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Community Protection, Transport &  
Environment Directorate  
Spatial Planning Team  
Surrey County Council  
County Hall  
Kingston upon Thames KT1 2DY

20 June 2019

Dear Sir or Madam

### **Aviation 2050: The future of UK aviation - Green Paper Consultation**

Surrey County Council welcomes the invitation to comment on the Government's Green Paper consultation on the long term strategy for sustainable aviation growth. This response has been shared with our Cabinet Member for Environment and Waste.

Our responses to the questions, included in the document that are relevant to us, are attached as annex 1 to this letter and our general comments are set out under the relevant headings below. The County Council's earlier response to the proposals set out in Annex A of the Green Paper for government powers related to airspace change applications is attached as Annex 2 to this letter.

In general, we support the Government's position in relation to aviation growth, particularly the emphasis on the need for such growth to take place in a sustainable way, "with actions to mitigate the environmental impacts." This reflects the ongoing issues of concern to us, expressed in a County Council Resolution agreed at the Full Council meeting held on 16 July 2013. In summary, our resolution recognises the importance of both Heathrow and Gatwick Airports to the success of Surrey's economy and we would not wish to see the capacity at either airport reduced. However, we are clear that environmental and surface access issues must be satisfactorily addressed alongside any proposals for expansion. We further consider that where mitigation of environmental impacts is not possible, it is essential for appropriate compensation packages to be offered. The resolution provides the context for our response to this consultation.

### **Economy**

Surrey is located between Heathrow and Gatwick Airports and the contribution that these two major airports make to the prosperity of the county's economy is well recognised. This proximity also generates significant negative impacts and this council's primary concern is the impact of future aviation growth on our residents, businesses and the county's already pressured transport infrastructure. We are hopeful that an outcome of the Green Paper will be

for the government to take more of a lead in resolving these tensions and to engage with this council, along with other stakeholders, to work constructively and in partnership.

### **Surface access**

The two international airports on our borders makes surface access a priority for us as the local transport authority for Surrey. The reference in the consultation document to the importance of surface transport access to airports and the statement that all airport developments should be accompanied by clear surface access proposals is therefore welcome. We consider that airport expansion will only be a success for residents and businesses in Surrey and the wider region if there is a clear and agreed framework for the necessary supporting transport infrastructure. To date there has been no firm commitment for the funding of a southern rail access to Heathrow as part of the surface access strategy to support expansion. This scheme was supposed to be delivered as part of the T5 development and the failure in delivery indicates that Government intervention is necessary to ensure that it is provided prior to the utilisation of a third runway at Heathrow. We understand that a representative from the Department for Transport has recently assured the Heathrow Strategic Planning Group's (HSPG) Officers and Leaders Board that the Department now intends to take the lead in defining the minimum requirements and objectives for a Southern Rail Link to Heathrow. This is welcome as we consider a southern rail access to Heathrow critical to delivering the surface access strategy for the expanded airport.

### **Noise**

We welcome the Government's recognition that more concentrated and frequent overflights, as a result of the introduction of the new performance based satellite navigation system, could cancel out the benefits of quieter aircraft. As the decision to provide multiple flight paths will be made by individual airports and not by an independent public authority, it remains a matter of concern for this council that the precise concentrated flight paths will limit the opportunity for respite. Given the recognised impacts of noise on public health, the Government is urged to commit to target levels for noise and also to give a clear enforceable lead on the requirement for overflown communities to benefit from periods of respite. It is also considered that the industry needs to be made accountable for the costs it imposes on communities and on wider society for example, in terms of the additional resources required to address the potential longer term impacts on both mental and physical health.

### **Air Pollution**

We support the proposal for government-set minimum criteria to meet local air quality targets. The proposal to improve the understanding of aviation's impact on local air quality is also welcomed to be included in air quality plans for all major airports. We also welcome the proposal to explore the impacts of the toxicity of ultrafine particles and for better monitoring.

