

Response to HM Government Consultation on Aviation 2050 The future of UK aviation.

Main points

- **Balsall Parish Council encourage the UK Government to support initiatives that ensure that the Aviation industry is taxed appropriately to reflect the use of fuel to match other transport sectors such as road. A level playing field in fuel tax across all industry sectors would enable a more sustainable aviation strategy based on real environmental costs.**
- **Efforts to reduce emissions require a collaborative approach between stakeholders, especially airlines, airports and the Government. The wellbeing of those adversely affected by aviation should be properly represented in a coordinated and planned manner.**
- **We agree that disturbance from aircraft noise has negative impacts on the health and quality of life of residents in Balsall Common. The extension of the runway in 2014 and the resulting flight path changes introduced for departures from runway 15 have brought aircraft closer to Balsall Common increasing the negative impact.**
- **As a minimum we recommend that airport companies should be mandated to make noise data publicly available. We support the ambition for further research and would like to see a plan to deliver research to implement ‘meaningful, measurable targets to protect the public from impacts of aircraft noise on health and quality of life’.**
- **We would like to see a much stronger, clearer vision from the Government on noise. We are disappointed that there is not any commitment even long term to achieving the World Health Organisation recommended safe limits. This is particularly important during the night time period.**
- **We welcome the government proposals of new measures for people moving near to airports but suggest that Local Planning Authorities should be encouraged not to grant planning permission to build new homes within close proximity to flight paths where aircraft operate under 7000 feet. We suggest ICCAN looks into a better method of regulation.**
- **It required a major public campaign by resident groups in the parish directly to the Civil Aviation Authority (CAA) to intervene to force Birmingham Airport to reconsider its proposals. It has taken five years to fully implement design changes to the new flight paths implemented in 2014. This increased negative impact and cost could have been avoided with earlier genuine community engagement.**
- **It is critical that the government through establishing ICCAN improves best practice across all airports for community engagement at the very early stage of all proposals that could impact communities living near airports.**

Full submission

1. We note that the Government's strategy is very pro-growth with the only environmental objective to "support growth while tackling environmental impacts." There is no evidence that the scale of the growth that the Government wants will in fact be sustainable. The Aviation Strategy is not created in an industry sector level playing field because of the post-war agreements amongst the small group of nations that aviation use of fuel should not be appropriately taxed. The main reason for this is the so-called "Chicago Convention", agreed in 1944 by a then much smaller air industry, which prohibits countries from imposing jet fuel tax and VAT on international flights. Taxes on other forms of transport have increased dramatically since 1944 but thanks to the convention aviation has remained almost untaxed. Recently the Dutch Government has sponsored a discussion on an inter-EU fuel tax. We would encourage the UK Government to support initiatives that ensure that the Aviation industry is taxed appropriately to reflect the use of fuel to match other transport sectors such as road. A level playing field in fuel tax across all industry sectors would enable a more sustainable aviation strategy based on real environmental costs. Such a fair playing field policy across all transport sectors would also provide valuable additional tax revenue.
2. We welcome that the Government only supports growth in aviation in a sustainable way, with actions to mitigate the environmental impacts. We agree that achieving this requires a partnership between the Government, the industry but rather than simply stating "other interested parties" it is critical that the wellbeing of those adversely affected by aviation are properly represented in a coordinated manner, to ensure their needs are included in a comprehensive policy framework to better manage the environmental impacts of the sector. It is disappointing that "partnership" is a statement of hope without a clear plan to actually implement. Efforts to reduce emissions require a collaborative approach between stakeholders, especially airlines, airports and the Government.
3. We agree that disturbance from aircraft noise has negative impacts on the health and quality of life of residents living in our parish because we are near Birmingham Airport. Balsall Common is the largest settlement south of the airport affected by aircraft under 7000 feet. The extension of the runway in 2014 and the resulting flight path changes introduced for departures from runway 15 have brought aircraft closer to Balsall Common increasing the negative impact. Balsall Parish Council has conducted noise studies using industry standard processes and equipment to measure the increase in negative impact. The results of these study measuring aircraft movements above 65 decibels were shared with Birmingham Airport and the Civil Aviation Authority.
4. We agree that there is evidence in our local community that residents are becoming more sensitive to aircraft noise to a greater extent than noise from other transport sources, and that there are health costs associated from exposure to this noise. We are concerned that airspace modernisation does not increase the negative impact on our residents. We welcome the Independent Commission on Civil Aviation Noise (ICCAN) and expect that sufficient weight will be given to this body to achieve

reductions in noise impacts for affected residents. We are concerned that ICCAN is only advisory and lacks real influence in policy formulation. As a minimum we recommend that airport companies should be mandated to make noise data publicly available. We support the ambition for further research and would like to see a plan to deliver research to implement 'meaningful, measurable targets to protect the public from impacts of aircraft noise on health and quality of life'. A better approach to measure impact on communities would be to measure and publicly report the number of daytime and night-time aircraft movements above 65 decibels.

5. We would like to see a much stronger, clearer vision from the Government on noise. We note that there is no mention of 'tranquillity' in the strategy which is particularly important to rural communities such as ours with a background noise level below 35 decibels at night. We are disappointed that there is not any commitment even long term to achieving the World Health Organisation recommended safe limits. This is particularly important during the night time period. A ban of six and a half hours on scheduled night flights should be extended to all UK airports.
6. Performance Based Navigation has already been implemented for departures south on runway 15 at Birmingham. Initially the failure of the Airport Company and the Local Planning Authority (Solihull Metropolitan Borough Council) to consider the impacts on residents led to implementation of flight paths that caused a significant increased negative impact on the most populated settlement south of the airport. The poor judgement of the Local Authority to manage the balance between the commercial interests of the airport and the negative impact on residents is particularly concerning. We welcome the government proposals of new measures for people moving near to airports but suggest that Local Planning Authorities should be encouraged not to grant planning permission to build new homes within close proximity to flight paths where aircraft operate under 7000 feet. We suggest ICCAN looks into a better method of regulation.
7. It required a major public campaign by resident groups in the parish directly to the Civil Aviation Authority (CAA) to intervene to force Birmingham Airport to reconsider its proposals. A change of management at the airport company led to a more consultative approach including community representatives and the airport's original proposals were changed to benefit the majority of residents living in Balsall Common. The CAA has listened to communities affected by airspace change proposals and significant improvements have been made to the airspace change process. It has taken five years to fully implement design changes to the new flight paths implemented in 2014. This increased negative impact and cost could have been avoided with earlier genuine community engagement.
8. Birmingham Airport has since developed a much improved process of community engagement using targeted issue sub-groups with affected community representatives, delegated tasks from the Airport Consultative Committee. We welcome the role of ICCAN in the airspace change process. It is critical that the government through establishing ICCAN improves best practice across all airports for community engagement at the very early stage of all proposals that could impact communities living near airports.

