

Aviation 2050: the future of UK aviation

1. Introduction

Thank you for responding to this consultation on Aviation 2050: the future of UK aviation strategy.

The easiest way to respond to this consultation is via the online form:

<https://www.smartsurvey.co.uk/s/aviation2050/>

The online form allows you save and continue your response and save or print a final version for your records.

The aviation strategy sets out the government's vision for aviation to 2050 and includes proposals to:

- develop a partnership for sustainable growth which meets rising passenger demand, balanced with action to reduce environmental and community impacts
- enhance the passenger experience
- build on the UK's success to establish new connections across the world and create greater choice for consumers

Your answers will help us to shape the policy proposals within this document to create a final strategy which will support industry to delivering even greater improvements for passengers, the environment and our country.

This consultation has been extended, and now closes at 11:45pm on 20 June 2019. This is with the exception of the questions posed in 'Annex A: Legislation to enforce the development of airspace change proposals', which will still close for responses at 11:45pm on 11 April 2019.

Confidentiality and data protection

The Department for Transport (DfT) is carrying out this consultation to gather views and evidence on measures for inclusion within the statutory guidance issued for the aviation strategy. This consultation and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. If your answers contain any information that allows you to be identified, DfT will, under data protection law, be the controller for this information.

As part of this consultation we're asking for your name and email address. This is in case we need to ask you follow-up questions about any of your responses. You do not have to give us this personal information. If you do provide it, we will use it only for the purpose of asking follow-up questions.

We may contract a third party to analyse the responses we receive to the consultation. If you provide your contact details, we may share this information with a contractor in case they need to contact you regarding your consultation response.

[DfT's privacy policy](#) has more information about your rights in relation to your personal data, how to complain and how to contact the Data Protection Officer.

Your information will be kept securely and destroyed within 12 months after the consultation has

been completed. Any information provided through the online questionnaire will be moved to our internal systems within 2 months of the consultation end date.

2. Personal details

1. Your name and email address (only used if we need to contact you).

Your name

Your email

2. Are you responding as:

	an individual? (Go to section 4. Chapter 2: Build a global and connected Britain)
x	on behalf of an organisation? (Go to 3. Organisation details)

3. Organisation details

3. What organisation do you work for?

The London Borough of Southwark

4. What type of organisation is this?

	Airline
	Airport
x	Regulatory body
	Interest group
	Community group
	Industry
x	Other: Local Authority

4. Chapter 2: Build a global and connected Britain

The UK has the largest aviation network in Europe and the third largest in the world, an industry that contributes at least £22 billion to the UK economy, along with over 230,000 jobs. The government supports the growth of the aviation sector, provided that this happens in the most sustainable way, to ensure its continued success.

Build a global and connected Britain

Aviation is important for the government's goal of building a global and connected Britain. The UK already plays a prominent role on the world stage with the biggest international aviation network in Europe and currently the third largest in the world. Through the Aviation Strategy the UK will be equipped to build new connections in rapidly growing aviation markets, and to use the leverage we have internationally to pursue our objectives on environmental measures and liberalisation.

The government is working to:

- improve standards globally
- maintain and improve the UK's connectivity
- support UK aviation exports, including overcoming barriers to exporting

17. This section contains questions on chapter 3 of the consultation document - Ensure aviation can grow sustainably. Which of the following topic areas are of interest to you as an individual or to the organisation on behalf of which you are answering? (choose all relevant options)

x	A partnership for sustainable growth
x	Airspace modernisation
x	Resilience
x	Slots allocation
x	Safeguarding land
x	Community engagement
x	Carbon emissions
x	Non-carbon emissions
x	Air quality
x	Noise
x	Reducing waste
x	Sustainable journeys to the airport

18. To what extent does the proposed partnership for sustainable growth balance realising the benefits of aviation with addressing environmental and community impacts?

