



Uttlesford District Council

Interim Chief Executive: Rob Tinlin

Stansted Airport Advisory Panel Remote Meeting

Date: Wednesday, 18th August, 2021

Time: 6.00 pm

Venue: Zoom - <https://zoom.us/>

Chair: Councillor M Foley

Members: Councillors M Caton, A Dean, P Fairhurst, V Isham, G LeCount, M Lemon, S Luck, N Reeve and M Sutton

AGENDA

1 Apologies for Absence and Declarations of Interest

To receive any apologies for absence and declarations of interest.

2 Minutes of the Previous Meeting

4 - 8

To consider the minutes of the previous meeting.

3 Government Consultation on Night Flights Restrictions at Heathrow, Gatwick and Stansted Airports beyond 2024, plus National Night Flights policy.

9 - 39

To consider Government consultation on night flight restrictions beyond 2024, plus national flights policy.

4 Government Decision to Roll Forward Existing Night Flight Restrictions

Verbal item.

5 Panel Workshop

Verbal item.

6 Government "Jet Zero" Consultation

40 - 49

To consider Government "Jet Zero" consultation.

7 Future Panel Business

Verbal item.

For information about this meeting please contact Democratic Services

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Agenda Item 2

**STANSTED AIRPORT ADVISORY PANEL held at ZOOM on WEDNESDAY,
19 MAY 2021 at 6.00 pm**

Present: Councillor Foley (Chair)
Councillors M Caton, A Dean, P Fairhurst, V Isham, G LeCount,
S Luck and N Reeve

Officers in attendance: C Edwards (Democratic Services Officer), G Glenday (Assistant
Director - Planning), R Harborough (Director - Public Services)
and J Pine (Planning Policy/Development Management Liaison
Officer)

Also present: Councillors L Pepper and M Sutton

1 **ELECTION OF CHAIR**

The Members sent their sincere best wishes to Councillor Eke. A Chair was required for this meeting in his absence. In his absence Councillor Foley was the nominated to take the Chair by Councillor Fairhurst and seconded by Councillor Caton. There were no objections and he was duly elected as Chair for the meeting.

2 **APOLOGIES FOR ABSENCE AND DECLARATIONS OF INTEREST**

Apologies were received from Councillor Lemon.

Councillor Luck declared a non-pecuniary interest as the President of the Youth and Education Support which works with Manchester Airport Group (MAG) Youth Schools Unit at Stansted Airport.

Councillor Isham declared a non-pecuniary interest as a member of Stop Stansted Expansion (SSE).

Councillor LeCount declared a non-pecuniary interest as a member of SSE.

3 **MINUTES OF THE PREVIOUS MEETING**

The minutes of the previous meeting held on 26 February 2019 were agreed and would be signed by the Chair as an accurate record at the next opportunity.

NIGHT FLIGHTS CONSULTATION

The Senior Planning Policy Officer suggested that this item be postponed until the next meeting as the deadline for the consultation had been extended by the Department for Transport to the 3 September 2021. This was so that further evidence that was shortly to be published could be taken into account, including the CAA's Survey of Noise Attitudes 2014: Aircraft Noise and Sleep report ("SoNA Sleep").

The Chair suggested that the item was discussed so that Members could provide feedback on what had been published to date.

The Senior Planning Policy Officer presented the report and explained that Appendix A set out suggested responses and Appendix B gave an overview of how the existing night flights regime worked.

He particularly pointed out:-

- The operation of the dispensations arrangements where certain flights in the Night Quota Period did not count against the quota count or movement limits. He said there should be no dispensations when there was industrial action and when the daily rotation of aircrafts was pushed into the night time due to overrunning.
- The benefits of a 10 years plus regime with a review half way through this period.
- The operational details of the QC system and the recommendation to phase out the carry over and overrun arrangements as this did not give transparency to residents.
- What would be included in the future night flights policy including: best in class aircraft; providing respite and minimising demand for night flights.
- Support for the proposal to include night flights in the Government's overall policy on aviation noise.

Councillor Dean asked for a seminar to be arranged before the revised report came back to the meeting to refresh the Panel on general aviation details and it was suggested that this included what the Panel's role should be.

The Chair agreed that there should be more regular meetings of the Panel and suggested that the next STAAP meeting took place in August or September 2021.

Councillor Caton was concerned that the report focused on noise, health, and the economy but had no environmental constraints on additional night flights.

The Senior Planning Policy Officer said the forthcoming Net-Zero Aviation Strategy and Transport Decarbonisation Plan would provide this opportunity and would be looked at separately. The Department of Transport had confirmed that these would be separate documents, but could not confirm which one would be published first.

There was further discussion about the environmental impact of night flights and the Senior Planning Policy Officer suggested the inclusion of comments that cargo aircraft were generally more polluting and night flights added to the carbon footprint.

Councillor Pepper agreed to circulate information regarding the impact of aviation on the environment. She had noticed that there were more flights after midnight and she was concerned that this would further increase post-Brexit as overseas trade increased.

The Director of Public Services said there had been growing use of the night time period for cargo but there were some restrictions. Uttlesford District Council had previously made representations which asked for a total night flight ban.

The Chair said that there should be strongly worded statements against night flights. He said airports operated at night because they could.

The Director of Public Services said that the operating license required 24 hour operations at Stansted albeit with night flight restrictions.

Councillor Isham said that low fares airlines like Ryanair relied on late arrivals as there were lower landing fees at night and they needed to move aircraft ready for the early morning flights the next day. He thought it would be difficult to implement a total ban.

Councillor Fairhurst said there should be a clear view and support for a total night flights ban with a consultation across all town and parish councils with regards to the impact of noise on the Community. He said there was no current proposal for the de-designation of the airport now but there could be in the future and the Council should have a position worked out now for this eventuality.

Councillor Sutton said that Stansted had 13,700 night flights per year which was twice the number at Heathrow and these were all within 11:30pm to 6:00am. She agreed it was important to involve the parishes.

The Chair said that MAG and SSE should be invited to meetings to provide information and updates. The Senior Planning Policy Officer agreed that this used to happen and would be a good idea for the future.

In response to comments from Councillor Pepper, Councillor Luck said there were efficiencies made at night due to fewer delays and therefore less consumption of fuel; aircraft were more efficient in cooler temperatures and cargo flights were scheduled months ahead to provide efficient operation of the airport and crews. He thought it would be helpful for an operator like FedEx to be invited to speak at the meeting.

The seminar was discussed again, the Director of Public Services said this had Officer resource implications. He also said there needed to be a balance between the local community's views and what would actually influence the Department of Transport.

Councillor Isham agreed and suggested that Professor Banatvala from SSE be invited to speak on health issues.

Councillor Sutton said MAG had a market research company and there was a small group being formed to work on the airspace modernisation programme. This showed that the airport was interested in communities' view.

The Senior Planning Policy Officer said that details of the airspace modernisation programme were set out on page 53 of his report. The aim of the process was to move away from ground based technology and make use of satellite navigation.

There was an on going application for airspace change at Stansted Airport and Councillor Eke had been involved in the first stage of stakeholder negotiation and the second stage would look at a variety of options. Once a preferred scheme was chosen a full public consultation would take place in 2022.

Councillor LeCount said he thought the Panel should be comparing those airports that have night flights with those that did not and agreed to work on this with the assistance of the Chair, Councillor Isham, and Councillor Fairhurst.

Councillor Isham agreed to share a document which related to night flights with the Panel.

The Director of Public Services said that other national governments had different priorities and this needed to be taken into account when carrying out the research.

Councillor Reeve joined the meeting at 7:00pm

SP5

GOVERNMENT CONSULTATION ON AVIATION TAX REFORM

The Senior Planning Policy Officer said that the consultation ran until 15th June 2021 and set out the Government's approach to reducing the domestic rate of Air Passenger Duty (APD) to support Union and domestic connectivity and to increase the number of international duty bands so that the further an individual flew the higher the duty (the 'polluter pays' principle).

The Senior Planning Policy Officer said that Appendix A set out the planned responses and he suggested the following:-

- The reduction in domestic duty was not supported as it was not compatible with the aim to achieve net zero carbon status by 2030.
- The response would support the principle of international bands and that option B worked best.
- The Frequent Flyer Levy (FFL) would be difficult to administer.

Councillor Isham said he thought the FFL was an obvious way to increase duty on those who flew on a regular basis both for business and pleasure. He said the administration of the scheme should not be too difficult to work out. He said the current APD should be kept and added to in order to reduce frequent flying.

Councillor Dean said he agreed with the “polluter pays” principle and said a way to administer the FFL needed to be found.

Councillor Fairhurst said it would not be too complicated to find a way to manage the FFL and impose this on each flight an individual took using FFL to fund carbon reduction.

There was some discussion as to where the FFL pot of money should go and the general consensus was that it should go into general taxation to provide for other services and should not be there to encourage more polluting activity.

Councillor Caton thought the APD cut was a populist idea without any thought behind it and he also agreed with the “polluter pays” concept. He said FFL was complicated and had privacy issues.

Councillor Reeve was not in favour of reducing APD, but did agree with the FFL concept. He thought the first flight for an individual should be exempt and then charges increased depending on frequency after that.

AGREED: to endorse the final response to be submitted to Cabinet for ratification to include the additional suggestion of a Frequent Flyers Levy within the response.

6 **GENERAL UPDATE ON AVIATION MATTERS**

The Senior Planning Policy Officer said that page 52, paragraph 10 related to the Government’s Green Paper on the future of aviation. This was still being developed and a report would be brought back to a future meeting.

Councillor Luck said there were a number of items from the last meeting that needed to be revisited including passport control delays; S106 agreements and pedestrian and cycle access.

Councillor Luck left the meeting at 7:20pm.

