

# Aviation 2050: the future of UK aviation

## Personal details

Q1. Your name and email address (only used if we need to contact you).

**Your name** Lucy Owen

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Q2. Are you responding as:

on behalf of an organisation?

## Organisation details

Q3. What organisation do you work for?

Heathrow Strategic Planning Group (HSPG)

Q4. What type of organisation is this?

**Other:**  
Local Authorities

## Chapter 3: Ensure aviation can grow sustainably

Q17. This section contains questions on chapter 3 of the consultation document - Ensure aviation can grow sustainably. Which of the following topic areas are of interest to you as an individual or to the organisation on behalf of which you are answering? (choose all relevant options)

A partnership for sustainable growth

Airspace modernisation

Resilience

Safeguarding land

Community engagement

Carbon emissions

Non-carbon emissions

Air quality

Noise

Reducing waste

Sustainable journeys to the airport

**Q19. How regularly should reviews of progress in implementing the partnership for sustainable growth take place?**

It is welcomed the emerging Aviation Strategy recognises the need for a joined partnership between the DfT and CAA to oversee airspace modernisation. HSPG have welcomed this and have called for Government to take a leading role in this area. Aviation growth must be intertwined with environmental enhancements, mitigations and involving all parts of the community. It should not be solely left to the industry.

Stakeholder and community engagement best practise should be prioritised by the proposed partnership. HSPG have recently responded to Heathrow Airports Limited's (HAL) consultation on Airspace Change and we consider that more is needed to be done to help communities, stakeholders and the public to fully understand the implications. HSPG considers that HAL's consultation could have done more to help the public to separate and understand how airspace and future operations would change between now, during the interim and into the future. This is where the Aviation Strategy can set parameters and guidance for future consultations to aid individual promoters' future consultations.

HSPG welcome the continued engagement with DfT and other governmental bodies to ensure that the best is done for communities impacted upon the proposed third runway expansion at Heathrow Airport and the negative impacts are mitigated against and minimised.

Figure 8 - 'Partnership for sustainable growth' on page 51 clearly demonstrates the bodies and areas which would be involved in the 'partnership'. From a community perspective, there are many local groups covering environmental matters (incl. Noise and Air Quality) which in our view should either be included or consulted upon in this 'partnership(s)'.

The previous chapter (Chapter 2), covers the liberalisation of air traffic rights and the Government's support for this. HSPG considers that DfT and CAA should have control of any liberalisation considering environmental and community impacts.

**Q20. Are there any specific 'triggers' (e.g. new information; technology development etc) that should be taken into account when planning a review?**

We should expect regular reviews to take place of the partnership at regular intervals, as per para 3.9, it would be advisable to review the 'partnership' on the basis of when new information is presented or when circumstances change, this would allow the partnership to be a real reactive force in shaping aviation growth.

**Q21. How could the policy proposals be improved to maximise their impact and effectiveness in addressing the issues that have been identified?**

Specific triggers could be when major airspace changes are authorised or occur, such as if and when the CAA approves HAL's proposed Independent Parallel Approaches (IPA) proposal, and if and when HAL's longer term airspace changes are authorised and begin implementation, and when major infrastructure changes are authorised or implemented (eg HAL's proposed north-west runway). Major technology developments should also be a trigger for review.

**Q22. How should the proposals described be prioritised, based on their importance and urgency?**

The objectives identified on page 52 carry weight in terms on minimising and controlling, however, they do not go far enough in respect of other environmental concerns. The objectives should be refined to add in environmental control (as well as noise), there is clear acceptance in Heathrow's recent Airspace change consultation that environmental concerns will be an important factor. National policy should reflect this, and the aviation strategy should outline the importance of mitigation against environmental impacts for an increase in airspace movements.

HSPG recommend the overall objectives are strengthened in relation to noise to include:

- the impact of noise on outdoor areas used, or with potential, for recreation that offer accessible long term opportunities for respite which is good for active lifestyles, mental health and general quality of life
- reduction in numbers of people experiencing significant adverse effects at all times of day and night. This shouldn't be defined solely by where people live- note the point above relating to respite in outdoor recreation areas , and to;
- use a suite of noise metrics to address peak noise events as well as a range of period foot measurements.

Para 3.17 suggests that airspace modernisation could lead to the removal of stacking which will have positive benefits on carbon emissions and noise emissions, we believe that this statement needs to be supported by additional evidence before HSPG can give a firm position. Airspace modernisation, and increased capacity could well lead to increased noise and carbon emissions, and the use of technology such as PBN could increase noise for certain communities.

## Q24. What are the financial burdens that need to be managed and how might those be addressed?

### ICAAAN

Welcomed by HSPG to be the independent noise body and welcome the Government's proposed strategy to involve ICAAN to help communities understand airspace (para 3.22). HSPG press to be involved and seek advice from ICAAN to help HSPG in dealing with airspace change and expansion at Heathrow Airport. HSPG are involved in the Noise Envelope Design Group (NEDG) with HAL and welcome this involvement.

