

**Department for Transport**

Via email to [aviationstrategy@dft.gsi.gov.uk](mailto:aviationstrategy@dft.gsi.gov.uk)

I am writing with my submission to your call for evidence on a new UK aviation strategy. I appreciate that this is the first of a series of consultations and an opportunity for us to consider the high-level approach being taken.

Aviation remains of critical importance to London, enabling trade and investment as well supporting inbound tourism. Every year, London's airports handle 163 million passengers. Together, they give the capital access to more flights than any other city on the planet. Our airports therefore play a valuable role supporting growth and employment, with around a million jobs across the UK attributed to aviation. Our airports are important as we look to secure new trading opportunities post-Brexit and the framework for aviation must support this.

Despite this valuable role, the negative environmental impacts of aviation cannot be ignored given their consequences for public health. They must be properly addressed in the aviation strategy, yet in the draft presented are considered a secondary factor in the context of managing growth.

It is also a serious weakness of the draft strategy that it excludes Heathrow expansion. This policy decision will have by far the largest impact of any issue within aviation. You will be aware that I remain opposed to a third runway. Regardless of your view of this proposal though, its exclusion fundamentally undermines the aviation strategy and holds back the development of the sector.

My response should be understood in context of the strategies I am currently developing. The draft London Plan, to be launched later this year, will consider the overall role of aviation for London. Aviation is also addressed in my recently published draft Mayor's Transport Strategy and draft London Environment Strategy. Collectively, these strategies set out my vision for a greener, more sustainable, growing global city. The aviation strategy has a role to play in supporting this vision for London and improving the health and quality of life of Londoners.

This response focuses on four fundamental concerns with the draft aviation strategy.

## **Brexit**

The fundamental issue currently facing the UK economy is Brexit and this presents the aviation sector with unique challenges. The post-Brexit arrangements are fundamental to the UK aviation sector and its future success. The aviation strategy must fully engage with the issues it presents: it is not sufficient to treat Brexit as something separate from longer-term UK aviation policy.

The paper rightly recognises the success of the UK aviation sector. Core to this success has been its membership of the EU's European Common Aviation Area (ECAA). This has liberalised air travel within the EU and European Economic Area, as well as with third countries on Europe's borders and the US and Canada. This has spurred competition, lowered fares and transformed our connectivity.

All that is now potentially at stake. Unlike trade, which can rely on WTO rules, there is no automatic 'fall-back' for aviation. If the UK were to leave the ECAA, it is unclear what legal basis there would be for flights to these markets. There is no guarantee that we could secure comparable access to key markets like the EU and the US in the ensuing bilateral negotiations. There would be a significant risk to the extensive air connectivity that underpins the UK economy.

This issue is also pressing because of the industry's lead times. Airlines plan their fleet and crew requirements and start selling tickets a year in advance. In the face of uncertainty, airlines face a difficult choice in spring 2018: reduce planned flights to and from the UK or risk selling tickets on flights that they might not legally be allowed to operate.

The guiding principle of any aviation strategy should be how we can continue our participation in the ECAA post-Brexit. The framework in place after Brexit needs to be sufficiently consistent that we can secure continued membership of the ECAA. This includes the approach to slot regulation, public service obligations (PSOs) and state aid as well as wider competition policy and regulation of the industry. We should also be looking to replicate the EU air passenger rights to the benefit of British travellers.

The UK should take the requisite steps to retain membership of the EU's European Aviation Safety Agency (EASA). This will ensure it can continue to influence global standards. The UK's position in air freight will also be affected by the nature and scope of the future EU-UK customs arrangements.

The risk to London and the UK of higher fares, fewer routes and lower frequencies post-Brexit should not be taken lightly. In the extreme, this could undermine the case in favour of an additional runway for London and the wider South East.

## **Environment**

In its fifth objective, the draft strategy sets out support for growth while addressing the environmental impacts. It would be a serious omission if the strategy only addressed the environmental impacts of growth; the existing impacts of aviation must also be addressed.

The paper says that "it will put passengers and businesses at the centre of everything we do" but fails to give similar weight to the communities impacted by aviation. Their

consent is critical if the sector is to thrive and meet its full potential. This is particularly so in the context of the major airspace change and new capacity options coming forward.

It is not an explicit objective to tackle the environmental impact of aviation nor the impact of aviation's noise and pollution on public health. Instead it is framed in the context of supporting growth. Where growth plans are taken forward, it must be on the basis that the aviation sector is directly addressing its impacts.

