

To the Department for Transport - **Skytyping and skywriting**

28th March 2020

Dear Sirs,

This response on the proposals to allow skytyping and skywriting is made on behalf of London Forum of Amenity and Civic Societies which is a charity established in 1988 to network, inform, support and represent over 100 community groups in London.

London Forum objects strongly to the proposals by the Department for Transport (DfT) to relax General Aviation regulatory rules and to allow the activities described in this consultation.

The reasons for the current ban on such advertising, described in the Executive summary item 6, are still valid, namely "a pre-emptive response to visual disruptions and the potential spread of political propaganda." The London residents that London Forum represents do not want either of those to be allowed and the Government should not encourage them by lifting the ban.

Reference is made to this change being in the Green Paper 'Aviation 2050'. That new aviation strategy proposed was for:-

- developing a partnership for sustainable growth which meets rising passenger demand, balanced with action to **reduce environmental and community impacts**
- improving the passenger experience, including through technology and innovation, a new passenger charter and action to reduce delays at the border
- building on the UK's success to establish new connections across the world and create greater choice for consumers

London Forum supports the aim to reduce environmental and community impacts and considers that sky advertising would be contrary to those objectives.

There was no reference to skytyping and skywriting in that Green Paper.

In the consultation responses to it published by Government was the statement "Community noise and environmental interest groups were generally opposed to the proposals." Those groups pointed to "the absence of an appropriate environmental framework".

Such concerns apply still and would be increased by the proposals in this consultation.

It is extraordinary for the consultation not to contain a proper cost benefit analysis, quantifying both the economic benefits and the environmental costs fully quantified in financial terms. It is quite unacceptable to make such a significant change without this.

Moreover, such a relaxation sends a perverse signal; the Government had been trying to limit greenhouse gases but this would be a move in the opposite direction. Also, the DfT has just issued its proposals for 'Decarbonising Transport'.

Apart from the visual distraction, which could lead to accidents on the ground, the consultation paper refers to the noise being less at ground level than that from other operations using the same type of aircraft. Communities in the outer London boroughs do not want **any** more noise.

The DfT consultation document tries to reassure people that such advertising in the sky would be carried out by one plane but then shows pictures of displays by several planes and describes such advertising. The cumulative effect of several planes could result in noise at ground level. Also, the aircraft would have to take off from airfields around which residents would have added irritation.

In its reference to the possibility of a **nuisance factor of visual disruption**, the DfT consultation paper states "However, given the aeroplanes would be operating at an altitude of at least 7,000ft they would be hard to see and are unlikely, therefore, to be considered a nuisance.". That does not cover the distraction of the advertisements themselves.

DfT states that "There is, however, a potential for skytyping and skywriting to compete with or displace other forms of aerial advertising such as banner towing or use of balloons." which could result in the loss of jobs for those engaged in such activities and in associated suppliers.

The fact that "In the UK, we already boast some of the world's best skytyping pilots" is no reasons to allow skytyping and skywriting.

An assurance is given in the proposals that there would be "no additional safety risks to third parties on the ground resulting from skytyping and skywriting activities." However, that is because of "the requirements for minimum heights as set in the European standardised rules". It is understood that there is a ban on single engine fixed wing aircraft over "Central London" but for other areas the risk of a plane carrying out skytyping or skywriting becoming faulty and crashing to the ground in populated areas is not covered in this consultation and it should have been.

Finally, it is most unreasonable during the current Covid-19 pandemic that DfT should issue a consultation with little publicity for one of the shortest periods of consultation that London Forum can remember of thirteen days for responses.

The consultation should be extended for a further six weeks and publicity of it renewed.

Peter Eversden MBE,
Chairman,
London Forum of Amenity and Civic Societies

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