



Aviation Strategy: Call for Evidence Response by Stop Stansted Expansion

Stop Stansted Expansion ('SSE') was established in 2002 in response to Government proposals for major expansion at Stansted Airport. We have some 7,500 members and registered online supporters including 150 parish and town councils and local residents' groups and national and local environmental organisations. Our objective is to contain the development of Stansted Airport within tight limits that are truly sustainable and, in this way, to protect the quality of life of residents over wide areas of Cambridgeshire, Essex, Hertfordshire and Suffolk, to preserve our heritage and to protect the natural environment.

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1. Introduction

Stop Stansted Expansion ('SSE') welcomes the opportunity to respond to this Department for Transport ('DfT') call for evidence on future aviation strategy, as set out in '*Beyond the Horizon*' (the Consultation Document), published by the DfT on 21 July 2017.

A brief description of SSE is set out on the cover page of this response. This includes our website address where you can obtain more detailed information about SSE if required.

2. Preliminary Comments

We wish to make clear from the outset that we consider that the DfT has gone much further than is fair, reasonable, supported by the evidence or appropriate by making the following statements at this stage in the consultation process. Indeed, to have done so is premature, runs entirely counter to the evidence-based ethos which is stated to underpin the Government's emerging Aviation Strategy and, unless promptly corrected, runs the real risk of improperly influencing the statutory regime by which planning decisions on all proposed developments are to be made:

"The government... is minded to be supportive of all airports who wish to make best use of their existing runways including those in the South East." [para 7.20]

"Due to the recent rise in growth, the government believes that this issue cannot wait until the publication of a new Aviation Strategy." [para 7.21]

The Secretary of State published these two statements when the consultation process has barely started and directly contrary to the extant Government policy, as set down in the Aviation Policy Framework, as follows:

*"Before taking decisions on any future new airport capacity, the Government will want to have a thorough understanding of the local environmental impacts of any proposals."*¹

On the basis of discussions SSE has recently held with both Uttlesford District Council, the Local Planning Authority ('LPA'), and Stansted Airport Ltd ('STAL'), and public statements by STAL, it is clear that both parties regard the above statements as a clear signal of Government policy support for STAL's application to raise the Stansted planning cap from 35 million passengers per annum ('mppa') to "approximately 44.5 mppa", and as representing a presumption in favour of approval.

Yet further, the Government seeks to justify its proposal to support the best use of runway capacity at all UK airports by saying that it:

"...agrees with the Airports Commission's recommendation that there is a requirement for more intensive use of existing airport capacity." [para 7.20]

However, what the Airports Commission specifically said in relation to Stansted was:

*"The Commission considers that there may be a case for reviewing the Stansted planning cap if and when the airport moves closer to full capacity. Its forecasts indicate that this would not occur until at least the 2030s, although the airport has seen rapid growth since its purchase by MAG, which if sustained over a longer period would bring this forward. The Commission does not have any view as to the outcome of any such review, but is clear that it should be carried out on the basis of a full detailed assessment and consultation process, taking into consideration the environmental and other issues that supported the imposition of the original cap, as would be expected for any planning application of this nature and scale. The independent aviation noise authority could be involved in such a review."*²

Contrary to the DfT's representation of the position, the above statement does not imply any sense of urgency and it is heavily qualified by environmental and other considerations. We elaborate on some of these points below.

¹ 'Aviation Policy Framework', DfT, March 2013, para 3.54.

² Airports Commission Final Report, July 2015, para 16.49.

We therefore urgently request that the following steps be taken, lest the above statements are wrongly relied upon as supporting prospective planning applications when the consultation process is ongoing and the statements set out above are highly controversial and will be the subject of strong, evidenced-based, objection.

Remedy Sought

In order to avoid unfairly and unreasonably prejudicing consideration of the forthcoming Stansted Airport 'best use' planning application, a statement should be issued by or on behalf of the Secretary of State as soon as possible making clear that paragraphs 7.20 and 7.21 in the Consultation Document should not be taken to signify Government support for any particular planning application, nor relied upon as being a material consideration in support of any such application.

