

Aviation strategy: call for evidence

Page 1: Personal details

Q1. Contact information	
Name	Cait Hewitt
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Q2. What is the nature of your:	
interest in the aviation sector?	As an organisation we are concerned exclusively with the environmental impacts of the aviation sector
involvement in the aviation sector?	-

Q3. Are you responding:	
on behalf of an organisation?	

Page 2: Organisational details

Q4. What is the name of your organisation?
Aviation Environment Federation

Page 3: Aviation Strategy

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

As emphasised in response to question 7, we consider that only a specific environmental objective, considered early on in the strategy process, will ensure that aviation policy is given the appropriate framework. The fifth objective should therefore, we argue, remove reference to supporting growth. Growth in aviation should be supported only on condition that environmental impacts are effectively tackled.

We do not take the view that this would necessarily prevent the sector from growing. In relation to climate change, for example, the Committee on Climate Change has advised that a 60% growth in passenger numbers may be possible by 2050 while keeping economy-wide emissions to a level consistent with the Climate Change Act, and some of our members take the view that noise improvements are possible to deliver while still allowing for some growth, for example through better airspace arrangements or the use of less noisy aircraft. Several of these communities have cited the Government's 2013 objective that the benefits of noise reduction should be shared between industry and communities, allowing for some growth while providing a benefit in terms of the noise experienced.

But delivering these outcomes requires a degree of intervention and guidance in the market. The inevitable tensions between "supporting growth" and "tackling environmental impacts" are a good example of why a government aviation strategy is urgently required. Meeting the recommendation of the Committee on Climate Change, for example, will require some degree of aviation demand management; modelling from the DfT, the CCC and the Airports Commission has all indicated that a policy of 'growth everywhere' will result in emissions exceeding the maximum recommended. This challenge becomes particularly acute in the context of the Government's support for Heathrow expansion, which would require severe restrictions to be imposed on emissions from other airports in stark contrast to the approach of unrestricted growth advocated in the call for evidence. As indicated in our response to a later question, we see no justification for considering Heathrow and its expansion as an entirely separate policy matter from the aviation strategy.

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

Yes

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	6
Build a global and connected Britain	3
Encourage competitive markets	4
Support growth while tackling environmental impacts	1
Develop future innovation, technology and skills	2

Why?

The numbering options above seem to keep snapping back to the original arrangement, no matter what I do to them. In addition the wording and ordering of this and the previous question differ significantly from the questions in Annex of the document (which refer instead to policy challenges). Working with the wording in the strategy, we do not accept that “meeting increasing demand through sustainable growth” is an appropriate policy challenge since it closes down a question we consider fundamental, namely the extent to which ensuring sustainability of the aviation sector is consistent with growth, and in particular whether it is possible to cater for all consumer demand while meeting sustainability objectives. We suggest that the fifth policy challenge should be replaced by “meeting environmental objectives”, and that this should move to the top of the list. There are two reasons why these objectives should be clarified at the start rather than the end of the strategy consultation process. Fundamentally, as set out above, we consider that proposals in the draft strategy to encourage growth, for example by suggesting a presumption in favour of approval for applications to increase capacity, are premature in the absence of a set of framing conditions related to what level and kind of aviation growth is consistent with environmental objectives. Additionally, concerns about environmental impacts very often arise when proposals for aviation growth are made to local planning authorities, so an early statement of national policy on appropriate environmental objectives for the UK aviation sector is required to facilitate the decision-making process. We do not have a view on the appropriate order in which the remaining issues are tackled.

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

We strongly object to the proposal to “put passengers and businesses at the centre of everything”. While improving the passenger experience is certainly a legitimate policy objective, as currently framed the proposal suggests that the Government is interested in people only to the extent that they are consumers. It specifically neglects the interests of those 50% of the population in any given year who take no flights, and of communities who are impacted by noise and pollution from aviation. Wider environmental objectives that are in the general public interest and reflect both national and international commitments, on climate change for example, are similarly likely to be excluded by such an exclusive remit. If the principle is to be retained as defining the DfT’s approach to aviation then responsibility, powers, and appropriate funding for tackling the sector’s environmental and social impacts must urgently and explicitly be passed to Defra (for air quality, noise, and conservation impacts), and BEIS (for climate change impacts). With the CAA now having an explicit duty to prioritise the interests of consumers, the need for the Government to take responsibility for championing the interests of the general public in relation to aviation is arguably greater than ever.