The meeting ended at 7:30pm.

Agenda Item 3

Committee:	Stansted Airport Advisory Panel	Date:	Wednesday, 18 August 2021
Title:	Government consultation on night flights restrictions at Heathrow, Gatwick and Stansted Airports beyond 2024, plus national night flights policy.		
Portfolio Holder:	Portfolio Holder for Planning and the Local Plan		
Report Author:	Jeremy Pine, Planning Policy/Development Management Liaison Officer jpine@uttlesford.gov.uk	Key decision:	N

Context

1. This report is an updated version of the one that was deferred at the meeting of the Panel on 19th May 2021. The reason for deferment was the extension of the consultation period from 31st May to 3rd September.
2. The consultation as originally published in December 2020 had two main purposes. The first was to consult on a proposal to maintain the existing night flight restrictions at the designated airports (Heathrow, Gatwick and Stansted) from October 2022 until October 2024 and to ban QC4 rated aircraft movements during the Night Quota Period (NQP) between 2330 and 0600. The second purpose (the subject of this current consultation) is to seek early views and evidence about future night flight policy both at the designated airports and nationally beyond 2024 (now 2025 – see next paragraph).
3. The consultation on the first purpose closed on 3rd March. The Council submitted its response by that deadline following an informal meeting of members of the Panel on 16th February. The Government has now published its decision on the restrictions that will run from October 2022. Quoting from the executive summary of the decision document (author's underlining):

"Firstly, the night noise objective and existing restrictions will be rolled over for a period of three years rather than two as originally proposed in our consultation. A two-year rollover, which would have necessitated consultation on new proposals in 2022, would no longer provide enough time for the government to have conducted thorough research to properly inform and develop a new evidence-based night noise regime. This is because of a change in the government's view on the pace and trajectory of the aviation sector's recovery. By rolling over for three years, the extra year will allow the government to develop a more meaningful evaluation of the costs and

benefits of night flights (as called for in a number of consultation responses from community groups), taking into account the effects of the pandemic and the extent and speed with which aviation demand returns. This will enable decisions to be taken against a background of a wider evidence base, including on the negative impacts on sleep and health, against which the economic benefits of night flights have to be balanced”.

“Secondly, the government will proceed with the implementation of a ban on QC4 rated aircraft movements, at the designated airports, during the night quota period. Despite receiving some opposition to the proposal from industry, the government has not received robust evidence that this would have more than a minimal impact on industry, while benefitting communities by taking the noisiest aircraft out of operation during the night quota period”.

4. Considering the uncertainty over the nature and speed of the recovery of the aviation industry from the pandemic, it is perhaps unsurprising that the existing restrictions have been rolled forward for three years. Nonetheless, this is still a disappointing decision, especially for local communities. The pledge by the Government to use the extra period of roll-forward to carry out a more meaningful evaluation of the costs and benefits of night flights is welcome, provided that local communities have a full opportunity to give evidence to that evaluation. The Council supported the QC4 ban during the NQP, so that is a welcome but small victory as there were no QC4 flights during the NQP at Stansted in the winter 2018/19 and summer 2019 periods.
5. Following closure of the current consultation, the Department for Transport (DfT) has said that responses received on revisions to its current night flight dispensation guidance (Annex F) will be used to revise the guidance for airport operators. The updated guidance will be published before the new night flight restrictions commence in October 2022. DfT aims to publish a further night flight restrictions consultation during 2023, and it is at that stage that firm proposals will be set out for longer-term policy reform and for the subsequent restrictions at the designated airports beyond (now) October 2025.
6. Of the consultation extension to 3rd September, DfT said in May of this year in an email to members of its Airspace and Noise Engagement Group (ANEG):

“The Department received requests from stakeholders to extend the consultation deadline to allow them to incorporate evidence expected to be available within the next three months in their consultation responses. This includes the CAA’s Survey of Noise Attitudes 2014 : Aircraft Noise and Sleep report (“SoNA Sleep”), which is now expected to be published early in the summer.

Extending the consultation into early September will allow respondents the time needed to consider and comment in detail in light of this further

research”.

7. The SoNA Sleep study was finally published on 22nd July and is available at <https://caa.co.uk/cap2161>. The study focusses on self-reported attitudes to sleep disturbance from aircraft noise, taken from responses to questions from within the larger SoNA 2014 study. A short summary of the study is attached as Appendix C.
8. Officers are concerned at the lateness of the publication of the study in view of the impending consultation deadline and the onset of the main holiday period. They expressed this concern to DfT at the most recent ANEG meeting and in a follow-up email. DfT has subsequently agreed that, whilst the on-line consultation portal will close on 3rd September, the Council’s response can be submitted by email no later than Friday 1st October. This will allow the Council time to refine its response after Cabinet on 2nd September, particularly in the light of any new considerations prompted by the study. SASIG has received a similar dispensation from DfT in order to allow time for its members to endorse its response at the full meeting on 29th September.

Recommendations

9. That the Panel:
 - i) considers the officers’ response to the second purpose of the consultation and advises of any changes and / or additions it would like made, and
 - ii) endorses the response which will then be put to Cabinet on 2nd September. It will be recommended to Cabinet that the Director of Public Services, in consultation with the Portfolio Holder be authorised to sign-off the Council’s final response for submission by 1st October.

Financial Implications

10. None.

Background Papers

11. None.

Impact

- 12.

Communication/Consultation	This consultation runs until <u>3rd September 2021</u> .
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Community Safety	To be considered by the Government.
Equalities	To be considered by the Government.
Health and Safety	To be considered by the Government.
Human Rights/Legal Implications	To be considered by the Government.
Sustainability	To be considered by the Government.
Ward-specific impacts	Those parts of the District affected by night flights.
Workforce/Workplace	Officer and Member time in considering the Council's response.

Situation

13. The consultation is available on gov.uk, an updated link to which is given here - <https://www.gov.uk/government/consultations/night-flights-restrictions-at-heathrow-gatwick-and-stansted-airports-beyond-2024-plus-national-night-flight-policy/night-flights-restrictions-at-heathrow-gatwick-and-stansted-airports-beyond-2024-plus-national-night-flight-policy>
14. The consultation is an industry-wide one. It is not expected that consultees will respond to every question. Some questions seem to be directed towards the aviation industry, and others to individual consultees rather than groups or organisations.
15. It is not intended to go through each question individually in this report, but rather to concentrate on the main issues that could affect the district. In the remainder of this report, officers' comments are in **bold** to distinguish them from the explanatory text.
16. Appendix B sets out how the existing night flight restrictions work, and how they evolved from the previous ones which expired in October 2017.

Background

17. In the consultation, the Government says that it:

“recognises that noise from aircraft taking off and landing at night is often regarded by communities as the most disturbing form of airport operations. We also recognise that there is evidence, including in the World Health

Organisation's revised Environmental Noise Guidelines for the European Region, that sleep disturbance caused by aircraft night operations can have adverse health impacts on overflown communities.

At the same time, the aviation sector has material value to the economy and night flights are an important contributor to this at many airports. The aviation industry plays a significant role in the UK economy and it connects people and UK businesses with the world. Prior to the coronavirus (COVID-19) pandemic, the UK's aviation network was the third largest in the world, after the USA and China. In 2019, UK airports served over 370 destinations in around 100 countries and handled over 297 million passengers. Aviation also facilitates global trade with £95 billion of goods exported by air extra-EU countries in 2018. The sector directly provided around 230,000 jobs with many more employed indirectly and the sector contributed at least £22 billion annually to UK gross domestic product (GDP).

The COVID-19 pandemic has had a profound impact on the aviation sector. The core focus in government at this time is combatting coronavirus and working with the sector on restart and recovery. The report of the Global Travel Taskforce, published in November, is the next step towards recovery for the travel and tourism sectors. It is nevertheless important that we continue to work on longer-term priorities, including those relating to aviation noise and night flights.

COVID-19 has meant that many people have had to profoundly change the way they live, work and travel. It is therefore sensible that the government explores how these changes in behaviours should influence future policy decisions.

It is also important the government finds the right balance between limiting the adverse environmental impacts that night flights have on communities, while supporting the aviation sector (passenger, freight, general aviation and so on), and the businesses that depend on the availability of night flights to deliver critical goods and services”.

Dispensations

18.At this stage, the Government is seeking views on its night flights dispensation policy. The way the policy operates is set out in Appendix B. Annex E of the consultation contains a review of airport dispensation reports between 2016-19.

19.In summary, the Government says that it does not have significant concerns over the use of dispensation powers. It does say that interpretation of the accompanying guidance by some has meant that some movement dispensations may not strictly meet the criteria. The Government intends to refine the guidance to improve clarity particularly around delays caused by weather, industrial action and network capacity and publish before October 2022. The Government also proposes that the guidance clarifies the

process by which an airport's decision to grant a dispensation can be rejected by the Secretary of State where the dispensation does not meet the criteria.

20.In relation to Stansted Airport, Annex E advises that dispensations are generally not applied for during the winter season as there is greater unused capacity at that time and an ability to absorb unscheduled night movements into the seasonal quota. However, the airport is particularly prone to disruption and delay during the summer season, possibly due to the low-cost business model that requires multiple rotations of aircraft and which does not provide much resilience. The charts provided within Annex E indicate that in summer 2018 there were 1,722 dispensations granted at Stansted, which:

- constituted 17.9% of total night movements
- were mostly granted for arrivals between 23:30 – 00:30,
- were mostly for network capacity reasons, and
- were mostly granted to Ryanair (88% of the total).