We now turn to our more general response to the Consultation Document.

3. Environmental Assessment

So far as we are aware, the DfT has not undertaken any assessment of the environmental and health implications which would flow from a policy of making best use of the existing runway capacity at all UK airports (except Heathrow). This is inconsistent with the DfT's stated principle for the proposed new aviation strategy, namely, that it should be evidence-led. It also marks a departure from past practice, for example the SERAS and RUCATSE studies. And it is no defence for the DfT to present this proposal as simply following the recommendations of the Airports Commission since, as the DfT knows, the Airports Commission only carried out detailed environmental assessment of its shortlisted options at Heathrow and Gatwick.

The absence of even a preliminary environmental assessment or sustainability appraisal prior to announcing its policy intention to encourage best use of all existing runways at UK airports may also be in breach of SEA Directive 2001/42/EC.

The Consultation Document takes a very narrow view of the adverse environmental impacts associated with the aviation industry, referring only to noise, air quality and climate impacts but a policy of making best use of the runways at all UK airports would have far wider environmental impacts. It would create the need for extensive new airport facilities including, for example, additional taxiways, aircraft stands, terminal and satellite capacity, car parking provision and surface access infrastructure. All of these 'bulldozer effects' would have significant environmental impacts.

Before intervening in the planning process by declaring, in principle, government support for any UK airport seeking planning consent to make best use of its existing runway(s) it is incumbent upon the DfT to carry out some form of assessment of the potential environmental and health impacts of such a policy.

We consider it highly irresponsible for the DfT not only to signal its support for making best use of existing runway capacity at all UK airports in this 'Call for Evidence' (para 7.20), but also to propose that this policy should be implemented before the new aviation strategy is even finalised (para 7.21). The attempt to qualify this by stating that each planning application should be judged on its individual merits is disingenuous. Government policy support will be cited by the applicant as a material and potentially decisive consideration.

This approach brings the principle of evidence-based policy into disrepute. The DfT has not published any new aviation demand forecasts for the UK to underpin this policy and has made no attempt to assess the environmental impacts of this policy, or to carry out any sustainability appraisal of the outcome of a policy of fully utilising existing runway capacity all across the UK.

We submit that this approach to policy-making is both irrational and unfair and may well be susceptible to legal challenge.

In our view, the DfT needs to carry out a Strategic Environmental Assessment ('SEA') of its proposed policy of supporting best use of all UK runways before taking this policy any further. There also needs to be at least a preliminary assessment of the health impacts of such a policy.

The SEA should be preceded by a scoping study which should be widely consulted upon. As a starting point, the SEA will need to include assessment of the following:

- A description of the reasonable alternatives considered before arriving at a policy of supporting best use of all UK runways
- The rationale for deciding upon the 'best use for all' policy
- The additional capacity expected to be provided by the policy
- Economic and employment impacts – both positive and negative
- Landscape impacts, including ancient woodlands and countryside and historic landscape
- Other visual impacts, including light pollution
- Impacts on cultural heritage, including listed and historic buildings
- Archaeological impacts
- Impacts on nature conservation and biodiversity
- Noise and air quality impacts
- Surface access impacts
- Community cohesion/social capital impacts
- Impacts on health and wellbeing
- Impacts on local/regional water supply, and waste water impacts
- Safety/risk and air traffic management considerations
- Carbon emissions' impacts
- Cumulative impacts
- Opportunity costs

The above list is for example only and is not exhaustive. We would expect to provide a more comprehensive description of the topics that would need to be assessed after reviewing the scoping study.

4. Strategy Aims and Objectives

The stated aim of the proposed aviation strategy is: *"To achieve a safe, secure and sustainable aviation sector that meets the needs of the consumers and of a global, outward facing Britain"*.

We would wish to see this expanded to include an explicit environmental aim, as follows:

"To achieve a safe, secure and sustainable aviation sector that meets the needs of the consumers and of a global, outward facing Britain and where its adverse environmental impacts are progressively reduced." [Additional text underlined]

Regarding the six stated 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*

... we are content with the wording of all but the fifth objective, where the present wording subordinates environmental objectives to growth objectives.

