Aviation strategy: call for evidence

Page 1: Personal details

Q1. Contact information

Name	John Turner
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Q2. What is the nature of your:

interest in the aviation sector?	Former military and civil pilot, airfield operator and air traffic service provider. On-going concerns over aviation safety and regulation.
involvement in the aviation sector?	Director of Aviation Affairs for The Honourable Company of Air Pilots, Aviation Consultant, Lecturer in Flight Test, Flying Display Director

Q3. Are you responding:

on behalf of an organisation?

Page 2: Organisational details

Q4. What is the name of your organisation?

The Honourable Company of Air Pilots

Page 3: Aviation Strategy

Q5. What are your views on the proposed aim and objectives?

We welcome the decision to develop a strategy for a safe, secure and sustainable aviation sector. However, the current document is of limited scope, suggesting a limited understanding of the diversity, complexity and interdependency of the components of aviation in the UK today.

The government's first duty is to keep people safe so it is surprising to find it places customers before the safety of everyone that flies and is over-flown. At this stage, it might be a matter too detailed and something for consideration later but we believe that the focus on aviation customers' rights must be counter-balanced by customers' responsibilities so that they understand the importance of:

• being punctual at check-in and emplaning etc (to avoid delays that affect ALL passenger & crew)

• taking security procedures seriously and politely (to avoid unnecessary delays or perceived security threats)

• behaving so as not to endanger passengers/crews/aircraft or to cause the aircraft to divert.

Therefore, the strategy should also address customer education and the need for clearly understood legal sanctions against unsafe behaviour.

The internet has revolutionised the way that people purchase goods and services and makes it easy for customers to search against price. However, that has also encouraged a rush towards the lowest standards and enabling people to travel with the cheapest airline does not allow them to make an informed decision over the safety level of that airline. This requires the activity to be sufficiently frequently monitored by a regulatory authority that has sufficient funds and resource and is staffed by a depth of people of sufficient experience and expertise.

The Paper mentions General Aviation (GA) but does not appear to recognise or reflect its importance as the bed-rock that provides access to and enthusiasm for aviation and aerospace and the motivation of many young people to study STEM subjects. Informal surveys suggest that over 50% of people working in the UK aerospace sectors, aviation industries and UK military air arms were first attracted to their career by attending an air display. The UK GA community provides the network of flying clubs and training schools through which many people obtain their initial flying training. Section 1.30 alludes to potential skills shortages across the sector, and an important way to address this is by a visible thriving local GA sector which encourages people's interest and 'draws them in'. This is especially important for younger people, offering a way towards accessing the opportunities available.

As the document says, the need for a thriving aviation industry is vital now, will become even more essential in the post-Brexit world and as a part of this we need to develop our 'domestic connectivity'. Also identified is the need to address the impact of aviation on local communities and the environment - and of course this impact can be both bad (excessive noise and pollution, for example) and very good, providing local and domestic business transport links, local employment, and environmental benefits (wildlife rich grassy areas for example), especially when considering smaller local GA airfields; the important contributions. It is important for any aviation strategy to encourage, support and protect GA; as a minimum, it should include measures to ensure that:

• there remains an effective network of GA airfields that can support GA training, leisure and transport. This should include planning assumptions that work in the favour of retaining airfields as viable concerns, not in leaving them open to exploitation by developers. (Airfields should be considered 'green-field', not 'brown-field' in the first instance.) Section 1.17 specifically recognises that thriving local airports make regions significantly more competitive. This effect applies equally to many of the smaller GA airfields and their immediate locality.

• those flying in GA aircraft, whether for training, experience, transport or leisure, have rights of access to the airspace they need to conduct training, leisure and transport.

• UK flying training is not burdened by additional costs that place it at a disadvantage compared to overseas training by making it zero-rated for VAT in the same way that other training benefits form zero-rating.

