



Consultation response

National Planning Policy Framework: proposed reforms and other changes to the planning system

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AEF is a UK-based national NGO that focuses on reducing aviation's environmental impact, particularly in terms of climate change, noise and air pollution. Internationally, we are a leading representative of the NGO grouping ICASA (the International Coalition for Sustainable Aviation) which has observer status to the UN's International Civil Aviation Organisation (ICAO).

We have an active membership comprising local community and amenity groups living under flight paths and around the UK's airports and airfields. Our interest in this consultation relates to how planning in the UK controls development at airports and aerodromes, including consideration of its environmental impacts.

Do you agree the proposed text in policy TR7 provides an effective basis for assessing proposals for marine ports, airports and general aviation facilities?

The general framework seems well-intended, but only with the inclusion of (d) as a safeguard. However, referring to (d) there is no definition of what is meant by "acceptable environmental effect". Acceptable to whom and to what? What tests, metrics and targets will be used to determine an acceptable environmental effect? These omissions could lead to inconsistent interpretations by airports, communities and local planning authorities, and are glaring given the potential scale of aviation's impacts (which are at risk of being incompatible with the goal achieving "acceptable environmental effect in terms of noise, air quality, carbon emissions, the transport network, landscape, visual and marine impacts.")

While compatibility with carbon budgets and targets provides part of the climate policy test, TR7 does not require the inclusion of non-CO₂ effects from aircraft which historically have had twice the climate warming impact of the sector's CO₂ emissions. Neither is there a quantifiable target in UK policy for assessing the acceptability of aircraft noise, and there no

policy exists in relation to air pollution and health issues such as ultra fine particles from aircraft. Without these important benchmarks, TR7 is too vague for AEF to form a judgement of the proposed text and we cannot agree or disagree with it.

We wish to make some additional points on what we see as omissions in the draft NPPF.

Cumulative carbon emissions:

Currently, the carbon emissions from aircraft that would result from airport expansion applications are largely out of scope for local planning authorities to take into consideration. The 2018 policy document 'The future of UK aviation: Making best use of existing runways' (MBU) stipulates that carbon emissions from increased air traffic should be considered at a national level instead. Previous iterations of the NPPF have stated that local plan-making should take a proactive approach to mitigating and adapting to climate change, but in the context of land use only. The Planning Inspectorate and the High Court have interpreted MBU and the NPPF to mean that carbon emissions from increased flights should be considered nationally, and not at local level.

However, there is currently no mechanism to ensure that potential emissions from airport expansion applications under the 1990 TCPA will be considered at a national level except. Instead, assessment of potential increases in emissions take place on a rare and ad hoc basis when LPA planning decisions are called-in on climate (and sometimes other) grounds. To illustrate the issue further, recent applications at Bristol and Stansted were determined, on appeal, by the Planning Inspectorate without reference to the Secretary of State. In both cases, the Inspectorate had little or no knowledge of airport emissions at other airports, either currently or resulting from current planning applications, to assess the national position.

If the Government takes its commitment to reaching legally binding carbon targets by 2050 seriously, cumulative carbon impacts (from all UK airports) must be assessed at every level of the planning process. The draft revision of the current NPPF contains an environmental objective 'to support efforts to mitigate and adapt to climate change, including moving to a low carbon economy', but there is little to indicate a pathway to meeting it. There should be clear guidance in the NPPF on how the climate impacts of aviation, and other transport projects, should be considered.

Additionally, it would make sense to empower local and regional authorities to assess the impact of airport expansion on local climate change targets by factoring in impacts of increased flights in addition to ground works and operations – in both formulating local plans and decision-making (National Development Management Policies should support this). This would remove uncertainties and conflict around meeting local, as well as national, net zero commitments and would help to ensure that the planning system supports the transition to a low carbon future.

In addition, local assessments should liaise with the central government for scrutiny of the potential cumulative impacts of airport operations in England and Wales. Collating local authority climate assessments would enable the Government to implement its Jet Zero policy to decarbonise the aviation sector in a way that is balanced, proportionate, and transparent.

Public Safety Zones

PSZs are designated planning areas (located at the end of the busiest airport runways where risk of accidents are highest) and are intended to limit the number of people on the ground at significant risk of being exposed to a crash. Accordingly, planning restrictions are imposed within PSZs in order to limit population increases in these areas by restricting new housing, other development and infrastructure, including roads.

While the risk of an aircraft crash at a UK airport is very low, it is nevertheless a possibility and the impacts could be devastating. As such, it is a serious concern that PSZ requirements are poorly understood and wrongly misinterpreted by some local planning authorities, largely because there is little readily available information and guidance about them. The revised NPPF should include clear and comprehensive guidance on how to interpret and apply PSZ policy, including defining the perimeters of the zones and how planning restrictions apply.

Land use planning and aircraft noise

A revised NPPF would benefit from incorporating the guidance on housing developments, new schools and other community facilities and potential exposure to aircraft noise that was set out in the former planning document PPG24. There is currently no clear guidance for local planning authorities on avoiding or mitigating the impacts of aircraft noise on new communities. In terms of mental and physical impacts, it cannot be sensible or desirable to increase the number of people exposed to aircraft noise, which is currently happening.

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