

<b>Committee:</b>	Cabinet	<b>Date:</b>
<b>Title:</b>	Aviation 2050: The future of UK aviation. A consultation	Thursday, 13 June 2019
<b>Portfolio Holder:</b>	Councillor Deryk Eke, Infrastructure, Transport and Stansted Airport	
<b>Report Author:</b>	Jeremy Pine, Senior Planning Policy Officer jpine@uttlesford.gov.uk	<b>Key decision:</b> No

---

## Summary

1. This report is about the Council's response to HM Government's (HMG) consultation on the Aviation Strategy Green Paper (ASGP) entitled "Aviation 2050: The future of UK aviation". The report contains some explanatory text and sets out how the consultation is structured. The suggested response is based around the strategic themes set out in the ASGP.
2. The report firstly comments briefly on the latest report from the Committee on Climate Change (CCC) entitled "Net Zero – The UK's contribution to stopping global warming" which was published on 2<sup>nd</sup> May 2019. The reason for commenting on this first is ease of reference later on.

## Recommendations

3. Cabinet considers the response to the ASGP that is set out in the report and suggests any extra points or amendments that it thinks are appropriate.
4. Officers send the Council's response to HMG.

## Financial Implications

5. None

## Background Papers

6. None.

## Impact

- 7.

Communication/Consultation	The consultation is being carried out by HMG, and runs until 20 <sup>th</sup> June, having been
----------------------------	---

	<p>extended from 11<sup>th</sup> April, mainly so that respondees can consider the latest report from the CCC.</p> <p>Questions relating to Annex A of the ASGP (Legislation to enforce the development of airspace change proposals) were still subject to the 11<sup>th</sup> April deadline, which was during the pre-election period. An officer-level response to Annex A was sent.</p>
Community Safety	Considered by HMG
Equalities	Considered by HMG
Health and Safety	Considered by HMG
Human Rights/Legal Implications	Considered by HMG
Sustainability	Considered by HMG
Ward-specific impacts	Districtwide, but wards closest to the airport are the most affected by airport and airport related activity.
Workforce/Workplace	Officer and Member time in preparing and considering this report and in formulating the Council's response.

## Situation

### The CCC report of 2<sup>nd</sup> May 2019

8. The CCC is an independent statutory body established under the Climate Change Act 2008. Its purpose is to advise HMG and the devolved administrations on emissions targets and to report to Parliament on progress made in reducing greenhouse gas emissions and preparing for climate change. The CCC report is published against the current legislative background contained in the 2008 Act, which is to reduce economy-wide greenhouse gas emissions in 2050 by at least 80% from 1990 levels. The present planning assumption underpinning the fifth carbon budget (2028-2032) is that UK aviation emissions in 2050 should be around their 2005 level, i.e. 37.5MtCO<sub>2</sub>e with other sectors of the UK economy reducing emissions by 85% from 1990 levels. The 2050 economy-wide target was derived as a contribution to a global emissions path aimed at keeping global temperatures to around 2°C above pre-industrial levels.
9. The Paris Agreement, which the UK ratified in November 2016, went a stage further. It provided for a firm international commitment to restricting global

temperatures to well below 2°C and to pursue efforts to limit it to 1.5°C. To achieve this aim, the Agreement additionally sets a target for net zero global emissions in the second half of the century. The CCC's response at that time was not to recommend that the UK target or budgets be changed because they were already stretching and ambitious compared to those of other countries, but rather to focus on meeting them and open up options to reach net zero emissions.

10. The CCC report takes things to yet a further stage. In its "Further Ambition" scenario, the CCC recommends that HMG should amend UK legislation to commit to net zero greenhouse gas emissions by 2050, including international aviation and shipping. The CCC also recommends that international aviation emissions should be formally included in the sixth carbon budget (2033-2037). This is unlike in earlier budgets where headroom was made for them, but no formal requirement was put on the aviation industry to limit its emissions.
11. A net zero emissions target is proposed by the CCC because some activities such as aviation will still be producing emissions in 2050. The Further Ambition scenario predicts 31MtCO<sup>2</sup> of aviation emissions in 2050 which would need to be removed from the atmosphere by processes such as carbon capture, paid for by the aviation industry. The CCC says that the aim should be to meet the target through UK domestic effort. International carbon units (credits) should not be relied on, and their use should only be as a contingency. In the June 2018 "Beyond the horizon" document (see para 14 of this report), HMG currently predicts 40.8MtCO<sup>2</sup>e in 2050 assuming the third runway at Heathrow is constructed and "best use" is made of other UK airport runways. The 37.5MtCO<sup>2</sup>e planning assumption would be met either by carbon trading in one scenario, or in a carbon capped scenario by such things as more efficient ground movements and use of renewable fuels.
12. The CCC states that the 25% reduction to 31MtCO<sup>2</sup> from 40.8MtCO<sup>2</sup> will require more action on fuels and efficiency, and also measures to manage growth in demand. The Further Ambition scenario allows for a 60% growth in passenger demand by 2050 compared to 2005 (25% from now), but this is reduced from 90% in a business as usual case. New policies will therefore be needed to manage growth in demand, which could include carbon pricing, reforms to Air Passenger Duty (APD) or policies to manage the use of airport capacity. Following recent research by the Department for Transport (DfT), it is not anticipated that demand restraint policies would lead to carbon leakage from the UK to other countries given the relatively small amount of emissions affected.
13. The CCC now intends to write to the Secretary of State to set out the implications of the recommendations in its report on the ASGP. This letter is awaited. It is not clear whether this letter will be issued during the ASGP consultation period. If the implications turn out to be significant, the Council should ask HMG to reconsider the provisions of the ASGP and reopen the consultation.