### **Climate Change**

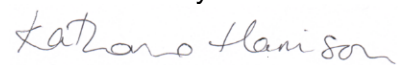
Since the Green Paper was published, the Climate Change Committee (CCC) has produced its report, *Net Zero The UK's contribution to stopping global warming* (May 2019). The Government has accepted the CCC's recommendation for the UK to become "net-zero" in terms of emissions by 2050. The draft Green Paper therefore needs to be amended to include a more ambitious target than that of reducing aviation's climate emissions to their 2005 levels by 2050. The impact of the new target, along with the CCC's more specific advice, due to be submitted to Government later this year, is likely to present new challenges and potentially to have a significant impact on the aviation industry. The Government will need to fully consider this advice in taking forward the Green Paper. We would suggest that any approach will need to involve setting specific targets and the regular monitoring of progress. Furthermore, the Government will need to make it clear that should targets not be met, regulated measures will be introduced.

The County Council wishes to work constructively with the Government, the airports, relevant national agencies, other local authorities and Local Enterprise Partnerships to ensure a balanced approach with regard to aviation policy making, planning and implementation and therefore welcomes the theme of partnership running through this document. In this regard, we

trust that you will welcome our response to this document and fully consider the concerns we have raised.

Please contact Katharine Harrison with any queries, either by telephone on 0208 541 9453 or by email at [kath.harrison@surreycc.gov.uk](mailto:kath.harrison@surreycc.gov.uk).

Yours sincerely

A handwritten signature in cursive script that reads "Katharine Harrison".

Katharine Harrison  
Spatial Planning and Policy Team Leader

## Aviation 2050: the future of Aviation – Completed Questionnaire

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

Your name

Your email

### 2. Are you responding as:

	an individual? (Go to section 4. Chapter 2: Build a global and connected Britain)
X	on behalf of an organisation? (Go to 3. Organisation details)

### 3. What organisation do you work for?

### 4. What type of organisation is this?

	Airline
	Airport
	Regulatory body
	Interest group
	Community group
	Industry
X	Other:

### Chapter 2: Build a global and connected Britain

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)

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

X	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?**

We recognise the importance of global connectivity and the benefits this brings to Surrey in terms of economic growth and prosperity. Surrey County Council supports the concept of expanding connectivity and welcomes the significant economic benefits that this is bound to contribute to the national, regional and local economy. However a robust framework for implementation is required to ensure that in pursuing the policies set out in this chapter, those policy objectives which seek to minimise the negative impacts of growth in aviation activity on local communities are not overlooked.

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

Good surface access to airports is essential to global connectivity and is central to boosting an airport's contribution to the economy. It reduces costs and increases productivity through time saving for businesses and employees, including airport workers. There are also knock-on effects through supply chains to markets and these benefits further support employment. Furthermore, there are wider benefits throughout the economy, from improving access to hubs of international connectivity – for example the widening of catchment areas which helps to optimise the capacity of the airport and boost the catalytic impacts of the airports. Airport expansion will only be a success for the local and wider economy if there is good surface access. Congestion can be a major issue for freight traffic movement by road to the airports and from the airports to markets and it needs to be resolved in order to support this sector and to enable it to grow.

**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)

**Chapter 3: Ensure aviation can grow sustainably**

**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
X	Resilience
	Slots allocation
	Safeguarding land
X	Community engagement

X	Carbon emissions
X	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 government’s approach is broadly supported in seeking to support the growth of aviation subject to growth “taking place in a sustainable way, with actions to mitigate the environmental impacts. However there are no clear free standing environmental objectives within the document and so at this stage it is difficult to envisage a framework whereby a programme for sustainable growth will evolve.

The recognition of the need for partnership between the DfT and the CAA to manage the airspace change process is welcome. It is important that the government takes a lead here to ensure that the intention for aviation growth to take place in a sustainable way is realised. The government is best placed to ensure that environmental enhancement, mitigation and community involvement is a feature running through the implementation of all planning for aviation growth. The County Council welcomes continued engagement with DfT and other governmental bodies to ensure that the best is done for Surrey communities impacted upon by proposals for growth at either Gatwick or Heathrow.

