

Beyond the horizon: the future of UK aviation (call for evidence) ~ Response from Campaign for Better Transport

October 2017

Campaign for Better Transport is a leading charity and environmental campaign group that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment.

We welcome the opportunity to respond to the call for evidence on the future of UK aviation.

Context

This response follows from our submission to the consultation on the Draft Airports National Policy Statement (May 2017) which focused on new runway capacity and infrastructure at airports in the South East of England.

We highlighted the failure of the draft NPS to address CO2 emissions, a critical failure which leaves it potentially open to legal challenge; and we identified the need for a clear and robust policy framework on aviation and carbon.

We noted that the failure to enact or adopt key components of a policy framework governing aviation carbon emissions means that, in practice, there exist no upper limits to which aviation emissions could be restricted within the NPS.

We advised then that to correct these deficiencies will require:

- the government itself to provide a quantified forecast of those carbon impacts (rather than relying on forecasts prepared by the Airports Commission)
- a government aviation carbon policy framework to be in place (in order to ensure that the UK's overall climate mitigation framework is not destabilised, and other economic and social sectors disadvantaged by an accelerated exhaustion of the UK's cumulative carbon budget to 2050, caused by increasing, rather than decreasing, aviation emissions)
- a government overall aviation strategy also to be in place (in order to ensure that a Heathrow capacity decision does not have consequences which disadvantage other airports, or air passengers in general).

In that context, the test for the strategy is whether it now addresses those points: by providing a government aviation carbon policy framework within which emissions forecasts can be first assessed and then managed and if necessary constrained, accompanied by a commitment to mitigate total UK emissions to a level consistent with the UK's climate mitigation framework (the 2008 Climate Change Act) and its adopted carbon budgets.

The framing of the call for evidence wholly fails to address this critical issue and gives us no confidence that the future strategy will be fit for purpose.

We are concerned that the proposed objectives ignore the central issue of carbon emissions and downplay the environmental impacts as secondary to supporting growth.

On that basis we find many of the questions, including the ranking of objectives, unhelpful and irrelevant and therefore have focused our response on the environmental aspects identified in section 7, including surface access; noise; air quality; and carbon emissions.

Addressing the environmental impacts of aviation is an absolute primary requirement of any aviation strategy. Without that, we cannot have sustainable growth. The range of measures and activities needed to meet our carbon budgets have potential to stimulate new and growing areas of economic activity that will prove more sustainable in the long term.

We urge the reframing of the aviation strategy in light of the UK Clean Growth plan, moving away from environmentally damaging activity towards capturing the economic benefits of low carbon technology and expertise.

Consultation questions	Response from Campaign for Better Transport
7.40 The government is interested in exploring the following issues as part of the planned consultation on this objective:	
whether there should be a new framework to allow airports to grow sustainably, and if so what that framework should be	There should be a government aviation carbon policy framework within which emissions forecasts can be first assessed and then managed and if necessary constrained, accompanied by a commitment to mitigate total UK emissions to a level consistent with the UK's climate mitigation framework (the 2008 Climate Change Act) and its adopted carbon budgets.
whether the government has the right structures in place to support airspace modernisation	n/a
how government and industry should address resilience issues both at specific airports and within the wider airport system	n/a
what the government could do to help co-ordinate the planning and delivery of improved surface access to meet the needs of consumers	<p>Surface access to airports has significant impacts on air quality, carbon emissions and noise, that are separate and additional to those from the airport operation.</p> <p>The UKCCC has identified a need to continue to reduce car miles by 5% beyond base. The planning of transport to airports needs to fit within that carbon budget imperative.</p> <p>The strategy should include an integrated transport strategy for access to airports that makes maximum use of public transport, local transport and low carbon modes, in order to contribute to reducing overall environmental impacts from the transport</p>

sector; relieve environmental impacts on surrounding communities; and improve access to jobs.

No airport has more than 50% of its customers arriving by public transport and some have no direct rail access.

18. Data from the CAA shows the modes of transport used by arriving and departing passengers in the UK:

Airport	Terminating passengers (000's)	Private %	Public %	Other %
Gatwick	34,994	58.3	41.4	0.2
Heathrow	46,991	58.6	41.0	0.3
London City	3,533	52.9	46.3	0.8
Luton	10,186	70.9	28.8	0.3
Stanstead	18,855	48.5	49.6	1.9
Birmingham	8,976	76.5	22.7	0.9
Doncaster	714	90.8	9.0	0.2
East Midlands	4,374	92.4	7.4	0.3
Leeds Bradford	2,879	88.5	11.3	0.1
Liverpool	3,752	79.3	20.4	0.3
Manchester	20,830	83.5	16.2	0.2

Source: Mode of transport used at the 2014 survey airports. Source: CAA Passenger Survey Report 2014, tables 7.1 and 7.2

HOC Transport Committee's 2016 report on surface transport to airports (<https://publications.parliament.uk/pa/cm201516/cmselect/cmtrans/516/516.pdf>) made a series of recommendations including that the DfT should have a strategic plan for modal shift as well as airport Surface Access Strategies and that the Government should ensure that airport operators are working towards ambitious and realistic modal shift targets, and are held to account for their delivery.

