

Aviation 2050: The future of UK aviation

On December 17th the Government published its **Green Paper** with proposals for its new aviation strategy which it will finalise and release in the second half of 2019. It is an important document. It sets out proposals for UK aviation policy until 2050.

There will be a **16 week consultation** ending on **11th April 2019**

Link to the full paper: <https://aviationstrategy.campaign.gov.uk>

There's also a **NATS paper** on the new type of flight paths being introduced:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/763085/nats-cao-feasibility-airspace-modernisation.pdf

And a **CAA paper** on past and future noise levels:

<https://www.caa.co.uk/News/New-Airspace-Modernisation-Strategy-launched-to-overhaul-UK-airspace/>

Responding to the consultation

This is a critical document that will influence both national aviation policy and what happens at each airport for many years to come.

The consultation is an important opportunity to influence the new policy.

When responding:

Don't forget to say what you like about it. Remember nothing is set in stone. All are still proposals. There may be lobbying for some of the proposals you like – say noise reduction plans – to be watered down. Your voice is important so the Department of Transport can understand that these proposals also have strong support.

Spell out the things you don't like. Or what is missing. Don't assume the Department won't listen!

Be constructive if possible. Don't be afraid to come up with alternative ideas or other solutions. They can have more impact than merely saying 'no'. And, even if your ideas or solutions are not taken up, you have laid down a marker for your future campaigning.

How to respond:

The Department is keen we use its online form to respond. But it is not essential. You can simply email your comments to AviationStrategy@dft.gov.uk or send a letter to Aviation Strategy, Department for Transport, 33 Horseferry Road, London, SW1P 4DR. If you do use the online form, you don't need to respond to every question – simply put 'no comment' in the box and move on to the next question.

On the next few pages we set out some things that may help you in your response

1. Growth of aviation

We recognise the aviation industry adds value to the UK economy and its importance to people who want to fly on holiday or acknowledge the case better connectivity to the emerging economies of the world.

But, as the Green Paper acknowledges, expansion of aviation will also have downsides, particularly around noise and climate change. Therefore the Government should not rule out measures that will limit the growth of aviation. These could include higher taxes on an industry that is currently under-taxed and the promotion of rail as an alternative where appropriate.

2. Noise

We welcome the statement in the Green Paper that the number of planes overhead can be the big problem: “the Government recognises that statistics showing past and future improvements in noise do not necessarily match the experience of some people living under flight paths, for whom the benefits of quieter aircraft can be cancelled out by greater frequency of movements or the effects of concentrated traffic associated with more accurate navigation technology.”

We support the introduction of less noisy planes but our fear is that, if the increase in the number of planes of our community is too great, this will off-set the benefits of less noisy planes.

We also welcome the setting up of ICCAN (Independent Commission on Civil Aviation Noise).

The specific measures in the Green Paper to deal with noise are broadly welcomed:

- **A new objective** to limit, and where possible, reduce total adverse effects on health and quality of life from aviation noise. Welcome but needs fleshing out: “*to limit, and where possible*” to reduce the impact of noise is too vague. The Government needs to define “*limit*” and “*where possible*” and explain how and by whom they will be enforced.
- A new **national noise indicator** to track the long term performance of the aviation sector in reducing noise. Welcome but specifics are required. Any national indicator should incorporate frequency measures as well as average noise measures.
- **Noise caps** to become routine at airports where planning permission is given for growth. Welcome.
- All major airports to draw up a **noise reduction plan** – welcome but ‘*noise reduction*’ would need to be defined.
- The introduction of **multiple flight paths** to provide **respite** but the decision will be down to individual airports. There may be airports, or particular flight

paths, where respite is not the best option but, if an airport is to reject it, it should be asked to be very clear why it is doing so.

- To reduce the current point where **noise insulation** has to be offered from the 63dB LAeq 16hr contour to the 60dB LAeq 16hr contour. This is welcome.
- To require all airports to review the effectiveness of existing **compensation schemes**, including “whether levels of contributions are affecting take-up.” A review is necessary, in particular how much householders are being asked to pay.
- The government or the new noise commission to issue new guidance to airports on best practice for **noise insulation schemes**, to improve consistency. Important there is consistency across the country. The guidance should also include levels of insulation that should be offered to people within the 54 and 51 decibel contours.
- For airspace changes which lead to significantly increased flights overhead, a new minimum threshold of an increase of 3dB LAeq is introduced to be eligible for **compensation**. Welcome.
- Provide more **information** to people moving into an area under a flight path. Welcome.
- **Promote best practice** in operating procedures; give the CAA the duty to require information on the practices used – important and welcome. Welcome.
- Introduce a new power to direct airports to **publish information**. Welcome.

Despite the welcome measures being proposed, there is still **no guarantee that noise levels will fall**. This needs to be addressed in the final strategy.

We are disappointed there are **no measures to cut night flights** at airports. An assessment of the value of night flights to the national and local economies needs to be carried out. There may be value in some intercontinental and freight flights but the majority of the night flights at most UK airports are holiday flights which may well be run for the convenience of the operator rather than the good of the economy.

3. Climate Change

We welcome the commitment in the Green Paper to meet the target of reducing aviation’s climate emissions to their 2005 levels by 2050.

We see merit in the three main measures set out to do this:

- A “**long term vision and pathway** for addressing UK aviation’s impact on climate change” which will be kept under review to take account of new technological, improved operational efficiencies, market-based measures, sustainable fuels as well as demand management and behaviour change.

- “to 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”
- “to support and strengthen the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)” - international scheme for aviation to **offset its emissions**.

Comment:

The measures proposed are ambitious but they are untested. There is no guarantee that the rest of the world will play ball in agreeing to a long term goal to cut emissions from international aviation or to accept a tougher off-setting scheme. Equally, while technology is likely to result in cleaner aircraft, the timescales remain uncertain. Therefore, the Government must commit to providing information and updates on the progress that is being made and to accept that, if there is insufficient progress, demand management measures will need to be introduced.

4. Air Pollution

Levels of air pollution have steadily fallen over the past 40 years. The UK is currently compliant with ambient air quality legislation for most pollutants, the exception being nitrogen oxides although emissions of nitrogen oxides have fallen by almost 27% between 2010 and 2016. However, we have become more aware of the health impacts of air pollution.

We broadly welcome the measures proposed in the Green Paper:

“The need to take further action to ensure aviation’s contribution to local air quality issues is properly understood and addressed.”

“The Government has created the Air Quality Plan to help achieve compliance as swiftly as possible. The draft Clean Air Strategy also sets out the ambition to reduce the harm to health from air pollution by half”. Both these need carefully monitoring and strengthening if necessary.

To “improve the monitoring of air pollution, including ultrafine particles (UFP), in order to improve understanding of aviation’s impact on local air quality” and to “require all major airports to develop air quality plans to manage emissions within local air quality targets. This will be achieved through establishing minimum criteria to be included in the plans.”

The proposal to require all major airports to develop air quality plans to meet local air quality targets, with the Government setting out the minimum criteria to be included in the plans will force the airports to meet air pollution targets. The proposal for the Government to improve the understanding of aviation’s impact on local air quality is necessary as there is a view that aircraft might worsen air pollution not just fairly close to the airport but also some many miles from it; the proposal to explore the impact of ultrafine particles is particularly welcome as there is a growing body of evidence to suggest they are much worse than previously thought.