



HM Government

Aviation Strategy: call for evidence

Personal details

1. Your:

name?

email?

2. What is the nature of your:

interest in the aviation sector?

involvement in the aviation sector?

3. Are you responding: *

on behalf of an organisation? (Go to "Organisational details")?

as an individual? (Go to "Aviation Strategy")

Organisational details

4. What is your organisation's name?



HM Government Aviation Strategy

Aim of strategy

To achieve a safe, secure and sustainable aviation sector that meets the needs of the consumers and of a global, outward facing Britain.

Strategy objectives

The strategy will have the following 6 objectives:

- 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

5. What are your views on the proposed aim and objectives?

The Council's main concern is with the fifth objective. It does not consider that tackling the environmental impacts of aviation should be seen in the final Aviation Strategy just as a sub-text of supporting growth. This may not be the intention, but it is certainly how it could be read.

Paragraph 3.3 of the 2013 Aviation Policy Frameworks (APF) sets out the Government's policy of future aviation growth ensuring that benefits are shared between the aviation industry and local communities. The Council considers that this is an important aspect of sustainability which should be carried forward into any new Strategy. However, the new Strategy should still require airport operators to reduce the current environmental impact of existing airport operations even when growth is not being proposed, such as via Noise Action Plans and Surface Access Strategies. It is therefore suggested that there should be two objectives:

support sustainable aviation growth

reduce the environmental impact of existing airport operations

6. Do you have a view on the order the objectives should be tackled? *

- Yes (Go to question 7)
- No (Go to Strategy principles)

7. In what order of importance do you think the objectives should be tackled (please rank the challenges 1 = highest priority, 6 = lowest priority)?

Ensure a safe and secure way to travel	1
Support growth while tackling environmental impacts	2
Encourage competitive markets	6
Build a global and connected Britain	5



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Develop future innovation, technology and skills

Help the aviation industry work its customers

3

4

Why?

Safety and security should be a given, so doesn't really need to be identified as a separate objective.

With an expanding civil airport within its district, the Council considers that managing the environmental impact of aviation growth (one of the key arms of sustainability) is of prime importance to residents and visitors. The next important has to be innovation, technology and skills development, which the Council takes very seriously, and which is essentially a local issue. To this end the Council has recently granted planning permission for a technical skills college at Stansted Airport in connection with Harlow College. Once opened, this will be the first further education establishment within the district. The college will deliver learning programmes for 16-19 year olds and will cater for apprentices of all ages to meet skills gaps in aircraft engineering and match the growing skills need of the airport and the wider area, particularly the London Stansted Cambridge Corridor.

Without technological innovation and skills development within the aviation industry, it is considered that the other three objectives would become more difficult. It is about having the right tools to do the job. Accordingly, the objectives relating to competitiveness, connectivity and customer experience (whilst undoubtedly very important) are given lower rankings.

The Council recognises that local authorities which host regional airports may attach greater weight to connectivity.

Strategy principles

- Consumer focused - it will put passengers and businesses at the centre of everything we do
- Market driven - it will emphasise the role of government as an enabler, helping to make the market work effectively
- Evidence led - it will target intervention on specific problems which government can address, avoiding activity that does not respond to a clear problem

8. What are your views on the proposed strategy principles?

The Council questions whether the constituent counts as a consumer? Passengers and businesses are referred to, but what about residents? Following a meeting between SASIG's Head of Secretariat and senior officers at the DfT, the Council understands that there is a sentiment in Government that the 2013 APF erred too far in favour of environmental arguments over growth, although any change in relative weights between environment vs growth in the APF and the new Strategy may only be marginal. The Council refers to the answer it gave to Questions 5 and 7 in terms of the importance that it attaches to dealing with the environmental impacts of aviation.



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Policy tests

- What is the rationale for action?
 - This will remain focused on what the government is trying to achieve, not just in terms of outputs such as the publication of an Aviation Strategy, but the final outcome for the sector and society
- What is government's role?
 - This will look at the need for government action to fix an identified problem, or whether activity is better carried out by others
- What does the evidence say?
 - This is a test of whether the government is using the best available evidence and whether there is anything that could be done to improve the information and data available to decision makers
- Have all the options been considered?
 - This will ask whether there are other approaches that may not have previously been considered
- What is the effectiveness of any proposed action?
 - This will ask whether government has considered the practicalities of policy decisions and if these have been properly discussed with those affected or who have an interest

9. What are your views on the proposed policy tests?

The proposed policy tests seem reasonable and run in a logical order.

