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Draft Aviation Policy Framework

Response to Consultation and Questions

by

CPRE Hampshire

October 2012

Introduction

This response to the Draft Aviation Policy Framework aims, where feasible, to fulfil DfT's request to respond in terms of the Questions and space for Comments, as per Annex A of the consultation draft. It also incorporates a reprise of CPRE Hampshire's response to the 'Developing a Sustainable Framework for UK Aviation: Scoping Document' of a year ago.

Under the umbrella of the CPRE National Office and as a member of CPRE Surrey's Aviation Group, the writer has direct experience of the views of the CPRE Transport Group and of organisations such as AirportWatch, the AEF (Aviation Environment Federation), GACC (Gatwick Area Conservation Campaign), HACAN (Heathrow Association for the Control of Aircraft Noise), the Helicopter Noise Coalition and organisations, councils etc. with similar environmental interests, particularly for Hampshire, Kent and Surrey.

Being familiar with the considered, high-quality responses to this consultation from parties mentioned above, and which cover most chapters with some authority, this response will concentrate on two aspects only:

- **Chapter 3: Climate Change Impacts**, primarily insofar as the General Aviation sector is concerned, using the example of Farnborough Airport on the Hampshire – Surrey border, and
- **Chapters 5: Working Together** and **Chapter 6: Planning**, mainly in the context of disparate Local Planning Authorities who, through no fault of their own, are poorly-equipped to appreciate and fulfil their local responsibility for aviation planning, let alone with regard to the national and international context.

For several years, the CPRE District Group for North East Hampshire (the writer is past chairman), has concentrated on the aviation planning and operational activities of Farnborough Airport. Our main concern has been the disproportionate impact of emissions associated with climate change from the typical low passenger numbers carried by business jet aircraft under the classification of 'General Aviation'.

At the 2010 – 11 Planning Appeal which granted an increase in flight movements at the airport, the writer appeared for CPRE Hampshire against the increase and, in the process, had a salutary experience of the shortcomings of the then planning regime. This informs aspects of the enclosed response.

This is in the form of an email with attachments. By setting out answers to specific questions and comments according to Chapter Headings, and in accordance with the approach for electronic returns, I trust the substance can be re-assembled readily into any other format preferred by the DfT.

Hugh Sheppard

October 28th 2012

Comments and Responses to Questions:

CHAPTER 3: Climate Change Impacts

Do you have any further ideas on how the Government could incentivise the aviation and aerospace sectors to improve the performance of aircraft with the aim of reducing emissions?

Business Aviation (BA) is exceptionally prolific in terms of climate change emissions, both in terms of the aircraft involved and few passengers per journey.

In **CPRE Hampshire’s Response to the Scoping Document** (re-forwarded with this response) it was conclusively shown that the BA sector is responsible for some 3% of national aviation emissions, representing a similar contribution to that of the UK’s fifth largest civil airport: Birmingham.

SEE Para 5.5 CONCLUSIONS of the above Response, as herewith:

- **Annual emissions of 0.91 Mt CO₂ pa. bring BA’s overall climate change impact above that of all national airports except Heathrow, Gatwick, Manchester and Stansted, and comparable with Birmingham.** (See: CAA UK Aviation Forecasts, Page 163: Table H.6. Total CO₂ in 2010).

Table H.6: CO₂ emissions at airport level 2005 2030 and 2050 detailed (central forecast)

