

Aviation 2050: the future of UK aviation

1. Introduction

Thank you for responding to this consultation on Aviation 2050: the future of UK aviation strategy.

The easiest way to respond to this consultation is via the online form:

<https://www.smartsurvey.co.uk/s/aviation2050/>

The online form allows you save and continue your response and save or print a final version for your records.

The aviation strategy sets out the government's vision for aviation to 2050 and includes proposals to:

- develop a partnership for sustainable growth which meets rising passenger demand, balanced with action to reduce environmental and community impacts
- enhance the passenger experience
- build on the UK's success to establish new connections across the world and create greater choice for consumers

Your answers will help us to shape the policy proposals within this document to create a final strategy which will support industry to delivering even greater improvements for passengers, the environment and our country.

This consultation has been extended, and now closes at 11:45pm on 30 June 2019. This is with the exception of the questions posed in 'Annex A: Legislation to enforce the development of airspace change proposals', which will still close for responses at 11:45pm on 11 April 2019.

Confidentiality and data protection

The Department for Transport (DfT) is carrying out this consultation to gather views and evidence on measures for inclusion within the statutory guidance issued for the aviation strategy. This consultation and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. If your answers contain any information that allows you to be identified, DfT will, under data protection law, be the controller for this information.

As part of this consultation we're asking for your name and email address. This is in case we need to ask you follow-up questions about any of your responses. You do not have to give us this personal information. If you do provide it, we will use it only for the purpose of asking follow-up questions.

We may contract a third party to analyse the responses we receive to the consultation. If you provide your contact details, we may share this information with a contractor in case they need to contact you regarding your consultation response.

[DfT's privacy policy](#) has more information about your rights in relation to your personal data, how to complain and how to contact the Data Protection Officer.

Your information will be kept securely and destroyed within 12 months after the consultation has been completed. Any information provided through the online questionnaire will be moved to our internal systems within 2 months of the consultation end date.

2. Personal details

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

Your name	John A Lamb	Hannah Bartram
Your email	President2018@lgtag.com	Hannah.Bartram@eastsussex.gov.uk

2. Are you responding as:

<input type="checkbox"/>	an individual? (Go to section 4. Chapter 2: Build a global and connected Britain)
<input checked="" type="checkbox"/>	on behalf of an organisation? (Go to 3. Organisation details)

3. Organisation details

3. What organisation do you work for?

Submitted on behalf of the Local Government Technical Advisers Group (LGTAG) and the Association of Directors of Environment, Economy, Planning & Transport (ADEPT)

4. What type of organisation is this?

	Airline
	Airport
	Regulatory body
	Interest group
	Community group
	Industry
X	Other: Local Government – Local Government Technical Advisers Group (www.LGTAG.com) Association of Chief Technical Officers and Association of Directors of Environment, Economy, Planning & Transport (www.adeptnet.org.uk)

4. Chapter 2: Build a global and connected Britain

The UK has the largest aviation network in Europe and the third largest in the world, an industry that contributes at least £22 billion to the UK economy, along with over 230,000 jobs. The government supports the growth of the aviation sector, provided that this happens in the most sustainable way, to ensure its continued success.

Build a global and connected Britain

Aviation is important for the government's goal of building a global and connected Britain. The UK already plays a prominent role on the world stage with the biggest international aviation network in Europe and currently the third largest in the world. Through the Aviation Strategy the UK will be equipped to build new connections in rapidly growing aviation markets, and to use the leverage we have internationally to pursue our objectives on environmental measures and liberalisation.

The government is working to:

- improve standards globally
- maintain and improve the UK's connectivity
- support UK aviation exports, including overcoming barriers to exporting

5. This section contains questions on chapter 2 of the consultation document - Build a global and connected Britain. 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)

Y	Air services agreements
	Liberalisation of air traffic rights
	Airline ownership and control
	Interchange (short term leasing of aircraft between airlines)
Y	International standards
	Aviation exports
Y	Global connectivity
	Airline competition

6. How should the UK use its global leadership and international influence to further the aims of the UK's aviation sector?

“The UK has the largest aviation network in Europe and the third largest in the world”. This places a commensurate and ever-growing responsibility on leading change. Aviation is recognised as part of how we live in the modern world; but just as change is demanded in other aspects of how we live as a society we must also think about the long run climatic impacts of continued growth in aviation and airports, along with the need to make the aviation sector resilient to the already changing climate.

The UK has declared a ‘climate change emergency’ and it is therefore incumbent for the UK to work through the implications of this on each and every policy area – leading locally and influencing

globally. This should not be seen as anti-aviation as current lifestyles and systems do rely on the sector; we must however develop new approaches to reduce dependencies through the creation of alternative choices and where not possible the full externalities be costed and applied.

In a similar vein the UK can continue to lead by example in standards associated with aircraft safety and promoting best practice.

7. What should the UK's priorities be for strengthening existing connections and establishing links with emerging markets?

The UK should consider, as a priority, the role of aviation in providing accessibility from and between markets across the UK that are poorly served or are difficult to serve effectively by other modes. Markets are restricted and growth constrained. This affects the agglomeration benefits across what is, on global terms, a very small island. Cornwall, Norwich, Bristol, Carlisle and indeed Airports across the UK provide a vital role in supporting local growth and creating travel choice. It is notable that some UK airports have struggled as the overall economics and access to hub airports are limited – Blackpool Airport is closed to passenger flights, Southend Airport has lost flights and the potential of airports such as Doncaster and Birmingham is restricted.