It is unclear how the partnership for sustainable growth will be applied in practice however the Authority does not have confidence that sufficient weight has been given to environmental and community impacts. The external costs of aviation have not been properly accounted and economic advantages of commercial aviation are overstated, in particular where there are impacts on very large urban populations. The Authority considers that the partnership for sustainable growth is unlikely to prevent growth in aviation which is, in the medium and long term, socially detrimental and environmentally unsustainable.

19. How regularly should reviews of progress in implementing the partnership for sustainable growth take place?

There should be annual reviews taking into account progress and any new evidence or information relevant to performance.

20. Are there any specific 'triggers' (e.g. new information; technology development etc) that should be taken into account when planning a review?

See above

Policy proposals

The questions in the section below refer to policy proposals contained in chapter 3 of the consultation document - Ensure aviation can grow sustainably. As with the rest of this consultation, you are welcome to respond to any, all or none of the questions in this section.

21. How could the policy proposals be improved to maximise their impact and effectiveness in addressing the issues that have been identified?

Carbon Emissions

Negotiate in ICAO (the UN body responsible for tackling international aviation climate emissions) for a long term goal for international aviation that is consistent with the temperature goals of the Paris Agreement

Support and strengthen the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) and negotiate for a long term goal for international aviation climate emissions, ideally by ICAO's 41st Assembly in 2022, that is consistent with the temperature goals of the Paris Agreement

The Authority agrees with these aims, however, there is no guarantee that such negotiation

would prove successful. The strategy appears to advocate expanding aviation capacity in the UK regardless of the outcome of international negotiations in order to avoid putting the UK at a '*competitive disadvantage compared to their global competitors*', despite the potentially catastrophic impacts of this approach for global climate. The proposal to '*maintain...current policy not to mandate sector specific emissions reduction targets*' allows the aviation sector to use the carbon benefits of future airspace modernisation and more efficient aircraft to increase flight numbers and continue an unsustainable level of carbon emission from air traffic. The strategy does not propose any effort to shift aviation demand to more sustainable alternatives (for example, greater use of international rail travel for short-haul journeys). This puts all strategic effort into encouraging and facilitating increased demand in aviation which is the least sustainable and most inequitable form of transport.

Accept the CCC's recommendation that emissions from UK departing flights should be at or below 2005 levels in 2050

A clear commitment on emissions targets is welcomed however it is considered that the targets are insufficiently ambitious in light of the escalating climate emergency. The Authority considers that emissions from UK departing flights should not exceed 2005 levels by 2030 and should be carbon neutral by 2050 after accounting for emissions reductions and offsetting. In order to achieve more ambitious goals it is considered necessary to impose stringent sector-specific emissions reduction targets on the aviation industry and to focus efforts on emission reduction and minimising demand for aviation where possible, rather than encouraging and facilitating market-led demand.

It is considered important that the progress of the aviation industry in reducing emissions should be regularly reviewed and reported.

Continue to lead efforts in ICAO to negotiate for robust, environmentally effective emissions reduction measures that minimise market distortions and address the sector's emissions in the most cost-effective way

The Authority supports all robust emission reduction measures. Carbon offsetting is considered to have an important role in the medium term but should be secondary to measures that directly reduce emissions at source wherever possible.

Air Quality

Improving the monitoring of air pollution, including ultrafine particles (UFP), in order to improve understanding of aviation's impact on local air quality

Ensuring comprehensive information on aviation-related air quality issues is made available to better inform interested parties.

Requiring all major airports to develop air quality plans to manage emissions within local air quality targets.

Validation of air quality monitoring to ensure consistent and robust monitoring standards that enable the identification of long-term trends.

Supporting industry in the development of cleaner fuels to reduce the air quality impacts of aviation fuels.

The Authority agrees with the proposed measures at 3.127 and 4.37. However surface access

and regional transport effects are not considered in sufficient detail in the strategy. Whilst the 'duty to co-operate with local government in the development of surface access strategies' is welcomed, there is no commitment to ensure future surface access strategies are consistent with local air quality action plans.