Background

14. In December of last year, HMG published the ASGP entitled “Aviation 2050: The future of UK aviation”. The ASGP must be read alongside the Airports National Policy Statement (ANPS) which was designated in June 2018 and which provides the primary policy basis for decision making on development consent applications for a third runway at Heathrow. Also in June 2018, HMG published “Beyond the horizon: The future of UK aviation – Making best use of existing runways” policy statement. That document sets out support for airports beyond Heathrow making best use of their existing runways subject to local planning authorities taking careful account of economic and environmental impacts and proposed mitigation when determining planning applications.
15. Alongside the ASGP, a number of background documents have been published. These include a feasibility study into airspace modernisation by National Air Traffic Services (NATS) and a subsequent Civil Aviation Authority (CAA) assurance report. Also published is what HMG describes as the most comprehensive aviation noise forecast ever undertaken in the UK.
16. The Strategic Aviation Special Interest Group (SASIG) will be responding to the ASGP consultation on behalf of the Local Government Association. The Council is a member of SASIG. SASIG is currently working on its response.

#### The ASGP consultation

17. HMG has devised an on-line questionnaire, but there is also a response form which can be emailed or sent by post. Each strategic theme of the ASGP has seven generic questions and some additional questions as well, but there is also the opportunity to add additional evidence / comment.
18. It is suggested that the Council’s response should be mainly based around the second and third strategic themes whilst still acknowledging that the others are important. It is further suggested that the Cabinet concentrates on the points that it wishes to include in the Council’s response, leaving officers to decide upon the best response format.

#### Outline of the ASGP

19. The ASGP is pro-growth, and sets out HMG’s vision for aviation growth to 2050 and its proposals for achieving this. HMG predicts that UK passenger numbers will grow from 284 million in 2017 to 435 million in 2050, and argues that if the UK can take advantage of this growth it will boost the economy.
20. The ASGP is built around six objectives which were defined at an earlier stage, starting with a call for evidence in July 2017 to which the Council responded. The six objectives remain unchanged and are:

- Help the aviation industry work for its customers
- Ensure a safe and secure way to travel
- Build a global and connected Britain
- Encourage competitive markets
- Support growth while tackling environmental impacts
- Develop innovation, technology and skills

21. HMG says that the motivation behind the ASGP is competitiveness, being a leader in the aviation sector and taking advantage of new opportunities whilst managing what it calls *“the potential economic, political and environmental headwinds along the way”* (ASGP Executive Summary). The ASGP contains the following strategic themes which are set out in the first chapter entitled *“the role of aviation in a changing world”*. These themes are:

- Build a global and connected Britain
- Ensure aviation can grow sustainably
- Support regional growth and connectivity
- Enhance the passenger experience
- Ensure a safe and secure way to travel
- Support general aviation
- Encourage innovation and new technology

22. Some issues are covered in more than one strategic theme. Having a set of overarching objectives and a set of strategic themes that are similar is a little confusing. This is perhaps symptomatic of a document that does not seem to be particularly well structured.

### The Council's response

#### *General overview*

23. There will be a need to clarify the relationship between the various policy documents. The ASGP isn't site specific (the subsequent white paper isn't expected to be either) - in contrast to the ANPS, which is Heathrow based. The *“making best use”* policy statement of June 2018 relates to making use of spare capacity at existing airports. If the post-2030 needs review by the NIC is positive, there could well be a fourth document setting out national aviation policy which may or may not be site-specific on the location of further new capacity. At the very least this could be cumbersome.

24. There still seems to be a continued focus on London and SE, and there does not seem to be a proactive approach towards using spare capacity outside the SE for economic rebalancing purposes. Where would the encouragement for rebalancing come from especially if (as is shown in the *“making best use”* policy statement) the third runway at Heathrow exceeds the 2050 emissions planning assumption on its own? Rebalancing would seem to be made even harder if HMG decides to adopt policies to manage airport demand as a result

of the latest CCC report and proceed with the Heathrow third runway. There is an opportunity for UK global connectivity to promote regional rebalancing. This opportunity can be enhanced by the new generation of smaller, more efficient long-range aircraft that can deal with point-to-point demand from passengers at regional airports.

25. Finally, one of the objectives still links growth to tackling environmental impacts. In a way this is not surprising because of HMG's aviation growth agenda, but environmental impacts on local communities are of sufficient importance and significance that tackling these impacts should be an objective in itself irrespective of whether growth is proposed.

*Build a global and connected Britain*

26. This strategic theme is highly consumer based, set against an expanding global air transport network with new emerging markets and destinations. HMG's aim is to ensure air travel is safe, secure and environmentally sustainable and can adapt to new technologies and business models to continue to respond to consumer needs.

27. Improving global connections has three main objectives:

- maintain and improve the UK's connectivity, both to the EU via an ambitious new relationship and, globally, maintaining connectivity with established markets and replacing existing EU-negotiated agreements
- seek more liberalised arrangements focusing on air traffic rights, airline ownership and control and interchange (short-term leasing of aircraft between airlines)
- improve transparency of aviation arrangements so that information is easily accessible to the industry

28. One important aspect highlighted in the ASGP is the UK providing leadership to improve standards. HMG sees the development of common international standards as critical due to the international nature of air travel. Differences in standards may make travelling to some destinations more complex and potentially risky, resulting in significant regulatory burdens and costs for business. Irrespective of the debate about the quantum of air travel that is environmentally sustainable, the Council should support the UK taking a leadership role in improving standards. HMG's priority areas are safety, security and the environment.

*Ensure aviation can grow sustainably*

29. Subject to any review following the CCC's latest report, HMG forecasts continuing aviation growth until 2050, is supportive of growth that is

sustainable and says it will provide the necessary framework (partnership for sustainable growth) for this to happen. It would be a long-term policy framework which would need flexibility to respond to changes over time while providing sufficient long term confidence for the industry and communities. In the ASGP, HMG states that it intends to discuss its modelling approach with stakeholders in the first half of 2019 in order to inform future capacity decisions. It is presumed that in this context, “stakeholders” refers to airport operators.