Section 6.17, 'Making the most of our General Aviation Network' says GA is important to the aviation the industry but in suggesting that "the government is keen to understand" it indicates that those preparing the document had only limited understanding of the issues currently faced by UK GA, including the threat it faces from developers closing airfields, and the critical role that GA plays in sustaining UK aviation. To quote one of our members, "The UK has just voted for Brexit, which I interpret as going it alone, but we're not going anywhere with any Aviation Strategy if there aren't the facilities for young people to see and try aviation, because that's what's needed if we are to get the pilots."

Q6. Do you have a view on the order the objectives should be tackled?

Yes

Page 4: Aviation Strategy: your order

Q7. In what order of importance do you think the objectives should be tackled (please rank the challenges 1 = highest priority, 6 = lowest priority)?

Help the aviation industry work its customers	5
Ensure a safe and secure way to travel	1
Build a global and connected Britain	2
Encourage competitive markets	6
Support growth while tackling environmental impacts	3
Develop future innovation, technology and skills	4

Why?
1. Safety must be the government's priority in this sector. 2. Connectivity the heart and soul of travel - it is needed across sectors as well as within sectors - this objective should be expanded into an integrated transport objective for the UK so that road, rail, air and sea work (eventually) as complementary, mutually supportive parts of UK infrastructure. The traveller's journey starts then they leave their home and finishes when they reach their final destination. An aviation strategy that works for air passengers (and aviation workers) must ensure they can access airport facilities directly from other transport modes easily and quickly. 'Connected Britain' must mean a network of travel modes. 3. Aviation aspirations, both in commercial air transport (airlines) and General Aviation (GA), tend to be disadvantaged rather than assisted by planning law and practice. The Honourable Company of Air Pilots recognises the need for increasing the UK's housing stock but this should not be at the expense of airports' existence or operating potential. We note that successful airports tend to attract people who want to live near them, yet then complain about aviation's environmental impact; there must be a degree of acceptance of primacy and some controls to prevent unlimited building in the immediate environs of our major and minor airports. Since 1985, we have seen a gradual erosion of GA: closure of airfields, closure of flying schools, the easing out of small aircraft from airfields to make them more commercial, residents in the locale of airfields having undue influence on their operation although the airfield had pre-dated the residents by many years, airfields under the threat of being turned into housing estates. 4. Innovation and technology will be crucial to the UK's future, both in aviation and elsewhere. GA plays a major part in encouraging people to develop the skills that the UK will need to be competitive in the global marketplace. 5. This very important objective can only be met by a safe and successful aviation industry. 6. Competition in aviation has led to some bizarre practices; airlines operate under the flag of a nation different from where they source most of their passengers, sometimes splitting their engineering and flying operations across two national regulatory bodies. Some airlines' employment practices run counter to best practice in air safety. Commercial Air Transport, chiefly airlines, are low profit organisations sensitivity to changes in fuel prices and access to destinations – as illustrated by the recent collapse of Monach, the UKs 5th largest airline. The strategy and objectives should reflect the aviation sector end-to-end 'supply chain,' ranging from pilot training through to fuel and technological innovation, rather than just an increasingly de-regulated final market place.

Page 5: Strategy principles

Q8. What are your views on the proposed strategy principles?

The need to retain a safety, rather than customer or business focus, at the forefront of the strategy work has already been covered.

We recognise and support the need for government to act as an enabler, providing it does so without hindering the safety objective.

The concept of evidence-led intervention as defined here is laudable. However, pressures at play within aviation in recent years have revealed that available evidence may be either distorted or hidden. This is well illustrated in the subject area of crew fatigue: While a BALPA survey of 500 pilots revealed 31% had woken on the flight deck to find the other pilot asleep, the CAA has received only 2 reports of this in 10 years. The Company also understands that an incident where a Typhoon was scrambled to intercept a business jet over the M4 corridor was blamed on radio problems despite the fighter pilot reporting that both pilots appeared to be asleep on the flight deck until disturbed by someone from the passenger cabin. This suggests a culture of cover-up or denial has developed, in parallel with an increase in low-cost operations; the associated loss of information is not only a threat to continued aviation safety it also to evidence-based decision-making. Placing safety responsibility solely on an airline operator can, in the absence of regular independent and investigative monitoring, be construed as a dereliction of duty by the regulator. The strategy should review regulation as well as activity and ensure the regulator is adequately funded and resourced to avoid and conflict of interest between regulator costs and sufficient regulatory oversight; the strategy must address government support to the Civil Aviation Authority and its role as the national air safety authority, regardless UK continued membership of EASA after BREXIT.

