

## ***'Aviation 2050: The future of UK Aviation' – Consultation***

### ***Response from Wandsworth Council***

#### Background Information

UK Aviation Policy was last updated in 2013 and is contained within the Aviation Policy Framework (APF). The APF set out the policy intent of the Coalition Government, these included a promise that there would be no 3<sup>rd</sup> runway at Heathrow as there were no technological solutions in sight to deal with the unacceptable noise impacts that would follow from expanding Heathrow. The APF set out proposals for sustainable UK aviation growth by encouraging existing airports to make the best use of existing resources.

Following extensive lobbying by the aviation industry Government set up The Airports Commission (A/C) in 2012 to look into the future provision of airport capacity in the south east of England. The A/C published its final report in 2015 which recommended that in order to maintain the UK's position as Europe's premier aviation hub, Heathrow be expanded by way of a new full-length runway. The A/C's recommendation was formally adopted in June 2018 by way of an Airports National Policy Statement (ANPS) following a vote in parliament in support of the project.

A new (draft) aviation policy was published in December 2018. The draft strategy reflects the Government's changed priorities for UK aviation growth to the year 2050.

The original 16-week consultation timeframe was extended in March 2019 (for most of the strategy) until 20<sup>th</sup> June 2019. This was in order that the comments from the Committee on Climate Change (CCC) could be considered in considering stakeholder comments.

The overall objective of the consultation is to seek views on the new draft strategy. The Government says that stakeholder responses will be noted and that these will inform the final strategy document (to be published later in 2019).

The consultation document runs to some 200 pages and includes 4 annexes (Annex A to D). Annex A concerns UK future airspace policy and design and it foreshadows the government's intention to take legal powers to force UK airports to enter into discussions about future changes UK airspace design.

Consultation on Annex A closed in April 2019. The Council opposed the Government's proposals and submitted a joint response to the Government through the Local Authorities' Aircraft Noise Council (LAANC). A copy of the response is attached as (Attachment 1)

The new policy is to support aviation growth throughout the UK including the construction of a Third Runway at Heathrow. Although the new strategy claims that future growth must take place within a framework of sustainable development there is little, or no information contained in it to show how the Government intends to balance the conflict that exists between aviation expansion and its other policies for example on noise, air quality and climate change.

The strategy is based around strategic themes rather than the objectives of the current APF. These are:

**Build a global and connected Britain:** To build new connections to rapidly growing aviation markets, to pursue objectives on environmental measures and liberalisation internationally.

**Ensure aviation can grow sustainably:** The strategy claims that this will require a partnership between the government, regulator, industry and other stakeholders to work within a new policy framework to better manage the environmental impacts.

**Support regional growth and connectivity:** Recognising airports as local economic hubs that provide connectivity, employment and transport, as well as potential contributions to economic rebalancing

**Enhance the passenger experience:** Making sure all passengers have a good experience of flying by creating a new Passenger Charter to promote best practice.

**Ensure a safe and secure way to travel:** The strategy seeks to address global variations in standards as well as work with the industry to make the skies safer for everyone.

**Support General Aviation:** This covers all non-scheduled civil aviation, such as business jets and air displays. The strategy similarly seeks to encourage growth in the sector. Although not stated this section also includes helicopters.

**Encourage innovation and new technology:** The strategy recognises the role of innovation and aims to capture the benefits for consumers by facilitating new options for how people and goods move.

The purpose of the new strategy is stated to be to keep the UK competitive globally and ready to take advantage of new opportunities in the aviation and aerospace sectors.

### **The Council's response to the consultation - Summary**

*(A copy of the consultation pro forma is to be found as Attachment B)*

The consultation has a total of 97 questions covering a wide range of aviation industry related topics including passenger comfort and experience. The council's response focuses on the Government's proposed policies for aviation noise, surface access and air quality all of which are of particular relevance to Wandsworth residents in respect of Heathrow.

The Council also wishes to voice its concern about proposed unrestricted growth in aviation with respect to climate change. The Council takes its responsibilities around climate change extremely seriously and is shortly to publish its own Environment and Climate Change Strategy. The UK's recent commitment to become Carbon Net Zero by 2050 means that UK aviation policy should now be built around a carbon reduction pathway rather than uncontrolled growth as set out in the draft strategy.

Instead it appears that the Department has managed to secure a special deal for aviation and the advice of Committee on Climate Change has been ignored by the removal of aviation to be part of the UK Net Zero target in the final statutory instrument published on 12<sup>th</sup> June 2019.