30. HMG says that framework policies would need to be tailored to local circumstances, such as if an airport is growing within existing planning approvals, was bringing forward a “best use” planning application or was potentially seeking planning permission for a new runway. Until any framework is adopted as government policy, planning applications should continue to be judged against existing policy.
  
31. The Council should give a cautious welcome at this stage to a new partnership approach as there is a lot of detail still to be worked out. It is not clear in the ASGP what these partnerships are or who they are with, although Figure 8 (page 51) defines stakeholders as government, regulators, airports and airlines. Notably, local communities aren’t mentioned as stakeholders, although community engagement is one of the partnership’s proposed strands of work. Para 3.8 of the ASGP refers to the partnership approach being key to ensuring that necessary conditions are met in respect of infrastructure, community investment and environmental measures. Any partnership approach must be able to provide a truly robust outcome that balances the benefits of aviation growth against the effects on local communities, and not just act as a “rubber stamp” for growth. If there is to be a single national partnership it would likely be “top down” in its constitution, probably led by the DfT, whereas if there were a number of local ones they could be more “bottom up”. The latter would seem to fit in better with the new Council administration’s manifesto commitments. To ensure that the partnerships are fit for purpose, it is essential that local communities and local councils are included as stakeholders. Progress in setting up the partnership(s) should be reviewed every six months, and if it is set up there should be a two-year post-implementation review.
  
32. HMG is promoting opportunities for community engagement on issues that have the most direct impact, such as road and rail access, airspace change and noise policy. To do this, it highlights the role of airport consultative committees (ACC) and the role of elected representatives who sit on them. DfT guidelines on ACCs identify them as structured forums that provide an opportunity for the exchange of information between aerodromes and interested parties. They make recommendations to airport management and other bodies where appropriate, and provide the opportunity for common understanding to be reached about the nature of airport operations. Local communities are encouraged to work with airports on bespoke engagement arrangements where complex issues are involved, such as airspace change

proposals.

33. The Council should welcome the acknowledgement that expansion can have significant environmental impacts. HMG sets out that there are significant constraints which require urgent attention. These constraints are identified in the ASGP as:

- airspace modernisation
- surface access links to airports
- new runway capacity.

34. HMG is seeking views on what the decision-making framework should be for **additional runways** post-2030 beyond the third runway at Heathrow “if a needs case is proven and suitable conditions are met in respect of sustainability” (para 3.13). Firstly, HMG proposes to ask the National Infrastructure Commission (NIC) to include airport capacity in future infrastructure assessments to determine whether there is a needs case for further runways. The needs case will need to be informed by the latest CCC report if its recommendations are accepted by HMG. If a need is identified, there are options on how to reach a decision on location, subject to the grant of either planning permission or development consent. HMG’s preferred approach is a further national policy statement “to set out the criteria but not name specific airports, so leaving it to industry to determine whether and when to bring forward applications” (para 3.14). The other options mentioned by HMG are an NIC sector study or an independent commission similar to the Airports Commission which reported in July 2015. Whichever approach is adopted, the Council will expect to be consulted at the evidence gathering and draft report stages.

35. The overall **airspace modernisation** objective (page 52) is *“to deliver quicker, quieter and cleaner journeys and more capacity for the benefit of those who use and are affected by UK airspace”*. This objective is delivered within a number of parameters, one of which is to *“create sufficient airspace capacity to deliver safe and efficient growth of commercial aviation”*, another being to *“progressively reduce the noise of individual flights, through quieter operating procedures and, in situations where planning decisions have enabled growth which may adversely affect noise, require that noise impacts are considered through the airspace design process and clearly communicated”*. In relation to the latter this might be too late and consultation under the CAA’s airspace change process viewed as a fait accompli. Planning and airspace change should be considered concurrently. Presumably, “airspace design” refers here to the airspace change process.

36. The requirement for NATS to work with key stakeholders to develop an airspace change masterplan for the south of the UK should be strongly supported by the Council, provided that local communities can have a meaningful input. This process is now underway, with consultation

requirements being defined with both DfT and CAA. A first draft of the plan is expected in June. The task of coordinating the various consultations on proposals for airspace change from airport operators (<7,000ft) and from NATS (>7,000ft) should not be underestimated in its complexity. In the CAA's Airspace Modernisation Strategy (December 2018), the delivery of airspace change in the south of the UK is flagged up as needing attention to meet the 2024 timeline. What absolutely needs to be avoided is a potential confusion of individual consultations on airspace change proposals – those that are linked should either form a family of consultations undertaken at the same time, or be part of a single wider consultation. In the NATS feasibility study it is a proposal, given the level of co-dependency between the southern airports, that they should consult on their individual airspace change proposals *“concurrently in a highly co-ordinated way”*. Latest information that officers have from NATS is that they are working with the airports towards a single consultation around October 2020. It is essential that local councils are consultees.

37. HMG policy is that decisions over whether modernised airspace leads to concentrated routes avoiding populated areas, or uses multiple routes to provide respite, should be based on local circumstances and informed by consultation with local communities. The Council should support this, and also the proposal that the newly established Independent Commission on Civil Aviation Noise (ICCAN) should help local communities engage with the airspace change process. ICCAN is an advisory non-departmental public body sponsored by the DfT. ICCAN is currently building a programme of works that will be published shortly. This work could include helping local communities understand technical jargon and analysis. Help should also be provided to local communities who wish to suggest, or even perhaps collectively submit their own proposals for airspace change – it should not necessarily be the case that this is left solely to airport operators who invariably will submit an application because there is a prime economic case to do so. It is noted that the Secretary of State could be given powers of direction to require individual airspace change proposals to be brought forward, even when they might not be solely in the airport's economic interests.
  