As presently worded this objective conflates an assumed "growth" benefit with the disbenefits of environmental harms without making any attempt to define how an equitable balance should be achieved. A key aviation strategy objective must be to reduce environmental harms. And it is wholly inadequate to use soft and woolly language such as "tackling", "giving due consideration to" and "addressing environmental impacts". Similarly, it is meaningless to refer to "the need to minimise impacts and respect environmental limits" when there is no quantification and no clarity as to what this actually means in practice.

By contrast, the 2002 Environmental Noise Directive, transposed into UK law, is quite clear that the objective is to "prevent, avoid or reduce the harmful effects due to exposure to environmental noise"

The fifth objective should be reworded as follows:

- *support aviation growth while reducing its adverse environmental impacts*

5. Prioritising the Objectives

The Consultation Document asks "In what order of importance do you think the six objectives should be tackled?" In our view this question is misconceived because the objectives need to be viewed holistically. Taken together, the objectives need to represent a balanced approach which will command support from the widest possible range of stakeholders.

Night Noise

Amongst the environmental objectives, a key priority in any new aviation strategy should be to reduce the adverse health and community impacts of night noise.

The 2003 Air transport White Paper made a specific commitment "to bear down on night noise"³ and in 2005 the DfT gave the following commitment:

*"The guideline values [i.e. the World Health Organisation 'Guidelines for Community Noise'] are very low. It would be very difficult, if not impossible, to achieve them in the short to medium term without draconian measures – but that is not what the WHO proposed. The recommendation was that the Guidelines for Community Noise should be adopted as long term targets for improving human health. This is also consistent with the advice above. **The UK Government is committed to take account of this. In respect of aircraft noise at night, the 30 year time horizon of the White Paper, provides a suitable time parameter for 'longer term'.**"⁴ [our emphasis]*

In the 12 years since the Government made the above commitment, more evidence has emerged about the adverse health impacts of aircraft noise upon those who live near airports and under flight paths. It is now incontrovertible that sleep disturbance caused by aircraft noise at night has significant adverse health impacts including an increased risk of cardiovascular disease.⁵

The new aviation strategy should therefore include a re-affirmation of the Government's commitment to achieve the WHO *Guidelines*⁶ by 2030. Very little progress has been made in the years since this commitment was first made and we are now at the half-way point with 12 years left for the Government to fulfil its promise to local airport communities. The new aviation strategy should include a plan to achieve that, with clear milestones and timescales so that progress can be measured and monitored.

At para 7.24 the Consultation Document states:

"We also need to make sure that communities affected by current and new flightpaths are fully engaged. For example, they should be involved in the decisions on where aircraft are allowed to fly, and the times when they can do so."

The final phrase of the above raises hopes for an end to night flights which is long overdue. Implementation of this commitment will be a test of the DfT's good faith in terms of genuinely listening to the concerns of communities and taking decisive action to alleviate these concerns, even where this inconveniences the aviation industry.

³ 'The Future of Air Transport' White Paper, DfT, Dec 2003, para 3.12.

⁴ 'Night Flying Restrictions at Heathrow, Gatwick and Stansted: Stage 1 of Consultation on Restrictions to apply from 30 October 2005', DfT July 2005, para 3.12.

⁵ For example, see BMJ 2013;347: f5432.

⁶ 'Guidelines for Community Noise', World Health Organisation, 1999, Table 4.1.

6. Strategy Principles

The Consultation Document lists three principles for the proposed new aviation strategy:

- *“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”*

If the intention of the new strategy is to provide a balanced approach for the future development of UK aviation, then the above three principles will clearly not achieve that.

Consumer-focused

A strategy which puts “passengers and businesses at the centre of everything we do” plainly lacks balance when it makes no mention of the interests of local communities who suffer the brunt of aviation’s adverse impacts, including adverse health impacts, and makes no mention of the environmental damage caused by aviation.

