Aviation Strategy Green Paper Consultation

19 June 2019

1. General

No action on managing demand for growth.
The green paper continues to take an unchallenged predict and provide approach to aviation demand. There is no sign that demand management initiatives, fiscal or otherwise, have been considered let alone that any will be pursued.

No reference to measure such as a Frequent Flyers Levy.
Given the climate emergency and suggestion by the CCC that policies to limit demand for flying may have to be considered, the final strategy should recognise that flying is a privilege. Consequently, initiatives such as the Frequent Flyers Levy should be given proper consideration.

No application of polluter pays principles. Aviation's core market failures are therefore not addressed.
There are no proposals to make the industry liable for more of the costs it imposes on society at large. This is extremely disappointing and a core policy failure.

Communities absent from partnership proposals.
It is not clear what role impacted communities would have in the new partnership. Communities are not shown as a stakeholder in the Partnership for Sustainable Growth diagram.

2. Climate Change

The strategy does not set out how support for airport expansion can be achieved within existing climate change commitments. Rather it appears to rely on international offsetting which has long been derided as inadequate. The strategy also assumes growth is essential and should be prioritised over environmental impact which is completely at odds with the climate emergency declared by Parliament and the new target of Net Zero by 2050.

The Committee on Climate Change (CCC) have always treated 37.5Mt as an absolute level of emissions. The Government appears to want to treat it as a net target, with any exceedance potentially dealt with through offsetting.

However, the kind of offsetting that the UN carbon offsetting scheme CORSIA will deliver isn't designed to deliver a zero emissions target. It will, at best, reduce emission by half what they might have been. In this context, the idea that offsetting makes a tonne of CO_2 from aviation "neutral" is misleading.

The strategy does not make clear whether the scientific evidence on achieving the Paris Agreement nor the latest CCC analysis will be considered in the climate policies set out in the final white paper. Government continues to state it does not propose to include international aviation emissions in carbon budgets. This will make achieving Net Zero significantly more difficult and impose larger reductions in other sectors of the economy.

The current Government projections on emissions reductions are based on a raft of highly optimistic assumptions, including sharp improvements in aircraft fuel efficiency and the use of cleaner fuels and steep increases in carbon taxes.

The strategy contains no indication of when the Government will finally publish its climate policy for aviation. Nor does it include proposals for the replacement of the UK's membership of the EU ETS post Brexit.

The Government should 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.

It is extremely disappointing that this recommendation appears to have been ignored as evidence by the continue exclusion of international aviation emissions in the Net Zero statutory instrument published on 12th June.

Aviation growth as envisaged in the Green Paper cannot in this context be justified. We therefore call on the Government to:

1. Develop, commit to and then implement the aviation carbon reduction policy framework that will consequently be required as an integral part of a wider reduction framework for UK transport as a whole. This is what the Aviation Strategy should deliver.

2. Accept that aviation must make a fair contribution to reductions in actual UK carbon emissions (without 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.

3. 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.

4. Explore as part of that demand management regime (and in conjunction with the Treasury) the opportunities for the taxation of aviation.

5. Re-evaluate and cease policy support for all individual proposals for airport expansion, and growth in demand generally, until they can be demonstrated to be compatible with the established aviation carbon reduction pathway, and an acceptable distribution of flight opportunities between UK airports. Withdraw the DfT's policy support for Heathrow expansion.

3. Air Pollution

There is growing evidence that current legal limits on air pollution need to be strengthened and also improvements made to the ongoing monitoring of aviation air pollution.

In particular, there should be greater clarity about what happens to particulate matter and other emissions at higher altitudes, as currently aircraft emissions are only accounted for if they occur in the landing and take-off cycle.

The strategy contains no robust policy measures to reduce air pollution, only a recognition that it is an issue and that further work is required on monitoring, particularly Ultrafine Particles (UFP). Studies have shown the elevated levels of NOx and UFP emitted from aircraft up to 40 kilometres from the airport boundary, yet the strategy has no initiatives to identify and measure these impacts of airport operations.

There is a requirement for airports to develop air quality plans to manage emissions within local air quality targets by establishing minimum criteria. But, this remains vague and makes no attempt at reducing air pollution.

Whilst the strategy discusses the potential for 90% reductions in NOx by 2050 on new aircraft, it remains strangely silent about the impact on communities over the next 30 years. The final strategy should set out a timeframe by which the most polluting aircraft should be phased out of operation.

The final strategy should commit to undertaking detailed research of the health consequences of the additional air pollution associated with airport expansion proposals.

Government must assess the robustness of the evidence base in terms of how to account for air pollution above the Landing and Take Off height, particularly considering the potential significance of ultrafine particle emissions at higher altitudes.

Government, should put in place enforcement mechanisms for ensuring that airport expansion does not proceed if it will either cause or worsen a breach of air quality limits, particularly where there is a high risk of this occurring.

4. Noise

Many communities will feel the new objective ignores their interests and will fail to ensure the industry acts to address noise impacts in their areas. The Government needs to define "limit" and "where possible" and explain how and by whom they will be enforced.

However, we welcome Government's recognition that any benefits of quieter aircraft can be cancelled out by the greater frequency of aircraft movements or the effects of concentrated flight paths.