Other issues

Produce guidance on minimum standards for community funds

The Authority welcomes the proposal to produce guidance on minimum standards for community funds and the acknowledgment that this is not a substitute for noise reduction. However it is unclear from the strategy how it will ensure that the benefits reach those most affected. The Authority would wish to be consulted on, and have the opportunity comment on, the content of any such guidance

Noise

Setting a new objective to limit, and where possible, reduce total adverse effects on health and quality of life from aviation noise.

The Authority considers that the setting of a new noise objective is a welcome development, however the Authority has a strong view that the objective to 'limit, and where possible, reduce total adverse effects on health and quality of life from aviation noise' is insufficiently robust. The objective is far too vague as it fails to define 'limit' or set out what circumstances are relevant to the consideration of what is 'possible'. Secondly the objective clearly still allows for the creation of new significant adverse noise impacts from aviation noise. This is out of line with other national noise policy such as the Noise Policy Statement for England and the National Planning Policy Framework which apply to other transport industry sectors. These policies positively require that new significant adverse effects are 'avoided'. No justification is given to explain why the aviation sector should be treated any differently from other noise-generating sectors of the economy. There is also no explanation as to which body will be responsible for oversight, or any proposals regarding how the new noise objective will be enforced.

Developing a new national indicator to track the long term performance of the sector in reducing noise

The Authority considers a new national noise indicator to be a potentially useful tool; however, the strategy does not give any further detail on this proposal or exactly how it will be used. The Authority considers any new indicator needs to incorporate overflight numbers in addition to measures of average noise level. Any new indicator proposed would need to be sufficiently evidence-based to be acceptable. Further detail is required.

Routinely setting noise caps as part of planning approvals (for increase in passengers or flights)

The Authority welcomes the proposal to routinely set noise caps, however, this measure will only be effective if the caps are set at levels which avoid significant adverse impacts for communities. The proposal to use maximum exposure levels or contours may not sufficiently account for community annoyance from increased overflight numbers, in particular in the case of new exposure from altered flight paths. The strategy highlights the need to consider the effects and costs of night flights when setting caps. It is stated that costs need to be balanced against '...the

benefits of night flights and any restrictions should be proportionate to local circumstances'. No guidance is given as to how the competing priorities of communities and the aviation industry can be fairly and transparently costed and balanced and how the external costs of aviation will be accounted.

The strategy recognises the need for appropriate compliance mechanisms; however, the proposal to allow airports to *'pay for additional growth by means of local compensation'* appears to risk a marketization of noise impacts and risks allowing unlimited growth as long as this is sufficiently profitable for the airports to justify buying the impact. There is no information provided on how this would work in practice, what limits would be placed on this principle, or, how the local compensation would be effectively and equitably directed to those affected by the impacts.

Requiring all major airports to set out a plan which commits to future noise reduction, and to review this periodically

The Authority strongly welcomes this proposal but considers it should also apply to airports covered by noise caps approved through the planning system. This would push all airports to consider and develop coherent noise reduction plans which could be subject to public scrutiny.

The Authority agrees with the proposal for better noise monitoring and a mechanism to enforce these targets *'backed up by additional powers as necessary for either central or local government or the CAA'*. The Authority would welcome more information on what powers are proposed.

Developing tailored guidance for housebuilding in noise sensitive areas near airports

Improving flight path information for prospective home buyers

The Authority welcomes the principle of the above proposal. The Authority would wish to be consulted on, and have the opportunity comment on, the contents of any such guidance. The Authority also considers that flight path information should be improved for all residents regardless of tenure and improved information should be better publicised to homebuyers and home renters alike.

Proposing new measures to ensure better noise outcomes from the way aircraft operate, by increasing uptake of best practice operating procedures and improving compliance with mandatory controls

The Authority agrees with the proposed measures, however, it is considered that a regulatory role for ICCAN should be incorporated to ensure compliance.