Figure 8 appears to cover a comprehensive range of community impacts and so we are concerned that it does not include communities within the list of stakeholders. With this omission corrected, the partnership is welcome, although at this stage it is unclear as to what it will be aiming to deliver. In addition, given that the decision has been made to expand Heathrow and the master planning process has commenced, it appears to be an overdue proposal.

The County Council as the statutory waste authority welcome’s the recognition in the consultation document of the need to reduce waste including single use plastic at airports.

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

The purpose of reviewing this partnership will be to ensure that effective progress is being made towards achieving established milestones and targets. We would expect regular reviews of the partnership particularly as and when new information emerges or when circumstances change.

The partnership would seem likely to comprise a range of priorities and programmes with separate monitoring frameworks driven by a variety of stakeholders. For example Independent Commission on Civil Aviation Noise (ICCAN) has recently issued a draft strategy for consultation that proposes a two year review. It is assumed that this will feed into the framework.

The Government needs to ensure that meaningful and measureable progress on agreed priorities and objectives is made and to effectively hold stakeholders to account. As acknowledged in the Green Paper, continual monitoring of progress will be critical, but there needs to be clarity that the purpose of monitoring

is not simply to record but to assess and review progress and to make any necessary changes to implementation plans.

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

In addition to new information and new technology developments, this could include major airspace changes, for example HAL’s longer term airspace change and the potential implementation of the proposed Independent Parallel Approaches (IPA) at Heathrow. Also when major infrastructure changes are authorised such as the additional Runway at Heathrow.

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

A central theme of the policy proposals is the recognition of the need for growth to be sustainable and the importance of working in partnership to achieve shared goals. It is disappointing that local communities or their representatives in the form of local authorities are not included under the heading of Stakeholders in Figure 8. Early liaison with stakeholders is critical.

The policies in general are welcome, however the weakness appears to be the lack of a plan for implementation and a clear indication that the government will take a leadership role. The measures should take on the need for regulation and enforcement, where appropriate, to tackle the concerns relating to noise, air quality and carbon emissions.

With regard to noise, the measures should address and seek to mitigate the impact of noise not just inside buildings but also outdoor areas used for recreation. They should also seek to reduce the number of people experiencing significant adverse effects at all times of day and night, and to use a suite of noise metrics to address peak noise events and frequency of overflights and for parameters to address the need for respite.

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

The priority for this council is the safeguarding of the health and well-being of Surrey residents and therefore it is of utmost importance to achieve objectives that address the noise and air quality impacts of aviation growth.

Engagement with communities and organisations representing the interests of people living in close proximity to the airport is key to developing these objectives and supporting policies. Communities need to be made aware of the impact of any proposals for changes to airport operations or proposals for growth through properly regulated consultation processes. The introduction of trials for PBN procedures at Gatwick airport with no community consultation resulted in an increase in noise complaints from Surrey residents finding themselves living under a narrow path of concentrated flights being exposed to noise that they consider to be intolerable.

Another key priority should be for an agreed framework for providing the infrastructure necessary to support airport growth, particularly in relation to surface access. There is an immediate and urgent need to resolve the congestion on roads in Surrey, a significant element of which is airport-related. In the long term, significant investment in surface access infrastructure is therefore required for both airports.

The impact of air pollution on public health is a concern for this authority and we welcome the intention to better monitor air pollution, including ultrafine particles. More information is required about what happens to emissions at higher altitudes, given that aircraft emissions are currently only accounted for if they occur within the landing and take-off cycle.

**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)**

Implementation will depend on partnership and collaboration between all stakeholders on a shared vision – including communities. Consultations on airspace change often appear rushed and confusing to communities. The proposal to ask ICAAN to help communities engage in the process is therefore welcomed. ICAAN needs to work with the airport to ensure that communications are clearer than at present. In some areas, communities may be impacted by the airspace changes introduced at more than one airport and communities need to be made aware of the overall cumulative impacts of all the proposals likely to affect them.

