

**Mobility and Access Committee for  
Scotland (MACS)**

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Aviation Strategy  
Department for Transport  
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Our ref:  
2019/09

Date:  
20 March 2019

**MACS RESPONSE TO THE AVIATION 2050: THE FUTURE OF UK AVIATION  
CONSULTATION**

Please see below a response to your Aviation Consultation provided by the Mobility and Access Committee for Scotland (MACS).

Let me know if you require anything else.

Kind regards,

**Aga Lysak**  
**MACS Secretary**

## 1. Aviation 2050: the future of UK aviation

### 1. Introduction

Thank you for responding to this consultation on Aviation 2050: the future of UK aviation strategy.

The easiest way to respond to this consultation is via the online form:

<https://www.smartsurvey.co.uk/s/aviation2050/>

The online form allows you save and continue your response and save or print a final version for your records.

The aviation strategy sets out the government's vision for aviation to 2050 and includes proposals to:

- develop a partnership for sustainable growth which meets rising passenger demand, balanced with action to reduce environmental and community impacts
- enhance the passenger experience
- build on the UK's success to establish new connections across the world and create greater choice for consumers

Your answers will help us to shape the policy proposals within this document to create a final strategy which will support industry to delivering even greater improvements for passengers, the environment and our country.

This consultation has been extended, and now closes at 11:45pm on 20 June 2019. This is with the exception of the questions posed in 'Annex A: Legislation to enforce the development of airspace change proposals', which will still close for responses at 11:45pm on 11 April 2019.

### **Confidentiality and data protection**

The Department for Transport (DfT) is carrying out this consultation to gather views and evidence on measures for inclusion within the statutory guidance issued for the aviation strategy. This consultation and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. If your answers contain any information that allows you to be identified, DfT will, under data protection law, be the controller for this information.

As part of this consultation we're asking for your name and email address. This is in case we need to ask you follow-up questions about any of your responses. You do not have to give us this personal information. If you do provide it, we will use it only for the purpose of asking follow-up questions.

We may contract a third party to analyse the responses we receive to the consultation. If you provide your contact details, we may share this information with a contractor in case they need to contact you regarding your consultation response.

[DfT's privacy policy](#) has more information about your rights in relation to your personal data, how to complain and how to contact the Data Protection Officer.

Your information will be kept securely and destroyed within 12 months after the consultation has been completed. Any information provided through the online questionnaire will be moved to our internal systems within 2 months of the consultation end date.

## 2. Personal details

### 1.1.1 1. Your name and email address (only used if we need to contact you).

Your name

Hilary Stubbs

Your email

[macs@scot.gov](mailto:macs@scot.gov)

### 1.1.2 2. Are you responding as:

	an individual? (Go to section 4. Chapter 2: Build a global and connected Britain)
Yes	on behalf of an organisation? (Go to 3. Organisation details)

### 3. Organisation details

#### 1.1.3 3. What organisation do you work for?

Mobility and Access Committee for Scotland (MACS)

#### 1.1.4 4. What type of organisation is this?

	Airline
	Airport
	Regulatory body
	Interest group
	Community group
	Industry
yes	Other: Advisory group to the Scottish Ministers

## 4. Chapter 2: Build a global and connected Britain

The UK has the largest aviation network in Europe and the third largest in the world, an industry that contributes at least £22 billion to the UK economy, along with over 230,000 jobs. The government supports the growth of the aviation sector, provided that this happens in the most sustainable way, to ensure its continued success.

### Build a global and connected Britain

Aviation is important for the government's goal of building a global and connected Britain. The UK already plays a prominent role on the world stage with the biggest international aviation network in Europe and currently the third largest in the world. Through the Aviation Strategy the UK will be equipped to build new connections in rapidly growing aviation markets, and to use the leverage we have internationally to pursue our objectives on environmental measures and liberalisation.

The government is working to:

- improve standards globally
- maintain and improve the UK's connectivity
- support UK aviation exports, including overcoming barriers to exporting

**1.1.5 5. This section contains questions on chapter 2 of the consultation document - Build a global and connected Britain. Which of the following topic areas are of interest to you as an individual or to the organisation on behalf of which you are answering? (choose all relevant options)**

	Air services agreements
	Liberalisation of air traffic rights
	Airline ownership and control
	Interchange (short term leasing of aircraft between airlines)
	International standards
	Aviation exports
	Global connectivity
	Airline competition

**1.1.6 6. How should the UK use its global leadership and international influence to further the aims of the UK’s aviation sector?**

The UK has established standards for accessibility and passenger assistance. It is imperative that these standards or their successors are cascaded globally so that people with disabilities can travel internationally for business or pleasure.

**1.1.7 13. Are there any options or policy approaches that have not been included in this chapter that should be considered for inclusion in the Aviation Strategy?**

Policies relating to international travel options for people with disabilities, e.g. range of assistance available, fully accessible buildings, and toilet facilities at all airports, support if required for people with visible or hidden disabilities.

**1.1.8 14. Looking ahead to 2050, are there any other long term challenges which need to be addressed?**

Everyone should have an equal opportunity irrespective of their disabilities, needs or support requirements. Travel should be with dignity and choice, and where possible assistance services should allow the disabled person to retain their independence where possible.

