APPG on Airport Communities: inquiry into a National Aviation Strategy

Response from the Aviation Environment Federation and the Airspace and Noise Community Forum

10th December 2022

We welcome the opportunity to engage with the APPG on the opportunities and risks associated with the proposal for a new National Aviation Strategy. AEF campaigns on aviation's impacts for people and the environment. We formed as a federation in 1975 to represent the interests of communities living around civil airfields and airports who were increasingly affected by the noise from a rapidly growing industry, and to seek solutions at a national policy level. Our work now extends beyond the UK to influencing European and global policy makers, and our expertise has expanded to include local air pollution, climate change, airport planning and economic issues.

AEF's Airspace and Noise Community Forum was established in January 2022 to work with communities adversely impacted by aircraft noise and airspace change. It works to identify issues of common concern and to engage constructively with government, regulators and industry, focussing on national policy and matters of regulation.

AEF has a seat on the Jet Zero Council and on the advisory panel to the industry coalition Sustainable Aviation. The ANCF has a seat on the DfT's Airspace and Noise Engagement Group and Airspace Strategy Board, and meets regularly with representatives of the Department for Transport and the CAA.

1. Do you agree that the Government should develop a National Aviation Strategy?

We can see both opportunities and risks in this proposal.

Aviation in the UK is very largely provided by the private sector and is subject to reasonable competitive forces (other than at congested airports like Heathrow). National strategies are clearly relevant for critical industries, such as defence, and for vital public services such as road and rail, but it is much harder to see the case for aviation, which is overwhelmingly leisure, not trade, services: over 80% of UK passengers travel for leisure purposes. And it primarily serves a small proportion of society: 15% of people take 70% of UK flights.

More broadly the argument that growth in aviation is critical to economic growth and trade is no longer valid. Air transport, and services incidental to it, account for less than 0.7% of GDP and only 0.4% of jobs.

The development of a National Aviation Strategy could reinforce the self-importance of the industry while distracting from the urgent need to address specific policy gaps including in relation to environmental impacts.

Nevertheless we would support a review of the role of aviation in the UK that takes into account the full range of economic, social and environmental considerations, and would welcome a new aviation strategy if it enabled these issues to be reviewed fairly.

Current aviation policy is set out through a combination of documents including:

- *The Jet Zero Strategy.* This sets out a modelled trajectory for aviation emissions that the Government hopes to achieve, with very little policy detail about how this will be delivered.
- *Flightpath to the Future.* Designed to take forward some of the issues introduced in the 2018 aviation green paper, this provides very little by way of an environmental framework.
- *The ANPS*. This gave support for a new runway at Heathrow but predated the new net zero emissions target for the UK.
- *Making Best Use of Existing Runways (or MBU)* The MBU policy was written 4 years ago and set out the case for airport use based on the now-outdated concept of a 37.5 Mt 'planning assumption' for aviation emissions (under the then 80% national emissions target). Nevertheless it is described in recent documents such as Flightpath to the Future as having 'full effect' for planning purposes.
- *The 2013 Aviation Policy Framework.* Amongst other things this sets out the government's core aircraft noise policy and its approach to managing noise.

Given the various gaps and untested assumptions in these policies, we would welcome a new approach.

Historically it has been taken for granted that growth in aviation is both necessary and beneficial, and that policies to mitigate aviation's environmental impacts have to be fitted in, as far as possible, around this assumption. In fact, however, there is good evidence that aviation demand growth cannot be straightforwardly reconciled with climate commitments[1] while the IEA has recommended keeping business travel to 2019 levels; capping long-haul flights (of more than six hours) for leisure at 2019 levels; and shifting demand to high-speed rail.

Even the Government's techno-optimistic 'Jet Zero' strategy assumes a larger wedge of emissions reduction from the demand impact of carbon pricing (assumed to increase over time) than from either SAF or new aviation technologies. In terms of local impacts similarly, there is strong evidence to suggest that the number of aircraft remains a

[1] https://www.climateaction100.org/news/climate-action-100-warns-that-the-aviation-industry-must-take-urgent-action-to-keep-1-5c-within-reach/

problem for noise-affected communities and households, even if those aircraft individually are becoming less noisy, and while in theory airspace change offers opportunities to distribute flights more fairly (as well we more efficiently), in practice there are no easy solutions.

