

Slot Reform Consultation

Aviation Directorate, Airport policy division
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Dear Sir / Madam

HSPG Response to the DfT consultation on airport slot reform

Background

This response is made by the Heathrow Strategic Planning Group (HSPG), a constituted grouping of 'willing' local authorities (and formerly local enterprise partnerships) ⁽ⁱ⁾ committed to jointly leading a collaborative multi-agency approach on the future planning of the functional economic area surrounding Heathrow Airport. The Group was formed in late 2015. It is independent of, but constructively engages with, Heathrow Airport Ltd (HAL).

The Group collaborates on interventions that could improve the area around the airport, and acts as a conduit between the members and Heathrow Airport Limited, Government, neighbouring area interests (including the West London Alliance of London Boroughs) and other key stakeholders.

Our work includes convening collaborative action around strategic spatial and infrastructure planning, economic development, airspace planning and local environment, and surface travel.

This response has been discussed and agreed at officer level across all HSPG members. Taking the main issues raised in the call for evidence HSPG would make the following points.

Introduction

HSPG welcomes the consultation which offers the opportunity to promote the achievement of wider aims for aviation as set out in other Government policy statements. However, to do so four significant linked changes are needed:

- The stated objectives for the slot allocation policy should be extended to include continuous reduction in noise impacts to support improvements in health, wellbeing and quality of life (QoL).

- Slot allocation changes must address historic rights to fly during the night-time period, including those within the shoulder period and facilitate these flights being re-timed to the daytime period through the re-allocation of existing slots and allocation of any new slots.
- Indeed, such re-timing should be the priority for slot allocations.
- A Balanced Approachⁱⁱ to achieving wider objectives for aviation and for addressing benefits and impacts requires a *more integrated approach right across regulation and policy*. In this instance, slot-allocation reform should be used in tandem with new night-time noise objectives and abatement procedures in a coordinated manner. Noise abatement processes should not be seen as the only 'tool' for reducing harmful night-time noise.

Failure to apply the Balanced Approach and the need for a further objective of slot reform

The Government's intended approach is to constantly balance the economic and consumer benefits of aviation against their social and health implications for local communities. HSPG support this approach but are seriously concerned that the two stated objectives for slot reform and the approach taken fail to deliver this balanced approach (particularly for existing slots), resulting in a focus on economic and consumer benefits only to be achieved through slot reform.

A third objective for the reform of existing and new slots should be added together with further scope for Secretary of State intervention, to further the aims of reducing noise impacts of existing and future growth in aviation activity, particularly at night-time.

Slot allocation and its reform are a powerful tool in the management of aviation opportunities and impacts and the Government appears to have been missed opportunities to contribute to health gains through the process of slot reform.

The Overarching Aviation Noise Objective adopted by Government last year states that:

"The government's overall policy on aviation noise is to balance the economic and consumer benefits of aviation against their social and health implications in line with the International Civil Aviation Organisation's Balanced Approach to Aircraft Noise Management. This should take into account the local and national context of both passenger and freight operations, and recognise the additional health impacts of night flights.

The impact of aviation noise must be mitigated as much as is practicable and realistic to do so, limiting, and where possible reducing, the total adverse impacts on health and quality of life from aviation noise."

Furthermore, the Government has just published (22/2/24) a night-time noise abatement objective for the next night flight regime to commence in October 2025:

“To limit and where possible reduce, the adverse effects of aviation noise at night on health and quality of life, while supporting sustainable growth and recognising the importance to the UK of commercial passenger and freight service.”

HSPG consider that the approach taken here to slot reform fails to contribute to the delivery of these noise policies as: (a) it fails to significantly reduce the number of night-flight movements, and (b) it fails to prevent night-time movements by noisiest aircraft. Two objectives for the process of slot reform are stated (Introduction para 32); in essence Objective 1 stimulating competition, efficiency, dynamism and transparency for (all existing and new) slot allocations, and Objective 2 establishing a framework for the allocation of the new slots (that are achieved through growth).

Para 39 does go on to note that:

“It is the Governments’ view that effective airport slot allocation should be environmentally positive by supporting efficient use of airport capacity.... making best use of capacity whilst complying with any conditions such as night flight and noise limits. The slot allocation process has helped the management of movement caps and night curfews that have been set for Level 3 UK airports”.

However, the positive measures that are included seem to be directed only to the allocation of new slots achieved through airport growth, and have ‘ducked’ the tougher challenge of addressing the greater number of existing Historic Slots and the existing Slot Pool.

HSPG consider that a third environmental objective should be added for slot reform – firstly to further the aviation noise and night-time noise abatement objectives above, and secondly wider environmentally positive outcomes. This addition would set a clear and prioritised basis for Secretary of State direction to the slot regulators to achieve further reduction in noise impacts, particularly at night, through the process of annual slot allocations processes.

Critically, this should address Historic Rights currently held to fly during the night-time period at Category 3 airports (many at times that would not be permitted today), so that these flights can be re-timed to daytime slots through the re-allocation of existing slots and allocation of any new slots. This will deliver continuous reduction in noise impacts in future, particularly at night, with both existing and new slots allocations.