**1.1.9 15. Are you aware of any relevant additional evidence that should be taken into account?**

<input type="checkbox"/>	Yes (see following evidence page)
<input type="checkbox"/>	No (proceed to next section)

## 5. Global and connected Britain evidence

### 1.1.10 16. Please give a brief summary of the additional evidence that you wish to provide.

Comments:

Scottish airports are providing very good passenger assistance, this needs to be replicated at all airports, no matter where the disabled passenger is travelling to or from. Standards vary across the world so a disabled passenger needs to be confident that their needs can be met from start to finish of their journey, regardless of destination.

## 8. Chapter 4: Support regional growth and connectivity

Airports are vital hubs for local economies, providing connectivity, employment, and a hub for local transport schemes. The government wants to ensure, through the Aviation Strategy, that these benefits are maximised, by ensuring that:

- markets are functioning effectively for consumers and local communities
- airports are delivering the connectivity that regions need to maximise their potential
- the industry continues to provide high quality training and employment opportunities
- barriers to freight are reduced

The government recognises the importance of rebalancing the UK through economic growth of the regions and ensuring that the UK remains competitive after we leave the EU. Airports have a crucial role to play as hubs for growth within and beyond the region in which they are situated. The government is committed to working with the industry to develop appropriate and practical policies that support the industry's ambitions. The Aviation Strategy focuses on:

- regional connectivity
- regional transport hubs
- supporting freight
- regional employment, training and skills

**1.1.11 30. This section contains questions on chapter 4 of the consultation document - Support regional growth and connectivity. Which of the following topic areas are of interest to you as an individual or to the organisation on behalf of which you are answering? (choose all relevant options)**

yes	Regional connectivity
yes	Public service obligations (PSOs)
	Start up aid
	Air passenger duty
	Surface access to airports
	Supporting freight
	Regional employment and skills

**1.1.12 31. To what extent do these proposals provide the right approach to support the complex and varied role that airports play in their regions?**

The PSO duty is very important for Scottish island communities, both for social and business travel, for freight and passengers.

In particular, the regionalisation of hospital services to major cities means that patients need to travel for medical treatment, and travel by air is frequently the only option due to the distances involved.

Assistance between different airlines also needs to be streamlined as many connecting flights are with a different company and disabled travellers cannot manage when baggage needs to be collected between flights.

Disabled people also require longer connection time between flights and accessible facilities are key as many disabled people cannot access toilet facilities on-board aircrafts without great difficulty, distress, anxiety and often without dignity.

Joined up services between rural airports and transport hubs is essential for effective air travel, as is joined up transition between flights and local bus / train services, we therefore support the measures in 4.37.

**1.1.13 39. Looking ahead to 2050, are there any other long term challenges which need to be addressed?**

Maintenance of the PSO duty for island and rural communities such as Prestwick, Campbeltown, Inverness and Aberdeen.

## 10. Chapter 5: Enhance the passenger experience

All passengers should have a positive experience of flying. The industry is responsive to the needs of consumers but improvements can be made for passengers with additional needs and when things go wrong. The government proposes to consult on a new Passenger Charter to promote good practice in the sector, create a shared understanding of the level of service that passengers should expect, and communicate roles and accountabilities clearly. The government proposes to take necessary action to improve the experience at the border and tackle problems cause disruptive passengers. It will also consider strengthening the Civil Aviation Authority's range of enforcement powers across the consumer agenda.

### The Aviation Strategy:

- sets out the proposed standards that could be included as part of a new Passenger Charter for aviation
- sets out a range of new measures for passengers with additional needs
- outlines measures to tackle the problem of disruptive passengers associated with alcohol
- describes the government's approach to improving the operating model at the border to enhance the passenger experience
- details proposals for simplifying and improving complaints and compensation procedures
- sets out government proposals for ensuring that consumers have timely access to the information they need to make informed choices

**1.1.14 42. This section contains questions on chapter 5 of the consultation document - Enhance the passenger experience. Which of the following topic areas are of interest to you as an individual or to the organisation on behalf of which you are answering? (choose all relevant options)**

yes	Passenger charter
yes	Passengers with additional needs
yes	Disruptive passengers and alcohol
yes	Experience at the border
yes	Delays, complaints and compensation
yes	Airline failure
yes	Booking information

**1.1.15 43. To what extent does the proposed Passenger Charter adequately address the issues that are most important to passengers?**

1. Before the journey we need to include awareness of rights and assistance that can be offered including working with travel agents and airlines. Many disabled people are unaware of the help that can be offered and issues such as being able to take 2 pieces of mobility equipment free of charge and the regulations governing batteries on wheelchairs and scooters. This all needs promoting before the journey booking and will give disabled people more confidence to travel by air.
2. All information needs to be available in formats, which are accessible to disabled travellers.
3. Information needs to be readily available before booking, and not as an after thought in a document.
4. We would advocate early Equality Impact Assessments of the developing Charter.
5. The Mobility and Access Committee for Scotland (MACS) welcomes the involvement and would encourage early engagement with disabled people and DPO's in developing the Charter. One of our workstreams is Ferries and Aviation and we are focusing on working with our Scottish airports to develop their accessibility. The Lead for this workstream would be keen to be involved in the development of the Passenger Charter.