HAL's recent airspace change consultation came about at the same time as ICAAN was first operational and therefore the community in our view were not able to fully and properly understand the technical details and the sheer volume of information presented and to fully understand the local implications and impacts of the proposed airspace change. Future consultations need to be approved by ICAAN and a partnership approach should be established between ICAAN, the airport promoter, the local communities, local authorities and key stakeholders.

### Performance Based Navigation (PBN)

The emerging strategy highlights the benefits of PBN and the part it plays in modernising airspace. HSPG members recognise that PBN gradually leads to aircraft flying increasingly concentrated flightpaths within the existing 3km wide corridors and Heathrow's concern to utilise PBN guidance to enable a wider spread using several flightpaths in every flight envelope.

Specifically relating to Heathrow Airport, HSPG expect a clear commitment to use PBN to alternate use of multiple 'flightpaths' (3 or more) within each 'envelope' flight corridor – to avoid the repeated overflight of locations through a meaningful separation of flight paths and alternation.

With PBN potential to effect local communities significantly we welcome the emerging strategy stating local communities should have their say. We also believe the CAA or Government should have a balanced view on this approach ensuring airspace change promoters eg. HAL cannot define flightpaths without authorisation from an overarching body i.e. the CAA or a combined partnership as suggested in the emerging strategy.

Regarding PBN, HAL propose the use of this in their IPA proposals. Please note that HSPG's position that it is opposed to growth in air passenger movements before 2026 using the existing runways, and any use of independent parallel approaches in the interim. Prior to implementation of the final airspace design (which should offer benefits to residents), the negative public health impacts are too significant for HSPG members to countenance.

### Coordination of Airspace Change in the south of the UK

The HSPG have previously responded to the 'Beyond the Horizon' Aviation Strategy consultation in 2017 but do not have a single position on the wider Airspace Design Principles as they apply to the locality and Heathrow airport (e.g. CAP 1520 and CAP1616) but wish to engage with Heathrow and CAA in relation to these processes in terms of how these impact the range of options and strategic approach available at Heathrow and surrounding communities.

HSPG is concerned at the cumulative impact of both the interim and expansion proposals at Heathrow airport with airspace change and airport expansion across the capital and wider south-east, and the impact on residents, businesses, users of open space, etc.

Some communities within Heathrow's design envelopes are also overflowed by aircraft using Gatwick, Farnborough and/or Biggin Hill Airports, Northolt etc. There isn't any reference to this. Further consultations need to clearly outline this together with being open and honest to the public impacted upon by these proposals.

HSPG seeks assurance such a full assessment on cumulative impact will be undertaken, particularly with regard to impacts on noise, air quality, and carbon emissions/climate change, whether carried out solely by HAL or together with Government and other airports and organisations. The partnership approach referred to in the Aviation Strategy could be the starting mechanism to ensure the cumulative impacts are picked up.

Airspace design and newly overflowed areas – Please refer to our Airspace consultation response submitted in March 2019

Significant harm to communities is expected when new flight paths are designed and should be heavily influenced where feasible by where existing local communities are. When designing new arrival flight paths for a third runway at Heathrow, and in respect to intensifying use of the existing two runways at the airport, HSPG would expect HAL to consider noise sensitive uses, including the following:

- All educational facilities i.e. children centres, nurseries, primary and secondary schools, colleges and higher education establishments.
- All community facilities, care homes and hospitals, religious establishments; and
- Open areas, ensuring they serve their intended and potential purpose, including areas of green belt, Regional Park and AONB that offer opportunities for recreation and outdoor respite.

**Q24. What are the financial burdens that need to be managed and how might those be addressed?**

HSPG believe that the Aviation Strategy should make particular reference to the immediate local impacts, this will ensure airport promoters will include consideration to these at the earliest opportunity.

**Community Engagement and Sharing Benefits of Growth**

HSPG promote the sharing of economic growth around the HSPG sub-region of the benefits expansion may bring. There are many disbenefits an expanded airport will bring to local communities including significant environmental issues. The strategy should set a mechanism of how community funds should be dealt with, this will ensure a consistent approach between all airports and allow a fair compensation package for the local communities affected by airport expansion.

**Sustainable Journeys to the Airport**

Environmental and social impacts together with surface access to airports are all important considerations which appear not to fully form part of the objectives. We recognise the ANPS goes further however we believe the strategy should strengthen the objectives around surface access to ensure a fully sustainable approach is delivered at airports, particularly in the south -east. There are significant demands and impacts (both positive and negative) on the local economy and markets for employment buildings and land, housing, skills and labour that a functioning successful airport is dependent upon. These will inevitably converse more widely and cross administrative boundaries. This requires the cross-boundary working relationship between local authorities, Local Enterprise Partnerships and transportation bodies with the airport. This essentially requires additional burdens on local authority's resources (not all of which will benefit from business rate income relating to the airport) and the level of cooperative working needed, The delivery of a successful national infrastructure asset is important to the UK and so it is the responsibility of Government to adequately fund and support the implications of expansion at the local level. The individual spatial planning body should not be expected to manage this at the individual airport level but additional support from Government is required to achieve sustainable growth.

**Air Quality**

It is good to see that comments from previous consultations have been addressed regarding air quality issues arising from surface access and not only from air borne activities (para 3.124). Surface access air quality is a major concern for HSPG of an expanded Heathrow airport.