21.In Annex E the Government comments that network capacity delays mostly result from restrictions, imposed by air traffic control (ATC), on particularly busy ATC sectors due to high volumes of traffic and staffing levels to safely transit aircraft through the sector. It wrote to each designated airport in summer 2018 to state that this type of delay, without an underlying cause that is exceptional, does not meet the dispensation criteria. The Government does, however, acknowledge the efforts made to address the need for dispensations, which reduced to 379 at Stansted in summer 2019.

22.To improve dispensations transparency, the Government proposes to:

- make the dispensation process more transparent through greater scrutiny at an airport's noise and track keeping group (at Stansted this is a sub-group of the Stansted Airport Consultative Committee),
- provide guidance to airports on the information they should share with the public and on websites, and
- implement periodic reviews of dispensations, which could be commissioned either from the Independent Commission on Civil Aviation Noise (ICCAN) or the Civil Aviation Authority (CAA).

23. The measures set out in paragraph 22 are all sensible and should be adopted without delay. An obvious question to ask is what the greater scrutiny at the noise and track keeping group would involve other than it becoming a "talking shop". For instance, would there be any powers to act if the group considered that the airport operator was being, or was still being less than transparent. There are clear sensitivities for local communities around Stansted when they observe that most dispensations appear to be for leisure-based flights that are subsidised through low fuel taxation. Dispensations should be minimised to

encourage airline business models that are more environmentally robust.

24. The review responsibility should ideally go to ICCAN, which was established at the start of 2019 as an impartial advisory body on all matters relating to civil aviation and how it affects communities. ICCAN's new Corporate Strategy 2021-2024 includes a longer-term ambition to empower people through being engaged and informed on issues related to aviation noise. ICCAN could also publish the guidance on the information that airports should share with the public and how it is provided, including ease of accessibility on websites.

25. The Government's aim in redefining and clarifying its guidance to airport operators should be to prevent the return of a high level of post-pandemic dispensations.

Structure of the restrictions regime beyond 2024

26. The Government is consulting on the length of the next regime beyond 2024 (now 2025). It asks whether there would be benefits from a much longer regime (10+ years). Historically, regimes have been for 5 years or shorter, which some stakeholders have indicated does not allow for long-term planning. The Government has remarked that it has not proposed a regime of shorter than 3 years, as consultation and notification requirements would mean that consultations on the subsequent regime would need to start soon after the new regime was coming into effect. On page 1 of Annex C, the Government says:

"it is equally important to acknowledge that there are still two years remaining of the current night flight regime and further evaluation of the regime will take place and be set out as part of the second stage consultation on the night flights regime in 2022".

27. The second stage consultation will now be in 2023. With shorter regimes, there is little time to analyse their effect once implemented before consultation starts on the next regime. In this current case, the start of the consultation was delayed due to the pandemic because DfT staff were seconded to restart and recovery. If it had not been delayed, there would still only have been about 18 months to assess the effect of the introduction of the new QC0.125 category before the new consultation started. With proposed shorter regimes, the temptation is always to roll forward the previous one (as has occurred in this case) on the presumption that a longer regime that can incorporate more change will follow. Rolling forward is often an easy way out, although understandable from 2022-2025 to allow a fuller appreciation of the

effects of the pandemic.

28. It is considered that there would be benefits to having longer regimes (10+ years). In particular:

- there would be adequate time for a mid-regime review (led perhaps by ICCAN) that could feed into the consultation on the next regime,
- airport operators and airlines would have more time to plan to meet medium and longer term targets, which could justifiably be more challenging due to the longer lead-in times, and
- there should be more certainty for residents over what would happen in the longer term.

The QC system and related matters

29. The Government is of the view that the QC system (which has been in place since 1993) continues to be the best for limiting noise at the designated airports. Annex B contains more information on how the system works (as does Appendix B), as well as a CAA study on QC classifications. The QC system is an averaging based one, as it allows the operation of a larger number of less noisy aircraft or a smaller number of noisier ones within the same tariff.

30. Disturbance and dissatisfaction are events-based issues and not averaged or aggregated ones. What matters today to residents is the number of night flights and whether they are genuinely needed. In ICCAN's 2020 review of aviation noise metrics and measurement, it continues to support use of averaging metrics for noise monitoring and statutory reporting where appropriate. However, it also recommends that supplementary single event metrics are routinely published by airports to better reflect the way in which noise is experienced on the ground.

A new QC category

31. An option is to introduce a new QC category (QC0.0625) for aircraft between 78 – 80.9 EPNdB. QC0 would then relate to aircraft rated 77.9 EPNdB and below. Annex H contains a list of aircraft expected to be covered under the new category and contains some illustrative footprints at 60dBLA_{max} compared to the Airbus A320neo, which is QC0.125 on arrival and departure. Generally, QC0.0625 aircraft would be business jets and propeller-driven aircraft. On westerly Clacton departures, for instance, the population size and number of households within the footprint would halve. The Government says in Annex H that:

“whilst the noise footprints of a new QC0.0625 rated aircraft would be significantly smaller than the A320neo, the impacts of a QC0.0625 aircraft

are not insignificant”.

Reintroduce an exempt category

32. Under the 2017 restrictions, the Government removed an exempt category for the least noisy aircraft, to provide more transparency, meaning that all QC0 aircraft still counted towards the movements limit (see [Appendix B](#)). This has led to the business general aviation sector stating that there have been times when it could not obtain, at short notice, sufficient night slots to deliver services which were previously able to operate at night as exempt flights. According to Annex D, there were 297 QC0 flights at Stansted during the winter 2018/19 and summer 2019 seasons compared to 0 at Heathrow and 18 at Gatwick.
33. The Government is suggesting reintroducing an exempt category which could be QC based, or based on aircraft size and/or weight, passenger loading or variations thereof. It asks whether the economic benefits of these movements outweigh the adverse health impacts. An option to reintroducing an exempt category would be a ring-fencing system for QC0 aircraft to ensure a fair share of night slots are available for commercial passengers, dedicated freight and business general aviation. The ring-fencing system could include guidance to airports and/or the scheduling committees, or a legal mechanism supported by the night flights regime.

Re-baseline the noise quota system

34. In recent years, new QC categories have been introduced to account for less noisy aircraft that were not in operation when the system was introduced in 1993. Decimalisation has been used for aircraft in categories less noisy than QC1, progressively QC0.5, QC0.25, QC0.125 with a now proposed QC0.0625. This seems very complicated, and the Government is suggesting re-baselining to ensure there is no current classification less than QC1. For instance, the current noisiest aircraft would become QC16 and QC8 and the QC0.5 - 0.125 categories would become QC4 – 1. The simpler decimalised categories could then be reserved for future generations of aircraft with lower noise signatures.

Night Quota Period (23:30 – 06:00)

35. The Government says it is open to broadening the NQP to 23:00 – 07:00 to be consistent with the full Night Period. Movement and QC limits would need to reflect movements that already take place in the shoulder periods. A mechanism might be needed if evidence shows certain periods of the night are more sensitive for communities than others.

Banning the noisiest aircraft

36. The Government says it is open to extending the operational ban that it is proposing on QC4 aircraft during the NQP up to 2024 (see Part 1

consultation) to the full Night Period beyond 2024. It also remarks that there are relatively few QC2 rated aircraft operating at night at the designated airports and is interested in exploring whether there is potential to introduce a scheduling ban on QC movements beyond 2024 during the NQP and eventually to the full Night Period.

- 37. Introducing a new QC0.0625 category would be a logical progression of technological advance, coupled with scheduling and/or operational bans referred to in Paragraph 36. In summer 2019, QC2 movements at Stansted during the NQP were only 3% of the total (277/8455), which is approximately the percentage that they have been for a while now. Moving aircraft from QC0 to QC0.0625 would be in line with Paragraph 3.3 of the 2013 Aviation Policy Framework, which expects the aviation industry to share the benefits of technology improvements between itself and local communities.**

- 38. Re-baselining the system would make it easier to understand, but any “rounding up” or “rounding down” that is necessary should have an overall neutral effect.**

- 39. On the evidence of what has happened in the past at Stansted, the reintroduction of an exempt category is not favoured due to the potentially high number of exempt aircraft that could operate at the airport (170 during summer 2019 according to Annex D). Basing an exemption on aircraft size and/or weight, passenger loading or variations thereof (see Paragraph 33) could be complicated and lack transparency. A ring-fencing system would seem the best option to meet the concerns of the business general aviation sector, but this really is a matter for the airlines and airport operator. The abolition of an exempt category was bound to result in teething problems, but that is no reason to reverse the decision now.**

- 40. If the NQP is broadened to the full Night Period, the QC and movement limits would need to be adjusted to reflect movements in the existing shoulder periods, which are busy – especially 06:00 – 07:00. At Stansted, the declared summer 2020 and winter 20/21 capacity for the runway is a maximum of 33 departures from 06:00 – 06:59 within an overall declared capacity of 50 2-way movements (summer) and 44 (winter). It would not be acceptable for any broadening of the NQP to allow (in particular) the earlier or later movement of aircraft in the first and last waves unless part of a prior consultation with local communities.**

- 41. Any such consultation should also consider whether respite should be offered (say between 01:00 – 05:00) when no movements other than genuine emergencies would be allowed. In the background section to the national night flight policy part of the consultation, the Government**

says it expects the industry to seek ways to provide respite wherever possible and to minimise the demand for night flights where alternatives are available. According to information contained in Stansted Airport's Noise Complaints Analysis Report 2020, from 2016-2020 the greatest intensity of complaints registered were during the evening shoulder period, followed by the morning shoulder period.