	Total CO ₂ (mtCO ₂) in 2010	Share of 2010 Total CO ₂	Total CO ₂ (mtCO ₂) in 2030	Share of 2030 Total CO ₂	Total CO ₂ (mtCO ₂) in 2050	Share of 2050 Total CO ₂
Heathrow	18.9	56.4%	23.1	48.5%	14.9	30.4%
Birmingham	0.9	2.6%	4.3	9.1%	4.0	8.2%
Gatwick	3.8	11.4%	3.8	8.0%	3.7	7.6%
Manchester	2.3	7.0%	3.7	7.8%	5.9	12.0%
Stansted	1.3	3.8%	2.0	4.2%	1.8	3.6%
Luton	0.5	1.6%	1.0	2.1%	0.8	1.3%
Edinburgh	0.5	1.6%	1.0	2.0%	1.1	2.3%
Glasgow	0.5	1.6%	0.7	1.5%	1.1	2.3%
Bristol	0.4	1.1%	0.6	1.3%	0.8	1.7%
London City	0.2	0.6%	0.6	1.2%	0.6	1.2%
Leeds/Bradford	0.2	0.6%	0.5	1.1%	1.1	2.3%
Southampton	0.1	0.3%	0.4	0.9%	0.3	0.6%
Belfast International	0.2	0.7%	0.4	0.8%	0.5	1.1%
Newcastle	0.3	0.9%	0.3	0.7%	0.5	1.1%
Liverpool	0.3	0.8%	0.3	0.7%	1.2	2.4%
Nottingham East Midlands	0.3	0.9%	0.3	0.6%	3.3	6.8%
Aberdeen	0.2	0.5%	0.3	0.5%	0.2	0.5%
Bournemouth	0.1	0.3%	0.2	0.4%	0.6	1.3%
Humberside	0.0	0.1%	0.2	0.4%	1.1	2.2%
Prestwick	0.1	0.3%	0.2	0.4%	0.3	0.6%
Belfast City	0.1	0.3%	0.2	0.3%	0.2	0.5%
Exeter	0.1	0.2%	0.1	0.2%	1.1	2.3%
Cardiff	0.1	0.3%	0.1	0.2%	0.6	1.3%
Doncaster Sheffield	0.1	0.3%	0.1	0.1%	0.2	0.3%
Norwich	0.0	0.1%	0.1	0.1%	0.1	0.3%
Inverness	0.0	0.1%	0.1	0.1%	0.1	0.1%
Newquay	0.0	0.1%	0.0	0.1%	0.1	0.1%
Plymouth	0.0	0.0%	0.0	0.1%	0.1	0.3%
Durham Tees Valley	0.0	0.0%	0.0	0.0%	0.1	0.1%
Blackpool	0.0	0.0%	0.0	0.0%	0.0	0.0%
Coventry	0.0	0.0%	0.0	0.0%	0.1	0.2%
Ground (APU)	0.4	1.2%	0.6	1.2%	0.8	1.6%
Freight	1.1	3.2%	1.9	4.1%	1.1	2.2%
Residual	0.4	1.2%	0.6	1.2%	0.6	1.1%
Total	33.4		47.6		49.0	

- **Birmingham Airport handles a throughput of 9.1 million passengers pa. (See para 6.4.11) for the same proportion of national emissions as the estimated 415,000 passengers (ie. 2.6%) throughput of all UK Business Aviation. In sum, each BA passenger is responsible for over 20 times the individual emissions per journey of his or her civil counterpart.**
- CPRE Hampshire accepts that aspects of source data may need to be qualified; eg. the re-calculation of emissions data as put to the Inquiry in Public into the appeal against expansion at Farnborough - refused by the Local Planning Authority and granted by Secretaries of State.
- Even if the outcomes as demonstrated were to be revised by 10, 20 or 25%, there can be no doubt that Business Aviation is unsustainable in terms of its contribution to the UK's aviation emissions and is failing to play a positive part in support of the UK's climate change policies.
- **The DfT is urged to review and revise government's assessment of the contribution of Business Aviation to the UK's national aviation emissions.**

Returning to the current consultation, there is no evidence that the DfT has revisited any aspect of the contribution of BA in the context of national aviation emissions despite responses to the Scoping Document, nor is there any acknowledgement of their significance in the analysis presented under the DfT's **Summary of Responses**. (In fact, every reference to General and Business Aviation would seem to have been taken from the industry, its associates and apologists).

As to 'further ideas on how the Government could incentivise the aviation and aerospace sectors to improve the performance of aircraft with the aim of reducing emissions', if government is concerned to have a more efficient GA sector, which seems extremely unlikely on present evidence, three areas of ready improvement would seem to be:

- To revise the application of Air Passenger Duty (APD) so that it applies across the GA sector on a per plane basis, including all sizes of aircraft and helicopters. When rates were set at the end of 2011, the collective acclaim from the BA sector, eg. through the BAA Press Release, says all the DfT needs to know.
- As an aircraft flies closer to the speed of sound, the logarithmic increase in power required implies a disproportionately higher rate of fuel burn. Were this to be reflected through fuel duties, some encouragement might be perceived for a) slower, propeller-driven, executive aircraft and b) a higher passenger pay-load than the present 2.5. (TAG Farnborough evidence to the Public Inquiry).
- A more co-ordinated approach to emissions. It cannot be good enough to deal with these only at the International or the Local level, without proper regard for quantifying the National problem. (See responses to Chapters 5 and 6).

Do you have any other comments on the approach and evidence set out in Chapter 3?

Para 3.2 closes with a tendentious statement that '*..despite advances over the past decade, considerable scientific uncertainty remains about the scale of the effect on climate change of non-CO2 emissions. As a consequence there is no consensus on whether and how to mitigate them*'.