2. What are the key elements that should be included in a National Aviation Strategy?

- Consideration of the role of aviation in the UK economy, including whether aviation services such as connectivity, tourism, and trade in goods could be delivered in a more environmentally efficient way, for example through the promotion of domestic tourism and leisure and the showcasing of businesses who plan to lock in good practices acquired during the pandemic of replacing some of their air travel with virtual connectivity.
- A focus on aviation employment, which has been in long-term decline as a result of automation at airports and the rise of the low-cost model and is likely to reduce further given the need for aviation demand reduction for environmental reasons; this needs to be planned for carefully, with the involvement of workers, and with a focus on support for transition to sustainable jobs as well as security for those currently in employment.
- A review of policy on airport capacity (including a review of the NPS and MBU) in light of net zero, and following CCC's advice.
- A consideration of the role of LPAs in relation to aviation, including advice for planners on appropriate environmental conditions (for example expansion being permitted only on condition that airport emission reductions track the Government's jet zero trajectory), and with new guidance to replace the now defunct PPG24 in relation to noise.
- The setting of health-based noise targets.
- Consideration of how to internalise the cost of delivering net zero aviation, including the delivery of engineered carbon removals, to the extent that the aviation sector will rely on them, as well as zero emission aircraft and fuels, to ensure that this falls on polluters and not on the general public many of whom don't fly in any given year.
- A broader review of the arrangements for regulating aviation's environmental and noise impacts, which are demonstrably inadequate given the scale of the industry's impacts and risks involved

3. Where should any potential growth in aviation capacity be focused?

AEF does not support growth in aviation capacity. Existing capacity already allows for significant growth in air passenger demand. It is worth noting that CCC recommends against any net increase in airport capacity but still allows for 25% passenger growth in passenger numbers over the level in 2018. Even this level of growth could pose a significant risk of not meeting the net zero target.

4. How best can the environmental impacts of aviation be reduced?

Climate impacts (CO2 and non-CO2)

In addition to achieving net zero CO2 emissions by 2050 - an enormous challenge - the CCC has recommended a target of no additional warming being caused by aviation's non-CO2 impacts (historically twice as large as those from CO2) by 2050. This is not yet Government policy. Solutions for CO2 may include:

- A reduction in flights (particularly long-haul flights which generate the most emissions and that will be hardest to replace with zero emission aircraft)
- More effective carbon pricing to deliver the 'polluter pays principle' and speed up new technology development
- Development of more accurate carbon accounting to ensure that the potential benefits of SAF are not over-claimed or double counted
- Better public and consumer information about the CO2 impacts of flying

Noise

The development of aviation noise policy has stalled in recent years but our members tell us that aircraft noise remains a significant problem as traffic returns post-pandemic. Action to reduce aviation noise impacts could include:

- The setting of meaningful, measurable targets to protect the public from the impacts of aircraft noise on health and quality of life
- Increased accountability for airports in delivering their noise commitments
- Guidance for local authorities on how to set appropriate planning conditions in relation to noise
- A guarantee of public access to agreed standard noise data
- Measures to protect tranquil areas
- Improved compensation for communities impacted by noise

Air pollution

While air pollution around Heathrow has been a subject of controversy in relation to expansion proposals, there has been no national review of air pollution levels at airports, to our knowledge, since the 2003 Airports White Paper. The most immediate action from the Government should be to close the current information gaps with respect to air pollution from aviation, by

- Setting out the evidence base in relation to aircraft air pollution (including particulate matter) outside the landing and take-off cycle
- Providing updated mapping of air pollution levels around UK airports with respect to legal limit values and WHO recommended maximum levels

5. Should there be operational limits on airports seeking to expand to ensure that new technology is delivered?

Yes, but the purpose of setting limits should be to ensure that aviation's adverse impacts are reduced and mitigated in line with policy, rather than specifically to ensure new technology is delivered. Where a limit is reached, the industry still has responsibilities to ensure that noise and emissions reductions are prioritised. And when a limit still provides an airport with operational headroom for growth, that growth should only be deemed acceptable where reductions in noise and emissions can be demonstrated.

In relation to noise policy, the Aviation Policy Framework said that, as a general principle, "the industry must continue to reduce and mitigate noise as airport capacity grows". However, DfT has no delivery process or programme in relation this policy, and does not monitor whether it is being achieved. It has not been translated into airport noise limits and no measurement metrics have been defined.

The 2018 Aviation 2050 Green Paper further proposed "routinely setting noise caps as part of planning approvals (for increase in passengers or flights). The aim is to balance noise and growth and to provide future certainty over noise levels to communities". This proposal has not been progressed. There is no guidance on how limits should be set, the outcomes they should be designed to achieve, the metrics they should use or the ways they should be enforced.

As a result of this inertia, current arrangements for the regulation and enforcement of aircraft noise are not fit for purpose. Responsibility is fragmented, complex and confusing. ICCAN identified that there is a "fog of accountability".

The solutions are straightforward. The Government should set health-based noise limits for UK airports. There should be noise limits at each major UK airport, using metrics that are meaningful to impacted communities, determined regularly by a body that is independent, expert and which has enforcement powers. These should be enforced whether or not an airport is seeking expansion.