Equally however, it is essential that the climate change imperative is incorporated into the development of new approaches that aim to alleviate domestic growth constraints. The Government must safeguard competition within a marketplace without necessarily creating too many airports with overlapping catchments. Local market composition, attainment and accessibility are key factors in airport development and maximising individual catchments. Thus, wider economic policies, independent of the London/SE region, that encourage regional development are essential. Manchester's recent growth in long haul to China etc. has followed the city region's strengthened business links with China.

Emerging markets (overseas) risk following the same historical narrative of creating and growing demand over long and extended distances that have significant climate change impacts. As a global industry, and reflecting that airlines operate in networks, there is a need to better understand when and where new routes, more services and extensive competition (duplication) is of benefit, given the goal to reduce climatic impacts of aviation and surface access trips.

Policy proposals

The questions in the section below refer to policy proposals contained in chapter 2 of the consultation document - Build a global and connected Britain. As with the rest of this consultation, you are welcome to respond to any, all or none of the questions in this section.

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

This is one of scale and proportionality. Climatic impacts are acknowledged but within a narrative that repeats historic approaches, the policy assumes the only solution is yet more and more flights, terminals and surface access infrastructure; it repeats the context set out for each and every new Terminal and each and every new runway across post war Britain.

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

The creation of a functioning UK economy should feature more fully in slot availability. Airport slots

should be seen less favourably on routes where there is mirroring high speed rail capacity and instead utilised to facilitate routes where alternative transport options are limited; aviation might provide better accessibility until such time as High Speed, electrified rail services are possible. It is notable that Heathrow – Manchester flights responded to rail failures during the West Coast Rail Modernisation by firstly markedly increasing the frequency of services during the highly disruptive works. Once the frequent and attractive Virgin Trains service became established, air retrenched to a limited BA service to Heathrow, largely serving BA's international hub offer. Edinburgh – London is the biggest UK domestic route and the sort of distance that would make high speed rail competitive and from UK and European evidence, air modal share would diminish with improved ECML services and eventually HS2. The policy ambition is to encourage rapid development of fast/high speed rail network to improve connectivity between key regional centres, cities and airports and the commercial air market will respond by refocussing on international routes.

These policies should support International routes that safeguard trade and reasonable access to tourist destinations that currently feature within a tourist economy yet to fully come to terms with its own climate change impacts. This also seeks to balance and recognise the impact of growing tourist demand from overseas travel into the UK.

10. 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)

The planning process is not fit for purpose and consideration needs to be given to new local arrangements with input from Local Government (both councils and professional bodies) to manage and mitigate impacts through a more collaborative approach. The current NSIP process fails to create an environment that prevents the Applicant from steam rolling local concerns.

The lack of coordination between individual airport planning applications at a national level is also an issue, with individual airport proposals commonly put forward independently of each other and solely based up their individual business decisions. A review of all mechanisms involved in bringing forward growth proposals is required so that views can be sort on how to coordinate aviation growth and the associated impacts for the UK as a whole. Co-ordination between the planning process and airspace change process is particularly crucial.

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

The limitation of fast high-speed rail to major airports is a reflection of the historic and unchecked problem of cost and lack of ambition. Airport and successive governments have continued to limit ambition to grow rail, metro and local bus networks. There are notable examples of success but these remain limited by lack of funding. Moreover, there are tensions between the largely commercially funded aviation world and land based rail and road projects that require a degree of public capital and revenue funding. There is a need for Central Government to work with airport providers and local councils with targeted support and influence through new and innovative models to allow growth but create are wide benefits on corridors and communities where impact is greatest and opportunity can be grasped.

12. What are the regulatory burdens that need to be managed and how might these be addressed?

Regulation must not be seen as a burden. Aviation is a highly regulated and extremely safe sector. Government policy that sets out an appropriate context and outlines clear parameters is essential in growing business confidence in the regulatory body. Problems emerge when local issues are not tackled and it results in ill thought out development that generates public hostility. Equally, regulations must evolve to deal with the ever-changing local, regional and national conditions. This is key when considering how to protect those livelihoods and ecosystems most at threat from climate change.

13. 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?

It is rather that policy options and choices are applied fully and with appropriate ambition to achieve growth in a managed fashion that achieves multiple policy objectives.

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

20th Century aviation growth has increased over the last fifty years, and it fulfils a major role in modern life for advanced economies. We do however now live in an increasingly disruptive and faster paced world, with innovation and change continuously hypothesised and anticipated.

Equally the impacts of historic and current decisions create a legacy that we must address today. In a globally interdependent market for example, disruptive events such as technical failures or political incidents outside UK Government control, can have extensive impacts on crucial airport hubs such as those in the middle east with resulting impacts on UK aviation.

The planned development of Stansted Airport, which was consented in the 1980's on the supposition of a totally different market mix, and still not at the throughput anticipated underlines the complexity of developing and delivering massively capital intensive infrastructure.

As technological innovations have increasingly significant implications on land-based travel and mobility evolves to provide increasingly flexible, personalised and accessible services, modern lifestyles are likely to create markedly different and diverse impacts compared to those perceived currently. This over time will create a far broader range of conceivable outcomes. Just as Aviation 2050 touches on the concept of travel in space, we should not ignore the major and significant development in concepts such as hyperloop but equally the paradigm shift linked to travel behaviours and contrasting desires / abilities to travel by differing age groups. Advances in tunnel engineering and the ability for high speeds (with or without vacuum conditions) demands appropriate consideration. Journey times into major centres are invariably quicker and more convenient and for destinations that are less than 1,000km the potential (over a 40 years' time frame) clearly exists. This could readily affect the business model of fixed infrastructure around hub airports that could be subject to significant disruption if /when disruptive innovation occurs.

