

Appendix A: Kent County Council Draft Response to the Department for Transport Consultation: Aviation 2050: The Future of UK Aviation

Kent County Council's response focuses on the theme of sustainable growth, with other stakeholders better placed to advise Government on matters such as technological advancements and safety. The response is in line with the adopted KCC Policy on Gatwick Airport (December 2014) and accords with recent responses to other aviation consultations.

Chapter 3: Ensure aviation can grow sustainably

18. To what extent does the proposed partnership for sustainable growth balance realising the benefits of aviation with addressing environmental and community impacts?

Whilst Kent County Council (KCC) recognises that growth in the UK aviation sector will improve the country's connectivity and competitiveness, the Council is keen to ensure this growth is sustainably managed. Therefore, KCC fully supports the proposed establishment of a partnership for sustainable growth and would welcome the explicit inclusion of Local Authorities to ensure environmental and community impacts are appropriately balanced against the economic benefits of aviation. For example, this could include planning restrictions within sensitive noise contours. Noise management, air quality, community engagement and surface access are all areas of key concern for many local communities. We also support the ability to tailor the future policy framework to local circumstances and the latest data available, for example on health impacts.

A partnership for sustainable growth should also ensure that airports formally commit to sharing benefits with local communities, especially when growth is organic and outside of the planning process. As a related point, 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, it is proposing using larger aircraft and greater utilisation of the shoulder peak periods. It is therefore able to grow regardless of the policy position in the Crawley Borough Council Local Plan (policy GAT1), which supports growth up to 45mppa, and that was not expected until 2030. The framework should include a review of 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 proposals on sharing the benefits of growth with communities is focused on community funds and recycling waste. We consider that the waste impacts of airports are not of direct benefit to communities but do affect climate change impacts and so would be better addressed within that objective.

The proposals for a stronger noise policy framework are very much welcomed, and long overdue considering the disputed interpretation of the current policy from the 2013 Aviation Policy Framework. The new focus on health and quality of life is more meaningful than on number of people 'significantly affected' because it allows consideration of those in the Lowest Observable Adverse Effect Level (LOAEL) contour as well as those beyond the Severe Observable Adverse Effect Level (SOAEL) and Unacceptable Adverse Effect Level (UAEL) thresholds. One notable omission from this section is the need for Health Impact Assessments as part of any expansion plans. Only with such information will it be possible to judge if the economic benefits justify the social costs.

Modernisation of airspace and growth through use/development of new runways will require new flight paths and cause new communities to be overflown. Involvement in the decisions

about where and when aircraft can fly is simply not sufficient in instances where there is brand new noise 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 noise cannot be totally mitigated. Where newly affected, there is a case for financial support for residents who wish to move altogether. We therefore welcome the review of minimum standards for insulation schemes, although we would always encourage individual airports to go beyond the minimum requirements. There is no policy proposal on relocation schemes, and often such assistance is restricted to home owners. We would ask the final Aviation Strategy to encourage airports to consider assistance for those in rented accommodation where they are either newly affected or affected by a significant increase in noise as a result of airport growth. This would additionally avoid indirect discrimination as identified Equality Act 2010.

The height at which aircraft fly along designated flight paths is also an issue for those overflown (as the lower the aircraft, the more noise). There is increasing evidence from complaints from residents that aircraft are flying lower than they should. There needs to be stricter enforcement of the heights aircraft fly, especially on approaches to Gatwick over west Kent, which experiences low flying aircraft on a regular occurrence.

Overall, the proposed partnership for sustainable growth is a broad approach to economic, social and environmental issues that must be balanced to permit expansion. How these are balanced will be determined by the future development at individual airports and adoption of the long-term policy framework. Until there is more detail on how the partnership is to be applied, it is impossible to say whether it will satisfactorily balance the benefits of growth with the negative impacts.

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

Frameworks should be established and adopted as soon as possible. The premature adoption of Government policy to support the best use of existing runways has prompted airports to propose measures to grow now, prior to any formal partnership for sustainable growth being in place. For example, the Gatwick Airport Draft Master Plan 2018 proposes to consult on a Development Consent Order to routinely use the emergency runway in 2019 and Heathrow are proposing to introduce new arrivals procedures to increase capacity.

