

A 'sustainable framework' for aviation: what should it mean?



AEF Director Tim Johnson with Aviation Minister Theresa Villiers at the AEF/AirportWatch conference in June. (Photo: Sarah Clayton, AirportWatch)

Just before the AEF/AirportWatch conference in June 2011 to discuss the scoping document for the Government's new aviation policy, one of our members contacted me asking what was meant by the word 'sustainable', used throughout the consultation document. So at the conference I asked the most senior DfT official present. A 'sustainable framework' for aviation, he said, would be long-lasting, and would 'strike the appropriate balance'.

The environment versus economy myth

It was left me to guess what DfT is trying to balance. Maybe the UK's trade deficit in tourism? (In 2010 UK residents spent £12.4 billion more abroad than inbound tourists spent in the UK.) Or maybe the amount of money put into research on aviation's negative impacts compared with research expounding its virtues

(the current consultation requires responses to be 'evidence based' and we understand that the industry is producing many self-promoting shiny documents).

My assumption, of course, was that DfT still works on the premise that environmental bads must be balanced against economic good, and it is notable that the consultation does not cover economic harms from aviation, but begins with questions about aviation's benefits, and its contribution to "economic growth and social wellbeing" as though there was no distinction between the two.

A long-lasting policy

The suggestion that to be sustainable, aviation policy should be 'long lasting' reflects DfT's desire to depoliticise this area, and we anticipate the white

paper remaining at a high level rather than making airport-specific statements. It is not even clear whether the current Government's opposition to runway building in the South East will be part of the white paper or a standalone policy.

There are, however, a series of questions about 'making better use of existing capacity', and about regional and international connectivity, in the context of a possible redistribution of traffic to the regions.

Setting the right limits

AEF believes that for aviation policy to be sustainable, it must be framed in the context of clearly-defined environmental limits, and that it is only once these limits are in place that decisions about traffic distribution should be taken. Agreeing the right limits at a national level is particularly important given changes afoot in the planning system, including a proposed presumption in favour of 'sustainable' development, which may make it hard for communities to resist expansion pressures when the industry recovers from recession.

Following delay in the publication of a key climate report (see overleaf), the deadline for responses has been extended to 20th October. Please get in touch with Cait, who is leading on the response (and has written this newsletter) with any comments - cait@aef.org.uk or 0207 248 2223.

Aviation economics: jobs, tax, and social benefits

AEF's response will:

- **Caution against over-claiming with regard to job creation (a job created in an airport is a job lost on the high street)**
- **Note the considerable annual losses to the UK tourism industry as a result of cheap foreign travel**
- **Note that economic growth and social wellbeing should be assessed separately.**
- **Question whether aviation's special treatment in market-based measures such as EU ETS, climate legislation, and the UK tax system is justified.**

In 2008, David Cameron, then leader of the Conservative opposition, suggested that the Prime Minister had a "fetish" for the third runway at Heathrow, and argued that in fact the idea that Heathrow expansion was essential for the UK

economy was a myth, an idea supported by former BA boss Bob Ayling, who suggested that the economic value of transfer passengers is little more than a cup of coffee.

It's a sentiment that the Government may need reminding of. The idea that aviation is simply good for the UK economy seems to be so hard-wired, at least at DfT, that not a single consultation question considers possible environmental disbenefits from the sector, though in addition to the opening questions about aviation's benefits, there are sections on regional and international connectivity which touch on the role of aviation in supporting other economic sectors.

Of course, aviation has a role to play in facilitating economic activity, but evidence suggests that this does not mean that ever-increasing aviation translates into ever-increasing benefits. AEF's response will take on industry claims about job creation, economic benefits and its role in ensuring British competitiveness.

Climate change

AEF's response will:

- **Argue for UK leadership in this area, while noting that 'propensity to fly' in the UK remains high**
- **Explain why a national aviation target is an essential complement to the EU Emissions Trading System**
- **Point out that no policy measure exists to tackle aviation's non-CO2 climate impacts**
- **Question the sustainability and rate of market penetration of biofuels**

The need to integrate aviation policy with climate policy is given as one reason why this policy review is needed, and climate concerns cited by ministers in the context of their cancelling third runway plans at Heathrow. Yet the Government is remaining tight lipped over its view of the target announced by the last government alongside its decision to give Heathrow expansion the green light, namely that by 2050 UK aviation emissions would be no higher than they were in 2005.

While this appeared far more lenient than the huge reduction targets given to other sectors (the UK is legally bound to reduce emissions from 1990 levels by 80% by 2050, and by requiring aviation and shipping to do no more than a stabilise emissions, other sectors will need to make cuts of around 90%), it was required to be



Lord Adair Turner, Chair both of the Committee on Climate Change and of the Financial Services Authority, has argued that much tougher action on climate change is both essential and affordable. (Photo: Telegraph 2010 - Julian Simmonds)

achieved without access to carbon offsetting or trading, making it actually surprisingly stringent. CCC has since stated that the stabilisation of aviation emissions is 'essential'.

