

All Party Parliamentary Group Inquiry on Heathrow Expansion and Regional Connectivity

Building Aviation Back Better: Developing an Environmental Aviation Strategy

Responses of Teddington Action Group <http://www.teddingtonactiongroup.com/aboutus/>

Question Number	Question	Response of Teddington Action Group
1	<p>Aviation White Paper The delay to the publication of the Aviation White Paper provides an opportunity to pause and rethink its priorities to ensure that it delivers for the whole country.</p> <ol style="list-style-type: none"> 1. Is the mantra of ‘growth everywhere’ still feasible in a post-pandemic world? 2. How much growth in aviation is compatible with the Net Zero targets? 3. What incentive and penalties should be mandated to ensure technological improvements are delivered? 4. What options should be considered for demand management? 	<div style="text-align: right;">  </div> <ol style="list-style-type: none"> 1. The mantra of growth everywhere is not feasible. We have to get to a 100% reduction of CO2 by 2050. The Committee on Climate Change (“CCC”) advises that this will mean no more than 30 MtCO2 all to be offset. They say in the letter of Lord Deben to the SoS for Transport: “Measures should be put in place to limit growth in demand to at most 25% above current levels by 2050” 2. Likely to be nil and maybe even contraction. The CCC’s statement above in (1) “at most” should be planned at no expansion to give the necessary leeway to truly get to net zero by 2050 3. Taxing aviation fuel, carbon taxing, some use of sustainable fuels but ONLY to the extent that there are genuine greenhouse gas savings (to include non CO2 gases), frequent flyer levies upon passengers. 4. Pricing, including frequent flyer levies. To enable people to take a holiday abroad once a year, there would need to be a serious uplift for extra flights, with the first one free of the frequent flyer levy. Devlin and Bernick for the New Economics Foundation proposed in 2015 a rising levy of £40 for the first extra flight beyond one flight a year rising to £90 for the second, then £155, £220, £290, £350, £405, and £420 for the 9th extra flight. They conducted a detailed survey of wealth and spending patterns. However, time has moved on since then and the need for reduction is greater with a net zero target by 2050 –

		something that was not the case in 2015. We would suggest a greater levy is necessary and propose increasing Devlin and Bernick's figures by 30%. Depending upon the effect, there may need to be adjustments
2	<p>Regional Balance Government policy is to help rebalance the economy and this should seek to focus any growth in aviation in the regions, within existing planning constraints and ensure that this is compatible with net zero climate targets.</p> <ol style="list-style-type: none"> 1. What support do regional airports require from Government? 2. Where would growth in aviation best deliver economic benefit within existing environmental targets? 3. What investments in surface transport are require to facilitate fewer car journeys to regional airports? 	<ol style="list-style-type: none"> 1. The only support necessary for regional airports is to stop allowing expansion of south east airports into hubs, which drain resources away from the regions 2. The North and the Midlands 3. Rail and buses. We also need a national infrastructure plan to co-ordinate facilities. Most notably this needs to happen with airports to stop them competing against each other in a way that duplicates facilities. We need to use our existing airport capacity to full effect rather than allow airports to expand
3	<p>Bailouts It is likely that many aviation sector businesses will need financial assistance. The UK Government could include social and environmental objectives in any bailout approach as has happened in other European countries.</p> <ol style="list-style-type: none"> 1. What financial support should Government be willing to offer to the aviation sector? 2. What conditions should be attached to any financial support? 	<ol style="list-style-type: none"> 1. None. There are other areas that are far more needy of support. 2. If there is to be any financial support, then it should be conditional on there being appropriate policies and commitment to moderation and emissions compliance. Domestic aviation, other than to islands should be banned in favour of trains

	<p>3. Are there any regulatory mechanisms or legislative changes required?</p>	<p>3. Yes; stringent emissions limits from the airport including airborne aircraft. Individual targets for greenhouse gas emissions with requirements to cease operations if breached. There should also be a noise levy that will not only deter the use of noisy aircraft but will also deter aircraft being flown in a way that causes extra noise to people on the ground beyond that which is unavoidable. Noisy aircraft like the A380 and Boeing 777 need to be prohibited from flying after 10pm</p>
4	<p>Jobs It is vital that transition arrangements are put in place which ensure that good quality employment in the sector is protected, while also facilitating the development of the skills necessary for roles in the future.</p> <ol style="list-style-type: none"> 1. What level of demand is likely to return to aviation in the next few years and at what pace? 2. What policy options does Government have to protect workers (particularly low skilled and lower-paid workers) in the sector? 3. What skills and training do workers require to transition into alternative sectors? 	<ol style="list-style-type: none"> 1. The pace is likely to be slow. The prior demand level was excessive and brought about by under and unfair pricing favouring aviation over other forms of transport, such as rail. 2018 levels of demand may not return until 2025 2. Workers need to be helped to find work elsewhere since the industry will contract for a number of years. We are seeing severe redundancies across the industry, which has until now completely failed to adapt to modern 21st century needs. Simply giving financial support to the industry as it exists is tantamount to propping up an industry that is no longer operating within the current market. Lower paid workers will probably have fewer aviation specific skills and potentially be more moveable, subject to there being work elsewhere 3. The most obvious skilled area is conservation and development of sustainable forms of transport and energy as well as alternative forms of propulsion. This is likely to be a growth area and employment in this field should be encouraged. It can, of course, include aviation
5	<p>Taxation The Government is due to review the tax arrangements of the aviation sector.</p> <ol style="list-style-type: none"> 1. Are existing aviation taxes fit for purpose? 2. How can Government ensure that all aviation companies make a fair 	<ol style="list-style-type: none"> 1. The existing aviation taxes are not fit for purpose and are grossly unfair and prejudicial to other forms of transport – particularly rail. The existing taxes also offer no incentive or inducement to the industry to act responsibly in controlling either emissions or noise 2. Fuel tax and VAT on aviation fuel, VAT on tickets and supplies, no loss leaders. At present Fuel Tax is 57.95p per litre of fuel + 20% VAT on the fuel (both for business and personal use). The VAT can be reclaimed as