The aviation strategy should include measures to ensure airport operators play their part in delivering modal shift among airport passengers and workers; in particular, Government should intervene to secure rail / light rail access to all major airports.

how to encourage and improve connectivity across the regions and nations of the UK in a way that benefits the country as a whole

The idea of levying differential rates of air passenger duty (APD) was explored in the 2012 HMRC study with the specific aims of:

- Supporting economic growth in the regions
- Encouraging use of direct flights from regional airports as an alternative to promoting the use of hub airports to the South East
- Addressing congestion at SE airports through regional development but also rationalisation.

Any such reform must be in the context of an overall carbon emissions cap. We see further potential for APD to be converted to a charge which is flight related not passenger related in order to improve efficient use of existing slots.

how to ensure all regions of the UK have suitable connectivity to major airports

The Government should review the Regional Air Connectivity Fund which supports small regional airports in the UK. This provides a direct subsidy to passengers using these routes but has been unsuccessful in creating sustainable new routes while generating additional polluting journeys.

Many of these routes are internal UK flights that would be better served by a robust rail network. The Government should withdraw this support for regional airports and use the funding for better value transport services including investment in strategic rail freight interchanges.

how to achieve the right balance between growing the

Carbon emissions – see response below
Noise – see response below

<p>sector, and ensuring effective action is taken to tackle carbon emissions, reduce noise and improve air quality</p>	<p>Air quality</p> <p>The major contributors to lethal and illegal levels of air pollution are NO_x from diesel engines and PMs from tyre and braking systems. Sources within the aviation sector include aircraft; ground based operational vehicles within airports; supply chain vehicles; and surface transport of passengers, employees and freight.</p> <p>Reducing the total number of vehicle movements is the most effective way to cut air pollution. Other measures could include:</p> <ul style="list-style-type: none"> • Congestion charging zones around airports, including Heathrow • Workplace parking levies for airport employees • Target dates for converting ground based operational fleet to ULEVs • Bringing airports' surface transport within the remit of surrounding Clean Air Zones • Providing EV rapid charging infrastructure for bus and taxi fleets serving airports and making provision for EV car clubs. • Reviewing airport parking charges to reward use of ULEVs.
<p>whether the right incentives and regulations are in place to ensure industry continues to reduce noise, including the feasibility of noise targets</p>	<p>We note the recognition in the paper that aviation noise is an area of growing concern among the communities affected, and that technical measures to quieten aircraft, while welcome, have not sufficiently addressed these concerns. If the volume of flights increases, then any benefit from reducing the noise per flight will be lost.</p> <p>Directing flight paths away from more densely populated areas will undermine the tranquility of the countryside which is a key purpose of national parks and other protected areas.</p> <p>Reducing the overall number of flights is the best and most effective way to address noise and has the cumulative benefit of also addressing the problems of CO₂ emissions and air pollution.</p>
<p>what the best approach and combination of policy measures are to ensure we effectively address carbon emissions from aviation</p>	<p>As we note in framing our response, addressing CO₂ emissions should be the central focus on any aviation strategy. Aviation is up from 15MtCO₂ to 35MtCO₂, an increase of 133% and already 8% of total UK emissions. There is an urgent need to model the trajectory for all transport carbon through to 2050, and within that the aviation carbon trajectory, including identifying when aviation emissions will breach the CCC assumption, if they have not already done so.</p> <p>Research from Transport & Environment among others demonstrates that attempting to offset aviation's carbon emissions is a failed approach: it does not directly address the impacts of fuel burn, does not constrain growth and does not meet our obligations under the Paris agreement.</p> <p>Maintaining or growing capacity while seeking to decarbonise aviation fuel is also a failed policy. Reliance on biofuels assumes a sustainable feedstock, that biofuels can be supplied from sustainable sources at a rate to meet demand. That is not the case. Recycled biofuels are sustainable but the supply rate is inevitably variable. Growing biofuels to order is unsustainable, given the distorting impacts on land use and local food and fuel economies: deforestation to grow cheap biofuels such as palm oil, and the fuel miles needed to get them to market, would result in an increase, not a reduction, in greenhouse gas emissions.</p> <p>Instead of pursuing unsustainable increases in capacity, the UK's aviation strategy should focus on managing down demand as part of an integrated plan for sustainable development and clean growth.</p> <p>We need to first accurately assess the forecast emissions from the aviation sector and then have an active strategy to reduce them, with constraints on any further expansion, a focus on making best use of existing capacity, and a strategy to reduce capacity in future.</p> <p>International action is necessary but not sufficient. There are measures that can and must be taken at UK level to help bring carbon budgets back on track.</p>

These include fiscal measures to manage demand. The current Air Passenger Duty regime provides weak incentives for reducing demand for passenger flights and most action around reducing emissions from aviation is focussed around technology and fuel issues.

Research by HMRC in 2012 showed that APD could be reformed to use differential rates to reduce congestion on Heathrow and Gatwick, or it could be converted to a charge which is flight related and not passenger related to improve the efficient use of existing slots and generate revenue to mitigate the impact of existing airports. That could be considered in the context of an overall carbon emissions cap.

In the longer term APD could be converted to a charge which is flight related not passenger related in order to improve efficient use of existing slots.

An alternative would be the introduction of a frequent flyer levy a levy on ticket prices that increase with the number of round trips a person takes during a tax year (with one return or round per year trip tax free). If geared to manage demand growth to deliver CCC recommendations on carbon budgets, the tax take for the exchequer would be around double the APD revenue over the period to 2050.

Such changes have potential to deliver benefits for HM Treasury as well as making a positive contribution to delivering the UK carbon budget.

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Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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