Page 6: Policy tests

Q9. What are your views on the proposed policy tests?

Providing the issues that have been raised in answering earlier questions are addressed effectively, the tests provide a reasonable basis.

Page 7: Utilising existing runways

Q10. What are your views on the government's proposal to support airports throughout the UK making best use of their existing runways, subject to environmental issues being addressed?

This assumes the government can control which airports an airline operates from but it cannot as that will always be the airline's decision based on commercial principles. However, the government can make one airport more attractive than another to airlines by ensuring there is adequate infrastructure - runways, airspace and land travel connectivity - to provide an adequate operational capacity. Note that capacity to handle routine planned flights is not sufficient to make an airport attractive; the airport must have additional reserve to cope with and recover from restricted aircraft movement rates imposed by poor weather.

The adverse impact on current planning processes and practice has already been discussed.

Page 8: Consultation process

Q11. Are there any other specific questions on the 6 objectives that you think should be included in the planned consultations?

Yes

Page 9: Consultation process: other questions

Q12. What other questions would you like considered?

We believe the strategy needs to consider the following additional questions with a futures analysis covering 5 and 10 year horizons to aid with development of this strategy.

1. Where do we (UK) compete?

1a. HMG is looking to aviation to enable a truly globally connected Britain – so it is turning to the sector to become a cornerstone of support economic growth and diplomatic engagement. This is excellent recognition of the importance of the sector.

1b. However, its comments on competition are unclear: what geographic scale is DfT looking at for its objective and subsequent strategy on competition – global/foreign or domestic. It is planning to look at sub-markets (in the UK or global?), search for market failures and promote further competition yet on the same note it does not appear to be planning to support prosperous areas of the industry or world leading UK products.

1c. Is there to be a focus on domestic competition between UK companies or does it seek a more foreign and global posture – supporting UK companies to compete globally by championing the industry and or specific UK 'products' which in turn may help a globally connected Great Britain. The later requires thought, the failed attempt to introduce an Emission Trading Scheme with regards to the United Nations Framework Convention for Climate Change demonstrated how both politics and foreign government support of their own airlines can both hinder environmental policy and fair competition within a global market.

2. What unique value do we bring to the global market – why would people choose UK or UK Commercial Air Transport? (cost, differentiation, image, reliability?)

2a. There is an over focus on capacity yet DfT does not address why anyone in a global market would choose the UK aviation product, be it a carrier or airport like Heathrow, and what future benefit we would likely offer geographically, is there anything that differentiates the UK over, say Germany or France, cost(tax) incentives, image, safety and security and reliability?

2b. It would be beneficial for a comprehensive futures analysis over a 5 to 10 year period to be conducted by HMG with industry cooperation to identify how the UK continues or develops unique global value in this sector. The policy principles and objectives carry many assumptions and conflicting priorities; an over the horizon analysis and assessment of the UK 'product' would be important to move this paper forward.

3. What resources and capability can we bring to bear: human capital, superior technology, network, unique reputation?

3a. The paper discusses skills, innovation and technology but lacks recognition of the exceptional human capital (both in training and competence) that the UK can bring to bear globally.

3b. The UK has a good foreign diplomatic network that could be energised to raise the awareness of the global market for flight training and commercial air transport.

3c. Development of new technology and integration within operations is steeped in regulation (ranging from both security aspect through to airframes themselves) – the strategy needs to consider regulatory and policy reform as a resource to accelerate development of superior technology and ensure a globally competitive industry.