Whilst KCC does not have a view on how regularly reviews of progress should take place, we would argue they should have the scope to be tailored according to each specific airport partnership and therefore appropriate to local circumstances but with a prescribed review after, for example, three years or following first application of the principles.

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

There is continually emerging evidence on the impacts of aviation noise that strongly demonstrates the real health costs felt by individuals, including evidence that people are becoming more sensitive to noise than they have been before. Additionally, research is now being carried out on areas of air quality that have previously had limited research in an aviation context, such as ultrafine particulate matter. Ultimately the financial burden of health impacts due to the aviation sector are picked up by the National Health Service (NHS), and there are additional economic costs in terms of reduced productivity. However, unsustainable growth in the industry including more intensive use of the existing runways will lead to more intensive noise impacts. KCC cannot support growth at all costs and would

therefore encourage a review to be undertaken following new evidence on health impacts for local communities affected by airport operations.

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

The policy proposal that the National Infrastructure Commission (NIC) should include airport capacity in their future assessments is accepted. However, the preferred option to produce a general National Policy Statement on airports and let the industry determine which airports should be expanded is flawed because it provides no certainty (even if only for a specific time period) for communities around airports. The NIC work or a separate commission should determine the location for expansion, and this should be set through a location-specific NPS as has been done for Heathrow so that the planning criteria are appropriate and specific for those local circumstances.

The proposal to ask Independent Commission on Civil Aviation Noise (ICCAN) to consider how to best support communities in engaging with the airspace change process is important, especially in the context of airspace modernisation because it will result in newly affecting communities with noise, as well as potential concentration of overflight. Airspace change proposals are determined by a range of technical requirements, and what is permissible is dependent on the safety and operating procedures of aircraft, as well as geographical constraints. The ability to communicate this detailed information to manage expectations about noise levels and timescales for changes is currently missing from the process. A source of frustration at the Gatwick Noise Management Board has been the perceived latency of improvements to the noise environment due to technical requirements and the speed of the airspace change process.

There is no specific policy proposal on sustainable surface access within Chapter 3, although we appreciate that the aims would be replicated in other policy documents (such as the Road to Zero strategy). Nevertheless, 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 and this should form a policy proposal as part of the partnership for sustainable growth. Current growth at Gatwick has the potential to absorb much of the M23 smart motorway additional capacity as well as capacity from upgrades to the Brighton Main Line to the detriment of other users of the network and yet funded by general taxation.

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 an intolerable increase in overflight in recent years, and Gatwick also has a much greater night movement and noise allowance than Heathrow in the summer season, an unfair outcome against which we have consistently campaigned. Therefore, we welcome the proposals to provide a much stronger noise policy framework. To improve their efficacy, we consider that thought needs to be given to supporting those in rented accommodation when they are newly affected by noise or increased noise. Current insulation and relocation schemes are targeted at home owners to the detriment of long-term tenants. Gatwick has tried to launch an information booklet with estate agents to inform prospective residents about the likely noise impacts they will experience. However, there is anecdotal evidence that this information is not being passed on and therefore it may need to

be done through the legal packs associated with purchase in addition to voluntary information given to prospective buyers. It has also proven difficult for Local Plans to prevent development within the boundary of noise contours which has led to new residential properties being affected by noise. Tailored guidance should be issued to Local Planning Authorities to assist the Local Plan making process to take account of the recommendations from airports and the ICCAN.

Finally, proposals for Health Impact Assessment should be included to properly assess the impacts from noise and air quality emissions from airports as part of growth proposals. These should be an independent exercise rather than carried out by the airports themselves.

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

The policy proposals should not be a straightforward priority list, but rather should be addressed concurrently to ensure maximum benefit as soon as possible. Airports are already producing new master plans and expansion proposals since the release of the policy to make best use of existing runways, and it is therefore vital that the partnership for sustainable growth and its constituent proposals are enacted now. Further, some of the proposals are simpler to implement, such as changing the minimum standards for noise insulation schemes. Government must work with stakeholders to judge how quickly the proposals can be brought forward.