	<p>contribution to the reduction of emissions?</p> <p>3. Should revenue raised from aviation taxes be directed to investing in emissions reductions technologies?</p>	<p>an Input tax for VAT registered businesses, but the Fuel Tax cannot, so that is an overhead expense. The same should apply to aviation. There should also be a noise levy that will give serious inducement to airlines and operators to operate quieter planes in the way that causes least noise to communities on the ground. For example, it is possible to operate aircraft, as do airlines at Heathrow, in a way that does not cause least annoyance to the most people on the ground so as to save money on fuel and servicing costs. This should be prohibited by the introduction of a noise levy to offset any financial advantage in operating in such a way</p> <p>3. Possibly. This will depend on how much and what assistance is left for the aviation sector. At present, it gets far too much support with its tax concessions. Many would consider that taxpayers' money is needed elsewhere far more urgently</p>
6	<p>Policy Framework for Decarbonisation In order to meet Net Zero targets there will need to be a robust framework for decarbonisation from Government with strict targets and incentives to help boost investment and innovation.</p> <p>1. What would these targets and incentives look like?</p> <p>2. What role might be played by electric and hybrid aircraft?</p> <p>3. Are any changes required to the Renewable Transport Fuels Obligation?</p>	<p>1. Specific targets for UK aviation (including departing flights to international destinations) and specific targets for individual airports. If there are breaches, there should be penalties and then a shutdown if breaches increase beyond a certain point</p> <p>2. Not much since the technology is not available for enough energy storage. Short commercial flights with electric aircraft might be a possibility within 10 years. Hybrid aircraft incorporating fuels like hydrogen may be problematical as hydrogen combustion produces water vapour, which, when emitted at high altitude, is a greenhouse gas. The aviation industry has been very slow to admit or research the emission and effect of non-CO2 greenhouse gases.</p> <p>3. Yes; there is insufficient attention to greenhouse gas capture of existing vegetation when computing the net greenhouse gas emissions from renewable fuels. Increasing the Obligation Buy out price is an</p>

		<p>interesting concept, but we are concerned that the Government is putting too much emphasis upon renewable fuels. Biofuels do not “capture” all the greenhouse gases during their growth because many biomass crops would have been grown in any case. The CCC consider that biofuels should be phased out by 2030 for surface transport and that synthetic fuels are too uncertain at present to put any figure on their usage or uptake. Second generation biofuels from waste or residue are promising but their CO2 savings will not be the original capture from growth but rather the CO2 savings from avoidance of the degradation if not used a second time around. At present there is insufficient information on what would be the CO2 emissions savings. Statements that are not helpful are such as “Sustainable Aviation Fuels can achieve as high as 80% emissions savings compared to conventional jet fuel, and therefore, if deployed at a large scale, have important potential to help aviation contribute to EU reaching its climate targets” [EU Commission Inception Impact Assessment for the 4th quarter of 2020]. There is no specification or detail on how this figure of 80% is calculated. If it includes capture during growth, it is probably grossly optimistic for the reasons stated.</p>
7	<p>Community Impacts The operations of aviation have significant impacts on local communities near airports and under flight paths. As demand returns to pre-pandemic levels there is an opportunity to ensure that the most robust mitigation measures are in place.</p> <ol style="list-style-type: none"> 1. Do current noise impact assessments consider changes in the noise environment? 	<ol style="list-style-type: none"> 1. No. Indeed the noise assessments from existing policies are specifically static and give no consideration to changes. This is a fundamental defect in the current SoNA study that is used by the Government as a baseline, with the noise limits being way too high and vastly in excess of the World Health Organisation recommended maxima. We also have the situation of the Government creating its Airspace Change Organisation Group (ACOG) to assist in the implementation of Performance Based Navigation (PBN) creating in the Government’s

	<ol style="list-style-type: none"> 2. What impact will the intensification of existing flight paths have on local communities? 3. How can improvements in local air quality be secured for the long term? 4. What schemes or incentives are required to increase the number of people accessing airports via public transport? 5. Can the impact of night flights be mitigated? 	<p>own words “motorways in the sky”. The ACOG admit that “With a higher appetite for airspace change, the current emphasis on noise mitigation at lower altitudes is likely to come into greater conflict with network designs that seek to maximise flight efficiency and combat emissions”. The Government, without any consultation or discussion with people affected, has adopted three recommendations of the ACOG with no consideration of the environmental effects upon people of these “motorways in the sky”. There is at least considerable doubt (admitted by ACOG who provide a non-return scenario, which they term “L shape recovery”) that the demand for aviation will return to 2019 pre-Covid-19 levels</p> <ol style="list-style-type: none"> 2. Very considerable impacts. For example, we can see that there is not one single implementation of PBN that has been introduced anywhere in the World without huge adverse consequences and protest from people affected 3. By setting targets (noise, emissions, greenhouse gas emissions) and insisting that they are met. If they are breached, then the perpetrators of the breaches need to be fined and ultimately have to be stopped from operating 4. More trains, buses, and taxis 5. No; night flights should be banned outright. Living beings need to sleep
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