38. Community group representatives do recognise that airspace modernisation could deliver noise benefits on a per flight basis. They are concerned with some justification that these benefits could be substantially outweighed by noise from additional flights facilitated by the capacity increase that modernisation will allow. The Council should share this concern. The CAA's general duty under Section 70 of the Transport Act 2000 requires it to exercise its air navigation functions to *“secure”* the most efficient use of airspace consistent with the safe operation of aircraft and the expeditious flow of air traffic, but only to *“take account”* of any guidance on environmental objectives given to it by the Secretary of State for Transport. The NATS feasibility study acknowledges only that there *“may be opportunities to improve noise over the ground of each flight”* and the DfT's comments on NATS' findings include the

statement that *“holding stacks would not need to exist in the same form at present, and would be replaced with contingency stacks at higher altitudes and positioned to minimise impact on local communities”*. This benefit could be small as existing stacks generally terminate at 7,000ft, the height at which HMG policy states that aircraft noise ceases to be a main determining issue.

39. The Council should require HMG to reconsider the CAA’s statutory duty under Section 70 so there is a more balanced outcome between the most efficient use of airspace and environmental objectives. The Council notes that one of the purposes of airspace modernisation is to ensure that airspace is not a constraint on aviation growth, as capacity would be determined through the planning process. In these circumstances there seems to be an argument for airspace being used at less than optimum efficiency if that enables environmental objectives in a particular case to be fully met without compromising safety. There is no question that maintaining a high standard of safety should remain the overriding priority under Section 70.
  
40. The ASGP accepts the CCC’s earlier recommendation that **emissions** from UK-departing flights should be at or below 2005 levels in 2050, which should keep up the pressure on other sectors covered by the Climate Change Act to compensate for the aviation emissions planning assumption of 37.5MtCO<sup>2</sup>. This assumes that the other sectors retain the capacity to do so. The ASGP is, of course, silent on the recommendations in the CCC’s latest report because it predates it.
  
41. HMG continues to recognise that international action is the first priority for tackling international aviation emissions, and will continue with its current policy not to mandate sector specific emissions reduction targets. This is so that reductions can be made *“wherever it is most cost effective across the economy”* (para 3.86). However, HMG will now need to revisit this policy following the recommendations in the CCC’s latest report that aviation sector specific emissions should be included in the sixth carbon budget. The Council should push hard for this to be done.
  
42. One of the measures proposed by HMG to implement its long term vision and pathway for addressing UK aviation’s impact on climate change is to: *“require planning applications for capacity growth to provide a full assessment of emissions, drawing on all feasible, cost-effective measures to limit their climate impact, and demonstrating that their project will not have a material impact on the government’s ability to meet its carbon reduction targets”* (para 3.96). The Council should view this requirement with some cynicism although the intention behind it is fine. To so demonstrate is probably not difficult if individual projects are salami-sliced against national carbon reduction targets and then assessed using “material impact” as the threshold. HMG should look again at the wording of this requirement, especially in view of the CCC’s latest report. Assessments should be made against clear and measurable HMG targets.

43. Prior to publishing its latest report, the CCC wrote to the Secretary of State for Transport on 12<sup>th</sup> February 2019 setting out its views on the ASGP. In summary, the letter says that achieving the legislated targets by 2050 will mainly be reliant upon new technologies and aircraft designs, but also from improved airspace management, airline operations and use of sustainable fuels. The white paper should set out a clear strategy to ensure these technology solutions are developed and brought to market in a timely fashion. There is added urgency to this following the CCC's latest report in which the CCC says that achieving a net zero emissions target by 2050 and at acceptable cost is entirely contingent on the introduction of clear, stable and well-designed policies. The CCC also says that HMG must set the direction and provide the urgency. The Council should support the CCC's views.
44. HMG is committed to ensuring that the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) is successfully implemented as widely as possible. CORSIA, which was agreed by ICAO in 2016, runs from 2021 to 2035 and creates an obligation for carbon-neutral sector growth from 2020. CORSIA is voluntary until 2026, the UK participating from 2021. Whilst there are uncertainties around the availability and cost of robust carbon units, the CCC does recognise CORSIA as an interim measure but says that the capping of emissions at the 2020 level until 2035 is not compatible with achieving net zero emissions globally.
45. HMG also intends to negotiate in the International Civil Aviation Organisation (ICAO - the UN body responsible for tackling international aviation climate emissions) for a long term goal consistent with the temperature goals of the Paris Agreement, ideally by ICAO's 41st Assembly in 2022. The CCC recommends that CORSIA should be aligned with this.
46. HMG recognises that aircraft **noise** has negative impacts on the health and quality of life of people living near airports and under flightpaths. At a more detailed level there is an acknowledgement that noise exposure at some airports has grown over the past five years following a period of sustained growth although a 30-year trend is downwards (para 3.104). There is a further acknowledgment that the benefits of less noisy aircraft can be cancelled out by greater frequency of movements or the effects of concentrated traffic associated with more accurate navigation technology. HMG also accepts that the public is becoming more sensitive to aircraft noise in comparison to noise from other transport sources.
47. The current overarching policy originally set in the 2013 Aviation Policy Framework (APF) 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 in support of sustainable development"* (para 3.114). HMG recognises that there has been uncertainty on how this policy should be interpreted, measured and enforced. "Significantly affected" and "sharing benefits" are being interpreted in different

ways, and the industry points out that reducing the number of people affected is not within its powers when population encroachment into noise contours is beyond its control. HMG wants to put in place a stronger and clearer framework which addresses current policy weaknesses and ensures that industry is sufficiently incentivised to reduce noise, or to put mitigation measures in place where reductions are not possible.