Preparing for a low carbon travel sector by 2050 must considered alternative uses to airports. Establishing a positive environment for ongoing change is crucial to avoid the fate of traditional British sectors such as coal mining and ship building that could not evolve and have since left a massive legacy and local impact in areas that had once been thriving. As airports attract a lot of business development around the site, any sudden changes affect sectors far wider than the core aviation uses in a form of negative agglomeration. History shows we have not been very good at anticipating and planning for change or dealing appropriately with the after effects. Thus a transition cannot be left to the market without intervention.

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

	Yes (see following evidence page)
X	No (proceed to next section)

5. Global and connected Britain evidence

16. Please give a brief summary of the additional evidence that you wish to provide.

Comments:

The rise of 'digital as a mode', where digital connectivity reduces or removes the need to travel, is already disrupting traditional patterns of travel associated with access to work, education and healthcare and has the potential to have a much more pertinent impact.

Electronic communications are increasingly important and physical face to face interactions associated with routine work activities could become less commonplace. – Evidence suggests however, that digital communication technologies are not always being fully exploited. Companies such as Pfizer still send executives back and forth across Atlantic when videoconferencing could have dealt with their needs and there are significant opportunities for Universities to share their learning digitally.

As differing market segments each evolve over time there needs to be a closer understanding of market segments that collectively form the overall market for air travel. Air travel is derived from such smaller segments and if they each demand swift action to tackle climate change then the long run assumptions of air travel could be flawed by the collective outcome of small and local decisions. This is especially true for non-UK markets and where corporate social responsibility might take a strong lead than Governments are prepared to initiate themselves.

Rise of tourism is something that has mixed benefits into the UK from abroad but outflow since the 1960's that has led to the decline of many of Britain's historic coastal settlements. Decades later, these communities still suffer from a legacy of Victorian towns and dated infrastructure.

6. Chapter 3: Ensure aviation can grow sustainably

Demand for aviation has grown significantly since 2010 and the government welcomes growth in the sector, but this growth must be sustainable. Achieving this requires a partnership between the government, the regulator and industry to work within a comprehensive policy framework to better manage the environmental impacts of the sector.

The Aviation Strategy:

- outlines the government's preferred approach for developing a framework for sustainable growth and outlines the respective roles for government and industry
- makes the case for making most efficient use of infrastructure, including by reforming the system for slot allocation at airports and continuing to support industry in improving resilience
- describes the approach being taken to airspace modernisation to deliver capacity and environmental benefits
- sets out a robust policy framework and package of measures to reduce the harmful effects of aviation on the environment, such as carbon emissions, air quality and noise
- sets out government's expectations that communities should benefit directly from growth

17. 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)

X	A partnership for sustainable growth
X	Airspace modernisation
	Resilience
	Slots allocation
X	Safeguarding land
X	Community engagement
X	Carbon emissions
	Non-carbon emissions
X	Air quality
X	Noise
X	Reducing waste
X	Sustainable journeys to the airport

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

The Proposed Partnership for Sustainable Growth is set out fig 8. The stakeholders presented in the centre (i.e. Government, Regulators, Airports and Airlines) are a collection of organisations which could be construed as all being affiliated and interwoven within the aviation sector.

There continues to be a historic deficit of community representation and independent voice. The 'Independent' Airports Commission was drawn from established and vocal advocates of infrastructure development and delivery. Moreover, there remains an absence of fresh thinking that might move beyond the same approach of determining, every 15-20 years, that the only way to grow jobs and increase trade is via a fossil fuel based aviation model.

Whilst acknowledging that Airport Consultative Committees already exist, they must seek to move beyond dated aviation policies of trying to 'soften' the significant environmental harm, that are essentially borrowing from future generations through excessive carbon-based growth. Instead a new approach that embeds the climatic and planetary scale impacts is essential for wider acceptance.

The proposed partnership approach should also look to encompass the multitude of mechanisms and processes at different administrative and spatial levels (local, regional and national). Oversight of the partnership approach is thus essential to ensure that all partnerships are incorporated and subsequently identify gaps in representation.

It is also important to consider airport ownership. Contrast Manchester and Stansted where MAG's ownership historically has been local authority controlled and Stansted part of the then BAA plc. Even though MAG now owns both, there is a different relationship with communities and the local Government at Manchester compared to Stansted. Despite MAG's part private ownership, the Greater Manchester influence and relationship is still evident if not as strong. The Greater Manchester authorities still take a dividend and Manchester owns the land.

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

The document is for the period to 2050. Hence, we suggest that reviews of progress are held every five years.

However, in the absence of defined and binding targets, there is a questionable point in holding a review. As the document currently reads there are no definitive targets and high-level ambition on how to facilitate aviation growth to 2050.

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

Yes, targets should be established. If these are met then the planned growth assumed within the long-term trajectory would continue – albeit with continued ambition to better and improve on sustainability goals. If goals are not achieved then corrective action and redress would be demanded.

At this stage it is difficult to envisage what new development may occur or when. However as and when such activities occur the review will need to prioritise their impact on sustainability.