6. What level of investment is required to deliver net zero aviation?

It's currently difficult to answer this question accurately given the level of uncertainty about an appropriate pathway to net zero. ICCT has estimated[2] that at a global level up to $4 trillion in technology investment may be needed to achieve a 1.75 C-compatible aviation emissions reduction pathway through 2050, or an annual investment of $121 billion, based on analysis by the UN body ICAO. Raising $121 billion of revenue in 2019 would have required a flat $25 tax on each one-way flight, ICCT estimates.

AEF has significant concerns, however, about the way in which carbon accounting for SAF currently works, and whether the volumes assumed in existing global decarbonisation models for aviation are appropriate. The cost of decarbonisation could, in our view, be higher.

[2] https://theicct.org/publication/global-aviation-frequent-flying-levy-sep22/

It is also important to establish the right principles for investment, namely that:

1. Polluters, not the public, should pay. The aviation industry has until now managed to escape most policies, including fuel taxes, to drive the development of new technologies so as a sector it's almost totally dependent on kerosene. The sector's last minute efforts to decarbonise should be borne by the industry, not the public.
2. The cost of developing carbon removal technologies to balance remaining aviation emissions should also be borne by the industry. Almost all aviation decarbonisation plans, including those by the Government, the CCC and the industry coalition Sustainable Aviation, assume that carbon removal technologies such as BECCS and DACCS - the 'net' in net zero - will play a larger part in achieving the target than any aviation-specific measure. Investment in this technology is urgently required if this is going to be a possibility. At present it is non-existent in the UK. To the extent that the aviation sector will be relying on it, airlines should cover the cost of that investment either directly, or indirectly (by way of Government taxes or charges).

7. What is the gold standard for compensation and mitigation for local communities impacted by airport operations?

The aviation industry is currently not required to compensate people whose health or well being its operations adversely impact, nor to compensate homeowners whose properties are devalued as a result of increases in aviation noise arising from airspace changes or airport expansion that does not trigger the Land Compensation Act.

This is despite the facts that:

(a) DfT's own research has identified that there is a negative relationship between aviation noise and house values, specifically that "higher noise levels cause lower house prices …".

(b) The Airports Commission's view, in its Final Report, was that "those who benefit from airports should meet the costs of compensating those who suffer the disbenefits".

The Government's 2017 consultation on UK Airspace Policy proposed the "Inclusion of additional wording in the policy to encourage an airspace change promoter to consider compensation for significantly increased overflight …".

However, this has never been implemented. In its feedback on that consultation the government said: "We recognise further points were raised regarding the proposals and will undertake additional consideration of this issue through the Aviation Strategy, by exploring whether a new approach to reducing noise annoyance is needed, for example through better information engagement or by creating a greater sense of 'fairness' and sharing of the benefits of aviation growth, including new forms of compensation and community investment."

The additional consideration promised did not take place and the 2018 Aviation Strategy Green Paper contained no proposals to make the aviation industry more accountable for its externalities either through compensation or otherwise.

We believe that current aviation compensation arrangements are wholly inadequate. They fail any test of basic fairness and perpetuate an environment in which the aviation industry is insufficiently accountable and makes economically illiterate decisions without regard to their financial, health and other community consequences.

We would like to see fundamental changes to current compensation arrangements, consistent with the globally accepted polluter pays principle. We believe this is an essential element in rebalancing the relationship between impacted communities and the aviation industry.

We propose the following arrangements:

1. As a general principle compensation should be provided in any situation where people are materially impacted by noise and other environmental damage caused by aviation and particularly where noise or other environmental impacts increase from a previous base level (including as a result of airspace change, reduction in height, change in flight procedure or intensification of use).
2. There should be a right for landowners to sell property that becomes severely impacted by aviation activities, to the relevant airport, at its previous value together with a disturbance package covering all relocation and removal costs.
3. Landowners whose property becomes moderately impacted by aviation activities should be entitled to claim for diminution in value.
4. These arrangements should have the effect of applying Part 1 of the Land Compensation Act 1973 to aviation, including to impacts from new or altered flight paths.
5. The industry should be obliged to fund appropriate insulation and air conditioning works in relation to all property that is or becomes moderately or severely impacted by aviation activities.
6. In addition, in recognition of the wider health, well-being and loss of amenity impacts of the industry, periodic compensation packages based on national standards should be agreed between airports and communities, with a particular focus on areas that are or become moderately or severely impacted by aviation activities. These should be meaningful in the context of the socio-economic costs imposed on communities.

8. What assessments are available for the future of the hub airport model compared to direct point-to-point flights?

This isn't a topic we've recently tracked.