Managing night noise through QC limits only

42. Subject to changing primary legislation, the Government thinks it would be possible to have a future regime based on QC limits only, without any movement limits. It thinks this could incentivise the use of quieter aircraft.
43. **Whilst this may be possible, it is certainly not desirable. Movements limits are an integral part of the International Civil Aviation Organisation's (ICAO) Balanced Approach to dealing with aviation noise and have consistently been imposed at Stansted. In the absence of a movements limit, it would be possible for an airport operator to double the number of movements (say by operating QC0.25 instead of QC0.5 aircraft) and stay within a QC limit, which would certainly be noticeable to local communities.**

Unused allocation during seasons

44. The Government explains that the movement and QC limits are split into separate quota pools by the respective airports' scheduling committees. Within the scheduled service pool, each airline that has a service during the NQP is allocated a proportion of the pool, and they report to the airport when they use part of their allocation. If a service that is scheduled for the NQP actually operates during the day period, it can "bank" that allocation for use later in the season.
45. **So long as the "banked" allocation is used during the season, either by that airline or another and not as carry-over (see next paragraph), there should be a neutral effect.**

Carry-over of limits between seasons

46. The existing regime allows airport operators to carry over limits between seasons and borrow from future seasons (see [Appendix B](#)). The Government comments that an important aspect of this is to allow operators to manage Easter movements which can fall in either the winter/spring or summer seasons. However, airports have often used the process to increase the limit on a regular basis, calling into question whether the current process remains appropriate and proportional. Annex D indicates that Stansted has exceeded its summer movements limit (whilst staying within

the QC limit) from 2016 – 2019.

47. The Council should again urge the phasing out of the carry over and overrun arrangements. Prolonged use of these at Stansted both disguises and perpetuates higher summer limits which are not transparent, and which are not evident from the movement and quota limits set under the restrictions. Certainty and transparency for local residents can only be achieved by absolute limits, which airport operators will be able to plan for in setting their schedules. If the new regime were to be longer than 5 years in duration, this would assist airport operators in their longer-term planning. Easter dates are known for many years ahead and should be able to be planned for within existing and proposed QC and movement limits.

National night flight policy

48. The Government's approach to managing aircraft noise is based on the principles of the ICAO Balanced Approach, which takes into account both health and economic factors. The Balanced Approach sets out four pillars to managing noise, which are sequential in nature:

- 1. Noise reduction through technology*
- 2. Improving noise perception through better noise planning*
- 3. Noise reduction through better operation*
- 4. Operating restrictions on aircraft if the other three pillars are exhausted*

49. Under the Balanced Approach (the operation of which is set out in Annex A), operating restrictions should only be introduced at airports if there are no other ways of achieving the desired benefits. The APF recognises that the costs on local communities are higher from aircraft noise during the night, particularly the health costs associated with sleep disturbance. However, it also recognises the importance to the UK economy of certain types of flights, such as express freight services, which may only be viable if they operate at night.

50. The Government has consistently argued that night flight restrictions under Pillar 4 are needed at the designated airports to protect local residents. Back in the January 2017 consultation which set the current restrictions, the Government said:

“the failure to impose any operating restrictions would mean these communities would not be adequately protected from the harmful impacts of aircraft noise and the Government would be failing to limit or reduce the number of people significantly affected by aircraft noise”.

51. The Government says it expects the aviation industry to make extra efforts to reduce and mitigate noise from night flights, such as by encouraging the use of best-in-class aircraft and best practice operating procedures. It also expects the industry to seek ways to provide respite wherever possible and to minimise the demand for night flights where alternatives are available.

52. The Government is keen to explore how future technology will benefit communities, consumers and the industry. Noise at source (and carbon) has been reduced through advances in airframe and engine technology, but it is unclear what future technological advances will be, and whether there will continue to be reductions in both forms of environmental emission.

53. Noise reduction through technology is Pillar 1 of the Balanced Approach, but this is insufficient in itself to adequately mitigate the adverse environmental effects of night flights. The Government is right to exercise caution over the future contribution that technology can make, particularly in the short term. Technological improvements tend to come mainly in steps from the introduction of new generations of aircraft rather than gradually year-on-year, and Stansted has a relatively modern fleet mix. There is also a need to fully understand how new aircraft and engine technologies will affect noise signatures and noise mapping.

Proposal to include a night noise reference in the Government's noise objective

54. In the APF, the Government's overall policy on aviation noise is:

"to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise, as part of a policy of sharing benefits of noise reduction with industry".

55. The Government is asking whether there should be specific reference to the balance between the impacts of night noise and the economic benefits of both passenger and freight operations. It is suggesting the following addition:

"There should be a balance between the local and national economic and consumer benefits of night flights, both in terms of passenger and freight operations, against their social and health implications, in line with the ICAO Balanced Approach".

56. The intent of this expanded overall policy would be to provide a framework when competent authorities set individual noise abatement objectives at airports. In particular, the Government would expect local planning authorities, when assessing a planning application, to consider this overall

policy and ensure that both national and local factors are taken into account when making its decision.

57. The Council should support the proposal to include a night flights reference in the Government's overall policy. This would be consistent with Section 2 of the National Planning Policy Framework which sets out overarching but interdependent objectives (*economic, social and environmental*) as a means of achieving sustainable development. The expanded policy would put airport operators on notice that the full effects of night flights should be set out in environmental statements that accompany planning applications at both designated and non-designated airports.

Airport designation

58. Stansted has been designated for the purpose of avoiding, limiting or mitigating the effect from aircraft noise since 1971. The Government recognises that there are currently no criteria for deciding whether an airport should be designated in England or Wales. There could be a number of factors, such as population affected, number of night flights, baseline background noise levels or the strategic importance of any airports. The Government is not proposing to designate or de-designate any airport as part of this consultation but is open to considering criteria for designation.

59. A final question in the consultation asks about the impact that de-designation of an already designated airport would have on a number of stakeholders, including communities.

60. SASIG's view, as expressed at the meeting with DfT, is that any proposals for the designation of other airports would need clear grounds and a degree of pragmatism. At some smaller regional airports, noise is locally managed via discussions with communities. Officers suggest that the Council endorses SASIG's view on the designation of other airports.

61. De-designation could have a potentially disastrous effect on communities in the absence of a suitable replacement scheme. Much would therefore depend upon what is put in its place and who the responsible authority would be for running any replacement scheme. The Council would expect any replacement scheme to be based both on an up-to-date assessment of the economic benefits vs the environmental disbenefits of night flights and on research into which types of night flights are truly essential to the economy. Flights deemed to be non-essential should either be rescheduled for the day period or, if they do still fly during the night period, incur a higher tariff.

Risk Analysis

62.

Risk	Likelihood	Impact	Mitigating actions
The Government is not able to take the Council's views into account as part of the consultation process.	1 The consultation process is designed to allow all views to be considered.	2 Greater weight could be given to the economic case for night flights than to the environmental case for their restriction.	Respond to the consultation.

1 = Little or no risk or impact

2 = Some risk or impact – action may be necessary.

3 = Significant risk or impact – action required

4 = Near certainty of risk occurring, catastrophic effect or failure of project.

STANSTED AIRPORT ADVISORY PANEL

Night flights consultation.

Appendix A Consultation Questions – Suggested Response

What are your views on the findings of the night flight dispensation review?

The findings are not a surprise, and generally seem to reflect a lack of scheduling resilience in the low fares airline model, with the final leg of the last rotation taking place close to the Night Quota Period. The reduction in dispensations granted at Stansted in summer 2019 compared to summer 2018 is encouraging, although the 8,100 movements limit was still exceeded. Current operating conditions are clearly unrepresentative, but the Government's aim in redefining and clarifying its guidance to airport operators should be to prevent a high level of post-pandemic dispensations returning.

There are clear sensitivities for local communities around Stansted when they observe that most dispensations appear to be for leisure-based flights that are subsidised through low fuel taxation. Dispensations should be minimised to encourage airline business models that are more environmentally robust.

What are your views on the proposals for the night flight dispensation review?

The three proposals to increase transparency are all sensible and should be adopted without delay. An obvious question to ask is what the greater scrutiny at the noise and track keeping group would involve other than it becoming a "talking shop". For instance, would there be any powers to act if the group considered that the airport operator was being, or was still being less than transparent.

The responsibility for periodic reviews of dispensations should ideally go to ICCAN, which was established at the start of 2019 as an impartial advisory body on all matters relating to civil aviation and how it affects communities. ICCAN's new Corporate Strategy 2021-2024 includes a longer-term ambition to empower people through being engaged and informed on issues related to aviation noise. ICCAN could also publish the guidance on the information that airports should share with the public and how it is provided, including ease of accessibility on websites.

Should disruption due to local weather qualify for dispensations?

Not in situations where adverse local weather is forecast and can be planned for, Annex E highlighting snow and ice, particularly in relation to departures. However, the Government does acknowledge in the consultation that the guidance is unclear

where the threshold for wide-spread and prolonged weather disruption is. This should be clarified, although no two instances will be the same.

Should disruption due to en-route weather qualify for dispensations?

Should disruption due to foreign airport weather qualify for dispensations?

Yes to both questions, but only in the circumstances set out in Annex F – *“Unscheduled landings in the night period arising from diversions from other airports due to weather conditions provided an aircraft had taken off unaware that its intended destination was unavailable”*.

Should disruption caused by ATC industrial action qualify for dispensations?

Should disruption caused by industrial action by airport staff qualify for dispensations?

Should disruption caused by industrial action by airline staff qualify for dispensations?

No to all three questions. The point of industrial action is to inconvenience the aviation industry, not local residents.

Should network capacity delays qualify for dispensations?

No. The Government’s letter to each designated airport in 2018 made it clear that airspace capacity related delays, without an underlying cause that is exceptional, do not meet dispensation criteria. Airlines and airport operators should plan summer schedules with “headroom” built into the QC and movement limits to accommodate these delays.

Should delays caused by serious criminal or terrorist activity that affect multiple flights qualify for dispensations?