It is notable that the opportunity to rapidly reduce fuel burn and CO₂ production from internal combustion engines including gas turbines is limited. Similarly, while lightweight flying electric drones have appeared recently, it seems unlikely that electrically powered aircraft for longer ranges

are likely to appear in the near future. For short distance trips however, applicable for many internal UK trips, this should be possible and encouraged. Equally however, there is a need to markedly reduce the growth rate for aviation; then to find alternative modes that provide equivalent journey / convenience experience i.e. High-Speed rail for all key cities. This would reduce the need for certain types of flights and in a similar vein challenge recently evolved expectations that long-haul tourism is an annual norm for the middle classes. There is also the need to support new and more convenient modes with a lower carbon footprint. Development of hyperloop and non-vacuum based tunnel systems are being trialled and when one of these systems achieve the necessary breakthrough the disruptive and economic potential is significant. The UK should be pursuing the developed and trialling of such technology now being deployed in the USA and Spain.

Policy proposals

The questions in the section below refer to policy proposals contained in chapter 3 of the consultation document - Ensure aviation can grow sustainably. As with the rest of this consultation, you are welcome to respond to any, all or none of the questions in this section.

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

A number of comments are made below:

Section 3.13 The National Infrastructure Commission (NIC) could usefully be asked to include airport capacity assessments, in conjunction with airports, but these should be done for all sizeable airports and not just those within the South East.

3.14 The strategy states that the Government's preferred approach to identifying locations for potential growth in the future is an aviation NPA, to set out the criteria any development consent application would need to meet but not naming specific airports. For the growth aspirations of the aviation sector across the country to be best brought forward in the interests of the whole nation, direct Government oversight and strategic management is required. Leaving industry to determine whether and when applications are brought forward has the potential to neglect wider infrastructure, economic, social and environmental implications.

3.22 The Independent Commission on Civil Aviation Noise (ICCAN) should be required to consult with local authorities and the public on how best to support communities in engaging with the airspace change process.

3.35 - 3.38 The Met Office and Environment Agency have concluded that in any single year there will be a significant weather event (snow, ice, heat, rain) and that such 'repeat events' will be 30% more significant to that previously experienced. This is a material issue for airside operations and ground transportation in being able to provide resilience during increasingly common and more intense events caused by a changing climate (generated by human activities centred on exploiting fossil fuels).

3.39 "the government does not have a process to ensure that airports have adequate plans" (for flooding etc) underlines the need to build a strategy for international and national aviation mobility. The Government must look beyond the aviation industry for such minimum standards and instead look to local councils that manage nearly 98% of the English road network and serve as the road track for local buses upon which staff depend (for buses and car trips).

3.40 The scale and frequency of future events demands new models and approaches.

3.56 Any discussion on Slot Allocations should be required to prioritise and reserve slots for regional services.

3.66 There is a need to consider the challenges faced by local authorities in development and

delivery of infrastructure linked to airport. Demands include additional housing, which is already a recognised national crisis. Safeguarding of land – off airport – should be considered as directly related to mitigating the impact of overheating in housing markets. Moreover, travel impacts are spread over a significant area with Airport operators having been historically limited by ambition and funding beyond the immediate airport environs.

3.72 The use of a Community Fund to appease local concerns about impacts (e.g. aircraft noise) is flawed. Communities actually want real improvements and for the aviation nuisance to go away. The emphasis needs to be on improvements.

3.73 Faced with the recognised climate emergency it is no longer acceptable to wait for another generation for zero waste in 2042. Moreover 'aviation must play its part' ignores the ability for airlines to more readily influence product choice and source separation to recover, reuse and recycle on-board and ancillary waste. Most of this paragraph has no direct bearing on aviation and underlines the need for demonstrable, tangible and visionary action on aviation's contribution to achieving zero waste more swiftly.

3.75 The examples of Airport Operators centre on 'good practice' that is barely significant given the overall environmental footprint of major airport – including Heathrow which remains Europe's single largest traffic generator. Coffee cup recycling and water fountains are small scale comparatively and stand out solely as a result of concerted and substantive action in a controlled environment (airside).

3.78 The reference that "International Greenhouse gas emissions increased by only 7%' (2010-2016) underlines the disconnect with the climate emergency that we, and future generations, are now faced with.

3.85 It was acknowledged during the Terminal 5 public Inquiry that 'international action takes time' but 25 years on, there remains very little policy led action to create a new and sustainable aviation industry. Recognising the very scale and significance of our extensive European and global network there is a commensurate – and historically lacking- responsibility that should weigh heavily on the UK to drive change.

3.98 Vehicles with zero tail pipe emissions do nothing to tackle the issue of congestion near airports and the associated costs of this congestion. Zero emission vehicles also do not help to support 24/7 public transport routes, networks and services that are integral to airport ground transportation. Airport related car trips do contribute to local air quality issues but beyond the immediate environs they rapidly form part of the background / base levels of pollutants which demands swifter and more concerted effort than current Government Policy ambition.

3.99 Airport Transport Forums were created prior to Government legislation and their success is noted. 25 years after the first forum formed at Heathrow however, there is a need for Government to get ahead of the policy curve to develop and lead more proactive and ambitious transformation of public transport alternatives for staff, air passengers and the major business and ancillary arrangements that are located off airports. This should at least include new and crucial evidence on PM2.5 microns and the need for swift and decisive action to tackle air quality around all our major airports. Equally the reference in para 4.36 that councils should 'get more involved' must recognise the lack of power or influence Councils actually have on such forums. 25 years on, the very modest additional funding, and inability / lack of funding for councils to develop genuine area based and corridor specific interventions, has limited the ability to create appropriate transport systems that serve the airport – especially for airport staff. We welcome the proposed measures in 4.37 but it is essential that Local Government has genuine powers and influence to manage and mitigate surface access given the significant air quality, congestion and wider impacts of cars, taxis, buses and logistics into and around airports and the associated business parks and ancillary related development. Manchester's most effective body was the ground transport steering group in the 1990's/early 2000's when it just comprised the senior execs from MAG, MPTC Cheshire CC, Railtrack and later Highways Agency and their remit was to deliver surface access improvements that emerged from R2 and the s.106 agreement. The latter set the objectives and targets for delivery

and accountability. The Transport Forums have few, if any, teeth. Previous airports' reviews have been successively weak and failed to be ambitious from Airport Operator with softer calls to 'consider this' or undertake reviews.