Government must have a role as a regulator of the aviation industry as well as a facilitator of growth and a general enabler. Accordingly, we propose a fourth principle, as follows:

- *Dealing with the downside – it will include a commitment to reduce aviation’s adverse impacts on local communities and the environment.*

Market-driven

If the strategy is to be market driven:

- Is it still appropriate to have some UK airports in majority public ownership?
- Should there be an upper limit on the market share of total available slots that any one airline can have at any one airport?
- Should the unfair competitive advantage provided by aviation’s fuel duty and VAT exemptions, compared to other modes of transport in the UK domestic market, be reviewed?⁷

Evidence-led

We deal with this point later in this submission.

7. The Need for a Balanced Approach

The DfT must seek to develop a balanced approach which is fair and reasonable to a wide range of stakeholders. It is not acceptable for the role of the DfT simply to be a champion of the aviation industry where this means riding roughshod over the interests of local communities and paying scant attention to aviation’s environmental harms.

One of the objectives set down in the 2013 Aviation Policy Framework (APF) was *“to share the benefits of aviation in a fairer way than in the past”*. It would be helpful if the DfT were to provide some examples to show what additional fairness has been delivered to communities since the introduction of this policy four years ago.

The Consultation Document uses similar language in proposing *“a greater sense of fairness and sharing of the benefits of aviation growth, including new forms of compensation and community investment.”* This will simply be meaningless rhetoric unless the DfT places specific new obligations upon the aviation industry in each of these four areas – i.e.:

- fairness towards local communities;
- sharing the benefits of aviation growth;
- new forms of compensation; and
- community investment.

⁷ We note that it is not within the gift of the UK government to remove this anomaly for international air travel.

We would welcome an opportunity to discuss with the DfT specific proposals in each of the above areas.

Again, on the need for a balanced approach, it is disappointing – but, sadly, unsurprising – that the Consultation Document makes numerous references to the Airports Commission's recommendations when seeking to justify its airport expansion proposals but is silent on the Commission's recommendations which are 'community-focused', for example:

"The Government should introduce a noise levy or charge at major UK airports to ensure that airport users pay more to compensate local communities. A levy should not impose undue or unfair costs at any airport."

Quite apart from any new measures, the DfT should address the abject failure of the Land Compensation Act 1973 ('the LCA') to compensate local residents whose homes have been devalued – in many instances greatly devalued – by airport expansion over the years and who have not received a penny in compensation. The difficulties experienced by local residents around Stansted Airport in obtaining fair compensation for the devaluation of their properties over the past 15 year is nothing short of scandalous.

The DfT should commission an investigation into the effectiveness (or otherwise) of the LCA in relation to providing local residents with fair and reasonable compensation where their homes have been devalued as a consequence of airport expansion. The investigation should also examine the scope to amend the LCA to provide compensation for property devaluation arising from changes in flight paths. If the DfT is unconvinced as to the need for such an investigation, it should ask all UK airports to provide details of the sums paid to claimants under the LCA over the past (say) 20 years, and the number of successful claimants.

8. Policy Tests

We fully endorse the point that any new aviation strategy and all the policies therein should be evidence-led. There is however an obvious irony in the DfT's emphasis on an evidence-led approach in the Consultation Document which states from the outset that the Government

"is minded to be supportive of all airports who wish to make best use of their existing runways including those in the South East."

This proposed policy has been set down before the DfT has published any evidence in terms of new aviation demand forecasts which would justify such a policy and before there has been any assessment of the adverse environmental impacts of such a policy. This cannot be described as an evidence-led approach. In addition, the level of market demand will depend upon the outcome of Brexit negotiations but we are given no indication as to the assumptions made about that outcome, nor any sensitivity analysis showing how different outcomes might affect the future demand for air travel to and from the UK and thereby influence future aviation strategy, including the need for airport expansion.

The only market demand evidence provided in the Consultation Document is the Figure 6 graph on page 17 which crudely shows the expected growth in passenger numbers, not the expected growth in ATMs or aircraft movements as a whole. Runway utilisation, of course, relates to the number of aircraft movements rather than the number of passengers.