The Government says in the consultation that it does not expect drone incursions or other criminal or terrorist activity to become more frequent. In these circumstances dispensations could be allowed to ensure public safety, but this would be a judgement call between the airport operator and the police.

Should cumulative delays qualify for dispensations?

Not after the point that the circumstance that led to the delay is no longer ongoing.

Should dispensations be permitted for flights delayed to the NQP due to a medical emergency that has passed?

Should dispensations be permitted for flights delayed to the NQP due to a police emergency (for example a disruptive passenger) that has passed?

The answer to both questions is that these would probably be relatively local effects, so dispensations should only be granted for aircraft that were en-route at the time the emergency started.

Should dispensations be permitted for the repositioning of emergency service (including medical transplant) aircraft?

Yes, where the judgement is that an out-of-position aircraft may pose a risk to health.

Should dispensations on the basis of reducing carbon emissions be permitted?

No, and it is doubtful whether affected local residents would be sympathetic to this type of dispensation on a flight-by-flight basis. Reducing carbon emissions is already the main policy goal for airspace management above 7,000 feet where noise is less of a factor and is also a prime motivator for airspace modernisation. In the Aviation 2050 consultation, the Government proposed a new measure to set a new objective to limit, and where possible, reduce total adverse effects on health and quality of life from aviation noise. This would bring national aviation noise policy in line with airspace policy in the DfT's 2017 Air Navigation Guidance to the CAA.

Should pre-emptive dispensations be permitted?

No. The Council understands that this is a practice adopted only at Heathrow in order to land aircraft early on poor weather days to avoid later knock-on effects that could extend into the night period. This would seem to imply that the weather has been forecast and can therefore be planned for.

Should dispensations be granted for information technology failures?

No. The industry should have back-up plans to deal with IT failures.

If you have further views on the guidance allowing airport operators to grant dispensations, please provide it here?

The Council acknowledges that it is very difficult to tailor guidance to fit all situations where the duration and nature of incidents will inevitably vary. However, the general point made in Annex F that dispensations would not be appropriate when airport operators have reasonable time to rearrange their schedules should apply.

What are your views on government dispensations overall?

The Council notes that the Secretary of State has provided dispensations in exceptional circumstances to allow aerodromes to recover from prolonged disruption. Whilst there are no objections to this, the Government should clarify in guidance that dispensations will generally only be granted for a limited period to

allow replanning.

What length should the night flight regime beyond 2024 be?

It should ideally be 10+ years in length.

How do you think the length of regime will affect you?

With shorter regimes, there is little time to analyse their effect once implemented before consultation starts on the next regime. In this current case, the start of the consultation was delayed due to the pandemic. If it had not been delayed, there would still only have been about 18 months to assess the effect of the introduction of the new QC0.125 category before the new consultation started. With proposed shorter regimes, the temptation is always to roll forward the previous one (as has occurred in this case) on the presumption that a longer regime that can incorporate more change will follow. Rolling forward is often an easy way out, although understandable from 2022-2024 (now 2025) to allow a fuller appreciation of the effects of the pandemic.

It is considered that there would be benefits to having longer regimes (10+ years). In particular:

- there would be adequate time for a mid-regime review (led perhaps by ICCAN) that could feed into the consultation on the next regime,
- airport operators and airlines would have more time to plan to meet medium and longer term targets, which could justifiably be more challenging due to the longer lead-in times, and
- there should be more certainty for residents over what would happen in the longer term.

Do you think that QC is the best system for limiting noise at the designated airports?

Not on its own. Disturbance and dissatisfaction are events-based issues and not averaged or aggregated ones. What matters today to residents is the number of night flights and whether they are genuinely needed. In ICCAN's 2020 review of aviation noise metrics and measurement, it continues to support use of averaging metrics for noise monitoring and statutory reporting where appropriate. However, it also recommends that supplementary single event metrics are routinely published by airports to better reflect the way in which noise is experienced on the ground.

What do you think are the:

- advantages of changing to a new system?
- disadvantages of changing to a new system?

This would depend upon what system is chosen. A new system could be advantageous if it is events-based, allows only night flights which are genuinely needed, and which allows targets to be set that share the benefits of technological

improvement between the industry and local communities as set out in the 2013 Aviation Policy Framework (APF). The main disadvantage of a new system might be inability to compare historically if different metrics are used.

Do you have evidence of other noise management regimes being used elsewhere and how they compare with the current system?

No, but the Council is aware of a 2004 European Commission study on the different aspects of noise limits at airports.

Should we introduce an additional QC category for quieter aircraft in the longer-term?

Yes. Introducing a new QC0.0625 category would be a logical progression of technological advance, coupled with scheduling and/or operational bans referred to in the consultation. Moving aircraft from QC0 to QC0.0625 would be in line with paragraph 3.3 of the APF, which expects the aviation industry to share the benefits of technology improvements between itself and local communities.

Should the government reintroduce an exempt category?

No. On the evidence of what has happened in the past at Stansted, the reintroduction of an exempt category is not favoured due to the potentially high number of exempt aircraft that could operate at the airport (170 during summer 2019 according to Annex D). Basing an exemption on aircraft size and/or weight, passenger loading or variations thereof could be complicated and lack transparency.

Do you think we should re-baseline the night quota system in the longer-term?

Yes. Re-baselining the system would make it easier to understand, but any “rounding up” or “rounding down” that is necessary should have an overall neutral effect.

What factors should we consider when anticipating how to best future proof a re-baselined QC system?

This will depend partly upon how far is looked into the future. A main issue to consider will be future fleet mixes – are they more likely to be dominated by smaller aircraft doing point-to-point journeys? What will be the uptake of electrical aircraft and would this change noise signatures?

What costs, if any, would you anticipate in re-baselining the QC system?

No specific direct costs for local authorities, other than familiarisation time for both officers and members.

Would you be impacted if the NQP was extended to 11pm to 7am?

For local communities, this would depend upon whether there was a material impact on the occurrence of noise throughout the extended NQP. According to information contained in Stansted Airport's Noise Complaints Analysis Report 2020, from 2016 – 2020 the greatest intensity of complaints registered were during the evening shoulder period followed by the morning shoulder period.

If the NQP is broadened to the full Night Period, the QC and movement limits would need to be adjusted to reflect movements in the existing shoulder periods, which are busy – especially 06:00 – 07:00. At Stansted, the declared summer 2020 and winter 20/21 capacity for the runway is a maximum of 33 departures from 06:00 – 06:59 within an overall declared capacity of 50 2-way movements (summer) and 44 (winter). It would not be acceptable for any broadening of the NQP to allow (in particular) the earlier or later movement of aircraft in the first and last waves unless part of a prior consultation with local communities. Any such consultation should also consider whether respite should be offered (say between 01:00 – 05:00) when no movements other than genuine emergencies would be allowed.

Do you think night flights in certain hours of the NQP have a greater impact on local communities than other times of the NQP?

Not sure, but in the background section to the national night flight policy part of the consultation, the Government says it expects the industry to seek ways to provide respite wherever possible and to minimise the demand for night flights where alternatives are available.

Would a mechanism that disincentivises aircraft movements in periods of the night that are more sensitive for communities impact you?

This really is a question for individual residents to answer based on their own experience.

What would be the impact on you if QC4 rated aircraft movements were banned between 11pm and 7am after October 2024?

Unlikely to be very significant at Stansted due to the nature of the fleet mix at that time. However, within the APF requirement to share the benefits of technology between the industry and local communities it would be worthwhile.

What would be the impact on you if a scheduling ban was placed on QC2 rated aircraft movements between 11.30pm and 6am after October 2024?

Unlikely to be very significant at Stansted due to the likely nature of the fleet mix at that time. However, within the APF requirement to share the benefits of technology

between the industry and local communities it would be worthwhile. In summer 2019, QC2 movements at Stansted during the NQP were only 3% of the total (277/8455), which is approximately the percentage that they have been for a while now.

What would be the impact on you or your business if a scheduling ban was placed on QC2 rated aircraft movements between 11pm and 7am after October 2024?

Unlikely to be very significant at Stansted due to the likely nature of the fleet mix at that time. However, within the APF requirement to share the benefits of technology between the industry and local communities it would be worthwhile.

If bans are introduced should the implementation be staged?

No. See answers to the three previous questions.

In a future regime how should we manage the number of aircraft movements (detailing the airport or airports relevant to your view)?

In relation to Stansted Airport, there should continue to be a movements limit which should be reduced over time to accommodate only night flights that are deemed essential.

In a future regime how should we manage an airports' noise allowances (detailing the airport or airports relevant to your view)?

In relation to Stansted Airport, there should continue to be a quota cap which should be reduced over time to accommodate only night flights that are deemed essential and to share the benefits of new technology between the industry and local communities.

Should we remove the movement limit and manage night flights through a QC limit only?

No. Movements limits are an integral part of the International Civil Aviation Organisation's (ICAO) Balanced Approach to dealing with aviation noise and have consistently been imposed at Stansted. In the absence of a movements limit, it would be possible for an airport operator to double the number of movements (say by operating QC0.25 instead of QC0.5 aircraft) and stay within a QC limit, which would certainly be noticeable to local communities.

Should we introduce a ring-fencing mechanism to ensure night slots are available for:

- commercial passengers?
- dedicated freight?

- business general aviation?

This is a matter between the airport operator, airlines and the slot coordinator.

Should an airline be able to use unused allowances later in the season?

Yes, within that same season.

If the government decided that unused allowances should be returned to the airport's pool, what would be the impacts on:

- communities?
- airports?
- airport users?
- airlines?
- business in and around airports?

So long as the "banked" allocation is used during that season, either by that airline or another one and not as carry-over, there should be a neutral effect.

Do you agree or disagree that the current carry-over process benefits you?

