

Aviation Strategy Green Paper Briefing

General

No action on managing demand 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

The idea that flying is a privilege and as such should be more heavily taxed, particularly for those who fly regularly, is not even considered.

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.

Watered down policy on sharing the benefits of growth

Past government policy was that the benefits of growth must be shared between the industry and those it impacts. The government now appears to see this in a much more general way, with community benefits now potentially including local employment, improved transport links, tourism and trade.

Noise

The paper announces the long-awaited **launch of ICCAN** - the Independent Commission on Civil Aviation Noise.

Very importantly, and perhaps officially for the first time, the Government recognises that **any benefits of quieter aircraft can be cancelled out by the greater frequency of aircraft movements or the effects of concentrated flight paths.**

A **new minimum threshold** of an increase of 3dB LAeq is introduced to be eligible for compensation.

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.

The proposed new noise objective is ***“to limit, and where possible, reduce total adverse effects on health and quality of life from aviation 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.

The Green Paper proposes that **new national indicator** but this is of little relevance to any individual community, so the proposal seems of limited real value. There is, however, 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.

The Green Paper proposes to **set 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 how noise and growth would be balanced if growth is approved but noise is not reduced.

The Green Paper also propose requiring all major airports to set out a **plan which commits to future noise reduction**.

Flight Paths

There will be big changes to flight paths, with new ones introduced. The satellite system will not allow for the dispersal of flights which some areas currently have. The only options will be precise, concentrated flights without respite or the creation of a number of these flight paths so respite is possible.

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

Heathrow has committed to respite periods which may result in breaks from noise (albeit reduced from half a day to a third of a day if a third runway is built). However, this will result in the creation of new flights paths meaning that there will many new communities that are overflowed for the first time.

Regional Connectivity & Public Service Obligations

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 that funding contributions should increasingly be provided locally.

The government expects that significant direct financial support for PSOs into Heathrow following expansion is unlikely to be required, due to the commercial incentives in place for airlines to run routes into the UK's primary hub airport.

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 NPS.

There has no assessment has been 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.

There are currently **no legal agreements** in place between the Department for Transport and Heathrow Airport Limited to guarantee existing routes between London Heathrow and regional airports

Surface Access

By 2050, the Green Paper anticipates a 70% increase in surface access journeys to airports in the UK. The Green Paper suggest 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.

DfT aim to produce a guide book on how to engage with the different surface transport planning processes that exist, particularly things like rail franchising. This Surface Access Strategy will ensure that journeys to airports become more sustainable and won't just focus on mode share to achieve environmental targets. This was expected to be published alongside the Green Paper but has not yet emerged.

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.

Air Pollution

There is growing evidence that current legal limits on air pollution need to be strengthened, there needs to be a better 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 Green Paper 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).

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.

Climate Change

The Green Paper 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 Green Paper assumes growth is essential and should be prioritised over environmental impact

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.

The Green Paper reveals that government will maintain its current policy not to mandate sector specific emissions reduction targets. Government says it does not propose to include international aviation emissions in carbon budgets.

The Green Paper 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.