This leaves the question open, as if there is no consensus as to whether or not these non-CO2 emissions ARE harmful in the context of climate-change, and on that there is a very wide consensus. However, as with climate-change generally, there are still some who wish to deny the probable impact. Government has to acknowledge that events have contributed to this being recognised as an eccentric point of view.

Action at a Global Level

Support to ICAO, the ETS and SES policies should not deny an important role for UK Government to take responsibility for aviation emissions reduction. Side-stepping the issue on the grounds that most flights are international and most planning considerations are local is simply not good enough.

CPRE Hampshire believes is essential for Government to treat aviation emissions with a sector specific national aviation target.

This is particularly relevant because actions, such as on planning, APD and fuel duty can influence the UKs contribution to resolving or mitigating an acknowledged global problem with appropriate, intelligent national intervention.

Re. Paras 3.26 & 3.27: It is self-evident that alternatives to travel, such as the use of teleconferencing, video-conferencing and remote working, are encompassed within a range of developing IT scenarios. Just as the latest interactive war-games, screen-sports and movies can involve the viewer as a participant so, in a 4G world, participation in interactive discussions and social discourse could become the norm in business without leaving the office or home. Inevitably, this would reduce the need for travel, with its attendant time constraints and discomfort.

Re. Para 3.28: The benefits of a high-speed rail network, together with the points above, would logically reduce the need for travel, particularly for short-haul Business Aviation. However, there are few reasons for high net-worth individuals to choose to adopt such practices. There is enormous kudos, pleasure and personal satisfaction to be derived from Business Aviation which can never be supplanted by a high-speed train. Whether the industry directly contributes to the economy may well be a moot point, while the indirect arguments cannot be readily quantified.

CHAPTER 5: Working together

Do you think Airport Consultative Committees should play a stronger role and if so, how could this be achieved?

CAA recognised Airport Consultative Committees are currently only recommended for the 51 airports that were designated under Section 35 of the Civil Aviation Act 1982 for the purposes of having a representative Consultative Committee.

This list should be rationalised to include airports such as Farnborough, which has permissions in place for up to 50,000 movements p.a. It is simply not good enough for an ACC to be 'recommended' by the CAA; they should be mandated by DfT to whom there should be the right of appeal by 3rd parties if the structure is not felt to be properly representative.

Is there a case for changing the list of airports currently designated to provide consultative facilities?

Yes. As above.

Do you agree that the Civil Aviation Authority should have a role in providing independent oversight of airports' noise management?

Yes, but with direct responsibility to DfT.

Do you agree with the Government's overall objective on working together?

Yes, but this is little more than 'motherhood and apple pie' unless national aviation considerations can properly inform the planning process as conducted by Local Authorities. Government should ensure that LPAs have recourse to expertise and funding: a) to fulfil responsibilities to their local residents and b) to recognise and consult over aspects where local decisions impact on neighbouring authorities and/or within the regional, national and international aviation context.

An example of the present inadequacies relates to Annex D: Noise Descriptors. Local Authority planners and councillors are not equipped to qualify the advice put forward in Airport Master Plans or by consultants as to the noise implications of applying '57 dB LAeq,16h', or any similarly arcane criteria, to airport expansion proposals.

Nor can Local Authorities effectively challenge Public Safety Zone assessments for local airports in the interest of their residents. This is because National Air Transport Services (NATS), in which government holds a 49% stake, can opt not to put safety information into the public domain on grounds that it is 'commercial in confidence'. (q.v. The 2010-11 Farnborough Airport Public Inquiry).

Is the high-level guidance provided in Annex E sufficient to allow airports to develop local solutions with local partners?

Airport Master Plans and associated considerations are not to be divorced from aviation planning and the adopted National Planning Policy Framework (NPPF). Yet while 'Planning' is the title of Chapter 6. of the consultation, there are no directly related questions. Hence, in responding to that above, broader planning issues have also been taken into account.

PLANNING AND THE NPPF

The NPPF sets out the legislative criteria for sustainable development. Local Plans are primarily formulated under its provisions and those of the Localism Bill, together with '*relevant national policy statements and the Government Framework for UK Aviation*'. Presumably, and in due course, this is likely to mean the Aviation Policy Framework, ie. the subject of this consultation, when it passes into law.

As with other aspects of planning, in the absence of an Aviation Framework or an up to date Local Plan, the NPPF can override the normal LPA and Appeal processes.

NPPF provisions cover '*ports, airports and airfields that are not subject to a separate national policy statement*'- as if all are minor considerations in the scheme of things. But they may not be 'minor', because many can represent very large development proposals, often with national and international implications.