3.106 The fact that the Government wants to underpin the WHO guidelines with robust evidence is fundamental to its approach to noise and should be resolved in advance of publication of the Strategy.3.115 Suggestions for noise reductions (e.g. noise caps) at airports need careful consideration. The statement that the Government 'wants to explore mechanisms by which airports can 'pay for' additional growth' by means of local compensation' hints that Government is supportive of operators buying their way out of breaches of planning controls designed to minimise noise impacts on local communities. This potentially undermines the confidence of communities in controls the planning system puts in place and should not be promoted as a common practice. Matters which cannot be enforced will not be well received by communities.

It would have been useful if the consultation had included potential national indicator options (for tracking the long-term performance of the sector in reducing noise) for consultee comments.

The requirement for all major airports to set out a plan which commits to future noise reduction, which is review periodically should apply to airports with planning caps in addition to those without. This measure should also be a principal objective of noise action plans produced by airports. Despite highlighting in section 3.110 that night flights are the most disturbing for local communities, the proposed measures contain no proposals which relate to night noise. The Strategy should at least indicate the high priority of exploring options which restrict/alleviate night noise impacts on local communities.

3.118 Newly built housing in areas near airports subject to high noise levels is not satisfactory, notwithstanding the national need for more housing.

4.38 Integrating ticketing and airport transport hubs. In theory simple, in practice this continued to be a major struggle because of operator politics, and commercial distrust of competitors. Multi-mode travel information and passenger information screens were difficult to keep internal focus on managing a non-aviation service which 'isn't seen as core' and de-prioritised and then cut by airport operators.

4.40 states that the 'Government encourages airports to lead' but in reality it has been through firm and transparent commitments – as seen through the Stansted PATM commitments in the early 2000's that significant and sustained action might be possible.

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

It is not possible to rank or prioritise a range of complex inter-connected issues.

A healthy global ecosystem must however be placed above all else, along with tackling air quality issues that prematurely kill 40,000 people in the UK annually.

The role of the community, especially in living with the aviation noise impacts, is directly correlated with the economic gains in jobs and creation of sustainable networks of ground transport that can create area wide improvements to mobility.

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)

Transparent and demanding Targets and Timescales. These should be reviewed locally and centrally within a spirit that seeks to encourage high performance but not materially damage environmental conditions or sustainability.

The Strategy is also a useful tool for articulating the importance of embedding airport and aviation growth in long term plans and strategies at local, sub-regional and regional levels e.g., spatial, transport and economic strategies.

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

Financial Implications for smaller airports. Support should be given to allow their very size to become an advantage as test best for innovation and driving sustainable change.

25. What are the regulatory burdens that need to be managed and how might these be addressed?

Some of the proposed policy issues will require international cooperation. Reflecting the sheer size of the UK network, that underpins our international significance in global aviation, the UK should embrace such issues and take the International lead on change.

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?

This is not about any omissions per se but rather the scale and proportionality of interventions.

The experience drawn from across LGTAG and ADEPT includes very senior directors who have led aviation policy and led significant public inquiry and PATM parliamentary processes; such impartial input provides unique insight into future strategy development based on what had been promised / committed at crucial aviation development including:

- Heathrow Terminals 4 Inquiry
- Heathrow Terminal 5 Inquiry
- Manchester Airport Terminal 2 Original Planning Application
- Manchester Airport T2 Transformation project
- Manchester Airport Second runway
- Stansted Airport growth from 8 MPPA to 15 MPPA
- Stansted Airport growth from 15MPPA to 25MPPA
- Stansted Airport growth from 25 MPPA to 35MPPA

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

It is notable that Aviation 2050 predates the highly significant passing in to UK law of a Climate Emergency and more latterly the decision announced by the Prime Minister to declare 2050 for a Zero Carbon Britain. The Green Paper needs to be now considering the implications of these changes.

Automation of jobs could give rise to much lower job numbers. The historic link of 1,000 jobs per 1 MPPA has continued to reduce over the last two decades and now stands at 850 per MPPA and continues to reduce. Remaining jobs will therefore be higher skilled and demand consistent and ongoing learning and development.

Local communities surrounding airports often reflect the low skilled and ancillary role of catering and logistics and these are highly prone to automation.

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

<input type="checkbox"/>	Yes (see following evidence page)
<input checked="" type="checkbox"/>	No (proceed to next section)

7. Sustainable growth evidence

29. Please give a brief summary of the additional evidence that you wish to provide.

Comments:

No comment.