On air quality, we welcome the proposed measures in 3.127 as they will help to understand air quality issues. However, it is considered that some attention needs to be given to enforcement and potential sanctions.

The need to address surface access is at the top of this council's priorities and in relation to this we are mindful of past failings.

A southern rail access to Heathrow was supposed to be delivered as part of the T5 development. This failed due to a lack of commitment for funding and any delivery strategy. Despite the Secretary of State for Transport indicating his support for the scheme some 2 years ago, there is still no indication of how costs would be met and nor acknowledgement of responsibility on the part of the airport operator.

Currently, surface access to Heathrow from the south of the airport is woefully inadequate and there is a danger that this will seriously impact on the future viability of the expanded airport if left unresolved. The Government needs to do more than just "support airports to develop surface access" as proposed in diagram 8. It should work closely with airports to define the requirements for infrastructure provision and to plan for the delivery of schemes, including southern rail access to Heathrow, to ensure that the additional demand generated by aviation growth and airport expansion is met within an appropriate time frame. Surface access to Gatwick airport is also a concern to the council, particularly the need to improve east-west rail connections. We would like to the government work with the airport to secure the future use of hybrid or fully electric trains on the North Downs Line.

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

The burden of providing infrastructure to support aviation growth needs to be managed by Government to ensure that funding is provided from the profits generated by aviation growth or through national government funding sources and not from local authorities or via a bidding process that places pressure on local authority resources.

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

Clearly an important issue to address is the tension between the need to ensure the long term success of the aviation industry and the need to minimise and mitigate the impacts on local communities. Mitigation will add cost to the delivery of growth and will potentially involve regulatory burdens which may pose a threat to the viability of growth plans. However, the implications for prioritising cost minimisation over mitigation is likely to be significant for communities and their well-being. The government will need to balance the costs and benefits of competing interests whilst ensuring that the protection of the public interest is at the heart of its strategy for aviation growth.



**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?**

The proposed measures seem related to the provision of information and monitoring and the strategy appears light on clear objectives and targets to protect the environment.

There needs to be a clear strategy for ensuring that appropriate commitments are made and that these are implemented. Monitoring and enforcement mechanisms need to be in place to ensure delivery. There should also be a clear policy for the benefits of growth to be shared with local communities

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

The need to address climate change issues is a long term challenge which needs to be addressed urgently, particularly in the light of Government's recent acceptance of the Climate Change Committee's recommendation for Britain to adopt a target of net zero emissions by 2050. The forthcoming report from the Committee anticipated later this year is likely to present further challenges.

The Government should consider effective mechanisms to ensure that operators use the latest technologies to minimise impacts with regard to CO2 and other greenhouse gasses.

Recognition of the need to reduce waste is welcomed and as a waste planning authority, the council is concerned about the challenge to manage the volumes of residual waste of fossil origin, in a manner that does not prevent management of the waste at the highest point practical in the waste hierarchy. Investment in projects, such as the jet fuel project, to recover and burn residual waste could act as a disincentive to reduce single use plastic as a major carbon source and more generally the reuse and recycling of waste.

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

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

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

It is suggested that reference is made in the White Paper to the Government's recent policy document on waste and resources, [Our Waste, Our Resources: A Strategy For England](#)

Forthcoming advice from the CCC on the reduction of emissions from aviation.

**Chapter 4 Support regional growth and connectivity**

**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)**

<input checked="" type="checkbox"/>	Regional connectivity
<input type="checkbox"/>	Public service obligations (PSOs)
<input type="checkbox"/>	Start up aid

	Air passenger duty
X	Surface access to airports
X	Supporting freight
X	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?**

The government's approach is broadly supported in seeking to support the complex and varied role that airports play in their regions and we particularly support the recognised need for a more visible and cohesive approach to the provision of surface transport.

The measures proposed to better hold the airports to account with regard to surface access strategies and the formalisation of ATFs is particularly welcomed. Clear requirements are needed to ensure that strategies are not only up to date but also funded and delivered. Preparation of surface access strategies should involve engagement with local transport authorities and local transport strategies.