Data in the CAA's Noise Forecast and Analyses shows ATMs growing nearly 25% by 2030 and nearly 40% by 2050. It also shows that noise impacts will be greater, on almost all measures, in 2030 than currently. Thus, questions have to be asked about whether increases in flight numbers are compatible with the new noise objective.

The final strategy should set out clearly which body has responsibility for enforcing noise reduction; this cannot be simply left to airports to self-regulate.

The proposed new national indicator appears to be of limited real-world value and it has little relevance to any individual community. There is a risk that aggregate data will be used to defend industry performance. Any national indicator should incorporate frequency measures, as well as average noise measures.

In terms of the proposed noise caps as part of planning approvals (for increase in passengers or flights) it is important that there are appropriate compliance mechanisms in case such caps are breached. The government should spell out precisely what penalties would be imposed if growth is approved, but noise is not reduced.

The proposal requiring all major airports to set out a plan which commits to future noise reduction is potentially good news, yet there is an absence of detail about what should be included in these plans, how they will be implemented and how local communities will be involved.

We have a number of concerns about the new measures proposed for insulation, how these relate to existing expansion proposals and what best practice actually means. The policy proposals are not strict enough. The WHO Guidelines show that significant annoyance from noise can start from as low as 40dB at night and 45dB during the day.

Thus, the proposal for noise insulation to be offered at 60dB when Government's own policy that noise annoyance begins at 51dB, is wholly inadequate.

Proposing new measures to ensure better noise outcomes from the way aircraft operate is positive, but do not go far enough. As shown by the ICAO Doc 9888, steep departures can dramatically reduce the noise footprint, but there is no provision for this in the Strategy 2050.

There are also significant barriers to communities taking up insulation schemes, particularly in lower income households where the cost remains a significant deterrent. The strategy is completely silent on this issue.

5. Flight Paths

The Green Paper leaves the decision on whether or not to provide respite down to individual airports. This is simply not acceptable given that concentration of flight paths without respite will result in more noise for those living under the concentrated routes.

In the case of Heathrow, who have committed to respite periods; this will result in the creation of new flights paths meaning that there will be many communities that are overflown for the first time.

The final strategy should incorporate the findings of the WHO to ensure that a proper assessment is undertaken on how people react when airspace change happens, when new flights paths are introduced or there is a significant increase in flight numbers on existing routes.

We also remain concerned about the absence of a robust and clear definition of respite. This is vital for all communities who are or will be impacted by aircraft noise.

6. <u>Surface Access</u>

The strategy suggests that all proposed airport developments need to be accompanied by clear surface access proposals which demonstrate how the airport will increase the use of public transport and minimise congestion, emissions and other local impacts.

The government's current policy position, set out in the 2013 APF, is that *'the provision and funding of surface access infrastructure and services to airports is primarily the responsibility of the airport operator but where there are significant non-airport user benefits from changes and enhancements to the infrastructure and services government would consider making a funding contribution to reflect these'*. The Green Paper does not propose to change this policy.

Consequently, the proposal to expand Heathrow has not been accompanied by clear surface access proposals or a financial commitment by the scheme promoter to ensure that it contributes to the delivery of the schemes. Further, Government has been reluctant to commit any public capital to new rail links from the West and South into Heathrow. Heathrow had committed to increasing the number of passengers travelling to the airport by public transport to 45% by 2019. It has failed to deliver on this promise, only managing to achieve 41% (a 1% increase in past decade).

How can local communities have any faith in the promises made by Heathrow that there will be no increase in local congestion as result of expansion? Further, what is the likelihood that Heathrow can actually achieve the target of 50% by 2030 & 55% by 2040.

The final strategy should include mechanisms (including financial and operational penalties) to hold airports to account for their failure to deliver agreed public transport targets.

Government must also make clear how large a funding contribution it is prepared to commit to surface access improvements around Heathrow. It should then be equally clear in the amount that should be contributed by the airport.

7. <u>Regional Connectivity & Public Service Obligations</u>

In the Green Paper, the Government commits to supporting PSOs to London for routes vital for social or economic development that are in danger of being lost, but states that funding contributions should increasingly be provided locally.

Essentially this seeks to pass the buck for subsidising unprofitable routes from central government onto local government. Importantly, this is not what MPs were told in the run up to the vote on the Airports NPS.

There has been no assessment undertaken of the willingness or ability of local authorities to provide such finance. Consequently, many of those regions will not gain the increased connectivity that was promised to them by both Heathrow and the Government.

Promises to ringfence slots for regional airports are thus currently undeliverable in law – Heathrow cannot instruct airlines to fly to a place any more than the DfT can.

Further, Government has yet to make clear whether it is prepared to financially support the regional connections to ensure its commitment to 15% of slots at an expanded Heathrow is reserved for regional connections.

The strategy has failed to incorporate the recommendations of the Transport Select Committee's inquiry into the Airports NPS that found that if Heathrow expands, the international flights from regional airports would fall, as would the choice of destinations.

This will harm the Regional Airports ability to serve point to point (and even harm any large airports in the north from being their own hubs).

The strategy has also failed to consider the extra distances that will be travelled due to its "Hub" concept and the consequent impact on carbon emissions.