

ABTA supports the proposal to require options analysis in airspace change processes. It is important to ensure that all options are fully considered and are transparent.

ABTA agrees that the policy should result in the number of people experiencing adverse effects as a result of aviation noise being limited and reduced where possible.

ABTA supports the proposal that airports use a suite of metrics that measure the frequency and pattern of aircraft movements to which communities may be exposed.

Independent Commission on Civil Aviation Noise (Chapter 6)

ABTA supports the proposal to establish an Independent Commission on Civil Aviation Noise. In order for the Commission to work in the best interests of all stakeholders, it must be truly independent of the Government. We support the proposal that ICCAN be publically funded.

ABTA notes that Heathrow Airport Ltd and HACAN have jointly supported the introduction of such a body as originally proposed by the Airports Commission. Separately from the proposed introduction of an ICCAN, Gatwick Airport Ltd has established an independent noise management board to review and monitor noise and procedures at Gatwick which ABTA welcomes.

ABTA suggests that that work of ICCAN should be subject to a review after three rather than five years when its functions could potentially be expanded, as long as its governance structure is reviewed at the same time.

Ongoing Noise Management (Chapter 7)

Noise from individual aircraft has greatly decreased over the years due to the work of airlines, airports and the aerospace industry to introduce quieter aircraft, aided by the activities of Sustainable Aviation in the UK.

More sustainable operating procedures are also being introduced including the trialling of dispersed Noise Preferential Routes to provide residents with respite on a regular basis, continuous descent

approaches, continuous climb techniques and flying a steeper angle of descent. These trials have all been carried out with the full engagement of the airports' local communities.

ABTA agrees with the proposal that decisions on noise should be made locally wherever possible and points out that the three Designated Airports (Heathrow, Gatwick and Stansted) all have voluntary schemes fining noisy aircraft with consequential fines funding local community projects.

However, we believe that, in line with the Government's use of the ICAO Balanced Approach, the responsibility for operating restrictions at the Designated Airports, including for the night flight regimes, should remain with the Secretary of State beyond October 2022.

ABTA has consistently supported the ability of airlines to operate night flights. Night flights bring benefits to the UK economy increasing the number of flights that can be operated, particularly at capacity constrained airports, leading to additional jobs at airports and surrounding areas. ABTA believes that restricting flights during the night period would undermine the UK's attractiveness as a place to do business. With the EU Referendum, it is more important than ever before to show that the UK is open for business.

ABTA agrees that airports should publish details of their track keeping and performance.

In closing, ABTA would like to make a comment regarding Brexit. We believe that the current Air Traffic Management system should be maintained as a UK run system for airspace would be unnecessarily complex. While progress of the Single European Sky has been slow, if it were to come to fruition, it would bring important operational efficiencies for all parties, and the UK should seek continued involvement.

Thank you for considering our comments. We would welcome the opportunity to discuss any points raised in our response further with the Department.

Further information

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