As a general observation, we would consider the proposals to limit impacts on health and quality of life to be potentially the most beneficial in terms of social wellbeing and environment, for example use of cleaner fuels and reductions in noise.

23. What implementation issues need to be considered and how should these be approached? (e.g. resourcing challenges, high levels of complexity, process redesign, demanding timelines)

We have concerns regarding resourcing for the extensive airspace modernisation programme in the south. It is imperative that the Government provides the Civil Aviation Authority (CAA) and the ICCAN with sufficient resources to ensure appropriate stakeholder engagement is undertaken and that airspace modernisation is completed within targeted timescales. To determine the most effective methods of meeting the needs of affected communities will require substantial work from the airspace change promoters, within demanding timescales. It is therefore important that they are supported and that the CAA has the necessary powers to compel promoters to enact the change process, as well as complete it to a satisfactory standard.

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

There continues to be a financial burden on Local Authorities in terms of officer and Member time to provide representation at consultative committees, bespoke groups (such as the Noise Management Board at Gatwick, and the Heathrow Local Authorities Briefing, for example), and various other bodies addressing noise and growth at local airports. When the whole of airspace in the south is modernised through individual airspace change proposals then this will put great strain on Local Authorities in terms of finance and time, at a time of reduced Local Government funding.

Some of this burden may be reduced when the ICCAN is established and able to represent community interests in noise impacts, provided that it is truly independent and viewed as such by local communities.

26. Are there any options or policy approaches that have not been included in this chapter that should be considered for inclusion in the Aviation Strategy?

Surface access to airports should be addressed. 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 so that it generates more surface transport movements. Whilst this is usually addressed through the planning system, where airports are growing outside of this process there is still a burden on local transport routes. Although there may be voluntary contributions to infrastructure upgrades, such as Gatwick Airport's contribution to the Gatwick Station upgrade, it would be beneficial to have a policy position on this.

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

Airports have been forecasting increased passenger numbers through the use of larger aircraft. Whilst there are incremental capacity increases in the small aircraft types (e.g. Airbus A320neo), it is now apparent that demand for the super jumbo type planes is dwindling with the announcement of the end of production of the A380s. This change in demand for aircraft types will change how and where airlines operate. DfT and industry forecasts need to reflect this change when they are looking at where future runway capacity might be needed. Furthermore, other transport improvements and strategic objectives for economic rebalancing will also influence choice of location for additional capacity. For example, High Speed 2 would make Birmingham closer to the South East in terms of journey time and the emphasis on growth in the Northern Powerhouse region might suggest Manchester Airport.

The growing population within airport noise contours is a continuing long-term trend and whilst the proposals to better inform prospective residents and provide guidance on insulation is a positive step forward, there needs to be further work to either restrict development in these contours or provide an outlet for residents affected by noise to share their concerns.

Chapter 4: Support regional growth and connectivity

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

International gateways (ports and airports) are vital to our trading success, and their importance 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 supporting economic growth.

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). The proposal to support airports to develop master plans and surface access strategies consistent with regional and national transport strategies is welcomed. This is particularly important as more Sub-national

Transport Bodies are formed and achieve statutory status. There is a need to integrate the strategies for these vital transport infrastructure assets with the longer-term vision for the Strategic Road Network, Major Road Network and rail network. Transport for the South East is the appropriate body to consider these various pieces of strategic transport infrastructure collectively with economic and population growth to formulate sensible transport investment recommendations.

Chapter 5: Enhance the passenger experience

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

Enhancing the passenger experience looks at the whole end-to-end journey from booking a flight to onward travel from the destination airport. It is accepted 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 also reliability and price. The passenger experience could also include integrated ticketing, such as rail fares purchased concurrently with flight tickets. This could provide a seamless experience, and also help encourage model shift to public transport.

Chapter 8: Encourage innovation and new technology

77. To what extent are the government's proposals for supporting innovation in the aviation sector the right approach for capturing the potential benefits for the industry and consumers?

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 establishing an appropriate balance. This could be through regulation, but also incentives in the form of research grants and supporting skills through university and practical training opportunities.