Sustainable Growth Partnerships - “ensuring aviation can grow sustainably”, the Government is seeking views on the establishment of a sustainable growth partnership which would attempt to balance the benefits of aviation with addressing environmental and community impacts.

Although the proposals for the formation of partnerships are superficially attractive the reality is that without a step change in technology (which is not on the horizon) air noise cannot be mitigated or managed as suggested in the consultation. This can be clearly seen from accompanying technical report issued alongside the consultation (CAP 1731) – Table A of CAP 1731 shows that even with optimistic assumptions on future flight path design and fleet mix the numbers of people affected by noise around Heathrow will rise.

The Council’s view is that with current technology a ‘*sustainable balance*’ is only *achievable* if aviation growth is limited by controlling growth on numbers of flights.

There is continuing emerging evidence on the impacts of aviation noise. This is demonstrating that there are real health costs to be borne by individuals. The evidence is also confirming that people are becoming more sensitive to numbers of air noise events than they have been before. The most recent survey of public opinion undertaken by the CAA in 2017 (Report CAP 1748) demonstrated this very clearly from a sample of over 4,000 respondents nationally the top issue identified that people wanted the CAA to deal with was increased numbers of flights.

The reality is that the current state of knowledge about noise issues surrounding airport expansion is imperfect and evolving. For example, the long-term effects of concentrating routes above populations (as foreshadowed in the Government’s air noise and air space change policies) are unknown. Terms such as “Regular Breaks” and “overflights” are used in the strategy as useful tools to facilitate airport growth, but these terms are being used without any objective understanding of what they mean.

The Government has committed to modernising the UK’s airspace. However, modernisation will result in the possible deletion of existing flight paths around Heathrow and certain creation of new ones. The effect of this will be that communities not currently impacted by Heathrow will be overflown for the first time, If the third runway is constructed some communities are predicted to be impacted whatever direction the airport is working in. Compensation and mitigation will need to be very high for these communities but there is as yet no understanding of what this may need to encompass. A study commissioned by National Air Traffic Services on the community impacts of route concentration has yet to be published although the results were promised for “spring 2019”.

Nationally, airports have already begun producing new master plans and publishing expansion proposals in response to the Government’s change on policy “to make best use of existing runways”. This is happening without the scientific understanding in place to protect those who will be affected.

Without the understanding outlined above it is not possible to even attempt “the balance” between growth and the environment that the strategy aims to achieve. For example, without a real understanding of the impact that concentrated routes will bring to communities the Government is likely to have a flawed understanding on

what compensation schemes are required. With the growth envisaged and transition to precision navigation it may be necessary for the Government to offer to buy the homes of people who find themselves under new concentrated flight paths.

Detailed comments on each of the proposed new noise policies are to be found on the accompanying pro-forma response but in summary the Council is unable to support any of them as they stand without qualification. Given that this strategy represents a “root and branch” review of UK aviation policy the Council is critical that the opportunity has not been taken to present a clear concise noise policy statement.

Night Flights. The council is unable to support the proposed policies on Night Flights. (Flights between the hours on 11pm and 7am) – there is in fact nothing new in the strategy despite clear scientific evidence from both the WHO and EU of an association between ill health effects and Night Flights. With respect to Heathrow Night Flights are not an essential part of the airport’s operation. The strategy should at least reflect the recommendations of Airports Commission for a reduction in night flights rather than an increase as foreshadowed in the ANPS, which could result potentially in up to 140 per cent more night flights compared to today.

#### Proposed New Controls on Air Noise - Noise Caps

The Council does not support the use of noise envelopes (caps) without an accompanying movement limit (of some form). A cap on movements can also sit alongside master plan requirement to reduce numbers of people affected both by day and night – e.g. 10% reduction in contour area / numbers impacted over a 5 year period.

The Government’s proposal to “incentivise” airlines to renew their fleets with the promise of more movements the same amount of noise is outdated and flawed. The two most recent UK studies undertaken by the CAA clearly demonstrate that it is the increase number of audible air movements that is driving increased sensitivity to noise rather than equivalent noise dose. In any event the Government acknowledges in the consultation the incentive for fleet renewal comes from the reductions in fuel burn and associated costs associated with current generation aircraft.