Disagree that the current carry-over process benefits local residents. The Council again urges the phasing out of the carry over and overrun arrangements. Prolonged use of these at Stansted both disguises and perpetuates higher summer limits which are not transparent, and which are not evident from the movement and quota limits set under the restrictions. Certainty and transparency for local residents can only be achieved by absolute limits, which airport operators will be able to plan for in setting their schedules. If the new regime were to be longer than 5 years in duration, this would assist airport operators in their longer-term planning. Easter dates are known for many years ahead and should be able to be planned for within existing and proposed QC and movement limits.

What changes, if any, would you like to see to the carry-over process and how would this impact you?

The Council would like to see this process phased out.

How fair a balance between health and economic objectives do you think our current night flight approach is?

The current approach seems skewed towards economic objectives rather than health ones. A weighting towards health would imply an 8-hour NQP, rather than the current 6.5 hours. The 6.5 hour NQP would seem to allow 4 rotations of each aircraft under the low fares model, which causes issues of dispensations to arise as dealt with earlier in the consultation.

What are your views on the health impacts of aviation noise at night, including potential impacts on different groups in society?

The Council's view is that they are serious, and notes what the Government says in the consultation that it expects the aviation industry to make extra efforts to reduce and mitigate noise from night flights, and to seek ways to provide respite where possible and to minimise demand for night flights where alternatives are available. This reflects the Government's ambition in Aviation 2050 to reduce noise and minimise health effects, including by reviewing and improving noise insulation schemes. (Council underlining).

What are your views on the economic value of night flights, including the potential value on different businesses and aviation sectors?

The Council's view is that the economic benefits of night flights are always presumed but are not set out on a type-by-type basis. There needs to be a balanced assessment of their economic value against environmental effects and the establishment of a new post-pandemic baseline ought to be a good opportunity for this. The Government's pledge to use the three-year carry-over period of the current regulations until October 2025 to carry out a more meaningful evaluation of the costs and benefits of night flights is welcomed. Local communities must be allowed a full opportunity to give evidence in that evaluation.

There should not be a presumption on returning to the pre-pandemic night flying status quo, which might not occur anyway with a new baseline. For instance, new integrators, such as Amazon, do more daytime flying. The Council strongly considers that, post-pandemic, there is a good opportunity to establish a new night flights baseline and to fully review the economic need for each category of night flights against their environmental disbenefits. From the Council's perspective, the starting point should be that any benefits which have accrued to local communities from reduced night flying over the pandemic period should be captured into a new regime.

What are your views on changes to aircraft noise at night as result of the COVID-19 pandemic?

At Stansted this should be reduced due to a severe downturn in passenger traffic, but with cargo operations holding up. Information provided by Stansted Airport's Managing Director to the meeting of the Stansted Airport Consultative Committee in April 2021 indicates that, in the year to February 2021, the total number of NQP movements and QC points used approximately halved from the same period to February 2020, just before the first lockdown. This can be seen in the context of an 88% fall in passenger numbers (with overnight terminal closures) and a 70% fall in all movements in the same period, but an 8% increase in cargo ATMs. Generally, cargo aircraft are older, noisier, more polluting and add to the airport's carbon

footprint.

Interestingly, when comparing noise complaints received at Stansted Airport in 2019 compared to 2020, there were more complaints in 2020 in the evening shoulder and core night periods than in 2019, although a slightly reduced number in the morning shoulder period. These figures exclude multiple complainers.

What are the advantages or disadvantages that the emergence of new technology will have in relation to night noise from aircraft within the next 10 years?

This is difficult to say with any certainty. New propulsion technologies are likely to take longer than 10 years to become operational to any degree, so what will be locked in will be benefits from new generation aircraft coming onstream within that period. Emerging navigation techniques such as PBN could change noise signatures depending upon the solutions that they enable, such as “concentration versus dispersal” of flightpaths.

Should we include a reference to night noise when we publish a revised aviation noise objective?

Yes.

What factors relating to night noise should we include if we do introduce a noise reference in our revised aviation noise objective?

The additional statement set out in the consultation seems appropriate. From the Council’s point of view as a local planning authority, it would be consistent with Section 2 of the National Planning Policy Framework which sets out overarching but interdependent objectives (*economic, social and environmental*) as a means of achieving sustainable development. The expanded policy would put airport operators on notice that the full effects of night flights should be set out in environmental statements that accompany planning applications at both designated and non-designated airports.

Should the government set criteria for airport designation?

No comment, as Stansted is already a designated airport.

What do you think are the:

- advantages to the government setting criteria for airport designation?
- disadvantages to the government setting criteria for airport designation?

No comment.

What factors, if any, do you think we should consider when setting criteria for designation?

Any proposals for the designation of other airports would need clear grounds and a degree of pragmatism. At many smaller airports, noise is locally managed via discussions with communities.

How should any criteria for designation be agreed?

No comment.

What impact, if any, do you think the designation of an airport have on:

- communities?
- airports?
- airport users?
- airlines?
- business in and around airports?

No comment.

What impact, if any, do you think the de-designation of an already designated airport (Heathrow, Gatwick, Stansted) will have on:

- communities?
- airports?
- airport users?
- airlines?
- business in and around airports?

A potentially disastrous effect on communities in the absence of a suitable replacement scheme. Much would therefore depend upon what is put in its place and who the responsible authority would be for running any replacement scheme. The Council would expect any replacement scheme to be based both on an up-to-date assessment of the economic benefits vs the environmental disbenefits of night flights and on research into which types of night flights are truly essential to the economy. Flights deemed to be non-essential should either be rescheduled for the day period or, if they do still fly during the night period, incur a higher tariff.

Appendix B The Existing Night Flights Restrictions

The Current Restrictions

1.1. The current restrictions were published in July 2017, took effect in October 2017 and are due to expire in October 2022.

1.2. The restrictions are based on a winter and a summer season, the triggers for which are the change to and from Greenwich Mean Time and British Summer Time, resulting in the summer season being longer. The restrictions work by placing limits within both seasons on the number of aircraft that can fly at night (movement limit) and the total amount of noise energy that they can generate (noise quota). The restrictions apply within the night quota period (23:30 – 06:00), which is not the same as the night period (23:00 – 07:00). The remaining hours of 23:00 – 23:30 and 06:00 – 07:00 are known as the shoulder periods within which there are some restrictions on the type of aircraft that can fly. At Stansted Airport, the morning shoulder period is particularly busy with the first wave of departures of home-based aircraft on quick rotations as part of the low fares business model. The evening shoulder period is busy with last wave arrivals.

1.3. The noise quota is the seasonal total of the quota counts (QC) ascribed to each individual aircraft arrival or departure during the night quota period. The QC is the weighting attributed to the arrival or departure of a specified aircraft type by reference to its certified noise performance, divided into 3EPNdb bands¹. Aircraft types can be rated in a different QC band for arrivals and departures. The following table sets out the current aircraft noise classifications. When referring to aircraft by QC type, they are known as QC16, QC4, and QC0.125 etc:

Noise classification (EPNdb)	Quota Count (QC)	Comments
More than 101.9	16	Operational ban within night period.
99 – 101.9	8	Operational ban within night period.
96 – 98.9	4	Scheduling ban within night quota period, but no outright operational ban at the moment.
93 – 95.9	2	Commonly operate during the night quota period.
90 – 92.9	1	Commonly operate during the night quota period.
87 – 89.9	0.5	Commonly operate during the night quota period.
84 – 86.9	0.25	Commonly operate during the night quota period.
81 – 83.9	0.125	From October 2018, this was added as a new category in the current restrictions as these aircraft can still expose affected communities to noise levels capable of causing sleep disturbance. This category prevents a proliferation of exempt aircraft and incentivises the

¹ EPNdb is Effective Perceived Noise Decibels – a specialized noise unit used for aircraft noise certification tests.

		use of quieter aircraft at night. Many of these aircraft are business jets.
Less than 81	0	Count towards the movements limit, but not the quota count. The reason for this is to ensure greater transparency and certainty for communities whilst maintaining incentives for producing and purchasing quieter aircraft.

Dispensations

1.4. Under Section 78(5)(f) of the Civil Aviation Act 1982, the Secretary of State for Transport can grant dispensations such that particular movements are disregarded from the night flight restrictions. As a general principle, these dispensations relate to state matters, where they are required as a result of a Government decision, or where circumstances are so exceptional that the airport's operations become a matter of national interest. The headline categories are as follows:

- 1. Flights involving VIPs – but this does not include businesspeople or celebrities, and also excludes positioning flights,*
- 2. Relief flights – but this does not include the carriage of the media or their equipment*
- 3. Military aircraft, war / hostilities – to meet contingency arrangements, but not once time has been had to assess the situation and make alternative arrangements,*
- 4. Exceptional circumstances – such as recovering from prolonged disruption – (the volcanic ash crisis in 2010 was an example), and*
- 5. Changes to airspace arrangements as a result of Government decisions – such as flypasts where aircraft scheduled to land or depart during the day have had to be delayed, or the establishment of air exclusion zones (2012 Olympic Games).*

1.5. Under Section 78(4) of the same Act, the Secretary of State has the power to specify in a notice circumstances in which movements may be disregarded by the airport manager, who is then under a duty to notify the Secretary of State in writing within one week of the dispensation occurring. As a general principle, these dispensations should be used in relation to operational matters affecting a small number of flights. The headline categories are as follows:

- 1. Emergencies – where there is an immediate danger to human or animal life or health,*
- 2. Widespread and prolonged air traffic disruption – such as caused by computer problems or localised weather conditions that were not anticipated, and*
- 3. Delays as a result of disruption leading to serious hardship and congestion at the airfield or terminal.*

The movement and noise quota limits at Stansted Airport

1.6. The following table sets out the current limits for Stansted. For comparison purposes, it includes the limits from the previous restrictions which ran from October 2014 to October 2017.