MACS overarching strategic remits include providing advice to Scottish Ministers on the transport and travel needs of disabled people and in doing so, engaging with disabled people and/or their representatives to gather insights from their experiences to give advice.

**1.1.16 44. How should the operating model for border service be designed to improve the passenger experience?**

We would like to advocate the use of fast tracking disabled people through, designated flow lanes, quiet areas and an understanding of disabled peoples needs and anxieties when being security checked. (including disabled people trying to conceal indwelling catheters, stoma bags etcetera to retain dignity during security searches.

An awareness of these anxieties and procedure for managing them would make the checks less stressful.

## Policy proposals

The questions in the section below refer to policy proposals contained in chapter 5 of the consultation document - Enhance the passenger experience. As with the rest of this consultation, you are welcome to respond to any, all or none of the questions in this section.

### **1.1.17 45. How could the policy proposals be improved to maximise their impact and effectiveness in addressing the issues that have been identified?**

We have concerns about the tone in the consultation and hope that this doesn't filter into future developments including the Charter. The tone identifies disabled people as the issue to be addressed/resolved. We would draw your attention to the Social Model of disability that recognises the environmental barriers and MACS advocate this approach.

Example; as this is a strategy to take us to 2050, within the strategy should we be advocating that there is a move away from statements like 'passengers with additional needs' and towards: 'we will remove barriers preventing equity of access to all' and/or 'where people need assistance to overcome these barriers our staff will provide this'

In parts of the consultation the language gives the feeling that the disabled person is the issue that needs to be fixed, and it should be that the airport environments, facilities and design of aircrafts presents barriers to access for all.

The revised guidance para 5.29 should state that disabled passengers, irrespective of their disability should be seated with a companion, not only passengers with a hidden disability.

In para 5.30 The wording of this is not strong enough. One size doesn't fit all and it is very important that the preferences of a disabled traveller are met, not just considered. We have examples of people with hidden disabilities who won't request assistance because all passengers who ask for assistance at one airport are seated in a wheelchair and wheeled through the airport. For a fully mobile person with a mental illness or autism this is totally inappropriate.

### **1.1.18 46. How should the proposals described be prioritised, based on their importance and urgency?**

All the proposals are key to ensuring equality of access, and as such should not be ranked.

**1.1.19 47. What implementation issues need to be considered and how should these be approached? (e.g. resourcing challenges, high levels of complexity, process redesign, demanding timelines)**

Implementation of the Charter and priorities will only be successful if disabled travellers are involved in their design.

Publicity, across all media, will be important for the successful implementation of the Charter.

Training for staff should be designed with and delivered by disabled people.

**1.1.20 48. What are the financial burdens that need to be managed and how might those be addressed?**

The current growth in the numbers of travellers with a disability reflects the potential market growth that this sector holds.

Mobility equipment is becoming more varied with many disabled people preferring/choosing powered wheelchairs or mobility scooters. Thought needs to be given to the safe storage of mobility equipment and how to reduce damage that results in high financial compensation due to the cost of equipment repair or replacement.

**1.1.21 49. What are the regulatory burdens that need to be managed and how might these be addressed?**

As in qu 48, the current regulations relating to compensation for damage to wheelchairs needs to be changed. Limits need to be removed and there needs to be a clear drive to mitigate damage to wheelchairs due to the impact this has on the individual who can no longer move about. Compensation needs to be immediate, consider the costs due to temporary loss of a wheelchair and compensation should be based on full costs of repair or replacement on a like for like basis.

**1.1.22 50. Are there any options or policy approaches that have not been included in this chapter that should be considered for inclusion in the Aviation Strategy?**

Mention has been made about some airports employing disabled people. This should be commended and developed across both airports and airlines. By employing disabled people this enhances the understanding of disabled travellers and give a commitment to the economy of an area.

Section 5.35 should also include passengers who are disruptive due to drugs.

Hate crime towards people with disabilities should not be tolerated and this should also be included in the call for evidence with a disability hate crime charter developed.

**1.1.23 51. Looking ahead to 2050, are there any other long term challenges which need to be addressed?**

The design of aircrafts so that a wheel chair user can access the plane and remain in their wheelchair for the duration of the flight. Suitable toilet facilities and / or Changing Places should also be included in any designs.

Seating space for passengers with guide dogs or assistance dogs.

Quiet areas on aircrafts for passengers with Autism or ADHD.

**1.1.24 52. Are you aware of any relevant additional evidence that should be taken into account?**

<input type="checkbox"/>	Yes (see following evidence page)
<input type="checkbox"/>	No (proceed to next section)

**1.1.25 Return this questionnaire**

1.1.26 Email to:

[AviationStrategy@dft.gov.uk](mailto:AviationStrategy@dft.gov.uk)

1.1.27 Post it to:

Aviation Strategy,  
Department for Transport,  
33 Horseferry Road,  
London,  
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