8. Chapter 4: Support regional growth and connectivity

Airports are vital hubs for local economies, providing connectivity, employment, and a hub for local transport schemes. The government wants to ensure, through the Aviation Strategy, that these benefits are maximised, by ensuring that:

- markets are functioning effectively for consumers and local communities
- airports are delivering the connectivity that regions need to maximise their potential
- the industry continues to provide high quality training and employment opportunities
- barriers to freight are reduced

The government recognises the importance of rebalancing the UK through economic growth of the regions and ensuring that the UK remains competitive after we leave the EU. Airports have a crucial role to play as hubs for growth within and beyond the region in which they are situated. The government is committed to working with the industry to develop appropriate and practical policies that support the industry's ambitions. The Aviation Strategy focuses on:

- regional connectivity
- regional transport hubs
- supporting freight
- regional employment, training and skills

30. This section contains questions on chapter 4 of the consultation document - Support regional growth and connectivity. 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)

X	Regional connectivity
X	Public service obligations (PSOs)
	Start up aid
	Air passenger duty
X	Surface access to airports
X	Supporting freight
	Regional employment and skills

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

Aviation is far greater than the actual flights and the complex range of differing issues and opportunities associated with the sector demand consideration as separate elements, reflecting their local priority i.e. regional airports, surface access, freight, aircraft and component manufacture and employment/skills.

In the absence of a National Transport Strategy it is difficult to see how an Aviation Policy might sit. Equally how is it possible to develop a strategy for freight and logistics at Airports without a UK Freight Strategy (a point recently made by UK Ports and Transport for the North's 2017 International Connectivity Report). We also need to be very careful not to encourage less sustainable freight transport by air over other modes, albeit equally mindful that belly hold freight in passenger planes are an essential component of airline route economics.

It is understandable given their economic significance that major hub airports are dominant in Ministerial thinking. However regional airports demand different and locally appropriate consideration that has rarely been given appropriate policy consideration – aside from how to force major hub airports to release slots.

Regional airports could play a bigger role in creating agglomeration across the UK by linking local economies. Moreover, they could form the basis as early adopters of low and zero emission aviation, reflecting journey times of circa 1 -2 hours between regional airports or to major hub airports. It is an opportunity and regional airports should play a vital role in ensuring economic growth occurs away from London and the South East. The European Trading system for carbon credits needs to be modernised in line with more contemporary understanding of the climate change emergency with priority given to reduced emissions and more substantive carbon offsetting from ground based and airline emissions.

Bolder and more radical measures should be put forward, evaluated and consulted on. As stated in 2.2 “our influence on the world stage has brought clear benefits’ and we must use that leadership role to leverage change across the international community.

We support the suggestion that runway slots at an expanded Heathrow should be ring fenced for new Domestic services and suggest that new routes should be the priority.

Freight and logistics

2017 represented a record year for freight handled at UK Airports. This reflects strong and sustained economic activity and results in differing types of demand for flights (belly hold or freighters). It should be noted that re-shoring and on-shoring of key activities is occurring, just as 3D printing removes the need for certain high value and time critical components. The increase in airfreight demand is however expected to continue.

It is therefore notable that across the 200 pages consultation document, there is very little mention of air freight, despite the significance of supporting nearly 50,000 UK jobs. Indeed, this is within a context of an absence of a National Transport Strategy and from that the absence of a National Freight Strategy.

The three main airports for freight (Stansted, Heathrow and East Midlands) collectively account for 85% of the total freight at UK airports. The nature of this demand warrants a detailed examination as to how Government Policy might genuinely support a vital sector of the UK economy. Equally, in better understanding the sector, there must be consideration of how to generate less environmentally harmful ways to support the wider UK economy in terms of such specialist and time critical products – which is markedly different than sea borne bulk freight.

The role of regional airports as alternative destinations for freight would support more diverse and more local delivery of freight. Freighter gateways would take pressure off airports such as Heathrow but this would need careful consideration – the very purpose of this Green Paper and call for evidence. This must not solely look at the point of arrival in the UK but equally about the logistics; appropriate assembly and ancillary activities that such a move to regional hubs might facilitate need to be considered.

Tourism and regeneration

It is notable that some of our communities that have been worst hit by outflows of tourism since the 1960's have Airports that are readily able to support such growth. Blackpool – once a thriving seaside town and now with notable economic and infrastructure challenges - has established an enterprise zone around its underutilised airport where commercial flights ended several years ago. Government aviation policy must connect those parts of Britain that can and must play a bigger role. Moreover, there is a need for aviation policy to look beyond the sector into wider Government ambition for tackling inequalities and ensuring that all parts of Britain might share future growth.

32. 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?

Dealing with the broader issue of the lack of education staff and students for STEM subjects (including aviation professionals) action is needed. Again, the document could be far more radical. Perhaps schools and colleges near airports should have additional education funding and build on the work / increase the ambition shown by Manchester Airport as sponsors of an academy in Wythenshawe and formalise / expand the educational outreach work.

Policy proposals

The questions in the section below refer to policy proposals contained in chapter 4 of the consultation document - Support regional growth and connectivity. As with the rest of this consultation, you are welcome to respond to any, all or none of the questions in this section.

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

A number of comments are made below:

4.2 We are pleased to see that the document acknowledges that rebalancing the economy can occur through growth in the regions.

4.10 Reference is made to other modes of transport including road and rail when considering regional air services. This is welcome and we question why no mention has been made to the role other transport modes for International travel.

4.28 Air Passenger Duty (APD), Fuel Tax and VAT on ticket prices is referred to and this is welcome, including the proposed review. Notwithstanding the international issues and role of ICAO, the UK could play a leading international role in proposing change.

The UK should consider taxation changes that will drive innovation. The APD is a blunt tool with funding from aviation diverted into general Treasury coffers. Unlike the other regions, the EU has chosen not to charge a Kerosene Tax. Brexit provides an ideal opportunity to lead more strongly on environmental issues. An initial domestic tax of 1c a litre as seen in the USA would be the starting point, increasing to Canada's 8c/litre and then Japan's 14c / litre. Airlines would be further

stimulated to lighten the load both through design as well as the major issue of bulking up on fuel load at the cheapest airport and then carrying that deadweight – unused fuel being a major issue. Consideration of international flight levies the Chicago Convention “does not explicitly prohibit the taxation of jet fuel”, only the taxation of fuel remaining on board an aircraft upon arrival from another state.