There were 7.4% fewer ATMs last year compared to 10 years ago and 14.2% fewer total aircraft movements (see section 11 below). Additional airport capacity has been provided over the past 10 years at a number of UK airports including Stansted, London City, Luton, Birmingham and Southend – and the Government is now committed to building a third runway at Heathrow.

Against that background, and on the basis of the most recently available air traffic forecasts⁸, it is difficult to understand the evidential basis for a major change in Government policy to support best use of the existing runway capacity at all UK airports (except Heathrow).

⁸ 'UK Aviation Forecasts', DfT, January 2013.

We also note that no updated forecasts have been provided for carbon emissions (see also section 13 below).

9. Weighing the Evidence

The evidence needs to be weighed in an objective and balanced way but the Consultation Document repeatedly overstates the benefits of UK aviation whilst disregarding or understating its adverse impacts, for example:

- i. Much is made of the contribution made to the UK economy by inbound tourism but no mention is made of the opposite side of the coin. The 2016 comparison is:
 - o Overseas residents spent £22.5 billion on visits to the UK, whereas
 - o UK residents spent £43.8 billion on visits overseas.

Thus, the net UK tourism deficit in 2016 was £21.3 billion, of which £19.0 billion stemmed from air travel.⁹ This excludes the cost of air tickets where the 2016 figures are not yet available but the average over the previous five years (2011-2015) shows a UK trade deficit of £3.0 billion¹⁰. In total therefore, for 2016 the UK trade balance had a deficit of about £24.3 billion on air travel and tourism.

- ii. The Consultation Document makes no mention of the highly favourable tax treatment afforded to the aviation industry including its exemptions from fuel duty and VAT. HM Treasury has in the past assessed that, compared to the tax treatment of road users, the UK aviation industry's tax exemptions are worth some four times the £3.2 billion collected last year by HMT in Air Passenger Duty. The reasons for this tax anomaly are understood but it clearly distorts competition in the travel and tourism markets, favouring overseas leisure breaks by air over domestic leisure breaks by road or rail. Any new strategy should seek to address this issue rather than ignore it.
- iii. A third example is the DfT's overstatement of the importance of the aviation industry to the UK economy and jobs. The Consultation Document creates a false impression by conflating the UK aerospace and aviation industries. We do not seek to justify the building of new roads on the basis of the economic and employment contribution of the UK car manufacturing industry and so the DfT's conflation of the UK aviation and aerospace industries is difficult to comprehend.
 - o Aviation employment is defined in the ONS Annual Business Survey ('ABS') as the combination of 'Air transport' (SIC 51) and 'Service activities incidental to air transportation' (SIC 52.23).¹¹ This same definition applied at the time of the 2003 'Future of Air Transport' white paper which stated that aviation provided 200,000 direct UK jobs.
 - o By 2011 this had – according to the DfT – fallen to 150,000 UK jobs¹², with the DfT again arriving at its figure by adding the two categories SIC 51 and SIC 52.23, as reported in the ABS.
 - o The latest available ABS data show the aggregate of employment categories SIC 51 and SIC 52.23 (i.e. total direct aviation jobs) to be 124,000. This is 0.4% of all UK jobs compared to 0.7% of the UK workforce in 2003.¹³

⁹ 'Travel Trends 2016', Office of National Statistics, Tables 4.01 and 5.01.

¹⁰ This is the difference between the expenditure by UK residents on air tickets bought from non-UK airlines compared to the expenditure by foreign residents on air tickets bought from UK airlines – see ONS Pink Book 2016, Table 3.2.

¹¹ SIC = Standard Industrial Classification.

¹² 'Developing a sustainable framework for UK aviation: Scoping document', DfT, March 2011.

¹³ <https://www.nomisweb.co.uk/reports/lmp/gor/2092957698/report.aspx#tabrespop> and <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/datasets/fulltimep>.

Thus, the importance of the aviation sector to UK jobs is steadily declining but rather than acknowledge this, the DfT appears to be attempting to hide it, by conflating the economic and employment contribution of the UK aviation and aerospace industries.