We are similarly concerned that deciding from the start that a policy must be ‘market driven’, with the Government acting merely as an ‘enabler’ means that environmental externalities to the market will not be adequately addressed. We are open to the possibility that market forces may be harnessed in order to meet environmental objectives (structuring airport charges to incentivise the use of quieter aircraft, for example, or allowing carbon trading in the context of a defined CO2 cap). But the draft strategy fails to set out clear, national environmental objectives for aviation, suggesting that this second principle is largely a restatement of the first, namely to support industry growth. There are doubtless examples of the Government acting appropriately as an enabler of aviation markets. But in the absence of legal or other regulatory bodies to tackle environmental impacts, it also falls to Government to prevent the operation of markets from resulting in harm to public health and wellbeing or failure to achieve environmental objectives on climate change, in other words to restrain and regulate markets.

We support the principle that the strategy should be evidence led. We do not, however, feel that the approach of supporting growth at all airports in the absence of a climate change objective or strategy for the sector respects this principle, since ample evidence of the need for demand management has been made available by the Committee on Climate Change. Meanwhile several airports are located in areas where air quality management is a high priority, requiring a cautious approach on the basis of up-to-date evidence to avoid further deterioration.

Page 6: Policy tests

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

We support the proposed tests and would like to see them implemented throughout the strategy.

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?

The proposal is unclear to us. At present, with the exception of major infrastructure projects, local planning authorities are almost always responsible for determining whether or not a planning application should be approved, having considered its anticipated local impacts, both positive and negative. There appears to be little in the way of Government policy to obstruct this process, so we are unclear about the steps the Government could take to support airports in making best use of their existing runways.

Meanwhile it is unclear what the Government expectation is in relation to 'environmental issues being addressed', since the strategy contains precious little by way of environmental policy or objectives. We are concerned by the statement that "Due to the recent rise in growth, the government believes that this issue cannot wait until the publication of a new Aviation Strategy". We would strongly oppose a policy whereby planning authorities are encouraged to approve any applications for growth in the absence of strategic guidance from Government on how to assess environmental impacts.

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?

No

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?

There is ample environmental evidence that should have enabled the Government to construct a meaningful framework of environmental objectives and to present as an integral part of the strategy. There are also some areas where further evidence needs to be developed.

On climate change, the strategy should show

(i) How aviation emissions will be kept to 37.5 Mt CO₂e or below by 2050, with a specific and deliverable set of policy proposals that take account of

* the CCC's 2009 aviation report and its subsequent advice to Government

* the emissions gap between the mitigation expected from the CORSIA and the level of the planning assumption (<https://www.aef.org.uk/2016/10/24/new-aef-briefing-why-the-un-carbon-offsetting-deal-for-aviation-cant-close-the-uk-policy-gap/>)

* the Airports Commission's analysis, including its finding that a carbon price of around £600 per tonne would be required to keep emissions in line with the CCC planning assumption if a third runway is built

* the DfT's latest forecasts (currently unpublished) of CO2 emissions from UK aviation

* the DfT's latest view of likely future biofuel availability for the sector that accords with the recent decision on the crop cap and on prioritisation of waste in the context of revisions to the RTFO, noting the previous forecast of 2.5% of aviation coming from sustainable sources by 2050, as well as evidence gathered by the DfT alternative fuels team.

* How emerging evidence on non-CO2 emissions will be incorporated to policy in future

(ii) What role aviation will play in the achievement of longer term climate objectives, as reflected in the Paris Agreement, which are likely to require complete decarbonisation of the economy by the mid 2070s. Consideration could, for example, be given to consolidation of the global airport network, electric aircraft, airships, and electric aircraft.

On noise, the strategy should show

* How the public will be protected from aircraft noise, setting both short term and longer term objectives that reflect the latest advice of the WHO and WHO Europe for the protection of health (noting that updated recommendations are forthcoming), and a plan for achieving them. See AEF's report on aviation noise health impacts, the Evidence is Loud and Clear (<https://www.aef.org.uk/2016/01/12/new-report-finds-aircraft-noise-policies-put-the-health-of-over-one-million-people-at-risk/>)

* How the Government intends to respond to evidence (acknowledged in the strategy itself) that even as aircraft are individually becoming quieter and – in many cases – noise contours shrinking, noise annoyance from aviation has been increasing. (CAA's SoNA study is a recent example.)