Look into creating new statutory enforcement powers for ICCAN or CAA if other measures prove insufficient to drive the outcomes it wants

Communities affected by aircraft noise widely consider the CAA to be too close to the aviation industry and to have a track record of being either unwilling or unable to bring about positive change for their benefit. The Authority considers ICCAN to be lacking in appropriate enforcement powers currently, but would strongly favour ICCAN being given an enforcement remit and suitable powers independent of the CAA. The Authority would wish to see this happen now, without any further seeking of *'voluntary compliance'* which delays the public benefit that stronger oversight of the aviation industry could bring to communities affected by aviation noise.

Proposing new measures to improve noise insulation schemes for existing properties, particularly where noise exposure may increase in the short term or to mitigate against

sleep disturbance

The Authority agrees with the principle of improved noise insulation measures. In respect of the specific measures, the Authority agrees with extending the noise insulation policy threshold beyond the current 63dB LAeq 16hr contour and sees this as a move in the right direction. However, it is considered that the proposal to use 60dB LAeq 16hr still fails to provide for tens of thousands of people suffering adverse impacts from aviation noise around Heathrow Airport. The Authority believes that the requirement should extend to all households suffering a significant adverse effect, with at least those experiencing 57dB LAeq 16hr being entitled to a comprehensive mitigation package. The Authority considers that mitigation and compensation policies should provide, to some extent, for all people within the 51dB LAeq (16hr) and 45dB Lnight contour. It is considered particularly important to provide suitable mitigation for people newly affected by changes in flight paths.

In line with compensation on large infrastructure projects (e.g. Crossrail and the Thames Tideway Tunnel), the Authority considers that there should be a mechanism to make allowance for situations where people in a wider area, outside of the standard agreed noise envelopes, can reasonably justify special circumstances that adversely affect their sensitivity (for example relevant medical conditions or night shift working).

The Authority welcomes the proposal to require all airports to review the effectiveness of existing schemes and the proposal for ICCAN to issue guidance on best practice in noise insulation schemes. It is considered important that mitigation should be easily accessible for all residents who would benefit from it, regardless of income or housing tenure. In particular, insulation schemes should be available to tenants renting property as these are often the most vulnerable residents with the potential to be the most affected by aircraft noise.

The Authority welcomes the proposal that airspace changes, which cause significantly increased overflight, will lead to assistance with noise insulation. An increase of 3dB LAeq is considered to be a reasonable acoustic threshold for a change in most circumstances, however, the Authority considers this should apply to changes which leave households within the 51dB LAeq (16hr) and 45dB Lnight contours. The Authority would point out that a 3dB increase in LAeq is equivalent to a doubling of overflight assuming the fleet mix is unchanged. There may be cases where a lesser increase in overflight or average noise level still causes a significant impact on community annoyance, in particular in the case of new or altered flight paths. Therefore the Authority believes a mechanism should be in place to consider assistance with insulation on a case by case basis in such circumstances.

Other Issues

The Authority is concerned that the proposed Aviation 2050 strategy does not provide suitable guidance on concentration of flight paths. The strategy highlights that Performance Based Navigation will not allow for conventional dispersal of flight paths. The consultation highlights PBN will allow single concentrated flight paths or a relatively small number of concentrated routes to allow limited respite. The proposed strategy leaves flight path design principles to individual airports, in accordance with the CAA's airspace change procedures.

Residents in Southwark consistently raise the concentration of flight paths as their principle concern. The Authority considers that the strategy should allow a clear mechanism to ensure respite and dispersal of flight paths where this is clearly expressed by affected communities.

22. How should the proposals described be prioritised, based on their importance and urgency?

The Authority considers priority should be given to measures which immediately reduce adverse impacts on residents suffering from aircraft noise. As such, expanding insulation entitlement, implementing mitigation measures to minimise noise, restricting the noisiest flights and implementing suitably protective noise caps should be prioritised.