48. Four new measures are proposed (para 3.115):

- set a new objective to limit, and where possible, reduce total adverse effects on health and quality of life from aviation noise
- develop a new national indicator to track the long term performance of the sector in reducing noise
- routinely set noise caps as part of planning approvals (for increase in passengers or flights)
- require all major airports to set out a plan which commits to future noise reduction, and to review this periodically

49. The noise objective is welcome as it attempts to reconcile planning and aviation policy, but its wording could still mean that total effects are increased, retaining the same uncertainty for communities that the current policy has. A more ambitious and quantifiable goal to reduce total effects should be brought forward, perhaps linked to the requirement to produce future noise reduction plans. Local planning authorities are sensitive to criticisms from the industry that the planning process allows population encroachment into noise contours. Land-use planning is a democratic process and any assessment of the total effects would need to be able to compensate in some way for population encroachment or be based on criteria within industry control.

50. HMG explains that the requirement for future noise reduction plans would only apply to airports which do not have a noise cap approved through the planning system, although there does seem to be some confusion over this and clarification should be requested in the Council's response. A noise cap is not a commitment to noise reduction if it is static. Existing Noise Action Plans (NAPs) are an EU requirement, and are produced for airports with over 50,000 aircraft movements / year by the competent authority (the airport operator). NAPs are consulted upon, and submitted to the Department for Environment, Food and Rural Affairs for formal adoption. Stansted's current NAP (2019 – 2023) has as its primary aim *"to limit and where possible reduce the number of people significantly affected by aircraft noise from Stansted operations"*, i.e. linked to the overarching policy originating from the APF. The requirement to "commit to future noise reduction" sounds stronger than a NAP, although in need of more definition at this stage. The Council should ask why the requirement for the roll-out of future noise reduction plans should not be the

same as for NAPs.

51. HMG wants to see better noise monitoring and a mechanism to enforce plan targets as for noise caps. There would be resource implications for local authorities if the responsibility fell on them.
52. The Council should support the setting of noise caps subject to them containing challenging targets which would need to be met as a prerequisite of any “licence to grow”. Progressively tightening noise caps could be one way of ensuring that the benefits of new technology are shared between the industry and local communities. HMG would require noise caps to be subject to periodic review to make sure that they remain balanced.
53. HMG suggests that the new national indicator to track the long term performance of the sector in reducing noise could be defined either as a noise quota or a total contour area based on the largest airports. The use to which such an indicator could be put seems unclear (it could be useful for longer term benchmarking) and it could just be somewhat of a blunt instrument. It might be more meaningful to use indicators relating to airports of the same type as, for instance, local communities near to smaller regional airports may be more tolerant towards aviation noise because of perceived economic benefits.
54. HMG is still considering the recent World Health Organisation (WHO) noise guidelines, but whilst it agrees with the ambition to reduce noise and minimise health effects it says the WHO report did not assess the total cost of action and recent UK specific evidence. This does not indicate a willingness to adopt the guidelines in the short term, although the Council should support them. HMG admits that, given its priority to provide new homes *“it is unrealistic to expect that new homes will not be built in areas affected by aircraft noise to some extent”* (Para 3.116).
55. HMG is proposing to develop tailored guidance for housebuilding in noise sensitive areas near airports (as a replacement for the now defunct PPG24 – Planning and Noise), but this has been the intention for a while now and nothing has been done in spite of industry-wide support for this guidance, including from SASIG. The Council should strongly urge the preparation of this guidance and ask SASIG to continue to press for it as well. It is understood that DfT may lead on this.
56. Preparation of the post PPG24 guidance gives an opportunity to press for a review of permitted development rights (PD rights) for conversion of buildings to dwellinghouses without the need to apply for planning permission. These rights have received recent press coverage for other reasons, principally because of allegations they result in slum houses or flats. PD rights now exist

under the General (Permitted Development) Order for conversion from retail/betting offices, amusement arcades/centres, casinos, offices, storage/distribution and agricultural buildings to dwellinghouses, although there are some restrictions on the amount of floorspace that can be converted in each building. Local planning authorities can only require applications for prior approval on grounds relating to transport/highways impact, contamination, flooding, design/appearance and (in some cases) air quality and noise impacts of the development. There seems to be nothing to indicate that aircraft noise can be taken into account in all instances, and it is difficult to see how these PD rights are compatible with the ASGP's proposed new noise objective (para 47). Using PD rights in a scattergun way to try to promote economic development needs further thought. It is understood that there may already be some dialogue between DfT and the Ministry of Housing, Communities and Local Government (MHCLG).

57. HMG also wants improved flightpath information for prospective home buyers so that they can make better informed decisions. The Council should strongly support this, and it is suggested that ICCAN should be asked to advise on how this guidance should be produced – what metrics ought to be used – how to present the guidance – and who should own it. There could be a role here for ACCs. What is needed is a combination of actual track data and number above contours relating to the maximum sound level of a noise event rather than Leq (average) contours which are difficult to explain. Whilst no single metric is perfect, actual track data is a visual metric and seems to be easy to explain to the public, whilst number above contours can use thresholds that residents can relate to, such as speech disruption.
58. There is currently no national policy on community funds, and HMG is preparing to produce guidance on minimum standards for them. The Council should support this guidance, but HMG does say that the level of funds should be proportionate to the airport growth. However, the funds are regarded as a complementary measure and not a substitute for noise reduction.
59. HMG is also proposing a number of measures relating to aircraft operation, best practice procedures and compliance with mandatory controls. HMG is first seeking voluntary compliance, but ICCAN has been asked to consider compliance and enforcement as a priority work area. ICCAN could have a role of independent verification of airports' noise monitoring work. In the longer term, new statutory enforcement powers for either the CAA or ICCAN could be created. At the moment, and pending its initial two-year review, ICCAN does not have any statutory powers.
60. HMG identifies **noise insulation** as an important element in giving impacted communities a fair deal. Four insulation measures are proposed:
- to extend the noise insulation policy threshold beyond the current 63dB LAeq 16hr contour to 60dB