Rather than making a policy response to the report from the Committee on Climate Change on to deliver this target, the Government has instead redone their figures and supplemented them with some cost analysis, including higher aircraft efficiency assumptions and up to 40% penetration of undefined 'sustainable' aviation biofuels by 2050. AEF believes that the CCC's work was robust and that the focus now should be on delivering the target, and putting in place measures to tackle non-CO2 impacts.

Local impacts: noise, air pollution and third party risk

AEF's response will:

- **Point out that much GA and helicopter noise remains very largely unregulated and argue for new controls**
- **Suggest that noise policy consider health impacts as well as annoyance, and work towards WHO standards**
- **Argue that noise limits should not be defined purely as averaged levels; they must consider flight numbers**
- **Request that the policy recognise the particular impact that noise can have on children's learning**
- **Request updated assessments of airport air pollution levels**
- **Explain why DfT should review both its policy and its guidance on third party risk around airports.**

course, argue about how noise costs should be calculated. But there also comes a point when we must recognise that not every decision can be reduced to a cost benefit analysis. AEF believes that appropriate standards should be set for both noise and emissions, with no question of trade-offs.

The consultation also hints at a new policy of 'noise envelopes' around airports - an approach we might welcome if it translated into effective limits at aerodromes handling both GA and air transport flights. But to be meaningful those limits would need to take account of flight numbers as well as average noise levels, and should reflect both health and annoyance impacts of noise. And local circumstances, such as proximity to a school, may mean that additional action would be needed, such as the funding of respite outings for children.

AEF will also be arguing for a reappraisal of air pollution levels and standards, and will provide detailed evidence for the need to radically update policy on PSZs and third party risk.

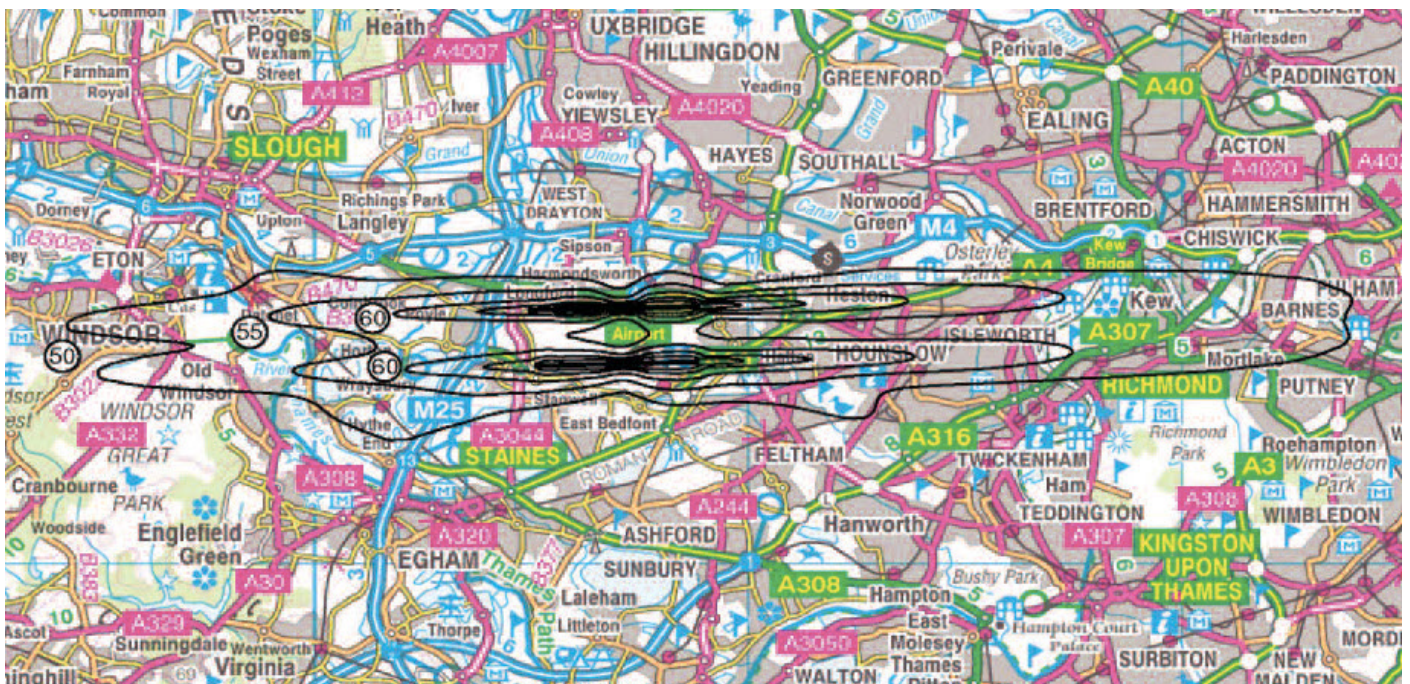
It may be climate change that, of all environmental impacts, is now most likely to get a mention in Government policy documents, but when it comes to airport development decisions it is noise that carries most weight. What, then, is the Government's view on noise management at a policy level likely to be?