Policy test 2 (government role) Any assessment under this test must include consideration of the local resources that are available to carry out the task. The Council is aware that DfT is currently carrying out a burdens assessment on a possible role for local authorities for ensuring noise related operating restrictions are adopted in line with EU Regulations, and is engaging with SASIG on this issue.

Policy test 4 (options) There is always merit in setting out what options have been considered and discounted, and for what reason, or reasons. This can aid understanding of the final option and why it was chosen.

Policy test 5 (effectiveness) The Council presumes that the discussions referred to will be those undertaken as part of the Phase 2 topic papers. There will also be a need to monitor the effectiveness of policy decisions post-implementation. The new Strategy should set out how this will be done, and what options there are should policy not have had the desired effect.

Utilising existing runways

10. What are your views on the government's proposal to support airports throughout the UK making best use of their existing runways, subject to environmental issues being addressed?

The first question that the Council has is what is meant by "best" use of existing runways, and this should be defined by the Government. Whilst noting the reference to more intensive use of existing airport capacity in Paragraph 7.20, the Council assumes "best" use would allow for sufficient resilience to quickly recover from external shocks that disrupt timetables. This will be of importance to consumers in a future strategy that is truly consumer focussed. "Best" use is



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therefore unlikely to equate to “maximum” use of a single runway. Perhaps the Government should refer to “most efficient” use instead.

It seems to the Council that the support that the Government wishes to give is akin to publishing a short term “other airports” Airports National Policy Statement (ANPS), but without the level of detail that will be contained in the to-be-designated ANPS, which is Heathrow based. The Council considers that it is inevitable that the requirements of the to-be-designated ANPS will become a benchmark for the consideration of all planning applications for airport expansion, particularly the use of noise metrics, and the principles surrounding the provision of mitigation and compensation.

The Government must make it clear that its support is in-principle only and does not usurp the planning process. To this end, the Council welcomes what is said in Paragraph 7.21 about planning applications needing to be judged on individual merits. Paragraph 7.21 highlights environmental issues such as noise and air quality as being important considerations in the determination of planning applications, but the Council considers that surface access should also merit a specific separate reference. In the APF (Paragraph 5.11) the Government states that:

“All proposals for airport development must be accompanied by clear surface access proposals which demonstrate how the airport will ensure easy and reliable access for passengers, increase the use of public transport by passengers to access the airport, and minimise congestion and other local impacts”.

This consumer focussed principle should be clearly restated in any Government support. The Council suggests Government support should also be dependent upon measures to reduce kiss and fly movements (the most polluting) and appropriate car park management as part of surface access strategies.

The Council understands that publication of the DfT’s latest aviation forecasts (2017) was delayed both by the election and by more modelling work. These forecasts should be published in a timely manner as they will be needed to back up and justify Government support.

Consultation process

The consultation document lists the questions that the government would like to explore in developing the aviation strategy within each of the 6 objectives that have been identified (chapters 3 to 8).

11. Are there any other specific questions on the 6 objectives that you think should be included in the planned consultations? *

Yes (Go to question 12)

N No (Go to question 13)

12. What other questions would you like considered?

N/A



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13. Are there any other sources of information or evidence that the government should bear in mind when developing the strategy? *

Y Yes (Go to question 14)

No (Go to question 15)

14. What sources of information or evidence?

The CAA's current consultation on aviation noise impacts which closes in January 2018.

The recent Which survey on the UK's best and worst airports.

15. Does the proposed timetable (chapter 2), provide enough time to examine the existing issues in sufficient depth? *

Y Yes (Go to question 17)

No (Go to question 16)

16. What timetable would you suggest and why?

N/A

17. What action could the government to make sure that the maximum number of people, communities and organisations are engaged in the process and are able to have their views heard?

