



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?	As a county council representing the views of our residents affected by the impacts of aviation, particularly noise impacts over West Kent from Gatwick.
involvement in the aviation sector?	Kent County Council (KCC) regularly attends the Gatwick Airport Consultative Committee (GATCOM), as well as associated groups including the Noise Management Board (NMB) and Noise and Track Monitoring Advisory Group (NATMAG). KCC also responds to consultations from London Gatwick and London Southend, as well as the Civil Aviation Authority and Department for Transport.

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?

Kent County Council



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?

We agree with the aim of the strategy. We recognise that growth in the UK aviation sector will improve the country's connectivity and competitiveness, thereby supporting economic growth. This connectivity is vital as we make the transition to a new relationship with the European Union and with the wider world. We also recognise that the aviation sector needs to grow sustainably.

Since the Airports Commission's demand forecasts were published, demand has continued to grow and now our nearest major airport, Gatwick, has published capital investment plans that aim to grow it towards 50 million passengers per year – beyond what the Commission believed was possible without a second runway. This is clearly of benefit to the passengers and businesses using the services of the airport as they have access to a wider range of destinations; and indeed the airport's freight business has grown alongside the range of destinations.

1. Help the aviation industry work for its customers.

Helping the aviation industry to work for its customers looks at the whole end-to-end journey from booking a flight to onward travel at the destination airport. KCC wishes to defer to the views of industry bodies and passenger representative groups on the issues such as consumer rights, ticketing, baggage, passport control, and so on. However, where we have strong views is on the surface access arrangements to airports in the south east. Whilst we understand that surface access will be addressed under the objective "support growth while tackling environmental impacts" whereas the consumer consultation will focus on information provision, it cannot be forgotten that the whole experience of using an airport can be heavily influenced by surface access options. This is not just in terms of journey time, but reliability and price also.

2. Ensure a safe and secure way to travel.

We agree with the range of issues covered in the call for evidence document but defer to organisations with greater knowledge of aviation safety and security for the specifics of this issue.

3. Build a global and connected Britain.

The importance of international gateways (ports and airports) is increasing given our new relationship with the EU and the rest of the world in terms of trade. We recognise that growth in the UK aviation sector will improve the country's connectivity and competitiveness, thereby



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supporting economic growth. Heathrow is the UK's only hub airport and has a freight operation far in excess of any other London airport, which is rightly identified as a reason for its expansion over Gatwick.

Again, travel to and from the airport must be considered as this is vital for freight where it is often the case that goods are transferred to van or lorry for redistribution. If the road network around our airports is unable to cope then that is a further barrier to economic growth. This is as true of routes to airports as it is of routes to the Port of Dover or Southampton. Growth at our airports should not compromise the transport networks in place and should ideally improve them (road and rail for passengers and freight).

4. Encourage competitive markets.

Competition is important to provide the highest quality at the best price for customers. When those customers are airports, airlines, freight operators and so on, it is ultimately the individual consumer that pays through their ticket price or delivery charges.

The airport sector is not just open to competition within the UK, but competition on the near-continent from major hub airports at Amsterdam Schiphol, Frankfurt, Paris Charles de Gaulle, and others. This should also be considered within the Aviation Strategy as policy in Europe will also affect the environment in which our own airports operate. We see one factor in this as Air Passenger Duty (APD). This currently has a negative impact on the UK's global connectivity, damaging UK business and tourism. Indeed, both the Netherlands and Ireland abolished APD. Long haul flights that have the greatest APD charges and these tend to be to emerging economies that the UK needs to forge greater trade links with post-Brexit. Therefore, we recommend that APD needs is reviewed alongside the UK's disadvantage in relation to capacity when compared to European hubs.

For example, varying the rates of APD across England to reflect congestion at airports could help to stimulate growth at regional airports and release capacity at congested airports by better enabling competition with the major London airports. Devolution is enabling Scotland to set their own rate of APD (replaced with Air Departure Tax from April 2018), which will give it an advantage compared to airports in northern England and should be addressed. Nevertheless, varying APD would also help with the aim set out in this call for evidence for better utilisation of existing runways.