The Authority also considers measures to increase oversight and control of the industry (such as empowering ICCAN) to be of vital importance.

23. What implementation issues need to be considered and how should these be approached? (e.g. resourcing challenges, high levels of complexity, process redesign, demanding timelines)

There is a lack of confidence in current regulatory arrangements and a lack of effective enforcement to ensure compliance. Communities do not find airports or the CAA to be transparent and technical information regarding changes can be difficult to understand. The detail of the changes proposed by the strategy need to be widely and clearly consulted.

24. What are the financial burdens that need to be managed and how might those be addressed?

There is a need to commit to funding further UK-specific studies to provide better evidence of aircraft noise impacts, particularly in the light of the general findings of the WHO Environmental Noise Guidelines for the European Region.

Aviation places a burden on Local Authority resources due to:

- Responding to resident complaints and enquiries regarding noise, air quality, planning proposals and requests for assistance in dealing with air transport related agencies
- Considering land side development such as the Heathrow 3rd runway scheme.
- Attending both professional and public meetings, consultative committees, liaison groups and similar

- Considering consultations and consent applications.

There is no direct contribution from the industry to account for these local authority costs.

The health and quality of life impacts on residents, education and businesses affect the local economy and increase public demand for local authority and national health services.

25. What are the regulatory burdens that need to be managed and how might these be addressed?

See above

26. Are there any options or policy approaches that have not been included in this chapter that should be considered for inclusion in the Aviation Strategy?

Yes, the strategy is focussed on facilitating increased demand for aviation and fails to take a wider view of the external costs of this approach. There is no consideration of measures to limit or reduce demand for aviation where possible. Such measures could include incentives to use international rail travel on suitable short-haul routes and use of fiscal policy to control demand for aviation and to incentivise quieter, more efficient aircraft and flight procedures.

27. Looking ahead to 2050, are there any other long term challenges which need to be addressed?

The main challenge areas are covered in the strategy

28. Are you aware of any relevant additional evidence that should be taken into account?

x	Yes (see following evidence page)
	No (proceed to next section)

7. Sustainable growth evidence

29. Please give a brief summary of the additional evidence that you wish to provide.

Comments:

The consultation largely ignores the recent WHO Environmental Noise Guidelines for the European Region. The Guidelines strongly recommend reducing noise levels produced by aircraft to below 45 dB Lden, as aircraft noise above this level is associated with adverse health effects. For night noise exposure, the Guidelines strongly recommend reducing noise levels produced by aircraft during night time below 40 dB Lnight, as aircraft noise above this level is associated with adverse effects on sleep.

To reduce health effects, the Guidelines strongly recommend that policy-makers implement suitable measures to reduce noise exposure from aircraft in the population exposed to levels above the guideline values for average and night noise exposure. For specific interventions the Guidelines recommend implementing suitable changes in infrastructure.

Whilst the Authority accepts that the suggested limits in the Guidelines are not realistically achievable at this time in relation to all airports (particularly Heathrow), it considers that the strategy should have a strong target to move towards compliance in the shortest possible time. Requiring airports to put far greater resources into mitigation and insulation policies would be one way to reduce exposure more rapidly without waiting for longer-term improvements in aviation technology.

18. Technical annexes

Thank you for completing the response to the consultation.

There are some additional questions on technical aspects of the strategy:

Annex A: Legislation to enforce the development of airspace change proposals

Annex D: Proposed Public Service Obligation (PSO) assessment criteria

Anyone can respond to these questions, however due to their technical nature, they are likely to only be of interest to subject matter experts.

88. Do you want to answer the questions on the technical annexes?

X*	Yes (Go to Annexe A)
	No (you have finished the questionnaire)

*Previously submitted April 2019 – re-attached below

19. Annex A: Legislation to enforce the development of airspace change proposals

This section contains questions on Annex A of the aviation strategy - Legislation to enforce the development of airspace change proposals.