- to require all airports to review the effectiveness of schemes, including whether the level of contribution affects take-up
- HMG or ICCAN to issue new best practice guidance to ensure consistency
- for airspace changes which lead to significantly increased overflight, confirmation that a 3dB change meaning that a home falls within the 54dB LAeq contour or higher would qualify it for insulation

61. The Council should welcome all of these measures, particularly the fourth, which would deal with a by-product of flight path concentration. The best practice guidance should acknowledge that there is no “one size fits all” solution to insulation, and the best schemes should include a provision for an independent survey to be carried out to inform qualifying residents of their options. For instance, if a house is difficult to insulate, the money could perhaps be better used to improve enjoyment of a garden.
62. Generally there is a lot to welcome in the noise provisions of the ASGP, but it remains to be seen whether the proposed growth in flight numbers will cancel out many of the benefits of the provisions.
63. HM Government recognises that **air pollution** is the top UK environmental risk to health, especially nitrogen oxides. Pollutants come from airborne aircraft, airside operations and mainly surface access (dealt with below). The ASGP recognises ongoing work to introduce cleaner aircraft into service and also cleaner fuels. It also recognises cleaner airside operations such as use of fixed electrical ground power to avoid on-stand aircraft emissions and reduced engine taxiing. Further action is needed and the following is proposed:
- improved monitoring of air pollution to improve the understanding of aviation’s impact on local air quality. This would be done by standardising processes for monitoring and communication
  - ensuring comprehensive information on aviation-related air quality issues is made available to better inform interested parties. This would be done by guidance on the scope and content of reports
  - require all major airports to develop air quality plans to manage emissions within local air quality targets. This would be done by establishing minimum criteria to be included in plans
  - validation of air quality monitoring to ensure consistent and robust monitoring standards that enable the identification of long-term trends. This would be done by either HMG or a third party at the national level
  - support industry in the development of cleaner fuels to reduce the air quality impacts of aviation fuels. This would be done by international action

64. The Council should support all of these measures, subject to sanctions being available in air quality plans for non-compliance with local air quality targets. The Council should ask HMG to consult on the guidance on the scope and content of reports and the minimum criteria to be included as targets in air quality plans.

*Support regional growth and connectivity*

65. HMG recognises the value of domestic air connectivity and the opportunity an expanded Heathrow will give to strengthen and develop links. It will consider ring-fencing slots and imposing Public Service Obligations (PSO) where appropriate, although direct financial support for PSOs into Heathrow following expansion is unlikely to be required. The CCC's latest report does look at the scope for modal shift from aviation to high speed rail, but says this is route distance dependent. Journeys up to 800km offer potential for substitution (domestic and short haul international), but as few journeys are within switching distance the CCC estimates this would only represent between 1-5% of domestic and EU demand. The Council should ask that the NIC fully assesses the scope for modal shift in its future infrastructure assessments which were referred to earlier in this report.

66. The industry is welcome to submit evidence on the impact Air Passenger Duty (APD) has on international competitiveness or route economics. It would be surprising if the industry said anything other than APD has a detrimental impact, but the CC's latest report identifies APD reform as a legitimate measure to manage growth in demand.

67. HMG acknowledges that airports are becoming **regional transport hubs** and their development needs to be planned in that context. It is important that airport operators recognise this role. The APF recommends that airports produce and keep updated master plans and airport surface access strategies (ASAS) – Stansted combines these into its Sustainable Development Plan 2015 which is shortly up for revision. Master plans do not have a statutory basis, but the APF advises that their primary objective is to provide a clear statement of intent on the part of an airport operator to enable future development of the airport to be given due consideration in local planning processes. HMG also advises that airports with more than 1,000 Passenger Air Transport Movements / year should hold airport transport forums (ATFs) which develop and oversee implementation of plans for future surface transport provision. The industry view is that ATFs do not have the authority to hold airports to account – in particular that:

- national and local government should take a more active role in the development of the hubs

- there needs to be a more structured approach to the planning of surface access provision as existing decision making processes are seen as fragmented, complex and poorly understood

- public transport operating hours may not be synchronised with airport operating hours

- there is a perception that public transport operators are generally not fully aware of airport needs

68. These are important criticisms for HMG to take into account. Using the ANPS as an example, Heathrow Airport Limited is charged with preparing an ASAS in conjunction with the ATF that meets the needs of the scheme that will be contained in its application for development consent for the third runway. The ASAS is expected to contain modal targets for public transport, associated actions, policies and performance indicators and a mechanism for the ATF to oversee and monitor implementation. The ATF therefore will become the delivery vehicle for Heathrow's third runway surface access commitments, and it is known that the DfT has already taken an interest in this. What is set out in the ANPS is likely to become the model for future use at other airports.

69. To meet these challenges, HMG is proposing to:

- formalise the position of ATFs, setting a requirement for membership to include relevant local and national transport providers and a duty to co-operate with local government in the development of ASASs

- update guidance to help airports in completing ASASs and master plans, by providing consistency in requirements and structures that align with future regional and national transport strategies. This would include a requirement to reflect the international gateway and transport hub role of an airport

- work with transport service providers to assist ATFs in understanding and working within existing surface transport planning processes and developing an associated manual in partnership with the Airport Operators' Association

70. The Council should support all these measures, especially those aimed at promoting the regional (and local) transport hub function of airports. Whilst Stansted's ATF is well established and is chaired independently, the relationship between airport master plans and the statutory planning process is not well developed or understood, and there is no real sense of wider ownership of the master plan. The experience of officers attending the Stansted ATF is that it would benefit from a duty to co-operate that works all ways (upon the airport, local authorities and transport providers), mostly to ensure continuity of attendance and maximum participation.