**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?**

The proposals on skills are welcome and the benefits to the community and the local economy with regard to training opportunities is welcomed.

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

Good surface access is the key to optimising connectivity. There needs to be a clear framework for the provision and investment of necessary transport infrastructure. As well as damaging the local economy and health of residents, traffic congestion and the lack of good public transport links can seriously affect regional connectivity.

It is most important for the Government to take a strong lead in working with ATFs to identify the infrastructure needed to mitigate the impacts of increased operations that generate additional traffic movements and to ensure that the investment programmes set out in strategies are delivered and do not comprise unfulfilled rolling programmes of wish lists. The Government's agreement to any proposals for growth at airports, through the DCO process should be conditional on airport promoters being required to commit to clear and agreed frameworks for investment and programmes for delivery of surface access strategies.

The Government's policy position that "the provision and funding of surface access infrastructure and services to airports is primarily the responsibility of the airport operator" needs to be clearly set out in any future aviation White Paper, as part of a clear and agreed framework for the delivery and funding of future infrastructure provision. Such a framework should include the delivery of southern rail access to Heathrow, to be provided prior to the airport's expansion and any new runways coming into operation. The government needs to take a lead in developing and agreeing such a framework with relevant stakeholders.

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

We consider addressing the urgent need to resolve issues relating to the need for improved surface access provision to airports and also meeting the workforce challenges, relating to training and skills to be the most immediate priorities.

**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)**

The spatial planning context should also be a consideration. Local Plans and strategic investment plans through the Local Economic Partnerships and other mechanisms need to be aligned to manage airport expansion and growth. It is critical that the government takes a leading role in facilitating collaboration to develop objectives and priorities to meet the significant demands for surface access, land and building resources and the impacts on employment, and housing markets. The government needs to take responsibility for planning the provision and resourcing of necessary additional infrastructure, such as a Southern Rail Link to Heathrow and the Brighton Mainline improvements, and not leave this up to individual local authorities.

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

Clearly an important issue to address is the tension between the need to ensure the long term success of the aviation industry and the need to minimise and mitigate the impacts on local communities. Mitigation will add cost to the delivery of growth and will potentially involve regulatory burdens which may pose a threat to the viability of growth plans. However, the implications for prioritising cost minimisation over mitigation is likely to be significant for communities and their well-being. The government will need to balance the costs and benefits of competing interests whilst ensuring that the protection of the public interest is at the heart of its strategy for aviation growth.

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

See the answer to question 36 above.

**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?**

There needs to be a clear strategy for ensuring that appropriate commitments are made and that these are implemented. Monitoring and enforcement mechanisms need to be in place to ensure delivery. There should also be a clear policy for the benefits of growth to be shared with local communities.

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

As a local transport authority, the County Council considers it important for the surface access implications of additional airport capacity to be fully considered in terms of the impact of additional airport capacity on the road and rail network. This should include the impact on both regional and local links.

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

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

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

The Surrey **congestion programme** lays out an integrated approach to managing congestion: a mixture of network and demand management; promoting alternatives to car travel; and new infrastructure.

The Surrey **rail strategy** identifies proposals for strategic investment.

Both demonstrate that surface access to the airports as a key transport issue and indicate that future growth at either or both airports or any major expansion elsewhere would have significant economic and transport implications for Surrey and beyond.

The Heathrow Strategic Planning Group (HSPG) and Heathrow Airport Limited have jointly commissioned a Joint Evidence Base and Infrastructure study to understand the scale and phasing of all the infrastructure requirements within the sub region. Building on this, HSPG are also preparing a Joint Spatial Planning Framework to address the implications of airport expansion and help align Local Plans and infrastructure investment to sustainably manage airport expansion growth and “background” growth together.

## **Chapter 5: Enhance the passenger experience**

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

We support the aim for all groups to be able to fly.

## **Chapter 6: Ensure a safe and secure way to travel**

**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?**

We welcome the policies which aim to ensure that the safety and well-being of passengers is protected.