10. Making “Best Use” of Capacity

If all UK airports were to respond to the DfT's call to make best use of their existing runways, this could create the capacity to handle up to 7.0 million ATMs¹⁴, which is **three** times the number predicted for 2030 in the January 2013 DfT forecasts (at time of writing, the latest forecasts available). Even allowing for aircraft movements other than ATMs, such a policy would clearly give rise to needless environmental damage and excessive and inefficient investment in airport and surface access infrastructure.

Moreover, there is no evidence of the DfT having considered other options, and no stated intention to consider other options, or even to await the outcome of the consultation process, before implementing this policy.

11. Demand Growth

In seeking to justify a policy of encouraging all UK airports (other than Heathrow) to make best use of their existing runways, the DfT repeatedly refers to passenger growth. Apart from the fact that no updated forecasts have yet been provided to justify this proposed change in policy, runway utilisation is based on aircraft movements, particularly ATMs, rather than on passenger numbers. The following tables show the growth in ATMs, aircraft movements and the number of air passengers over the past 30 years:

Table 1 – UK Air Traffic Statistics 1986-2016

	1986	1991	1996	2001	2006	2011	2016	Growth 1986-2016
ATMs ('000)	1,125	1,366	1,686	2,030	2,376	2,046	2,202	96%
Total Aircraft Movements ('000)	2,398	2,845	3,049	3,416	3,590	2,961	3,081	28%
Passengers (million)	77	96	136	181	235	219	268	250%
Freight ('000 tonnes)	878	1122	1767	2143	2315	2298	2385	172%

Source: CAA - <https://www.caa.co.uk/Data-and-analysis/UK-aviation-market/Airports/Datasets/UK-airport-data/>
Excludes Isle of Man & Channel Islands.

Table 2 – 10 year Intervals

	1986 - 1996	1996 – 2006	2006 - 2016
Growth in ATMs	50%	41%	-7%
Growth in Aircraft Movements	27%	18%	-14%
Growth in Passenger Numbers	77%	73%	14%
Growth in freight tonnage	101%	31%	3%

Source: CAA - <https://www.caa.co.uk/Data-and-analysis/UK-aviation-market/Airports/Datasets/UK-airport-data/>
Excludes Isle of Man & Channel Islands.

¹⁴ SSE analysis for the Airports Commission in 2013, updated to include Heathrow R3.
http://stopstanstedexpansion.com/documents/SSE_Presentation_to_Airports_Commission-July_2013.pdf.

A key feature of the growth in UK air travel has been the fact that total aircraft movements have increased, on average, by less than 1% per annum over the past 30 years whilst passenger numbers have increased by an average of more than 4% per annum. The average number of passengers per aircraft has grown by 70% over this period.

The above table also brings into focus the marked slowdown over the past ten years – across all key indicators – compared to the previous two decades.

12. The Aviation Policy Framework (APF)

The Consultation Document refers to “managing” and “tackling” environmental impacts whereas the policies set down in the 2013 APF contain more meaningful commitments, for example:

- *“Before taking decisions on any future new airport capacity, the Government will want to have a **thorough understanding** of the local environmental impacts of any proposals.” [our emphasis]*
- *“... to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise.”*
- *“... to seek improved international standards to reduce emissions from aircraft and vehicles.”*
- *“... to ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions.”*

The APF specifically links growth in the industry to noise reduction:

*“We want to strike a fair balance between the negative impacts of noise (on health, amenity (quality of life) and productivity) and the positive economic impacts of flights. As a general principle, the Government therefore expects that future growth in aviation should ensure that benefits are shared between the aviation industry and local communities. **This means that the industry must continue to reduce and mitigate noise as airport capacity grows.** As noise levels fall with technology improvements the aviation industry should be expected to share the benefits from these”. [our emphasis].¹⁵*

The Government needs to clarify whether it proposes to maintain or abandon the above policies. Clearly, we would not wish these APF policies to be abandoned. They should instead be further developed. The Government needs to:

