

Beyond the Horizon: The Future of UK Aviation.

Response by the London Forum of Amenity and Civic Societies.

Summary of response

1. The London Forum of Amenity and Civic Societies represents 130 local amenity and civic societies across London.
2. We have substantial reservations about the direction suggested by this call for evidence.
3. The heart of our concern is that not enough weight is being put on a more sustainable approach for aviation in the UK, and that insufficient emphasis is being put on reducing environmental impacts. This is a particular issue for the huge population of London and the wider south-east, who are more affected by the environmental impacts of aviation than are those living in any other part of the UK.
4. While we recognise the contribution that aviation can make to economic growth, nevertheless unless more weight is put on sustainability and the environment, there will be a reduction in broader economic welfare, as a result of growing environmental impacts. Without that, public opposition to aviation growth will continue to grow, and this opposition will further diminish aviation's economic contribution.

Aim and objectives of the strategy

5. The call for evidence proposes that the overarching aim of the strategy should be "To achieve a safe, secure and sustainable aviation sector that meets the needs of consumers and of a global, outward facing Britain".
6. The proposed objectives refer to environmental impacts only indirectly, in saying that one objective should be "to support growth while tackling environmental impacts"
7. We do not think the aim and objectives, taken together, give nearly enough weight to what should be a key aim of reducing environmental impacts from aviation. The need to reduce environmental impacts, including both climate change and more local environmental impacts, is so central to what should be the aim of an aviation strategy, that it should be both referred to in the overarching aim and given an objective in its own right, and not simply be a balancing item within the objective about supporting growth.
8. There is a particular inconsistency between the proposed treatment of safety and security on the one hand and environmental impacts on the other: the former is given an objective in its own right, while the latter is given only a balancing aim. Since there are trade-offs with growth both in relation to safety/security and in relation to environmental impacts, it is illogical to downplay the environmental objective by having it only as a balancing objective against growth.

“Meeting aviation demand”

9. Linked to this last point is the question of meeting demand for flights.
10. The call for evidence suggests (see especially para 1.25) that the aim of the strategy should be that of ‘meeting demand through sustainable growth’. Although the following paragraphs recognise that “balancing aviation growth with negative environmental impacts is one of the greatest challenges facing the aviation sector” and states that “the Government wants to make sure that growth in the aviation sector does not result in unwelcome environmental impacts”, nowhere does the strategy suggest that aviation demand should not always be met.
11. Our view is that this is the wrong approach, and that the strategy should be signalling a move away from a ‘predict and provide’ approach to aviation capacity to one of managing demand to reduce environmental impacts. This is what has been the aim in relation to road transport, especially in urban areas, for some years; and we strongly believe that, with its own severe environmental impacts, this should likewise be the aim in relation to aviation.
12. Managing demand certainly does not mean that increases in capacity should always be prevented, but that, as with road transport, measures should be regularly introduced to influence demand for aviation, for both passenger and freight use, especially where there are serious environmental impacts. It also means specifically encouraging alternatives to air travel where less environmentally damaging alternatives can be provided, such as rail travel (for passengers and freight), especially as an alternative to short-haul flights.
13. In addition it means influencing demand away from more environmentally damaging types of aircraft and flight paths towards less damaging ones.
14. For these reasons, we also do not agree with the proposal (para 7.20) that the Government “is minded to be supportive of all airports [except Heathrow where separate consideration is being given] who wish to make best use of their existing runways including those in the South East”. We believe that it would be quite wrong that the Government should start from a position of support; rather each case should be considered on its merits, taking particular account of the need for a sustainable approach, involving a move away from a ‘predict and provide’ philosophy, and with a strengthened environmental objective that we suggest above.

Tackling specific environmental impacts

15. Overall, we believe that the strategy should propose substantially stronger action to address these. The following paragraphs cover comments on noise, local air pollution and climate change – where the strongest impacts from aviation arise.

Noise

16. The call for evidence notes that “even as aircraft are getting quieter, recent evidence suggests people are becoming more sensitive to noise at lower levels and that the number of flights overhead can be a more significant factor than the average noise level”. It also notes that “conventional ways of mitigating noise have arguably failed to reduce public annoyance, particularly where there has been a noticeable increase in the number of flights” (paras 7.32-33). These are highly important observations, which need to be followed through much more fully in the strategy.

17. We welcome the commitment in the call for evidence that the government will explore whether a new approach to reducing noise annoyance is needed". This is long overdue.
18. Of the measures to address this that are touched on in the call for evidence, we believe that providing stronger incentives to reduce noise and establishing targets to reduce noise are likely to be the most effective, along with more stringent use of regulation to prevent the use of noisy aircraft, especially at night.
19. We believe that noise targets must be ambitious, to provide real pressure on airlines to use quieter aircraft and quieter flight patterns.
20. Financial charges for noise should have a key role to play, so that airlines would pay substantially higher charges for noisier aircraft, and that these should be rigorously enforced.
21. To provide the necessary incentives and enforcement mechanisms, we do not believe that these charges can be left to airports to set; but rather that this should be a Government responsibility, as the Davies Commission recommended. We do not see it as a disadvantage if this means that they are classified as a tax.
22. We also believe that there should be a Noise Authority established as a statutory authority, which would have enforcement powers for noise, as the Davies Commission also recommended.

Air Quality

23. We welcome the statement in the call for evidence that "the government would like to explore whether it should be taking a more proactive role in tackling air pollution from aviation" We strongly agree that there should be such an enhanced role for Government, with emissions limits levels set for aircraft both in flight and on the ground and additional charges set by government for the more polluting aircraft. This is over and above air quality limits and measures in relation to surface access to airports, as we have already commented on in relation to Heathrow. Both in relation to Heathrow and more broadly there should also be strong emphasis on measures to reduce air pollution.

Climate Change

24. The call for evidence notes that aviation's share in total climate change emissions has been steadily increasing as emissions from other sectors have fallen. We think that much more vigorous action is necessary, led by government, through a combination of regulation and financial incentives, to reverse this trend in relation to aircraft emissions. The market incentive for action by the industry provided by the fuel cost driver has clearly been insufficient given the record – hence the need for additional measures.

Conclusion

25. While we welcome this call for evidence, we believe that it underplays the need for more fundamental action to reduce the environmental impacts of aviation, with this being an objective in its own right. Linked to this, we believe that an objective to aim that all demand

for aviation should be met is misplaced, and that we should be moving to an approach of demand management, as already applies to much of surface transport policy.

26. Without this shift in emphasis, we believe that public opposition to aviation growth will grow, especially in major population centres. Only with such a shift in approach will aviation be able to provide the contribution that it can to wider economic growth and welfare.

London Forum of Amenity and Civic Societies
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