* How local authorities should use noise information in determining applications for growth or change of use

On air quality the strategy should show

* How the Government will ensure that aviation development does not lead to or exacerbate any breaches of either (i) the UK's legal obligations on limit values, particularly for nitrogen dioxide, or (ii) the National Emissions Ceilings Directive

* How the Government will ensure that aviation development does not compromise achievement of the air pollution targets recommended by the WHO for the protection of health, notably in relation to small particulate matter

* How the Government will ensure that specific sources of pollution from aircraft and airports are minimised

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?

Regardless of how well the opportunity to participate is publicised and how accessible the materials are made, there will be little motivation for communities to respond if they feel that the key decisions have already been taken. Our members, for example, are most likely to want to engage primarily on environmental questions, but the current timetable suggests that there will be no opportunity for this until the latter half of 2018, by which time issues such as the scale and nature of the aviation sector will already have been decided.

The most valuable action that could be taken would therefore be to bring forward consideration of environmental impacts to the start.

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 Annex A you asked "15. Are there any issues which we have not covered in this document which you think should be included in the consultation process?"

There are two important issues that are not addressed in our view.

The first is that we consider it inappropriate for the Government to be seeking parliamentary support for the Airports National Policy Statement before having developed its aviation strategy. A third runway at Heathrow would have significant environmental impacts that should properly be considered in the context of a national strategy. Heathrow expansion would – the absence of new and dramatic mitigation policy – make achievement of the CCC's recommendation on limiting aviation emissions under the Climate Change Act effectively undeliverable, would worsen air pollution in London and risk exceedence of limit values for NO₂, and would increase flight numbers in a part of London where more people already suffer noise impacts than at any other airport in Europe.

We do not see the logic in arguing that the environmental issues presented by Heathrow expansion should be dealt with in their own separate bubble, determined independently of Government policy for the rest of the UK. The impact of Heathrow's operation and expansion should instead be a consideration for this document on at least an equal footing as that of other airports. This would facilitate a UK-wide perspective on important issues such as determining whether total CO₂ emissions from the sector are consistent with climate change policy (an issue that is entirely sidestepped by the Clean Growth Strategy on the basis that it will be addressed by the Aviation Strategy), and understanding the regional economic impact of a major South East expansion. While the strategy gives strong in-principle support to the growth of airports outside the South East, evidence from the Airports Commission indicates that most airports will lose passenger growth if Heathrow expands (compared to a no-expansion future)

even under the ‘carbon traded’ case, and that every single UK airport will lose growth as a result of Heathrow expansion in the ‘carbon capped’ case. (See <http://www.aef.org.uk/uploads/2017/03/Heathrow-R3-impact-on-UK-airports.pdf>)

We also consider it inappropriate that the process for consultation on the strategy has begun prior to publication of the aviation forecasts. The graph on p14 indicates an expectation of consistent future growth but provides the minimum of information about how the data was generated (units of measurement and methodology are both absent). New forecasts were originally promised during the period of NPS consultation. While we understand that these were initially delayed as a result of purdah rules once the general election was announced we so justification for the current further delay. The strategy is currently based on the evidence of the past few years, but the levels and nature of future demand are a far more relevant consideration. Development of the strategy and any other relevant Government decisions should therefore be halted, we argue, until the forecasts are available.

We have an additional comment that is relevant to question 9, which asks if we think additional questions should be included in consultations. We consider it unacceptable that fundamental questions such as “how to achieve the right balance between growing the sector, and ensuring effective action is taken to tackle carbon emissions, reduce noise and improve air quality” and “what the best approach and combination of policy measures are to ensure we effectively address carbon emissions from aviation” have not been considered prior to publishing a policy that supports growth everywhere and proposed minimal government intervention. It is very clear that carbon emissions from aviation cannot be effectively managed by such a policy approach, so the question – proposed to be considered not be government but by respondents as an afterthought – will to a very large extent already have been decided, not least if Heathrow expansion has already received parliamentary approval at this time.

Rather than proposing additional questions to be tacked on to the end of the consultation process, we strongly urge the government to address these and other key environmental questions at the outset.

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