4. How will we sustain ability to continue to be a world leader over time, overcome barriers and ensure our UK product cannot be replicated (e.g. innovation, technology and skills)?

4a. Commercial Air Transport, chiefly airlines, are low profit organisations sensitivity to changes in fuel prices and access to destinations – this is illustrated by the recent collapse of the UKs 5th largest airline - Monarch. The policy objectives and strategy should reflect the end to end 'supply chain' for the aviation sector ranging from pilot training through to fuel and technological innovation.

4b. The policy objectives understate the importance of matching or exceeding the capabilities of foreign state backed aviation sectors and engaging with emergent markets in the developing world.

5. How can the UK support and grow its General Aviation sector including:

5a. Training in aviation and related skills.

5b. Encouragement of STEM education through the example of GA

Page 10: Consultation process

Q13. Are there any other sources of information or evidence that the government should bear in mind when developing the strategy?

Yes

Page 11: Consultation process: other information and evidence

Q14. What sources of information or evidence?

The on-line response, by its nature, constricts the breadth of answer/evidence that can be provided.

We believe it would be extremely useful for DfT to hold workshop sessions that would give them access to and understanding of the wider expert community involved in aviation matters.
The Honourable Company of Air Pilots, with some 2,000 members highly experienced in aviation matters, would be happy to assist in this.

Page 12: Consultation process

Q15. Does the proposed timetable (chapter 2), provide enough time to examine the existing issues in sufficient depth?

Yes

Page 14: Consultation process

Q17. What action could the government take to make sure that the maximum number of people, communities and organisations are engaged in the process and are able to have their views heard?

The Honourable Company of Air Pilots would be happy to provide a consolidated paper covering its views, which might be more appropriate and digestible than answers of limited scope elicited by the on-line questions.

The Air Pilots would welcome and be very happy to engage with DfT in further discussion to help develop the strategy.

Page 15: Other comments

Q18. Do you have any other comments on the issues raised by this call for evidence?

Yes

Page 16: Other comments: your views

Q19. What comments?

In comparison with other countries that have built new airports with multiple runways and the space to expand further, (the NEW Munich airport, opened in 1990s, is adding a 3rd runway) the UK finds such progress extremely difficult, if not impossible.

Nonetheless, it is time for the UK to reconsider its offering to global airlines and air travellers and to start planning now for the next airport serving UK, looking at opportunities beyond Heathrow and Gatwick for future expansion.

Although a 3rd runway at Heathrow has been announced as the government's 'preferred option,' the plan for further runway capacity in the South East appears, once again, to be stalled. This was to be expected in any attempt to build additional runways at existing airfields that, since their inception, have not be protected from encroachment by housing. It means any busy land-based airport will face continued challenge to further development, regardless of the economic benefits.

There is scope to use some existing airfields more effectively. As soon as it has been resurfaced, Northolt's runway could supplement London's capacity for domestic flights; too many UK destinations are not adequately served from the premier Heathrow hub which is not good for business. Stansted appears to have spare capacity with its single runway but it is very poorly placed - in terms of onward links - to serve London effectively.

Given the reality is that additional runways at London Heathrow and London Gatwick will always face huge local opposition so a forward-looking strategy should consider alternatives, which might include Manston and Lydd, and other locations in the margins of the Thames Estuary, including Goodwin Sands; all would avoid the security and safety risks associated with air traffic over the centre of London. Upper Heyford (surrounded by open land and next to M40 and railways) would have been a good option but is already destined for housing.

Note that in all circumstances, capacity must be sufficient to cater for the reduced operating rate that the UK weather regularly imposes on our commercial airports.

The need to ensure the strategy takes adequate consideration of the needs and importance of a thriving General Aviation (GA) sector, has been mentioned previously.

Page 17: Organisational help

Q20. If you are responding on behalf of an organisation, would your organisation be willing to:	
	Your answer
take part in helping development of the strategy?	Yes
help organise events to help the development of the strategy?	Yes