Part of the answer is bound to lie in technological solutions, as hinted at, for example, by question 5.6 on how 'trade offs'

between CO2 and noise should be managed (presumably a reference to the possibility of new open rotor aircraft entering the marketplace).

I recently heard it argued that it made perfect sense economically to build a second runway at Stansted even after factoring in the 'costs' of noise, but that it was now impossible because of the political landscape (as a result of 'vociferous' campaigning). We could, of

The 2006 Nlight contours at Heathrow. 62,100 people live within the 55dB contour, even though WHO Europe states that even as a interim measure, no one should be exposed to noise at this level for the part of the night when most people are in bed. Longer term, the correct limit for health protection is 40dB Nlight, says WHO Europe. Heathrow has not mapped the 40dB contour but 207,400 people live within the 50 Nlight contour. (Source: Heathrow Noise Action Plan annexes)



Consultative Committees: are they working?

The belief that the local impacts of airports should largely be dealt with without Government interference is longstanding, and given its push towards 'localism', it seems likely that the Coalition will favour a light touch approach to airport consultation. Nevertheless, Theresa Villiers' commitment that if a local solution cannot be found she will 'specify' Wycombe Air Park under Section 5 of the Civil Aviation Act (see our Spring/Summer newsletter) suggests that, among ministers at least, there is an awareness of the need for a plan B if local negotiation fails.

In addition to the scoping document question on consultation, a review of the DfT guidelines for consultative committees is due later this year. Feedback from our members suggests that to be effective these guidelines should be given more teeth, but also that environmental impacts and airport operations cannot be effectively dealt with in the same forum, and that separate committees should be established for these two purposes.

Planning reform to wipe out PPG24

Planning policy rarely hits the headlines. But while we've been busy working on the aviation consultation, emotions have been running high over a parallel consultation on the National Planning Policy Framework (NPPF) which, the Government proudly claims, would replace around 1000 pages of planning policy and guidance including all PPGs and PPSs with one 58-page document. Broadly welcomed by developers, the framework has prompted very public criticism from environmental organisations, including CPRE who have been described as 'Trotskyists in tweeds' over their opposition to the planned changes.

At the heart of the NPPF is the proposed presumption in favour of 'sustainable' development. But if the waters look murky in terms of how sustainability sits within aviation policy they are even filthier in relation to the NPPF. After some headline statements about climate change and sustainability, it says almost nothing about environmental impacts and requires very few sustainability tests to be applied by planning authorities in assessing proposed developments, with climate change only being forseen as relevant only when considering how to minimise emissions from surface transport by appropriate siting of major developments.

The response from the aviation industry has been mixed. While there is a broad welcome for any opportunities for speeding up the planning process in favour of growth, GA airfields are worried about losing out to housing developers, and larger airports are concerned that without the guidance for local authorities on how to assess the noise impacts of airport developments given in PPG24 (which also has a useful annex highlighting, for example, the particular characteristics of GA noise), planning inquiries will end up in fact taking longer.

AEF plans to make a brief response to the consultation - open till 17th October - suggesting how planning, noise and climate policies could be made compatible, and what guidance we think will be needed alongside a new policy document (Government is said to recognise that scrapping all PPGs probably does leave some gaps). Your comments would be welcome.

Aims and Objectives

The objectives of the Federation are as follows:

- to foster a climate of opinion which takes full account of the environmental issues arising from aircraft and aerodrome use;
- to promote a relationship between the environment and aviation in which the detrimental effects of aviation on quality of life and on the natural and man-made environment are kept to a minimum;
- to encourage wide discussion of the problems involved and to seek practical solutions;
- to consult and co-operate with local, national and international governments, the aviation industry, regulatory authorities, universities, professional institutions, research bodies, and any others for the purpose of reducing noise, disturbance and all forms of pollution by technical and operational means;
- to pursue these objectives with policy-making and legislative bodies - local, national and international - so that laws and policies include measures for effective environmental protection;
- to provide relevant advice and information to assist its members;
- to publicise and promote the viewpoint of the Federation through the media and through representation among bodies responsible for aviation matters as appropriate.

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