Farnborough, with circa 50,000 future movements permitted per annum, is a good example of an airport that itself 'flies under the radar' of the draft APF; it is essential for this to be remedied, viz:

Farnborough does not qualify as:

- one of the 3 'Designated' airports;
- one of 51 designated airports recommended for a Consultative Committee;
- one of the MAJOR airports controlled in terms of noise restrictions through 'The Aerodromes (Noise Restrictions) (Rules & Procedures) Regulations 2003'

Nor does Farnborough, as a private airport, fulfil other criteria tacitly accepted as within the scope of the Draft APF, as no scheduled airline services are involved.

So how would planning applications for Farnborough and similar airports be better scrutinised under the NPPF and the APD? The short answer is that they wouldn't as it stands, not least because the Draft APD proposals under Annex E do not appear to apply to such airports – even where flight movements approach 1,000 per week!

COMMENTS ON ANNEX E: REVISED GUIDANCE ON MASTER PLANS, AIRPORT TRANSPORT FORUMS AND AIRPORT SURFACE ACCESS STRATEGIES

E1

Mention that master plans, *'in the case of most airports'*, will address certain *“core areas”*, is unsatisfactory if airports such as Farnborough can still be excluded.

E2 – E7

The good intentions underlined by consideration of these paragraphs are brought to nought unless the above response re. E1 is taken into account.

Private airports are very good at obfuscating the proper requirement for well presented, accurate evidence that accompanies a planning application, usually put forward in the form of a Master Plan, whether obliged to prepare one or not.

Because aviation is a very expensive business, the cost of preparing a Master Plan is comparatively marginal in most cases, but the resulting plethora of detail is such that LPAs and Planning Committees are ill-equipped to come to terms with it.

We hold that the more information required, the more opportunity for obfuscation, such that only if professional aviation expertise can be put at the disposal of Local Authorities will the public interest in the outcome be properly represented.

In the case of Farnborough, evidence was put forward by CPRE Hampshire against an application in 2009-10 to increase movements by over 80%, and at the related Appeal. This showed that an error of an additional 1 million tonnes of in-flight CO2 emissions from business-jet aircraft (including a factor for radiative forcing) was mistakenly included in environmental reports associated with the application.

The incorrect figure had been put forward to the LPA and was thereby in the public domain, but went unquestioned for three months, both in printed form and on the Rushmoor Borough Council website, until queried by CPRE.

That such a huge error passed without any query from the LPA, the airport owner or the airport's consultants (as the authors) for so long serves to demonstrate that Local Authorities are not in a position to represent community interest fairly on aviation matters. Council planners are completely out of their depth and few councillors know enough to ask the right questions.

The situation is compounded by an absence of any knowledge, or any requirement to know, anything of other airport plans in the area – an area which for Farnborough ought to include proposals for Blackbushe, Biggin Hill, Redhill and even Oxford as airports mainly associated with General Aviation, and all with expansion plans. (This leaves aside London Heathrow and Gatwick, which are both within 30 miles).

CPRE HAMPSHIRE BELIEVES THE PLANNING SITUATION OUTLINED ON THESE PAGES (7 & 8) IS EXTREMELY SERIOUS AND WARRANTS EARLY DfT & DCLG INTERVENTION.

AIRPORT TRANSPORT FORUMS

The list of interested groups which the DfT proposes as participants is very weak on environmental interests.

To have included: '*Bodies representing interests of walkers, cyclists and disabled people in the area*' is fair enough, but the list reads all too clearly as if the last people DfT would wish to see involved in ATFs are those with aims associated with the countryside, tranquillity and wildlife.

Perhaps it was a mistake, but PLEASE RECONSIDER!

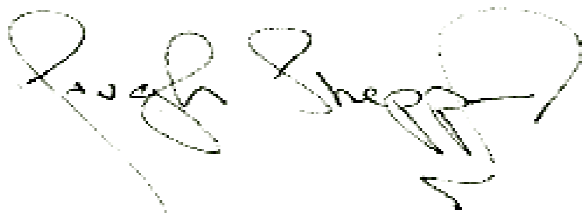
AIRPORT SURFACE ACCESS STRATEGIES

No particular comment, other than to note that the penultimate para. of the consultation paper is the only one to include the word '*green*', and only then in the context of employee transport.

IN CONCLUSION

While being disappointed that topics to do with General Aviation have not had the attention we believe they deserve, may we urge DfT to act with DCLG on our overriding concern, that the Aviation Planning issues we have discussed are urgently addressed. We also noted the high level of attention being paid noise issues.

END

A handwritten signature in black ink, appearing to read 'Hugh Sheppard', written in a cursive style.

Hugh Sheppard
CPRE Hampshire