HSPG propose that it is entirely appropriate to prioritise the re-timing of night-time slots into the (much sought after) early and late parts of the daytime schedule. So for instance, prioritise all available slots into 06:00 - 08:00 and 22:00 – 23:30 periods for re-timing of services currently scheduled at 23:30- 06:00. For example, at Heathrow, there are a significant number of Historic Slots during the middle of the night (many flown in larger long haul and noisier aircraft) at around 04:30, which are disproportionately disruptive to restorative sleep for wider population of all ages, particularly those that are vulnerable), such operational practices would not be permitted afresh by modern standards. Removing or re-timing these flights is beyond the reach of any planning application for new development and can be best achieved through coordination with the ‘tool’ of slot re-allocation and reform driven by the Secretary of State and direction to the slot regulators.

Specific responses to questions

In specific response to some of the consultation questions:

Q6 and Q7. The re-timing of slots should have priority in slot allocations where this is to facilitate the shifting of an existing night time services to a day time slot.

Q8. The SoS should have powers to make regulations about slot alleviation in response to a crisis – the operation of ‘ghost flights’ to maintain ‘historic rights’ is wasteful and unnecessarily disruptive.

Q10 – 14. HSPG has insufficient information to recommend a specific ratio of usage and the balance of different impacts and benefits of adopting higher than 80:20 usage ratio (in order to maintain historic slots). However, as a general principle the HSPG is opposed to the continuation of some existing Historic Rights where these allow flights at times of night where no new flying would be permitted under current standards. e.g. Flights at 04:30 at Heathrow.

As a general principle, the existence of Historic Rights to a slot established decades ago in the middle of the night, under very different conditions and levels of activity, should not ensure the continuation of night-flight operations today that breach the general principles and spirit of planning, environmental and health standards applied today to new flight operations.

Q19 – 24. HSPG support the addition of secondary criteria for slot allocation to achieve environmental and health benefits; it is reasonable for the SoS to add other secondary criteria to ensure slot coordinators ensure specific routes and markets (identified in the national interest) are prioritised in the allocation of slots. This might include ring fencing capacity for regional connectivity flights to the Heathrow Hub for example.

However, HSPG consider that the achievement of continuous progress to reduce the impact of aircraft noise on health and wellbeing should be added as a third primary Objective of slot reform and future slot allocation. Reduction of night time aviation noise (and disturbance impacts on health and wellbeing is the standout priority above all decarbonisation and environmental objectives in terms of impacts of aviation on the local communities around airports.

Q25 – 33. HSPG support the publication of airport slot registers and greater transparency about Historic Rights to a slot and the secondary trading of slots, with trading in a ‘fair and open’ competition.

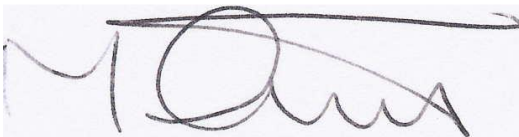
Q34 -39. HSPG recognise that setting time limits on slot leasing periods so that unused slots are sooner returned to the pool for use by new entrants and others will support a more fair and open competition and efficiency in slot allocation.

Q40- 43. HSPG are not in a position to comment on the most effective means of allocating new slots created by growth in capacity. However, given the additional environmental and societal impacts of additional flying it is important that these are allocated in a way that gives fullest priority to the national interest (including to safeguard domestic connectivity or serving markets important to

greatest inbound value to the UK economy) rather than simply highest bidder at a slot auction, and that noise reduction objectives and then other environmental objectives are fully delivered by the new operations. This might include giving priority to quieter aircraft operations during shoulder period and early morning (06:30 – 07:00). Also, those utilising low and zero carbon fuels and propulsion systems should be prioritised over those using carbon-based fuels.

Q46 – 48. HSPG support in principle the proposal that a proportion of any new slots be ring-fenced for domestic connectivity, achievement of net zero, noise reduction and other environmental objectives. However, the highest priority for local communities around airports is noise reduction particularly at night, due to adverse health impacts, including but not limited to, myocardial infarction, stroke and other cardiovascular effects. For example, an absolute priority for the allocation of any slots in the peak periods after 07:00 and before 23:00 should be so that existing historic night-time slots can be terminated and be re-timed to these new daytime hours.

Yours Sincerely,



Michael Thornton, Lead Advisor, Heathrow Strategic Planning Group

On Behalf of the HSPG members

ⁱ Full Members of the HSPG (and signatories of an 'Accord') are: Elmbridge Borough Council, Royal Borough of Windsor and Maidenhead, Enterprise M3 Local Enterprise Partnership, London Borough of Ealing, London Borough of Hounslow, Runnymede Borough Council, Slough Borough Council, Spelthorne Borough Council, Surrey County Council, Thames Valley Berkshire Local Enterprise Partnership

Other organisations have 'Observer' status and participate in some activities, including: Government, National Highways, LB Hillingdon, LB Richmond and West London Alliance (of London Boroughs). The Group works closely with Heathrow and airport stakeholder groups such as Council for Independent Scrutiny of Heathrow Airport and Heathrow Area Transport Forum.

ⁱⁱ Balanced Approach - as set out by 4 principles within the International Civil Organisation's (ICAO) document 8929 Guidance.