4.32 We welcome the acknowledgement that airports can be regional transport hubs.

4.37 Airport Transport Forums are useful and generally support the principle of giving them a reinforced remit albeit there is a need to consider the constitution, governance and remit.

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

1st Improved access to London airports for regional services

2nd Improved surface access for regional airports

3rd Improved education resources for the regions

35. 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)

Demanding targets and deadlines should be set.

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

The financial implications for smaller airports.

The relatively low price of air travel compared with rail or other modes – a better understanding of business costs and costs to the communities of different modes needs to be researched before appropriate mechanisms to address the issues is developed

37. What are the regulatory burdens that need to be managed and how might these be addressed?

See answer to question 36. No further comment.

38. 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?

No comment

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

Just a reminder of the need to reduce the carbon footprint and environmental damage of aviation

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

	Yes (see following evidence page)
X	No (proceed to next section)

9. Regional growth evidence

41. Please give a brief summary of the additional evidence that you wish to provide.

Comments:

No comment

10. Chapter 5: Enhance the passenger experience

All passengers should have a positive experience of flying. The industry is responsive to the needs of consumers but improvements can be made for passengers with additional needs and when things go wrong. The government proposes to consult on a new Passenger Charter to promote good practice in the sector, create a shared understanding of the level of service that passengers should expect, and communicate roles and accountabilities clearly. The government proposes to take necessary action to improve the experience at the border and tackle problems cause disruptive passengers. It will also consider strengthening the Civil Aviation Authority's range of enforcement powers across the consumer agenda.

The Aviation Strategy:

- sets out the proposed standards that could be included as part of a new Passenger Charter for aviation
- sets out a range of new measures for passengers with additional needs
- outlines measures to tackle the problem of disruptive passengers associated with alcohol
- describes the government's approach to improving the operating model at the border to enhance the passenger experience
- details proposals for simplifying and improving complaints and compensation procedures
- sets out government proposals for ensuring that consumers have timely access to the information they need to make informed choices

42. This section contains questions on chapter 5 of the consultation document - Enhance the passenger experience. 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)

<input type="checkbox"/>	Passenger charter
<input type="checkbox"/>	Passengers with additional needs
<input type="checkbox"/>	Disruptive passengers and alcohol
<input type="checkbox"/>	Experience at the border
<input type="checkbox"/>	Delays, complaints and compensation
<input type="checkbox"/>	Airline failure
<input type="checkbox"/>	Booking information

43. To what extent does the proposed Passenger Charter adequately address the issues that are most important to passengers?

44. How should the operating model for border service be designed to improve the passenger experience?

Policy proposals

The questions in the section below refer to policy proposals contained in chapter 5 of the

consultation document - Enhance the passenger experience. As with the rest of this consultation, you are welcome to respond to any, all or none of the questions in this section.

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

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

47. 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)

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

49. What are the regulatory burdens that need to be managed and how might these be addressed?

50. 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?

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

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

<input type="checkbox"/>	Yes (see following evidence page)
<input type="checkbox"/>	No (proceed to next section)

11. Enhance the passenger experience evidence

53. Please give a brief summary of the additional evidence that you wish to provide.

Comments:

12. Chapter 6: Ensure a safe and secure way to travel

The UK is a global leader in aviation security and safety, with one of the best and safest aviation systems in the world. The government and the CAA share knowledge and expertise with other nations, encouraging them to adhere to international standards and implement improvements with industry to make the skies safer for everyone.

In order to maintain the UK's safety record the Aviation Strategy focuses on:

- addressing concentrations of safety risks
- targeting emerging safety risks
- improving data and reporting
- addressing global variations in safety standards

In addition, through our Aviation Security Strategy, the government has committed to a major programme of work in partnership with industry to get ahead of the threat to aviation.

54. This section contains questions on chapter 6 of the consultation document - Ensure a safe and secure way to travel. 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)

<input type="checkbox"/>	General aviation safety
<input type="checkbox"/>	New business models
<input type="checkbox"/>	New technologies
<input type="checkbox"/>	Improving data and reporting
<input type="checkbox"/>	Responding to global variations in safety standards
<input type="checkbox"/>	UK driving global action on security
<input type="checkbox"/>	Cyber threat to aviation
<input type="checkbox"/>	Regulatory burden
<input type="checkbox"/>	Electronic conspicuity

55. To what extent do these proposals sufficiently address existing and emerging safety and security risks in order to maintain the business and passenger confidence in the UK industry and as a destination?

Policy proposals

The questions in the section below refer to policy proposals contained in chapter 6 of the consultation document - Ensure a safe and secure way to travel. As with the rest of this consultation, you are welcome to respond to any, all or none of the questions in this section.

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

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

58. 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)

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

60. What are the regulatory burdens that need to be managed and how might these be addressed?

61. 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?