Type of limit	2014-17	Current restrictions
Summer night movement limit	7,000	8,100
Summer night quota limit	4,650	4,650
Winter night movement limit	5,000	5,600
Winter night quota limit	3,310	3,310

1.7. In the DfT's decision document of July 2017, the following explanation was given for the upward adjustment of the movement limits in both summer and winter (Paragraph 5.16):

“in order to accommodate the number of movements of aircraft that have until this point been exempt from the restrictions. Airlines have planned their operations at Stansted under the rules that have been in place for many years and failing to make this adjustment would mean we would not achieve the aspect of the environmental objective concerned with maintaining the existing benefits of night flights. While this will not reduce Stansted’s movement limits to below the airport’s current level of movements, the combination of changes that we are proposing will mean communities do experience a benefit through being exposed to fewer flights that would otherwise be expected if no action was taken to prevent a proliferation of exempt aircraft”.

1.8. Similarly, the following explanation was given (Paragraph 6.26) for freezing the quota limits:

“We continue to think the current noise quota represents a suitable level given that more aircraft movements will have to be accommodated within it. This will incentivise airlines to use quieter aircraft so they can make full use of Stansted’s adjusted movements limits”.

Carry-over (and overrun)

1.9. One feature of the restrictions is what is known as carry-over and overrun arrangements which give the airport flexibility to defer or bring forward movements and quota allowance from one season to the next. These arrangements were also part of the earlier restrictions. In the DfT's January 2017 consultation document, it gave the following explanation for these arrangements (Paragraph 1.15):

“As these seasons (summer and winter) vary in length, airports are given flexibility to manage their allowance, and may carry-over unused movements or quota from one season to another, or may over-run in one season which leads to a deduction in the following season. The rules for carrying-over or over-running are as follows:

- If required, a shortfall in use of the movements limits and/or noise quota in one

- season of up to 10% may be carried-over to the next season;*
- *Conversely, up to 10% of an overrun in movements and/or noise quota usage in one season (not being covered by carry-over from the previous season) will be deducted from the corresponding allocation in the following season;*
 - *An overrun of more than 10% will result in a deduction of 10% plus twice the amount of the excess over 10% from the corresponding allocation in the following season, and*
 - *The absolute maximum overrun is 20% of the original limit in each case”.*

Appendix C

CAA Survey of Noise Attitudes 2014: Aircraft Noise and Sleep Disturbance (CAP 2161) – Published July 2021 – “SoNA Sleep”

(This summary is based on the Summary and Conclusions section of SoNA Sleep)

1. SoNA Sleep is a supplementary analysis to the original SoNA 2014 study, which was designed to obtain information on attitudes to daytime annoyance, and as a result, respondents were selected on daytime noise levels. The findings of SoNA Sleep are therefore indicative / exploratory rather than conclusive.
2. SoNA Sleep assesses attitudes to night-time noise using a sample of the 2014 study data set. The sample size is 1,483 respondents from around Heathrow, Gatwick and Stansted. Their average summer night noise exposure ranged from below 39 dB to greater than 54 dB. Below 39 dB effects are at worst modest whilst greater than 54 dB effects are serious and can involve lifestyle adaptation with increasing danger to public health.
3. The SoNA Sleep analysis aimed to do two things:
 - explore relationships between self-reported sleep disturbance and noise exposure
 - explore any potential relationship between self-reported sleep disturbance and self-reported quality of health
4. SoNA Sleep compared reported mean night-time disturbance scores against average night noise exposure using three different noise indicators, all of which are highly correlated with night-time self-reported sleep disturbance:
 - LAeq,8h – equivalent continuous sound level, average summer night 11pm-7am
 - Lnight – equivalent continuous sound level, average annual night 11pm-7am

- N60 – number of events of maximum single event noise level 60 dB or more during an average summer night (11pm – 7am)

Is LAeq,8h an appropriate indicator to use to estimate self-reported sleep disturbance arising from aircraft noise?

5. SoNA Sleep shows it is plausible that Lnight is inferior to LAeq,8h as Stansted and Gatwick Airports experience significant summer seasonality of night flights. N60 correlates almost as well as the other two metrics. There is insufficient evidence to change from the current practice of using LAeq,8h for UK assessments.

Is summer night, average mode, still the best time period to use as opposed to single mode?

6. SoNA Sleep finds no compelling evidence to switch away from average summer-night. It does recommend that future studies investigate associations with the highest noise level of either westerly or easterly runway operation.
7. Other SoNA Sleep findings were that the likelihood of being highly sleep disturbed was found to increase with increasing night-time noise exposure. For a given noise exposure, a higher proportion of residents was found to be highly sleep disturbed at 45 dB and 48 dB compared with pooled data from pre-1990 studies. However, the proportion was lower compared with pooled data from post-1990 studies.
8. Noise exposure and self-reported sleep disturbance were compared against health ratings and a measure of mental well-being. Poorer health ratings and lower mental well-being scores were found to be associated with sleep disturbance, but not with noise exposure.

Recommendations for future surveys

9. Despite the exploratory nature of this analysis, it has been possible to identify some areas where further research would be beneficial, If the objective is to understand better the relationship between night exposure and the effect on sleep, the following recommendations are made:

- conduct research in the summer so that attitudes and exposure are aligned;
- respondent selection to take into account night noise exposure levels and, in particular, any dominance of arrival noise at night;
- adequate sampling to enable further investigation of any association between self-reported night-time disturbance and single-mode LAeq,8h night exposure.

Committee: Stansted Airport Advisory Panel

Date:

Title: Jet Zero consultation

Wednesday, 18
August 2021

Report Author: Jeremy Pine, Planning Policy/Development
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Summary

1. This is a covering report to introduce the briefing note on this consultation, which is attached. The Jet Zero consultation was published on 14th July and runs for eight weeks, closing on 8th September.
2. This is a concerning short period for consultation on an important topic that overlaps the peak holiday season. Officers have not had the opportunity to consider the consultation in detail in order to produce a full response at this stage, but have produced the briefing note to assist the Panel.

Recommendations

3. It is recommended that Panel members look at the consultation and advise officers by the end of the month of any comments that they would like to see included in the Council's response. These comments could relate to one or more of the consultation questions or could be more general in nature. Officers will then prepare the response for sign-off by the Director of Public Services in consultation with the Portfolio Holder.
4. It is also recommended that the Council contributes to any response from SASIG on behalf of the Local Government Association. The Council is a member of SASIG and is a main contributor to its work. Officers will liaise with SASIG's Policy Director over the response.

Financial Implications

5. None

Background Papers

6. None.

Impact

- 7.

Communication/Consultation	This consultation runs until 8th September 2021.
Community Safety	To be considered by the Government
Equalities	To be considered by the Government
Health and Safety	To be considered by the Government
Human Rights/Legal Implications	To be considered by the Government
Sustainability	To be considered by the Government
Ward-specific impacts	District-wide
Workforce/Workplace	Officer and Member time in considering the Council's response

Situation

8. Officers' initial impression of Jet Zero is that it is optimistic, placing great reliance on as yet unproven technology such as Greenhouse Gas Removal, as well as the uptake of sustainable aviation fuels (SAF). Many see SAF as the only alternative for long-haul flights up to 2050, which are the flights with the biggest climate impact. However, aviation will have to compete in the marketplace for the raw materials (crops or waste products) that are used to produce SAF.

9. There is a lot of uncertainty in Jet Zero, such as in the four aviation decarbonisation strategies (briefing note paragraph 7). Each strategy is made up of a number of measures in combination. These are:
 - impact of carbon pricing on demand
 - fuel efficiency improvements
 - zero emission aircraft
 - SAF
 - abatement outside aviation sector (i.e. GGR)

10. Unsurprisingly, in view of the uncertainty the Government says, *"we will review our strategy every five years and adopt our approach based on progress made"*.

11. Work on electric powered aircraft (zero emission flight) is progressing and there is some hope that a range of hydrogen-electric and battery-electric aircraft could enter the sub-regional and general aviation markets this decade. The Government says it wants to scale up the technology to achieve *"zero"*

emission transatlantic flight within a generation” which popular thinking is 20-30 years.

12. Most tellingly, the Government does not see (and probably does not want) a role for restricting airport growth as part of Jet Zero. Paragraphs 20-22 of the briefing note are relevant here. If the 5-yearly strategy reviews come out on the pessimistic side, would the Government of the time be prepared to think again about restricting airport growth? The Government does see a role for supporting customers to make sustainable travel choices, including the possibility of mandating the provision of environmental information when flights are booked. In relation to domestic or near-continental journeys, this should include information on surface travel alternatives to flying.

Risk Analysis

13.

Risk	Likelihood	Impact	Mitigating actions
The Government is not able to take the Council’s views into account as part of the consultation process.	2 The consultation process is designed to allow all views to be considered, but the 8-week consultation period is very short.	3 This Council and others have declared climate emergencies and the aviation industry is a major emitter of greenhouse gases.	Respond to the consultation.

- 1 = Little or no risk or impact
- 2 = Some risk or impact – action may be necessary.
- 3 = Significant risk or impact – action required
- 4 = Near certainty of risk occurring, catastrophic effect or failure of project.

JET ZERO STRATEGY

CONSULTATION BRIEFING NOTE

1. This DfT consultation closes on 8/9/21. Responses can be on-line or via email. The consultation consists of a main document and an evidence and analysis document (link below):

<https://www.gov.uk/government/consultations/achieving-net-zero-aviation-by-2050>

Ambition

2. This is two-fold:
 - i) to decarbonise aviation in a way that preserves the benefits of air travel, and
 - ii) to maximise the opportunities that decarbonisation can bring.
3. The Government has legislated for net zero emissions across the economy by 2050 and has agreed with the Climate Change Committee (CCC) on a 78% reduction in emissions by 2035 (1990 levels) in Carbon Budget 6. Aviation will be the second highest residual emitter by 2050. The strategy will have knock-on benefits in reducing non-CO² impacts and noise and improving air quality.