Difficult policy decisions are being taken, such as those I am taking in London to tackle our air quality crisis. These cannot be sacrificed to provide headroom for airports to increase their pollution. This could erase any benefits for Londoners brought about by my actions to improve air quality.

The UK also has challenging plans to mitigate climate change and meet its carbon reduction targets. The aviation strategy therefore must seek substantial reductions in greenhouse gas emissions. It is not acceptable to rely on carbon credits which would have implications for other industry sectors. Again, London is taking difficult steps to reduce carbon emissions and a national aviation strategy must ensure that the industry is doing all it can to tackle its environmental impacts.

The draft strategy fails to acknowledge that journeys to and from the airport are a key contributor to the air quality impacts of aviation. The aviation sector, and by association this strategy, must ensure concrete steps to significantly improve sustainable mode share for both passengers and staff. Similarly, the sector must make progress to improve its airside operations to minimise the environmental impact of its activities. This is the only way that aviation can play a fair part in meeting the UK's legal obligations on air quality.

Any ambition in the strategy to reduce the noise, air quality and greenhouse gas emissions of aviation is fundamentally undermined by Government policy on airport capacity in the South East. If every other airport in the UK achieved an 80 per cent reduction in the number of people significantly exposed to aircraft noise, the benefits would be cancelled out by impact of a third runway at Heathrow. There is a risk that Heathrow expansion will lead to air quality limits being exceeded and there remain concerns about how expansion can be accommodated within existing carbon limits. If the Government persists with Heathrow expansion it will undermine any broader attempts to reduce the impacts of aviation and build public trust in the sector.

Data shows that people are becoming more sensitive to noise impacts. Therefore a holistic approach is required, including airspace management, to establish challenging and binding noise objectives. This should recognise the impact of the increasing numbers and concentration of flightpaths, which have minimised respite for local communities. I believe a credible noise regulator could play that role. It requires effective powers of enforcement, including financial sanctions when appropriate. This will not be achieved by the advisory body currently proposed.

The draft strategy talks of favouring local solutions for dealing with aviation-related noise. This cannot become a euphemism for airports setting their own noise regime. Local solutions must be underpinned by a stronger role for locally-elected bodies.

## **Surface access**

The draft aviation strategy underplays the critical role of surface access in supporting aviation. The strategy should be clear about the need for more attractive, sustainable public transport access to airports. It is not a specific objective, which risks a piecemeal approach when a holistic one is required.

There should also be proper recognition of the valuable role that surface access can play in widening airport catchments. This would help make better use of existing capacity and encourage competition between airports, as well as unlocking associated development.

An increase in airport passengers using surface access routes cannot be at the expense of non-airport passengers. It needs to be demonstrated how any forecast growth in airport surface access demand can be accommodated by the network, alongside non-airport traffic.

Clarity in the surface access infrastructure required to meet airport growth then needs to be matched by a clear framework for how it is funded and delivered. I am not prepared to allow Londoners to foot a spiralling bill for surface transport improvements. Nor am I prepared to accept TfL-funded improvements to rail capacity to be absorbed by increased airport surface access demands. To do so undermines the very purpose of such long-standing, funded transport upgrades, designed primarily to cope with increased commuter demands.

The strategy also appears to neglect consideration of surface access to airports for freight. Freight transport to airports raises particular concerns, with large goods vehicles often using ill-suited local roads. There needs to be a clear strategy for reducing the environmental impacts of freight surface access.

### **Demand forecasts**

Updated aviation forecasts were first promised in February 2017, as part of the consultation on the National Policy Statement (NPS) on Heathrow expansion but have yet to be published. I welcome the announcement by Government on 7 September that this will be released later this year. For policy to be made on a sound, evidenced basis, there should be no further delay in publishing these.

Aviation will continue to play a critical role in supporting the economic development of London and the UK, particularly in the context of Brexit. We must make sure that Brexit is taken forward in a way that does not harm the UK aviation industry but builds on its previous success. We must also make sure that the environmental impacts of aviation are not an afterthought but central to aviation policy. We must take every opportunity to reduce the noise, air quality and carbon impacts of aviation and the associated effect on public health.

It will be necessary for Government to take clear, focused, meaningful action if some of these critical challenges are to be successfully addressed. There is no better opportunity to set this out in the strategy that is to guide UK aviation over the coming decades.

Yours sincerely,

**Sadiq Khan**  
Mayor of London