The proposed measures outlined in para 3.127 are welcomed as a starter to understand Air Quality impacts more and to reduce the negative impacts upon communities directly and indirectly affected by an expanded Heathrow Airport.

**Q27. Looking ahead to 2050, are there any other long term challenges which need to be addressed?**

Further expansion of airspace in light of expansion at Gatwick airport, this will have implications on the wider south-east region (see text on cumulative impacts under question 23 above).

Further potential expansions at other south-east airports will also need to be identified as a potential challenge to airspace, this is where close engagement is needed with the regulator (CAA), the Government (DfT) and the individual airports and the community to fully understand the impacts (and benefits) together with the impacts upon communities within the south-east.

**Q28. Are you aware of any relevant additional evidence that should be taken into account?**

No

## Chapter 4: Support regional growth and connectivity

Q31. To what extent do these proposals provide the right approach to support the complex and varied role that airports play in their regions?

Connectivity to Heathrow as outlined in paras 4.15 and 4.16 onwards is encouraged. The Government should continue to play a role in supporting connections to Heathrow from the regions, this will help the HSPG sub-region benefit from inward investment (and likewise for the regions around the UK), subject to any environmental impacts be adequately addressed/mitigated.

Q32. To what extent are the proposals on skills the right approach to ensuring the aviation sector is able to train and retain the next generation of aviation professionals?

HSPG support skills and training in the HSPG sub-region and HAL's proposals for skills, jobs and apprenticeships; and encourage the Government to hold HAL accountable to provide apprenticeships, skills training and technical jobs in the aviation industry and supply chain. HSPG support the principles outlined in para 4.54.

Q33. How could the policy proposals be improved to maximise their impact and effectiveness in addressing the issues that have been identified?

Proposals could be improved by ensuring the Government takes account of local strategies being developed which are encouraging growth in jobs, skills and training and recognising that local strategies are being developed on the back of airport expansion to develop the economy in and around expanded airport areas such as at Heathrow Airport.

HSPG have reiterated to Government and HAL the need for providing quality employment opportunities and training to local people around the expanded Heathrow airport. We would wish to see a much closer liaison with Government (and HAL) with HSPG on skills and employment issues..

HSPG are developing in parallel an Economic Development Vision and Action Plan, and a Joint Strategic Planning Framework (JSPF), where we believe that there is significant benefit of closer collaboration to ensure that the economic benefits are made available for the whole HSPG region and that the Local Industrial Strategies and other strategic economic development documents reflect the scale and potential of opportunity.

In line with HSPG's economic development opportunities, we would want to ensure that this improved collaboration addresses the following strategic economic opportunities for the HSPG area: -

- Capitalising on the Regional Economic Opportunities being provided by the enhanced role of Heathrow Operating as Britain's Global Gateway
- Support the identification and delivery of the Skills Pipeline needed by Heathrow Airport, its partners and its local supply chains
- Ensure that the business communities of the HSPG area are aware of and have the ability to compete for and win business contracts and procurement opportunities associated with the airport expansion.
- Support the use of new technologies and innovation driven by the expansion of Heathrow Airport across the whole HSPG region.
- Help identify appropriate employment land use opportunities to enable the effective, sustainable and locally supported economic growth enabled by the expansion of Heathrow Airport.

HSPG endorse any economic benefit of an expanded Heathrow. The economic benefits should be spread around Heathrow's host authorities and into the wider SE region (and beyond into other more local industrial / economic growth strategies). However, it is key that economic growth and development is not at the cost of negative impacts to the environment.

Q40. Are you aware of any relevant additional evidence that should be taken into account?

Yes

## Regional growth evidence

Q41. Please give a brief summary of the additional evidence that you wish to provide. You can support your evidence by uploading a file, for example an MS Word file (max file size 1MB). Do not upload anything that is commercially sensitive.

**Comments:**

As above under question 33, joint planning and economic development plans being produced by HSPG could really support and improve the area's business growth, jobs generation, skills and apprenticeships offerings through partnerships with the airport promoter.

## Chapter 7: Support general aviation

Q65. This section contains questions on chapter 7 of the consultation document - Support general aviation. Which of the following topic areas are of interest to you as an individual or to the organisation on behalf of which you are answering? (choose all relevant options)

Reducing regulatory burden

Airspace

Environmental impact

Q66. To what extent do these proposals strike the right balance between the needs of general aviation and the rest of the aviation sector?

It is important to note that the south-east is a heavily congested aviation region with airspace being the most congested in Europe. The Government needs to carefully consider the role of reducing regulatory burdens in light of this particularly with Heathrow expansion and the proposed Gatwick expansion.

Q73. Looking ahead to 2050, are there any other long term challenges which need to be addressed?

The expansion of Heathrow and Gatwick and the impact on airspace and the environment. Additional aircraft albeit small will have a combined cumulative impact on the local communities in the area, and this should be clearly addressed in any future strategy.

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Q74. Are you aware of any relevant additional evidence that should be taken into account?

No

## Technical annexes

Q88. Do you want to answer the questions on the technical annexes?

No