5. Support growth while tackling environmental impacts.

Surface access to airports is of national importance because additional passengers and freight getting to the airports will have an impact on the journey time reliability of road and rail networks for other users. Reliability of those networks will also influence the choices made about which airport to use, as does the cost of the various modes. We consider it appropriate for the airport operator to pay for, or towards, the upgrading of transport infrastructure where they are increasing the capacity of the airport. This is usually addressed through the planning process. However, where there is a general background growth in demand for air services it then falls to local and central government (via Highways England and Network Rail) to increase capacity, which in these financial times cannot be appropriate. More general investment in surface access to these important international gateways should also be dealt with in the Aviation Strategy.

As already stated, growth in the aviation sector will support economic growth and is increasingly important as the UK broadens its trading connections across the world. Nevertheless, this growth can have dire consequences for communities in the vicinity of the airport or overflowed by its flight paths. West Kent has suffered with an intolerable increase in overflight in recent years, and the continued expansion of Gatwick Airport will mean a continued increase in noise exposure, especially because the new night noise regime will not reduce the movement allowance at Gatwick and, in fact, permits growth in the winter season. Gatwick also has a much greater night



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movement and noise allowance than Heathrow in the summer season, an unfair outcome against which we have consistently campaigned.

We welcomed the UK Airspace Policy consultation proposals to introduce a tier 2 airspace change whereby the permanent and planned redistribution of aircraft would have to be as stringently assessed as changes to the structure of airspace. Subsequently, we responded to the Civil Aviation Authority's (CAA) consultation on the new airspace change process to reiterate that tier 2 should be as rigorous as tier 1. This is because of our experience of the severity of such a change at Gatwick when the joining point to the Instrument Landing System (ILS) final approach was altered and consequently changed the turning movements of aircraft, leading to a significant increase in noise over West Kent. Not only did this have severe noise impacts (and therefore associated health and wellbeing impacts) but this created a lot of mistrust in the airport, CAA and Department for Transport (DfT).

Hence, we consider the objective to "support growth while tackling environmental impacts" is an understatement of the noise effects of aviation. Noise deserves an objective in its own right, perhaps also aligned with the need for meaningful community engagement, so that the objectives of the Aviation Strategy more closely reflect the greater emphasis on noise in the consultation on the UK Airspace Policy, the draft Airports National Policy Statement, and the CAA's airspace change process consultation. Noise is not solely an environmental impact but an impact on the quality of life and health of people.

Paragraph 7.20 states that "there is a requirement for more intensive use of existing airport capacity and [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." Paragraph 7.21 states that this policy cannot wait for the finalised Aviation Strategy and is therefore effectively consulted on through this call for evidence. This is not an acceptable approach. Further, it has not been publicised widely enough to be a legitimate consultation with the affected groups – particularly community action groups.

Turning to the policy itself, whilst we accept that there is a need to more intensively use our existing runways, the policy is a default of support for expansion, placing this need above all others. Planning processes will have to be followed where there is an existing cap on passenger numbers, but the voice of communities needs to be listened to regarding the damaging impact of aviation noise. We are concerned that this policy will lead to a worsening of the already intolerable situation over West Kent. Mitigation and compensation cannot counteract the inability of residents to sleep, the reduction in educational attainment of children, or the wider negative health impacts of noise. It is simply not possible to insulate an open window or a garden to effectively mitigate the noise of overflight. The increased overflight of designated landscapes will also disrupt the tranquillity that so many people enjoy when visiting such green spaces, such as National Parks and Areas of Outstanding Natural Beauty (AONB).

Gatwick has made clear its ambitions to reach 50 million passengers per annum (mppa) and is expanding in a way that does not require planning consent. For example, using larger aircraft and greater utilisation of the shoulder peak periods. It is therefore able to grow regardless of the policy in the Crawley Borough Local Plan that supports Gatwick up to 45mppa, which it did not expect until 2030 (Policy GAT1). Government must therefore review the current ability of the planning process to manage airport growth and appropriately mitigate its impacts through - for example - robust conditions and legal obligations, supported by a robust local and national policy framework. The pending review of the National Planning Policy Framework and emerging Airports National Policy Statement provides a real opportunity for Government to address these issues.

Expansion will need new flight paths and therefore cause new communities to be impacted by aviation noise. Involvement in the decisions about where and when aircraft can fly is simply not



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sufficient in these instances where it is a brand new disturbance. Aviation noise may not be a statutory nuisance but that does not mean it does not cause substantial distress. Compensation and mitigation should be very high for new communities even though, as noted above, noise cannot be totally mitigated against. Where newly affected, there is a case for financial support for residents who wish to move altogether.