71. In its response, the Council should comment briefly on the experience of Stansted's ATF. Whilst the ATF has been successful in promoting local and regional bus / coach travel to and from the airport (including "out of hours" services), growth of rail travel remains hampered by legacy timetables which

do not meet airport peak demand hours, by the need for track repossession for overnight maintenance and by the compromise nature of the West Anglia Main Line itself. There is a continued lack of certainty over longer term investment in four-tracking which would enable a step-change in rail service provision to occur. In paragraphs 4.42 – 4.34 of the ASGP, HMG reaffirms its currently policy position that making infrastructure contributions would only be considered where there would be significant non-airport user benefits, citing onward connectivity as one example.

72. A local impact is the effect of off-airport on-street parking in the vicinity of airports and pressures for use of land for more organised airport related car park operations, often without the benefit of planning permission. Whilst land use related issues can be dealt with by normal planning enforcement procedures, the experience at Stansted is that on-street parking requires a partnership between the airport operator, local communities, the local planning authority, the highway authority and, possibly, Trading Standards. A number of airport localities experience issues with on-street parking, including those around Stansted, Luton and Manchester and common solutions are either the introduction of no-waiting zones or residents' parking schemes, subject to normal consultation procedures. Where there isn't a planning permission to set out the governance of an on-street parking strategy, HMG should require one to be included in an ASAS.

73. Paragraphs 4.47 – 4.48 identify Stansted as one of the three main airports for handling **air freight** in the UK. HMG values the catalytic effect of air freight on the UK economy, and recognises the importance of night flights to the air freight industry. HMG states that industry can support growth within existing night noise limits by using quieter and more environmentally friendly cargo aircraft and encourages their early adoption wherever possible. Whilst these aircraft are a good aim in themselves, this is not a commitment to reducing night noise. Consultation on the next night flights regime for Heathrow, Gatwick and Stansted is due to start in the second half of 2019, and the Council will have the opportunity to take part in that consultation.

74. There is a section in the ASGP entitled “inspiring the next generation” and in that section the Stansted Aerozone and Stansted Airport College are acknowledged for the help they give to young people on career identification and training. The Council should welcome this acknowledgement, the College being a good example of effective partnership working between the public and private sectors.

*Enhance the passenger experience, and  
Ensure a safe and secure way to travel*

75. This report combines these two strategic themes, as they seem to be linked rather more than the others.

76. The UK is recognised as a world leader in aviation safety, but must proactively anticipate and mitigate emerging risk, continue to adapt its regulatory regime, and continue to respond to global variations in safety standards. This will support the UK objective of having no accidents involving commercial air transport that result in serious injuries or fatalities, including to third parties. The ASGP recognises cyber threats and the increase in drone incidents and laser attacks on aircraft, and accepts that a better experience is needed in unplanned situations involving flight delays or airline insolvency. The ASGP also raises issues relating to drunk and disorderly passengers and queues at Border Control.
77. A new passenger charter (one stop shop) is aspired to, which would include addressing the significant challenges in air travel that disabled passengers continue to experience. An aim is to develop a certified airworthy wheelchair standard and docking station system. It is proposed that the role of Transport Focus be extended to represent air passengers. Transport Focus is a watchdog for transport passengers and road users in the United Kingdom, based in London and Manchester. It is an executive non-departmental public body, sponsored by the DfT.
78. The Council should emphasise in its response that it is essential that passengers not only receive timely warning of delays and/or service alterations but also information on what their viable options are, (this should apply as much to surface access as to air travel). The Council should also point out that excessive queueing at Border Control is unacceptable and gives a poor impression of the UK to visitors. Passengers should be free to travel without fear of threat from drunk and disorderly passengers, and a “zero tolerance” attitude should be taken by the relevant authorities. Extending the campaigning role of Transport Focus is a good idea subject to it being adequately resourced. In relation to drawing up the passenger charter, HMG should engage closely with ACCs – Stansted’s has a User Experience Group as a sub-group of the main committee. All these points add to the quality and seamlessness of air and surface travel.

*Support general aviation*

79. Although general aviation has enjoyed a resurgence in recent years, the ASGP identifies that continuing population growth and demand for housing means there are strong economic incentives for aerodrome owners to sell part or all of their land, and more aerodromes may be lost, particularly in the SE. The NPPF requires planners to recognise the importance of maintaining a national network of general aviation airfields.
80. Work done on behalf of HMG recommends that DfT and the MHCLG develop planning practice guidance on how planning authorities can recognise the importance on maintaining airfields that qualify as part of a strategic network. In the longer term, serious consideration should be given to developing mixed

use airfields where general aviation, industry and housing can co-exist.

81. The Council should support the production of any national guidance that assists proper long term planning for general aviation which can be a valuable source of local employment.

*Encourage innovation and technology*

82. The ASGP identifies hybrid and fully-electric aircraft as having the potential to transform aviation, including tackling a number of its environmental impacts as well as reducing fuel costs. HMG sees the UK leading the world in aviation electric technology, exporting to countries that are not large aerospace manufacturing nations. Norway, for instance, has announced an ambition for all-electric short haul flights by 2040.

83. HMG does admit that there is a need to better understand the changing noise impacts of electric aircraft. With conventional aircraft, noise is caused by engines and airframe. On take-off (high thrust) engine noise dominates, whereas on approach (low thrust) engine and airframe noise are roughly in the same range and aircraft are lighter because of fuel burn. Noise from electric aircraft will be caused by the electric propulsors (motor and fan) and the airframe. As there is no fuel burn electric aircraft should land at the same weight as at take-off. As a result, they may well be heavier on landing than conventional equivalents which could have power and noise implications. The Council should share this desire, but this should not be limited to just the one emerging technology.