## **Chapter 7: Support general aviation**

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

The County Council would not welcome the relaxation of regulatory burdens for General Aviation in the South East where the airspace is more congested than anywhere else in Europe. We consider that the Government should place a duty on small airport operators, such as Biggin Hill, to have regard to the need to minimise noise impacts.

Small aircraft can have a detrimental cumulative impact on communities within a local area, for example, there is much feedback from the public in Surrey on helicopter noise and the annoyance this causes. Unlike commercial aircraft, helicopters do not fly very high and therefore their noise has the potential to impact on people living along the entire length of their flight path. This means that in areas which experience a concentration of helicopter movements, there is scope for considerable disturbance. There appears to be little way of addressing residents’ concerns as helicopters fly under visual flight rules (VFR), where they are not under the control of Air Traffic Control (ATC) resulting in ATC not controlling where the

helicopter flies. To date, the Government's approach to the management of noise from general aviation and helicopters has been that it is not appropriate for the Government to intervene. However, it is our view that there are insufficient local powers for adequate local resolution of noise from general aviation and helicopters.

We also advocate that the Government develop a system of monitoring helicopter movements across additional areas of the UK. This is necessary to undertake more effective monitoring of helicopter movements across the UK and not just in the London Control Zone.

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**Community Protection, Transport &  
Environment Directorate**

Surrey County Council  
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Emailed to: [AviationStrategy@dft.gov.uk](mailto:AviationStrategy@dft.gov.uk)

11 April 2019

Dear Sir/Madam

**Surrey County Council's Response to the Aviation Strategy 2050 Annex A consultation**

Thank you for consulting Surrey County Council on the Aviation Strategy 2050. We would like to take the opportunity to comment on the questions at Annex A relating to airspace change legislation. Further comments on the green paper will follow by the June deadline.

Comments in response to the questions set out in Annex A of the consultation document are attached to this letter. Please contact Judith Jenkins with any queries, either by telephone on 01483 518098 or by email at [judith.jenkins@surreycc.gov.uk](mailto:judith.jenkins@surreycc.gov.uk).

Yours sincerely

Judith Jenkins  
Senior Planning Officer

**Surrey County Council response on the Aviation 2050 Strategy, Annex A: Legislation to enforce the development of airspace change proposals**

**Q1. Should the government legislate for powers to direct individual Airspace Change Processes identified as necessary in a masterplan to be taken forward?**

Areas within Surrey are overflowed from a number of airports and the need for collaboration and coordination during the airspace change process has already been raised by councillors and communities. During the recent Heathrow Airspace consultation residents raised the difficulties of commenting on proposals for one airport without knowledge of potential proposals from others. The need to have sight of the “in combination effects” was considered essential. The County Council therefore welcomes the production of a masterplan providing detail on implementation plans, timelines and an overview of coordination activities.

Awareness of the airspace change process is high in areas such as Surrey where the process is overlapping with planning processes for expansion at Heathrow and potentially Gatwick. It will be essential that once completed there is promotion of the masterplan with stakeholders and that it features in all future engagement material produced as part of the change process for individual airports.

There remains a lot of confusion as to how the airspace change proposals of airports all operating at different speeds will be coordinated. Once considered in combination there may well be limitations for one airport on the ability to have multiple flight paths for dispersing and sharing noise based on proposals of another. Respite is a very important issue to consider in combination.

**Q2. What are your views on the above two proposals?**

**Q3. Do you agree that option a) should be the lead option?**

The County Council agrees that option A is preferable as this is the best approach to ensure that local knowledge and community involvement are able to impact the design process. Where airspace change processes overlap with a planning process to progress expansion it will also ensure that interrelationships between the processes can be considered and proposals and material produced are informed by both processes.

**Q5. What are your views on the use of the triggers for using the legislative powers?**

The County Council agrees that an enforceable strategic process must be in place to ensure compliance with the agreed timescales, however we have no comment on the measures proposed. Adherence to a timetable as agreed through the masterplan provides the best opportunity for in-combination impacts to be fully considered.