Jet Zero Delivery

4. Delivery is underpinned by three principles:
 - i) Clear Goal, Multiple Solutions,
 - ii) International Leadership, and
 - iii) Delivery in Partnership.

Clear Goal, Multiple Solutions

5. This will be a combination of sustainable aviation fuels (SAF), zero emission aircraft and greenhouse gas removal (GGR) technology. The development of all three will be accelerated such that by 2030 there is a clearer picture of what is needed to achieve Jet Zero.

6. The Government will set a CO² emissions reduction trajectory for aviation from 2025 to 2050 as follows – there are two optional trajectories that can be used:

	2030	2040	2050	
In-sector CO ² emissions	39 Mt	31 Mt	21 Mt	Any residual emissions removed by GGR methods
Net CO ² emissions	23-32 Mt	12-19 Mt	0 Mt	Offsetting and removals are considered as part of the target

7. The strategy, which will be reviewed every five years, sets out four illustrative pathways to net zero aviation in 2050, these are:

- i) continuation of current trends,
- ii) high ambition,
- iii) high ambition with a breakthrough on SAF, and
- iv) high ambition with a breakthrough on zero-emission aircraft.

8. All four pathways involve some element of abatement outside the aviation sector (such as through GGR). The most is in scenario i) – 36 Mt or 62.7% of total sector emissions in 2050. The least is in scenario iii) – 9 Mt or 15.2%. The assumptions used in each of the pathways are set out fully in the evidence and analysis document. The Government is also consulting on an earlier target for UK domestic aviation to reach net zero by 2040.

International Leadership

9. 96% of the UK's total of aviation emissions in 2019 were from international flights – 37 Mt out of a worldwide total of 627 Mt (about 6%). The Government intends to work through ICAO to agree ambitious emissions goals and effective mitigation measures for the entire global sector, including:

- a global long-term goal for international aviation CO² emissions consistent with the Paris Agreement,
- strengthening of CORSIA, and
- adoption of policies that support the use of truly sustainable fuels.

Delivery in Partnership

10. The Government intend to work closely with Sustainable Aviation (SA) and others. SA has published its 2020 plan for 2050 net zero with interim targets.

The Jet Zero Council's¹ priorities are zero emission flights and SAF.

Measures

11. The strategy plans action across five different measures as set out below.

System Efficiencies

12. This involves aircraft, airports and airspace and should deliver between 25-36% of CO₂ emissions savings over the short and medium term. These efficiencies should also allow immediate improvements in noise and air quality.

13. The strategy's new policy proposals are:

- *all England's airport operations should be zero emission by 2040 (scope 1 and scope 2 emissions)²*
- *to seek a voluntary agreement from all airlines to avoid tankering where there is no practical reason to carry additional fuel*
- *possible wider changes to incentivise efficiencies such as differential charging regimes and new regulations for operations such as formation flight.*

Sustainable Aviation Fuels

14. These should bring about medium to long term emissions savings and are the only option for savings on long haul flights to 2050. The government's vision is to scale up SAF use over the coming years on flights that may be more challenging to operate by zero emission aircraft, reducing dependence on imported oil and creating new green jobs across the UK.

15. The strategy's new policy proposals are:

- *to consider whether further policies are needed to provide SAF producers with greater confidence to encourage UK production*
- *to continue to negotiate in ICAO for comprehensive SAF standards and a future global SAF objective, including working with smaller groups of states*
- *to look at the feasibility of using SAF on UK public service obligation routes*
- *to undertake a SAF-specific review by 2030 and to use it to confirm a SAF trajectory to 2050*
- *to work across Government to pioneer the accelerated procurement and use*

¹ The Jet Zero Council is a partnership between industry and government to bring together ministers and chief executive officer-level stakeholders, with the aim of delivering zero emission transatlantic flights within a generation.

² Scope 1 emissions are those owned and controlled by the airport operator, such as energy generation and airport vehicles. Scope 2 emissions are those from the off-site generation of energy purchased by the airport operator.

of SAF

Zero Emission Flights

16. The Government considers that a range of hydrogen-electric and battery-electric aircraft could enter the sub-regional and general aviation markets this decade.

17. The strategy's new policy proposals are:

- to ensure the UK is at the forefront of deploying zero emission aircraft (zero emission routes operating by 2030)

- to look at the feasibility of using zero emission aircraft on UK public service obligation routes

- to work with industry to encourage the adoption of innovative zero emission aircraft and aviation technology in general aviation

- to work through the Jet Zero Council to consider the wider enabling framework for zero emission flight

Markets and Removals

18. The government states that the implementation of carbon markets and GGR technologies are vital to achieving Jet Zero. Of GGR, the Government says:

“To achieve net zero by 2050, analysis from the CCC shows that a mix of engineered and nature-based GGRs will be required to balance residual emissions from aviation and other difficult-to-decarbonise sectors, such as agriculture and certain heavy industries.

GGRs are not yet implemented at commercial scale, either in the UK or globally, and forecasts of costs and scale-up potential are highly uncertain. Demonstration of early-stage GGR solutions in the coming years will help to refine the Government's current assessment of GGR costs and the role they will play in achieving net zero. Work is ongoing to assess how the aviation sector could interact with GGRs for example through bilateral agreements with GGR producers or through markets”.

19. The strategy's new policy proposals are:

- to strengthen carbon pricing for aviation to ensure the “polluter pays” principle is maintained and to consider incentives for GGR

- to explore how the UK can support other states that may need help with CORSIA implementation

Influencing Customers

20. The Government wants to preserve the ability of people to fly whilst supporting consumers to make sustainable travel choices. There is currently much uncertainty over the longer-term effects of the pandemic on demand.
21. The Government does not believe that it will need to directly intervene to limit aviation growth in order to achieve Jet Zero. The focus will be on new fuels and technology and their economic and social benefits. The cost of fuel and carbon pricing will themselves help to reduce demand. The CAA has recently launched a research project to explore the feasibility and utility of sharing carbon information with consumers to enable better decision-making.
22. The strategy's new policy proposals are:

- to work with the CAA to explore whether mandating the provision of environmental information when flights are booked could influence consumer decision-making

- to look at other ways to support consumers to make sustainable choices when booking flights and reward those parts of the aviation sector that move to decarbonise more quickly

Non-CO² Impacts

23. These include condensation trails and NO_x emissions, though there is low confidence in the magnitude of their warming effect. The Government says it is working in four ways to address the non-CO² impacts:

- where there is evidence that system efficiency measures have a negative impact on reducing non-CO² emissions, it will carefully consider the overall impact on the climate

- it will ensure that the latest scientific understanding of aviation non-CO² impacts is used to inform policy

- it will continue to negotiate with ICAO for an improvement in aircraft emissions regulations as well as considering operational guidance and regulation of fuel composition

- it will consider whether it would be beneficial to undertake UK-based trials on contrail prevention (by considering the outcomes of EUROCONTROL's trial)

Consultation Questions

24. There are fifteen questions. These are set out below:

1. Do you agree or disagree that UK domestic aviation should be net zero by

2040? How do you propose this could be implemented?

2. Do you agree or disagree with the range of illustrative scenarios that we have set out as possible trajectories to net zero in 2050? Are there any alternative evidence-based scenarios we should be considering?

3. Do you agree or disagree that we should set a CO2 emissions reduction trajectory to 2050?

a . Should the trajectory be set on an in-sector CO2 emissions basis (without offsets and removals) or a net CO2 emissions basis (including offsets and removals)?

b. Do you agree or disagree with the possible trajectories we set out, which have in-sector CO2 emissions of 39 Mt in 2030, and 31 Mt in 2040 and 21 Mt in 2050, or net CO2 emissions of 23-32 Mt in 2030, 12-19 Mt in 2040 and 0 Mt in 2050?

4. Do you agree or disagree that we should review progress every five years and adapt our strategy in response to progress?

5. Do you agree or disagree with the overall approach to improve the efficiency of our existing aviation system?

6. What more or differently could be done to ensure we maximise efficiency within the current aviation system?

7. Do you agree or disagree with the overall approach for the development and uptake of SAF in the UK?

8. What further measures are needed to support the development of a globally competitive UK SAF industry and increase SAF usage?

9. Do you agree or disagree with the overall approach for the development of zero emission flight in the UK?

10. What further measures are needed to support the transition towards zero emission aviation?

11. Do you agree or disagree with the overall approach for using carbon markets and greenhouse gas removal methods to drive down CO2 emissions?

12. What could be done further or differently to ensure carbon markets and greenhouse gas removal methods are used most effectively?

13. Do you agree or disagree with the overall focus on influencing consumers?

14. What more can the Government do to support consumers to make informed, sustainable aviation travel choices?

15. What could be done further or differently to ensure we tackle non-CO2 impacts from aviation?

Acknowledged Uncertainty

25. It is interesting to word search on “uncertain” or “uncertainty” in the consultation document. This produces the following (with paragraph or page references in brackets):

Costs of SAF are high and uncertain (para 3.16)

Forecasts of costs and scale-up potential of GGRs are highly uncertain (page 36)

Uncertainty regarding the future technological mix of the pathways (para 2.8) - *and the short-term Covid uncertainty over CO² emissions*

The exact scale of the net warming effect of condensation trails has a large degree of uncertainty (para 4.2)

Quite a lot to resolve between now and 2030 or so!

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26/07/21