84. The Council should require some ambition from HMG to do more to bring about the benefits of modern aircraft technology on local communities. This should include challenging emissions and noise targets and timeframes.

85. A return to commercial supersonic flight is being pursued by a number of manufacturers, and whilst HMG recognises the potential benefits it acknowledges there are significant environmental consequences. HMG is negotiating with the ICAO for noise and emission standards that balance environmental benefit with technical feasibility. It is believed that at the moment most of the emphasis is on supersonic business aviation jets and 50-seat commercial aircraft, i.e. much smaller than Concorde.

86. The development of hypersonic aircraft (>Mach 5) could mature in the next 20 – 30 years, cutting flight times to Australia to 5 hours. These offer potentially lower emissions if powered by hydrogen, as no CO, CO<sup>2</sup> or particulate matter is produced during combustion.

*Other issue*

87. At this point, it seems appropriate to raise secondary impacts of airport expansion and their seeming lack of recognition in the ASGP. This has been a wider concern of SASIG for a while now. Secondary impacts include pressures placed on social infrastructure, access to housing for airport employees in overheated markets and the ability of small businesses to recruit and retain employees in areas where an airport is a dominant employer. Often, these are left to local authorities to evaluate without recognition from HMG or the airports themselves. HMG should be asked to look into how these can better be assessed, particularly to inform planning applications and decisions on them.

Summary table of the Council's response

88. A table is attached at the end of this report as an aide-memoire for the Cabinet, setting out in bullet form what officers think the Council's response should include. The Cabinet is welcome to suggest any additions or amendments.

**Risk Analysis**

89.

Risk	Likelihood	Impact	Mitigating actions
The Council's views are not taken into account.	1. The Council will be responding to the ASGP.	2. The ASGP could have a wide ranging impact on the District, depending upon what implications it has for the operation and growth of Stansted Airport.	Respond to the ASGP.

- 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.

## Summary of the Council's response

Report section	Para No	Issue to be raised
CCC report	13	- UDC should consider and respond to further CCC letter if necessary. HMG to reconsider ASGP provisions and reopen consultation if there are significant implications
General overview	23	- HMG to clarify relationship between aviation policy documents - Issues around regional rebalancing to be considered
	25	- HMG to split objective that links growth to tackling environmental impacts
Build a global and connected Britain	28	- UDC to support UK leadership role in improving standards
Ensure aviation can grow sustainably	29	- HMG to review growth forecasts after latest CCC report
	31	- UDC to give cautious welcome to new partnership approach subject to detailing about involvement of communities. Local communities and local councils to be stakeholders.
	33	- UDC to welcome acknowledgement that expansion can have significant environmental effects
	34	- NIC needs case for additional runways to be informed by latest CCC report - UDC to expect consultation at the evidence gathering and draft report stages
	35	- Consider planning proposals and airspace change concurrently
	36	- UDC to support airspace change masterplan subject to community and local council input and avoiding multiple consultations on airspace change proposals in the SE
	37	- UDC to support locally-based decision-making on flightpaths and ICCAN help - Help (ICCAN?) to be provided for communities wanting to suggest or collectively submit applications for airspace change
	38	- UDC to express concern that noise benefits could be outweighed by extra flights
	39	- HMG to reconsider CAA's statutory duty under S70 of Transport Act 2000
	41	- HMG to revisit policy not to mandate aviation sector emission targets following latest CCC report. UDC to push hard for the policy to be revised.
	42	- HMG to look again at wording of emissions assessment requirement. Assessments to be made against clear and measurable HMG targets.
	43	- UDC to support CCC's view on need for clear, stable and well-designed policies for net-zero emissions
	49	- HMG to provide a more ambitious and quantifiable goal to reduce total effects, but taking account of population encroachment
	50	- HMG to clarify extent of roll-out of noise reduction plans
	52	- UDC to support challenging noise caps + periodic review
	53	- Query to what use the new NI would be put. Use indicators

		based on airport type?
	54	- UDC to support WHO guidelines.
	55	- UDC to urge progress with PPG24 replacement
	56	- HMG be urged to review PD conversion rights
	57	- UDC to support improved flightpath information for residents
	58	- UDC to support guidance on community fund minimum standards
	61	- UDC to support noise insulation measures subject to independent surveys on options for residents
	64	- UDC to support air pollution measures subject to sanctions for non-compliance and consultation on scope and content of reports and minimum criteria for air quality targets
Support regional growth and connectivity	65	- NIC to fully assess scope for modal shift in its future assessments
	68	- UDC to stress importance of HMG acting on industry criticisms of ATFs
	70	- UDC to support measures to strengthen ATFs, ASASs and masterplans - UDC to comment on experience at Stansted
	72	- ASASs to include governance of an on-street parking strategy
	73	- UDC to comment that growth within existing night noise limits is not a commitment to reducing night noise
	74	- UDC to welcome positive acknowledgement of the Stansted Aerozone and Airport College
Enhance the passenger experience Ensure a safe and secure way of travel	78	- UDC to ask for timely warning of travel delays and options. Border Force queues give a poor impression. Travel safety. Extend campaigning role of Transport Focus. Passenger charters to be drawn up in association with ACCs.
Support general aviation	81	- UDC to support production of national guidance on importance of GA network
Encourage innovation and technology	83	- UDC to support research into noise signatures of electric aircraft and other emerging technologies.
	84	- UDC to require HMG ambition to do more to bring about the benefits of modern technology on local communities.
Other issue	87	- UDC to press for national research into secondary impacts of airport expansion