You will need to download a copy of the annexe from GOV.UK in order to respond to these questions.

You can find the annexe on this page - <https://www.gov.uk/government/consultations/aviation-2050-the-future-of-uk-aviation>

Q1. Should the government legislate for powers to direct individual ACPs identified as necessary in a masterplan to be taken forward?

Yes

Q2. What are your views on the above two proposals?

Of the two options put forward, the Authority would favour option b) as this would remove primary responsibility for taking forward ACPs from the hands of the airports/ANSPs. Airports have competing incentives and do not necessarily put communities first in the airspace change process. Hence, the Authority considers that this work is better completed at arm's length as far as is possible, to introduce more independent control and scrutiny. Giving more responsibility to NERL is also more likely to ensure better coordination between the ACPs from different airports. Residents affected by ACPs currently fundamentally mistrust the motives of airports. Requiring NERL to coordinate ACPs may provide greater assurance that an ACP has a justifiable reason beyond the airports' own commercial priorities. However, the level of community trust in the CAA and NATs is also low and so the benefits of option b) are likely to be limited in this respect.

Whichever body has the responsibility for taking forward ACPs, the key factor for the Authority will be whether the NERL masterplan is suitably protective of communities that are impacted by aircraft noise. The Authority does not currently have confidence in the CAA and its Airspace Modernisation Strategy and so there is a risk with either option that these powers become available to enforce airspace changes which could be detrimental to communities or which fail to provide significant benefits.

Q3. Do you agree that option a) should be the lead option?

No. Of the two options put forward in this consultation, the Authority would favour option b) as the lead option.

Q4. What are your views on the scope for the use of the powers?

The Authority would broadly agree with the proposed scope for use of the powers. It is considered imperative that powers to direct an ACP apply to achieving noise benefits as this is the most significant issue for our communities.

Q5. What are your views on the use of the triggers for using the legislative powers?

The Authority would agree with the proposed triggers as general principles; however the Authority would also have concerns outlined in Q6 below, regarding enforcement consistency and the transparency of the process. The effectiveness of the powers is contingent on the masterplan identifying suitable and beneficial ACPs and appropriate timescales for their implementation.

Q6. What are your views on the proposed sanctions and penalties regime?

The proposed sanctions and level of penalties conferred on the Secretary of State are considered appropriate. However, it would be preferable to also make these powers available to an

independent body such as ICCAN that can balance relevant interests and protect communities affected by the ACP in the case of noise. The consultation emphasises the '*preference to use alternative approaches*' and '*flexibility to enforce a direction*'. There is a risk that this may lead to a lack of transparency, inconsistency in enforcement, and/or potentially a lack of action. It is unclear how consistency will be ensured in enforcement decisions and how the process will be suitably transparent for communities affected by an ANSP's failure to adhere to an ACP, which was identified as necessary in the masterplan.

Q7. What are your views on the grounds for appeals?

The proposed scope for appeals appears to be reasonable, although it is unclear from the consultation how transparent this process would be or what opportunity affected stakeholders would have to provide evidence to the appeals process. The Authority would welcome further clarification on this progress.

Q8. What are your views on the best approach to funding an airspace change where a small airport may need financial support to do so?

The Authority agrees with the general principle that air passengers should fund the wider costs of their travel. The Authority agrees that airports or ANSPs should fund the costs of ACPs. The Authority agrees that where NERL or another third party takes forward an ACP on behalf of an airport, they will be eligible to recover costs from airspace users. For small airports genuinely unable to fund an ACP, the Authority would not object to funding from other industry sources to bring forward necessary ACPs where this would otherwise be at risk. The Authority would not object to use of the UK unit rate or other industry funding sources as long as this does not divert funding from other regulatory functions and does not involve any cost to the public purse.

Return this questionnaire

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