#### Noise Caps - Compliance Mechanisms

The council supports the Government’s search for effective compliance mechanisms to monitor compliance with noise caps (section 3.115). The Council does not however support the proposal that airports could ‘pay for’ additional growth (above an agreed noise cap) by means of local compensation as an alternative to the current sanctions available.

The newly formed Independent Commission on Civil Aviation Noise (ICCAN) has already advised that new thinking is required in terms of how future growth across UK airports and that in its view the pace of airport growth is outstripping the benefits to the community” and the Commission. The Council supports this view and urges the Government to give ICCAN the long-term statutory status as recommended by the Airports Commission. As an offshoot of the CAA and with its two temporary operating framework it is difficult to see how the organisation will be able to drive through changes it has already identified as being necessary.

The Council considers it essential therefore that the Government provides ICCAN with sufficient resources to ensure it is able to take forward the programme of research and engagement proposed in its draft Corporate Strategy 2019 - 21.

### Surface Access

The draft strategy dilutes current policy on funding in respect of Surface Access provision resulting from airport growth. This is unacceptable there is a danger that the taxpayer will end up footing the bill for aviation growth.

Travel to and from UK airports by Freight receives scant consideration in the strategy. It is now the case that goods are transferred to van or lorry for redistribution from one airport to another and then transported onwards again by road to other EU destinations. Currently there is little transparency surrounding Air Freight and its distribution patterns. In the council's view the strategy needs to set out a policy to support future decisions which ensure sustainable air freight / road and rail distribution models. These will need to take account of the UK's declared plans for road and rail networks as well as those on economic and future population growth.

Transport improvements and strategic objectives for economic rebalancing should also influence choice of location for additional UK airport capacity. For example, High Speed 2 will make Birmingham Airport an accessible option for many in the South East (in terms of journey time to airport). Manchester Airport will also be well placed to cater for increased demand resulting from the Government's Industrial Strategy and Northern Powerhouse initiatives.

### Aviation Growth - Land Use & Planning

The strategy offers no solution to the conflicts that currently exist between demand for mass housing that accompanies airport growth and Government noise policy objectives to minimise the numbers of people adversely affected by air noise. The council recommends that ICCAN be commissioned to research this and report on options.

### Air Quality - Heathrow

The case for Heathrow expansion relies on Heathrow-specific measures to reduce air pollution, such as improved public transport links and an ultra-low-emission zone. Without these measures, expansion is projected to worsen pollution by a greater extent, increasing still further the air pollution impact and the likelihood of delaying zone compliance. It is still unclear how the necessary transport improvements will be delivered and paid for, and the promised cap on airport-related traffic is not legally enforceable.

The Government itself acknowledges that Heathrow expansion will increase air pollution which in turn will increase mortality among people exposed to the increased pollution. The Council rejects the Government's claim that that this is acceptable as long as it is legal, and that it is legal as long as the increased pollution from expansion does not exceed the worst pollution in the whole of Greater London.

This disregard for the health residents and putting the needs of the aviation business above the health of our communities is unacceptable.

## Climate Change

Aviation growth as envisaged in the Green Paper cannot be justified. The council calls on the Government to:

1. Accept the CCC recommendation that international aviation (and shipping) emissions should be part of Net Zero target, and should in future be formally included within the UK carbon budget.
2. Develop, commit to and then implement the aviation carbon reduction policy framework that will be required as part of a wider reduction framework for UK transport as a whole. This is what the Aviation Strategy should deliver.
3. Accept that aviation must make a fair contribution to reductions in actual UK carbon emissions (avoiding recourse to offsets), first by capping aviation emissions at their existing level and then reducing them along an established emissions reduction pathway, noting that CCC has suggested that this could be achieved at a negative abatement cost. CCC has modelled scenarios which indicate that emissions from UK aviation can be reduced towards 21 MtCO<sub>2</sub>e or lower.
4. Undertake a detailed study of all aspects of how demand management can be applied to UK air travel as part of the carbon reduction policy framework, in accordance with various scenarios including holding demand at its existing level e.g. no higher than 300mppa.
5. Withdraw the DfT's policy support for Heathrow expansion.
6. The council believes that in respect of its climate change responsibilities the Aviation industry is not a special case. Government policy should therefore oblige the industry to reduce its carbon impact in real terms and not rely on the benefits of offsetting schemes. The Council urges the government to ensure aviation emissions are first capped and then reduced progressively in line with the recommendations of the CCC.