

Aviation strategy: call for evidence

Page 1: Personal details

Q1. Contact information	
Name	Richard Earis
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Q2. What is the nature of your:	
interest in the aviation sector?	Local Authority (Environmental Protection)
involvement in the aviation sector?	Local Authority (Environmental Protection)

Q3. Are you responding:	
on behalf of an organisation?	

Page 2: Organisational details

Q4. What is the name of your organisation?	
The London Borough of Southwark	

Page 3: Aviation Strategy

Q5. What are your views on the proposed aim and objectives?	
<p>The proposed aims and objectives do not give sufficient weight to tackling the environmental impacts of aviation, in particular noise. This is tied to supporting growth rather than being listed as an independent aim to minimise and reduce environmental impacts. In some circumstances these two factors may be incompatible. Therefore these two aims should be split with the latter being only to support growth in the aviation sector in circumstances where this can clearly be achieved with environmental sustainability.</p>	

Q6. Do you have a view on the order the objectives should be tackled?	
Yes	

Page 4: Aviation Strategy: your order

Q7. In what order of importance do you think the objectives should be tackled (please rank the challenges 1 = highest priority, 6 = lowest priority)?

- Help the aviation industry work its customers** -
- Ensure a safe and secure way to travel** -
- Build a global and connected Britain** -
- Encourage competitive markets** -
- Support growth while tackling environmental impacts** -
- Develop future innovation, technology and skills** -

Why?

The Authority considers that the most important policy challenge is to ensure that the aviation sector is environmentally sustainable and focuses on reducing its impacts from noise and air pollution on people affected and on the wider environment due to atmospheric pollution and climate change. The policy challenges listed do not adequately account for these issues. The only mention is of 'sustainable growth' in aviation without full consideration of existing environmental externalities and impacts. Due weight is not given to encourage more environmentally sustainable alternatives in aviation technology. Without environmentally sustainable aviation communities will cease to support essential aviation infrastructure. Safety & security and supporting sustainable economic growth are also considered important aims.

Page 5: Strategy principles

Q8. What are your views on the proposed strategy principles?

The proposed principles are inadequate. They focus on consumers and markets but are silent on the needs of communities affected by aviation and fail to mention environmental impacts.

Page 6: Policy tests

Q9. What are your views on the proposed policy tests?

The policy tests are accepted as far as they go however they should include an explicit test as to whether a policy will have a detrimental impact on the environment or local communities surrounding airports and flight paths. It is not clear how policy will be judged against the tests or what weight the different parts of the strategy will be given in measuring policy options.

Page 7: Utilising existing runways

Q10. What are your views on the government's proposal to support airports throughout the UK making best use of their existing runways, subject to environmental issues being addressed?

The Authority would agree with supporting more efficient use of existing runways in the limited circumstances where this can be done without detriment to the environment or local communities, thus in a sustainable way. The document currently implies a blanket policy of support for 'all airports who wish to make best use of their existing runways including those in the South East' (excluding Heathrow) which contradicts the qualifier in the question of 'subject to environmental issues being addressed'. Support for 'all airports' fails to take a broader strategic approach on where additional capacity is needed, where it provides the greatest economic benefits, or where it can be achieved with the fewest environmental impacts. The Authority agrees with the commitment that ultimately decisions should be made locally and planning applications judged on their individual merits, accounting for environmental impacts. The Authority would not support a blanket strategy of increasing airport capacity through more intensive use.

Page 8: Consultation process

Q11. Are there any other specific questions on the 6 objectives that you think should be included in the planned consultations?

Yes

Page 9: Consultation process: other questions

Q12. What other questions would you like considered?

The questions in Chapter 7 are considered reasonable to explore in developing the strategy. The test will be whether the strategy sufficiently answers the questions; in particular in relation to regulation and incentives surrounding community noise reduction and the balance between growth and environmental impacts.

Page 10: Consultation process

Q13. Are there any other sources of information or evidence that the government should bear in mind when developing the strategy?

Yes

Page 11: Consultation process: other information and evidence

Q14. What sources of information or evidence?

The government should consider evidence from Local Authorities, community groups and campaign groups affected by environmental issues from aviation. It should also consider up-to-date evidence of noise impact from the ANASE and SoNA studies. Further studies into noise and annoyance from aircraft should be commissioned to inform the strategy.

Page 12: Consultation process

Q15. Does the proposed timetable (chapter 2), provide enough time to examine the existing issues in sufficient depth?

Yes

Page 14: Consultation process

Q17. What action could the government take to make sure that the maximum number of people, communities and organisations are engaged in the process and are able to have their views heard?

Community consultation meetings, meetings and consultation with pressure groups and liaison with affected public organisations such as Local Authorities and the NHS.

Page 15: Other comments

Q18. Do you have any other comments on the issues raised by this call for evidence?

Yes

Page 16: Other comments: your views

Q19. What comments?

The Authority considers that it is important for the strategy to contain firm and measureable commitments on the future environmental performance of all aspects of the aviation sector and it's supporting industries.

Page 17: Organisational help

Q20. If you are responding on behalf of an organisation, would your organisation be willing to:

	Your answer
take part in helping development of the strategy?	Yes
help organise events to help the development of the strategy?	Yes