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

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

	Yes (see following evidence page)
	No (proceed to next section)

13. Safety and security evidence

64. Please give a brief summary of the additional evidence that you wish to provide.

Comments:

14. Chapter 7: Support general aviation

The General Aviation (GA) sector covers non-scheduled civil aviation. It includes, amongst other things, business jets, aerial photography, pilot training, emergency service flights and air displays as well as private flying. The aircraft involved include single and multi-engine fixed wing aeroplanes, helicopters, gliders, balloons, microlights, paragliders and model aircraft. The Aviation Strategy sets out how the government proposes to enable, facilitate and encourage growth in GA, and indicates where it thinks that the GA sector itself should seize the initiative and capitalise on those opportunities. It focuses on:

- how the government proposes to reduce regulation
- the government's proposals for a strategic network
- support for new and existing commercial activities
- airspace
- safety
- safeguarding of aerodromes

65. 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)

<input type="checkbox"/>	Reducing regulatory burden
<input type="checkbox"/>	General aviation (GA) strategic network
<input type="checkbox"/>	Airspace
<input type="checkbox"/>	Safety
<input type="checkbox"/>	Training and skills
<input type="checkbox"/>	Safeguarding
<input type="checkbox"/>	Environmental impact
<input type="checkbox"/>	Refreshing the GA strategy

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

Policy proposals

The questions in the section below refer to policy proposals contained in chapter 7 of the consultation document - Support general aviation. As with the rest of this consultation, you are welcome to respond to any, all or none of the questions in this section.

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

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

69. 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)

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

71. What are the regulatory burdens that need to be managed and how might these be addressed?

72. 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?

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

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

<input type="checkbox"/>	Yes (see following evidence page)
<input type="checkbox"/>	No (proceed to next section)

15. General aviation evidence

75. Please give a brief summary of the additional evidence that you wish to provide.

Comments:

16. Chapter 8: Encourage innovation and new technology

Innovation is key to delivering the outcomes of the Aviation Strategy. The government recognises the important role that technological advances and new business models play in economic growth, especially in industries such as aviation and aerospace.

The government wants to capture the benefits of innovation for consumers, by unlocking mobility and offering new options on how people and goods can move around; and for the aerospace and aviation sectors, to maintain the UK's global leadership, help support jobs, increase productivity, and boost our trade and export capabilities.

The Aviation Strategy:

- sets out some of the main areas of opportunity for innovation in aviation automation, electrification and digitalisation and data sharing
- identifies some of the barriers to innovation and how these can be addressed by government in its enabling role, working in partnership with the sector
- proposes measures to better align policy and investment

76. This section contains questions on chapter 8 of the consultation document - Encourage innovation and new technology. 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)

<input type="checkbox"/>	Automation
<input type="checkbox"/>	Electrification
<input type="checkbox"/>	Digitalisation and data sharing
<input type="checkbox"/>	Agile regulation
<input type="checkbox"/>	Public acceptance of emerging technology
<input type="checkbox"/>	Anticipating future developments
<input type="checkbox"/>	Aerospace sector deal
<input type="checkbox"/>	Improving cross government working

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?

78. Do the proposals in this chapter sufficiently address the barriers to innovation?

Policy proposals

The questions in the section below refer to policy proposals contained in chapter 8 of the consultation document - Encourage innovation and new technology. As with the rest of this consultation, you are welcome to respond to any, all or none of the questions in this section.

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

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

81. 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)

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

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

84. 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?

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

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

<input type="checkbox"/>	Yes (see following evidence page)
<input type="checkbox"/>	No (proceed to next section)

17. Technology evidence

87. Please give a brief summary of the additional evidence that you wish to provide.

Comments:

18. Technical annexes

Thank you for completing the response to the consultation.

There are some additional questions on technical aspects of the strategy:

Annex A: Legislation to enforce the development of airspace change proposals

Annex D: Proposed Public Service Obligation (PSO) assessment criteria

Anyone can respond to these questions, however due to their technical nature, they are likely to only be of interest to subject matter experts.

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

<input type="checkbox"/>	Yes (Go to Annexe A)
<input type="checkbox"/>	No (you have finished the questionnaire)

19. Annex A: Legislation to enforce the development of airspace change proposals

This section contains questions on Annex A of the aviation strategy - Legislation to enforce the development of airspace change proposals.

You will need to download a copy of the annexe from GOV.UK in order to respond to these questions.

You can find the annexe on this page - <https://www.gov.uk/government/consultations/aviation-2050-the-future-of-uk-aviation>

89. Should government legislate for powers to direct individual ACPs identified as necessary in a masterplan to be taken forward?

90. What are your views on the above two proposals?

91. Do you agree that option a) should be the lead option?

- Yes
- No
- Don't know

Comments:

92. What are your views on the scope for the use of the powers?

93. What are your views on the use of the triggers for using the legislative powers?

94. What are your views on the proposed sanctions and penalties regime?

95. The government proposes that the airport/ANSP would be able to appeal in relation to the following matters: the validity or terms of an enforcement order the imposition of a financial penalty the timing of the payment of a penalty the amount of the penalty What are your views on the grounds for appeals?

96. What are your views on the best approach to funding an airspace change where a small airport may need financial support to do so?

20. Annex D: Proposed Public Service Obligation (PSO) assessment criteria

This section contains a question on Annex D of the aviation strategy - Proposed Public Service Obligation (PSO) assessment criteria.

You will need to download a copy of the annexe from GOV.UK in order to respond to these questions.

You can find the annexe on this page - <https://www.gov.uk/government/consultations/aviation-2050-the-future-of-uk-aviation>

97. The government is proposing a new two-stage process for assessing PSO applications:*
stage 1 – prerequisite criteria* stage 2 – proposed full criteria Please review the details of these criteria in the Annex D document, and state below if you think they are the right criteria to judge PSO proposals against.

Return this questionnaire

Email to:

AviationStrategy@dft.gov.uk

Post it to:

Aviation Strategy,
Department for Transport,
33 Horseferry Road,
London,
SW1P 4DR