



Draft National Planning Policy Framework

A response from the Aviation Environment Federation, October 2011

The Aviation Environment Federation (AEF) is the principal UK NGO concerned exclusively with the environmental effects of aviation. Supported by individuals and community groups affected by the UK's airports and airfields or concerned about aviation and climate change, we promote a sustainable future for aviation which fully recognises and takes account of all its environmental and amenity affects.

As well as supporting our members with local issues, we have regular input into national policy discussions and acted as the sole environmental and community representative on the South East Airports Taskforce, which was chaired by the Aviation Minister, Theresa Villiers, and considered how improvements could be made to the passenger experience at Heathrow, Gatwick and Stansted airports without expanding capacity.

We also work with European and international policymakers, and, as part of the International Coalition for Sustainable Aviation, have observer status at the UN's International Civil Aviation Organisation.

We have responded only to those questions in the consultation to which we feel we can have useful input. We also attach a paper titled *Airports, risk, and the public interest*, which was prepared for this consultation.

1a Delivering sustainable development

The Framework has the right approach to establishing and defining the presumption in favour of sustainable development.

We disagree.

1b Do you have comments?

Paragraph 4 states that 'the National Planning Policy Framework... articulate[s] the Government's vision of sustainable development', the foreword to the document having been defined by the Minister as follows: '*Sustainable* means ensuring that better lives for ourselves don't mean worse lives for future generations. *Development* means growth.' As the word

'sustainable' has for some time been used routinely but often vacuously to preface controversial policy proposals, the inclusion of this definition is very welcome.

However, in the framework itself there are scarcely any policies that would ensure that this definition has meaning in practice. No tests of sustainability are to be applied in the context of planning decisions, apart from the most basic legal requirements, a presumption against coal mining, and a handful of recommendations that 'where possible' developments should be sited such as to minimise environmental harms. No mechanisms are proposed to link planning policy with the sustainability policies as set out, for example, by Defra and DECC. And throughout the proposed framework there is a clear sense that what matters above all is the approval of 'development', such that planning authorities should do everything possible to avoid proposals being stalled by environmental concerns.

AEF would be able to support a presumption in favour of sustainable development only if the phrase was to be meaningful in practice with respect to environmental sustainability. As it is, while we recognise that the planning system is currently in some ways cumbersome, we have real concerns about the proposed changes.

4a Decision taking

Any guidance needed to support the new Framework should be light-touch and could be provided by organisations outside Government.

We strongly disagree.

4b What should any separate guidance cover and who is best placed to provide it?

AEF believes that establishing an explicit aim for the Government's approach to planning guidance to be 'light touch' is mistaken. There are of course areas in which local discretion is preferable to top-down policy – whether community noise concerns are best alleviated by a concentration or a dispersal of flightpaths would be one example from our area of expertise.

However, there are areas in which AEF believes guidance from central Government to be essential in facilitating the planning process. We provide two examples:

- (i) PPG 24 contains guidance to LPAs in relation to planning and noise. We believe that the noise thresholds specified in the guidance require revision in the light of recent research into the impact of noise on both health and annoyance, and we have concerns about the fact that the guidance applies only in one direction (constraining development near airports but not, if strictly applied, constraining airports near to other developments). However, annex 3 of the document provides guidance on how noise from aircraft in general, from military aerodromes and from heliports should be assessed, and this, in our experience, has proved helpful for planners who may be unfamiliar with the specific issues related to the monitoring and measurement of aircraft noise.

- (ii) AEF believes that the way in which third party risk around airports is currently treated in the planning process is failing communities around airports, with DfT policy on Public Safety Zones being regularly misunderstood and/or misapplied. Our views on this, together with evidence drawn from a series of recent planning cases, is outlined in the attached document *Airports, risk and the public interest*. We believe that public safety should be specifically mentioned in the Framework as an issue for consideration in the context of planning decisions, and that new guidance on third party risk around airports, drawn up jointly between DfT and DCLG, is needed to ensure that an appropriate approach to risk is implemented consistently around the UK.

7a Transport

The policy on planning for transport takes the right approach.

We strongly disagree.

7b Do you have comments?

Paragraph 83 of the section on transport states that: “Where practical, encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.” As discussed in our response to question 14b, for this aim to be meaningful with respect to aviation emissions would require significant reform in the way that planning policy relates to climate policy, since emissions from surface access to and from airports are a tiny proportion of aviation emissions.

Paragraph 85 then states that ‘Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable economic growth, including large scale facilities such as Rail Freight Interchanges, roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand in their areas.’ While the wording is somewhat difficult to follow, this statement as it stands appears to imply support for infrastructure that will facilitate the growth of travel demand – a policy that would conflict overtly with statements elsewhere in the document on reducing the need for travel through appropriate siting of development (as, for example, in paragraph 86). Seeking alternatives to travel is an important component of the Government’s commitment to tackling environmental impacts such as greenhouse gas emissions, noise and air pollution, and the framework document should reflect this.

14a The policy relating to climate change takes the right approach

We strongly disagree.

14b Do you have comments?

Paragraph 23 requires local planning authorities to set out strategic policies to deliver climate change mitigation and adaptation; paragraph 71 describes the urgent need 'to restructure the economy, to build on the country's inherent strengths and to meet the twin challenges of global competition and of a low carbon future'; and paragraph 148 states that: 'The Government's objective is that planning should fully support the transition to a low carbon economy in a changing climate... To achieve this objective, the planning system should aim to secure, consistent with the Government's published objectives, radical reductions in greenhouse gas emissions...'

However, the principle means by which these ambitious goals are to be put into practice appear to be the siting of development such as to encourage access by public transport and an increase in the speed with which developments that will help to reduce emissions gain approval. The glaring hole, of course, is in relation to those developments that should be refused on the basis that they will result in large increases in UK emissions, the only exception appearing to be coal mining, for which there is a presumption against development.

AEF fully appreciates that the problem in making planning policy compatible with climate policy is not a new one. Yet common sense suggests that in considering the role of airport planning and climate change it is inadequate to address only the emissions arising from surface access. In the minds of both the public and of politicians, airport developments and climate change are closely linked, and while in opposition, the Conservatives repeatedly stated that one of the reasons for their opposition to the expansion of Heathrow airport was the huge rise in emissions that would result from the increased air traffic associated with a third runway.

AEF urges DCLG not to waste the opportunity for the new framework to consider how planning and climate change policies can work together on the ground rather than simply in the language of strategic ideals. Possible approaches could include, for example:

- The setting of airport-specific greenhouse gas targets, to include emissions from all departing flights as well as ground operations, by, for example, the Committee on Climate Change, the Civil Aviation Authority or the Environment Agency.
- The setting of regional caps for greenhouse gas emissions, in which aviation emissions are included. (The Tyndall Centre report *Aviation in the North West: emissions, economics and organizational flying*¹ proposed a methodology by which emissions could be allocated to an airport according to where passengers began their journey, which might be a fairer approach, assuming the availability of data, than a simple allocation in terms of flight departures.
- A presumption against airport development on climate grounds; permissions

¹ http://www.joulecentre.org/index.php?option=com_content&view=article&id=369&Itemid=79

could, for example, be considered only in cases where it could be demonstrated that emissions and/or demand had been reduced elsewhere

- A requirement for all proposals for airport development to receive the approval of the Secretary of State for Energy and Climate Change
- Longer term, restrictions on slot usage to implement greenhouse gas constraints

We recognise that pursuing any of these policies would take planning policy into territory that is quite new, but we firmly believe that the gap in relation to planning and climate change is in urgent need of redress. We would be keen to discuss these suggestions with DCLG.