Whilst the efforts of manufacturers and airlines are appreciated, the reliance on technological advances to reduce the noise footprints of individual aircraft does not take into consideration that if a noise is sufficiently above background levels, day or night, then it will cause a disturbance. For this reason, noise impacts must have a higher cost in areas of low background noise (such as rural areas around Gatwick and Stansted) than urban areas (such as Heathrow). This should be reflected in economic appraisal of expansion proposals. However, we do welcome the commitment that the Aviation Strategy will look at the use of noise charges at airports and operating procedures to further reduce noise. We also welcome the acknowledgement that communities are more sensitive to noise and that innovative ways of mitigating noise will be reviewed.

Reducing carbon emissions and the air quality impacts of aviation are equally as challenging and the existing financial incentive to reduce emissions by reducing fuel consumption (and hence cost) should be supported by other measures. This may include 'challenge funds' and other methods of promoting the industry and universities to research and innovate.

6. Develop technology, innovation and skills

The consultation document sets out a wide range of forthcoming opportunities to advance the UK's aviation industry, such as in drone use and by creating the first UK spaceport. It also looks at future technologies that could be developed and impact on other areas of public service provision, for example personal air mobility vehicles could alter use of traditional public and private transport.

Where innovation drives new technology that solves the challenges the aviation sector currently faces, including noise, we consider that there would be broad support. However, where the different drivers (noise, fuel consumption, carbon, etc.) conflict, then there is a clear role for government in setting the right direction. This could be through regulation, but also incentives in the form of research grants and supporting skills through university and practical training opportunities.

In terms of how the Aviation Strategy might address the issues outlined in this call for evidence, we believe that the aviation industry and aerospace educational centres, both in the UK and abroad, would be better placed to steer the proposals.

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

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



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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	4
Build a global and connected Britain	3
Develop future innovation, technology and skills	5
Help the aviation industry work its customers	6

Why?

We consider that the safety and security of travel is the most important factor, followed by tackling the environmental implications of growth. This is because the UK must not only reach its climate change targets and address the problems of emissions, but because growth should not come at the cost of the communities, many of whom are already significantly negatively impacted by the UK's aviation industry.

Innovation, economic competitiveness and international connectivity are all closely related, and we would rank 'helping the aviation industry to work for its customers' as the lowest priority primarily because this is also commercially driven and thus incentivised for the industry to lead on directly.

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 Aviation Strategy is proposed to provide direction to 2050 and beyond, based on a projected continued growth trajectory for the aviation sector. This is a considerable timescale in the context of the previous Aviation Policy Framework being replaced after only 4 years. It is also a long timeframe over which demand for air transport and technology could change substantially, alongside any economic changes and technological changes. We therefore expect the Strategy to acknowledge this and be flexible to review as necessary.

In general, we agree with the strategy principles. Passengers and businesses must be at the centre of the aviation industry as it is this that derives the economic benefits for the UK economy as a whole. Government must correct market failures, but also where the market produces negative externalities these must be dealt with nationally, rather than left to the industry to address. These will be the environmental impacts, particularly air quality, carbon emissions and noise.

As per our comments on the strategy objectives, we believe that the communities affected by aviation should be directly considered in the principles of the strategy too. Otherwise the principles, as currently proposed, risk alienating the communities negatively impacted. Currently, we feel that the principles do not adequately reflect the renewed commitment to addressing noise and air quality that has been prominent in other recent aviation consultations. Omitting it from the



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Aviation Strategy would undermine the good work of the other policies and the relationships being rebuilt. The strategy cannot forget that even if those affected by noise are not directly a customer of an airport or airline, they are always a customer of the government and the strategy has a duty of care to them as much as it has a requirement to support economic growth. Therefore, we feel that the first principle should be expanded to include 'passengers, businesses and communities'.

A market driven strategy is one that helps the sector to succeed by delivering a business-friendly environment in terms of certainty of regulation, skills and training, research, and competition. Ultimately this should be to the benefit of customers (passengers and businesses) and those affected by the aviation sector (such as residents near airports).

Being evidence-led is a sensible approach and one that we would support. However, we urge that a range of evidence sources are used and that as new evidence becomes available the existing policy position is reviewed. We are particularly concerned about the evidence base around aviation noise impacts on health and quality of life as new work is consistently adding to the evidence base.