Phase 2 of the consultation will involve the publication of a number of topic papers which the Council presumes will have a lot of detailed technical content. The Government needs to ensure that each topic paper is accompanied by, or includes, a non-technical summary specifically dealing with the questions that lay people could easily answer. The first topic paper on customer service issues should present a good opportunity for the Government to ask fairly straightforward open questions relating to such things as likes and dislikes about aviation.

During the course of each topic paper consultation the Government might wish to issue occasional reminders and prompts, perhaps focussing on one or two key issues in that topic paper.



Other comments

18. Do you have any other comments on the issues raised by this call for evidence? *

Yes (Go to question 19)

No (Go to Organisational help)

19. What comments?

As the Government says that the new Strategy will cover the whole country, it needs to make it clear how it will dovetail with the to-be-designated ANPS. The Council questions whether there will be a need for a second “other airports” ANPS, as the scope of the new Strategy does not seem to take into account or proclaim upon the differing needs of the UK’s regions. As previously mentioned, it seems to the Council that the support the Government refers to in Question 10 would be akin to a short term “other airports” ANPS, but without the level of detail contained in the to-be-designated ANPS.

Back in February of this year, the DfT said that its consultation on UK Airspace Policy formed a key pillar in the development of the Aviation Strategy. Again, it will be important to see how the one relates to the other. A triumvirate of documents (ANPS, Aviation Strategy, UK Airspace Policy) could weigh against easy understanding.

The Council considers that the new Strategy should cover the following points:

1) A specific statement on Brexit policy, as this is clearly of major importance to the industry in the short term, affecting forward planning and passenger forecasting. Chapter 5 does refer to the connectivity challenge that Brexit brings, but that is only one of the Brexit aviation issues, and connectivity would still be a challenge even if the UK was not leaving the EU. Indeed, connectivity featured heavily in the Airports Commission’s discussion paper on Airport Operational Models well before the EU Referendum took place. Depending upon when individual planning applications for airport expansion are submitted, local planning authorities may be tasked with determining them with the backdrop of all the uncertainty that Brexit will bring, especially around assumptions about forecasting and employment growth.

2) The need for a replacement for PPG24 (Planning and Noise), although the Council regards the recent document published by the Institute of Acoustics (ProPG: Planning and Noise – New Residential Development) as a useful starting point. Industrywide action is needed on this in conjunction with the Government. On a related point, the Council also has concerns about the freedoms imposed by Classes M to Q of Part 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015. Under Classes M to Q, change of use of some buildings to dwellinghouses can be permitted development with either no or (in some cases) limited consideration of the impact of noise on prospective residents, including in locations in close proximity to an airport. The way the legislation is currently worded therefore seems to run contrary to the aim of the ICAO Balanced Approach in using land use planning and management as a noise reduction measure.

3) A clear re-iteration of Government aerodrome safeguarding policy and responsibility. There does not seem to be a “go to” organisation that can help a local planning authority if it has a



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query over interpretation of current policy, which may well relate to public safety. An example of this might be where a proposed development straddles a public safety zone.

4) Clarity over the status of airport masterplans and surface access strategies within the planning process and the weight that should be given to them in planning decisions. Whilst it may not be of prime importance to airport operators, the Government should also support local authorities which seek to promote airports as local and regional transport interchanges.

5) The need to identify and deal with pinch points as part of an assessment of a passenger's whole-journey experience. This will include not only surface access to and from the airport but also, for example, Border Control, Air Traffic Control and through-ticketing. This may be something that the first topic paper could look at in some detail. It does seem from the recent Which survey on the UK's best and worst airports that there is plenty of work to do on alleviating pinch points at some airports.

6) Public health and how it is affected by aviation, although the Council welcomes what is said in Paragraphs 7.30 – 7.33 particularly about looking at whether a new approach to reducing noise annoyance is needed, as well as identifying new forms of compensation and community investment.

Organisational help

20. If you are responding on behalf of an organisation, would your organisation be willing to:

take part in helping
development of the strategy?

Your answer

Yes. The Council is a member of SASIG, and is happy to work with that organisation and the Government to develop the new Strategy.

help organise events to help the
development of the strategy?