

London Forum of Amenity and Civic Societies

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Aviation 2050 response

Aviation Strategy,

Department for Transport,

33 Horseferry Road London SW1P 4DR

1. This is a response to the Government's consultation document (CM 9714) on behalf of the London Forum of Amenity and Civic Societies.
2. The London Forum represents over 100 amenity and civic societies across London. It is taking a strong interest in aviation policy, not least because of the plans to expand Heathrow, and the environmental impacts of aviation especially across large parts of London.
3. This response focuses mainly on the issues and questions raised in Chapter 3 ("Ensure aviation can grow sustainably").

Summary of response

4. The main points in our response are:
 - a) The consultation document does not anything like sufficiently face up to the challenges of the expected very strong growth in demand for aviation if no action is taken. This is particularly serious, since the document suggests there will be a need for new airport capacity over and above the Government's proposed third runway at Heathrow, from as early as 2030, while also noting that such further expansion may well not be sustainable.
 - b) The document in several places aims to secure international agreement to achieve better environmental outcomes; but fails to acknowledge that this is likely to be very hard to achieve.
 - c) Much stronger UK-based measures are needed to address the noise, local air quality and climate change impacts of aviation than those identified in the document.

Challenges of strong demand growth

5. We welcome the aim in the document to ensure that future growth in aviation demand should be sustainable.
6. But we do not think that the document anything like faces up to the challenges of achieving this.
7. The document says that growth in demand can be met up to 2030 through the creation of a third runway at Heathrow. But such a runway, even if built (and the London Forum maintains its strong opposition to building it) would only be available from about then, and so would be insufficient to meet unconstrained aviation demand from the moment it is built. Yet the document is very unclear how any further airport capacity would be decided on after this, apart from suggesting that the Infrastructure Commission might study the issue, or that plans could be brought forward by the aviation industry. (One would surely have expected a strategy document such as this to propose an approach and criteria rather than simply leaving such proposals to others.)
8. We believe that the strategy in the document of accommodating continuing aviation demand growth through new airport capacity is fundamentally mistaken, as it is quite unsustainable given the rate of predicted growth, and as a result this would have totally unacceptable environmental impacts.
9. Consequently a different strategy, aimed at managing demand, rather than accommodating it, is essential, as has been the case already with road traffic demand, especially in urban areas. The environmental impacts of aviation are at least as large as those from urban road traffic demand; and there is therefore every case for adopting a similar approach with aviation demand. Yet this is not even hinted at in this document.

Challenges of achieving international agreement on a more sustainable approach

10. At several key points in chapter 3, the document commits the Government to seeking international agreement, through ICAO and other bodies, to secure environmental improvements.
11. However the document contains no analysis at all on how likely it is that such agreements can be secured. On past experience, even before the current Trump presidency, such international agreement on aviation has been extremely difficult to achieve, including through opposition to many proposals from China, India and the US.
12. We believe therefore that the document relies too heavily on securing such international agreements as a key means of securing environmental improvements to aviation. While it is certainly desirable for the Government to pursue such international approaches, the strategy needs to rely much more on measures which the UK can introduce in the absence of international agreement.

Much stronger UK-based measures

13. Given the problems identified above, we believe that far stronger measures are needed to manage and influence aviation demand and to limit the type and use of aircraft being flown, in addition to those proposed in the document. These should include:
- a) Strong financial incentives, especially in the form of taxation measures, to influence aviation demand. These should include taxes on noisier and more polluting aircraft (from the point of view of climate change and local air quality); and requiring airports to introduce comparable measures themselves as a condition of receiving planning permission for any further expansion. The Government should spell out the type of measures that it expects to introduce and require at an early stage, in order to influence any proposals coming forward.
 - b) Stronger regulatory measures, especially on preventing noisier aircraft being flown, and with a complete prohibition on night flights.
 - c) A greater emphasis on controlling noise from arriving aircraft. (The document proposes some tightening of standards on departing aircraft, but says nothing specific about arriving aircraft, which, especially in London, affect far more people.)
 - d) A much stronger role for the Independent Commission on Civil Aviation Noise; this should have independent enforcement (including prosecuting) powers, starting immediately, as the Airports Commission originally proposed. (It is extraordinary that the document only proposes such powers 'for the longer term if other measures prove insufficient...')
 - e) A much more integrated approach to addressing surface-generated environmental impacts from aviation and aircraft-generated impacts at the same time. A consequence of almost any kind of increase in aviation demand will be greater environmental impacts on the ground, including increased traffic noise, worse local air quality and more strain on public and road transport systems. Yet these impacts are scarcely addressed in the document: requiring airports to produce, for example, air quality plans, as proposed, is likely to make minimal difference to actual air quality. Instead, airports should be made responsible for a much wider range of environmental improvements on the ground, including in stronger funding obligations for enhanced public transport and in limiting road traffic connected to the airports.

Conclusion

14. We strongly believe that the strategy proposed in the document is misconceived and much too weak, especially in that it does not face up to the serious environmental consequences of unmanaged growth in aviation demand. Demand management is therefore essential, as are much stronger policy measures to address this issue.