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?

We agree with the proposed policy tests, subject to our comments on the strategy objectives and principles.



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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?

In the call for evidence, paragraph 7.20 states that “there is a requirement for more intensive use of existing airport capacity and [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.” Paragraph 7.21 states that this policy cannot wait for the finalised Aviation Strategy and is therefore effectively consulted on through this call for evidence. This is not an acceptable approach. Further, it has not been publicised widely enough to be a legitimate consultation with the affected groups – particularly community action groups.

Turning to the policy itself, whilst we accept that there is a need to more intensively use our existing runways the policy is a default of support for expansion placing this need above all others. Planning processes will have to be followed where there is an existing cap on passenger numbers, but the voice of communities needs to be listened to regarding the damaging impact of aviation noise. We are concerned that this policy will lead to a worsening of the already intolerable situation over West Kent and in other parts of the UK.

Mitigation and compensation cannot counteract the inability of residents to sleep, the reduction in educational attainment of children, or the wider negative health impacts of noise. It is simply not possible to insulate an open window or a garden. The increased overflight of designated landscapes will also disrupt the tranquillity from which many people benefit, such as National Parks and AONBs.

Expansion will need new flight paths and therefore cause new communities to be impacted by aviation noise. Involvement in the decisions about where and when aircraft can fly is simply not sufficient in these instances where it is a brand new disturbance. Aviation noise may not be a statutory nuisance but that does not mean it does not cause substantial distress. Compensation and mitigation should be considerable for new communities hitherto unaffected by noise even though, as noted above, noise cannot be totally mitigated against. Further, where people are newly affected, there is a case for financial support for residents who wish to move altogether.

More intensive utilisation of existing runways will be a commercial decision based on growing demand and constrained runway capacity, particularly in the London airports system until the completion of a new runway at Heathrow. Gatwick Airport has made clear their intentions to continue to grow passenger numbers to 50 million per year. As it is already one of the busiest single runway airports in the world, this can only be achieved by using bigger aircraft and greater use of the night period, where the quota limits allow it (primarily the winter season). This has implications not only for noise and emissions, but also for the destinations served. Where slots are unavailable it is advantageous to maximise the most profitable routes, potentially at the cost of regional connecting flights to other areas in the UK. The lack of aviation capacity in the South East must be addressed quickly with the Heathrow proposals, and when the third runway is operational there will be a clear opportunity to review operations at the other London airports to achieve environmental and social benefits (e.g. through a reduction in the night noise and movement quotas).

As previously stated, Gatwick is expanding in a way that does not require planning consent. Communities and business are placed in direct conflict where there are increased aircraft movements and/or noisier flights (due to larger aircraft) that support airport profitability (and ultimately economic growth) but the noise impacts are greater (both volume and number of people impacted, ultimately affecting quality of life and health). This is likely to be an especially



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volatile situation if the Aviation Strategy asks airports and communities to work together to set noise limits and night periods – two groups that have entirely contradictory aims. Government must therefore review the current ability of the planning process to manage airport growth and appropriately mitigate its impacts through - for example - robust conditions and legal obligations, supported by a robust local and national policy framework. The pending review of the National Planning Policy Framework and emerging Airports National Policy Statement provides a real opportunity for Government to address these issues.

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)
- ☐ No (Go to question 13)

12. What other questions would you like considered?

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

- ☐ Yes (Go to question 14)
- ☐ No (Go to question 15)

14. What sources of information or evidence?



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

- ☐ Yes (Go to question 17)
- ☐ No (Go to question 16)

16. What timetable would you suggest and why?

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?

The future consultations on the Aviation Strategy should be advertised widely in the press, through airport consultative committees, directly through aviation industry contacts, and internationally using the same industry channels. To ensure that community groups participate, careful consideration needs to be given to the fact that those campaigning against the existing impacts of aviation may be disenfranchised from the current regulatory system. It is therefore vital that these consultations are meaningful and give real opportunity to shape the Aviation Strategy.

We found the consultation events that the DfT ran for the draft Airports National Policy Statement and UK Airspace Policy consultations very useful, and such an event would help community groups engage in the process.

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)



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?
help organise events to help the
development of the strategy?

Your answer

Yes

Yes