- Set ambitious, unambiguous targets for aircraft noise reduction at each major UK airport and make any growth in flight numbers conditional on achieving these targets.
- Establish the impacts on communities living under Performance Based Navigation ('PBN') flight paths, introduce mitigation measures and set noise reduction targets.
- Create an independent aviation noise regulator with the duty and powers to enforce achievement of those policy goals. Historic regulatory arrangements have failed. A new or newly empowered regulator is needed to drive noise reduction.
- Establish a general principle that where aviation noise cannot be brought below acceptable thresholds people will be fully compensated for its effects, in line with the widely accepted polluter-pays principle.¹⁶

13. Carbon Emissions

Until seeing the Consultation Document it was our understanding that the Government was fully committed to ensuring that there would be no more carbon emissions from UK aviation in 2050 than in 2005, and that the Government would follow the advice of the Committee on Climate Change with regard to the necessary steps to achieve that objective.

That commitment amounted to a cap of 37.5 million tonnes of carbon dioxide emissions and the Committee on Climate Change advised as follows:

¹⁵ 'Aviation Policy Framework', DfT, March 2013, para 3.3.

¹⁶ The principle that the polluter should pay is also enshrined in the 1997 EU Treaty of Amsterdam, amending the Treaty on European Union (Treaty of Rome).

"The fact that aviation emissions are in the [overall national] 2050 target implies a trade-off between emissions in this and other sectors of the economy: the higher the level of aviation emissions, the deeper the emissions cuts required in other sectors to meet the economy-wide target.

Our analysis has illustrated how the 80% target could be achieved through reducing aviation emissions to 2005 levels in 2050 and reducing emissions in other sectors by 85% on 1990 levels.

Reducing aviation emissions to 2005 levels in 2050 could be achieved through a combination of fuel and operational efficiency improvement, use of sustainable biofuels, and by limiting demand growth to around 60% in 2050 compared to 2005.

Reducing emissions in other sectors by 85% in 2050 on 1990 levels is at the limit of what is feasible, with limited confidence about the scope for going beyond this."¹⁷

If the 37.5 million tonne cap is to be abandoned and/or the advice of the independent Committee on Climate Change is to be disregarded, the DfT needs to provide the evidential justification to support such a radical and potentially risky change in policy.

The Consultation Document (correctly) points out that climate change is a global rather than a local environmental issue. It then goes on to state (para 7.14) that the Government's position is that action to address these emissions is best taken at the international level. But the Government does not shirk from having clear policies to reduce carbon emissions from energy generation, road transport and households. The aviation sector must also play its part and 20 years of ICAO discussions have delivered no tangible results.

Is the proposed new Government policy not to limit carbon emissions from UK aviation until and unless there is international agreement through ICAO? If so, the DfT should explain what assessment it has carried out on the implications of this proposed new policy upon the legally binding target to reduce UK carbon emissions by 80% by 2050.

14. Conclusions and Next Steps

Successive governments have prioritised aviation growth over its environmental harms and at the expense of the health and well-being of those impacted by aircraft noise and emissions.

The proposals set down in this Consultation Document would, if adopted as Government policy, go further than ever before in subordinating environmental protection and local community health and well-being to the objective of aviation growth. The proposals are overwhelmingly focused on supporting the interests of air passengers and the aviation industry generally, at the expense of other stakeholders. The language used throughout the Consultation Document makes clear that the DfT is seeking to shift the focus away from the adverse environmental, health and community impacts of aviation in favour of aviation growth. Many environmental impacts are completely ignored. Noise and air quality are the only local environmental impacts specifically mentioned and even these are clearly subordinated to the interests of passengers and the growth of the UK aviation sector.

The proposal to support best use of the runway capacity at all UK airports (except Heathrow) is a further example of the complete lack of balance in the Consultation Document. It is also an example of a capricious approach to policy making rather than a balanced, evidence-led approach. Only the latter could be capable of commanding broad public support.

Finally, in response to your Q.20, SSE would of course be willing to assist the DfT in developing a new aviation strategy. Above all else, there needs to be a balanced approach to UK aviation strategy and SSE stands ready to work constructively with the DfT towards that end.

¹⁷ Letter from Chairman of Committee on Climate Change to Chairman of Airports Commission, 3 July 2013.