

SASIG Response to DfT's Consultation on the Proposed Approach to Developing a New UK Aviation Strategy.

Introduction

1. This document provides the collective response of the Strategic Aviation Special Interest Group (SASIG) to your consultation on the proposed approach to developing a new UK Aviation Strategy. As individual member authorities may be responding themselves we have concentrated our focus on high level generic policy issues of common interest to all our members and where there is considerable commonality of view following two workshop meetings and circulation of a draft.
2. As Chairman of SASIG I have delegated authority to submit the response, which will be reported to the next full member meeting in November, following which I will write again if there are any material additions or amendments that need to be brought to your attention.
3. As you may be aware SASIG is the largest of the twenty or so Special Interest Groups formed under the auspices of the Local Government Association. It currently represents 30 statutory local authorities (approximately 11 – 12 million people) from a combination of the shires, small towns, suburbs and larger urban centres of England with a direct or indirect interest in the development of airports, their surrounds and, crucially, the communities that elected them. All types of authority - from rural district and county councils to metropolitan boroughs and unitary authorities - are involved and each have a wide range of statutory responsibilities directly relevant to the future development and operation of airports and hence the implementation of national policy in this regard.
4. SASIG's remit is to:
 - a. Provide networking and knowledge sharing opportunities for those working in local authorities whose responsibilities include interface with the aviation sector,
 - b. Identify and promote consensus concepts or issues of importance for airport development
 - c. Initiate, where appropriate, engagement with key policy makers whose decisions impact on the sector on behalf of members of the Local Government Association
 - d. Respond collectively to formal consultations published by Government parties or their agencies.

This consultation on the Government's proposed approach to developing a new UK Aviation Strategy is a good example of (d), but also requires (a), (b) and (c).

5. It is important to emphasise that SASIG members have an important role both in representing their communities interests during the development of the policy, but then subsequently in overseeing and/or delivering many of its most significant provisions not only either directly as a shareholder in, or partner to, an airport company, but also as planning and transport authority, provider of other services, collector of business rates and enforcer of other statutory obligations. We trust, therefore, the Government recognises the scale of local authority engagement with the airport sector in England and therefore will ascribe appropriate weight to our views alongside those of other key interest groups (e.g. the industry itself, passenger groups, the business community and statutory agencies), when considering the responses it receives to this consultation.
6. The discussions at our membership workshops highlighted three major procedural issues with the consultation exercise (and several other administrative ones), which it is worth highlighting before we focus on the content of the document.
7. First, the questions at Annex A of the consultation paper do not match those in the online questionnaire, causing much confusion. We have structured this long hand response around the content of Annex A and cross-referred to it in our online response.
8. In addition the online proforma provided for the purpose:
 - a. Does not lend itself to completion by multi-member organisations where there are a spectrum of views;
 - b. Gravitates towards questions that are closed and designed to engender simplistic and circumscribed rather than encourage views that are well formed and well supported by evidence;
 - c. Mitigates against securing collective agreement from a large membership, particularly of public authorities that have governance procedures they are required to follow, within effective the timescale available (essentially only six working weeks outside the summer holiday period).
9. Use of "Survey Monkey" style portal may be convenient for the Department and help automated processing of answers from small organisations and individuals, but it should be accompanied by the option to allow more generic and extemporised contributions where a range of views, nuanced responses, original ideas and greater detail and most importantly substantive evidence can be captured.
10. We trust that the planned subsequent rounds of consultations do not fall foul of the temptation to put form before substance.
11. Second, the tone and 'voice' of the document was much commented upon, with the way it asserts certain opinions and facts being described as "reminiscent of 'big brother'" or in some places "verging on patronising". The language and approach is certainly 'closed' (i.e. this is how we see the world, and we would now like you to comment upon the issues we have pre-determined are important, not what you might consider to be).

12. To be candid, some of contextual passages in the document, for example on the operation of market forces and the extent of private ownership and choice, bear little resemblance to reality as we understand or see it. There are a very large number of issues that are of great importance to SASIG members and the communities they represent) that are covered superficially, tangentially, or in some cases not at all.
13. Successful consultation requires an open approach, underpinned by an objective and evidence based description of the present baseline rather than peddling a Breitbartian alternative reality and an invitation to consider a wide range of future choices, not, as in this case, asking for comment on pre-conceived outcomes.
14. We have prepared our collective response to reflect the kind of progressive and inclusive approach we prefer, which in turn means challenging or ignoring some of the more fanciful assertions and glaring omissions that the document makes.
15. Finally, this passage from paragraph 2.15 of the consultation document suggests after the three sets of discussion documents:

“the process will end with the launch of the final Aviation Strategy” that this will “pull together the findings from the consultation papers and set the framework for aviation policy for the next 30 years (up to 2050) and beyond. As such it will reflect the opinions, research and evidence that have been gathered through each of the consultation exercises.”

16. This strongly suggests that unlike previously indicated by DfT officials to SASIG, it is no longer intended to consult on a draft of the strategy document, but to go straight to publication. If this is the case, and given the equally glaring gap about how the strategy will be brought into alignment with the National Planning Statement and whether any such equivalent will be published for the rest of the country, judicial reviews seem inevitable.

Our views on the Aims and Objectives of the Consultation:

17. SASIG supports the Government’s aim ‘to achieve a safe, secure and sustainable aviation sector that meets the needs of consumers and of a global, outward looking Britain’. However, we think it could be improved by adding “... meets the needs of consumers, businesses and the wider economy across all parts of a global ... etc”. This reflects the fact that the real value of aviation is not solely in the direct and indirect economic activity and jobs it creates, but in the way it enables other sectors of the UK economy to attract inward investment, operate more efficiently and trade internationally by connecting every part of the UK to global markets.
18. The consultation focus on ‘Consumers’ is misplaced. In the first instance it should refer to ‘Users’ not ‘Consumers’; the latter are simply a small subset of the former and a new aviation policy should be casting its net much wider. Users of an airport include not only passengers but airlines, ground handlers, cargo operators and other companies based within the airport environs (e.g. retail, maintenance, FBO’s, outsourcers) or adjacent to it (hotel chains, holiday companies, aerospace companies) and commuters using local and regional transport services at an airport

transport hub to access onward connections etc. All 'Users' need to be considered as part of an overall aviation strategy that includes economic development. Secondly, it should also be paying careful attention to those impacted by the presence of an airport, particularly those:

- whose amenity and environment is adversely affected,
- local non-airport businesses who have to compete for employees in overheated labour markets caused by the airports presence, and
- local authorities whose social infrastructure and housing stock is put under pressure by in-migrants to the area seeking work at the airport.

19. Given these kinds of secondary impacts and the extent of concerns about environmental issues relating to aviation raised during the introduction of climate change legislation, the ANASE noise studies and during the Airports Commission process, we find it surprising just how substantive a change in the overall direction of aviation policy, appears to be being proposed only four years after a review by a previous Conservative led administration. We say this even though we consider the current Aviation Policy Framework to be a poor document, thrown together in a hurry to replace the much more coherent, well researched and consulted upon 2003 White Paper, This change is most notable in the prominence it gives to 'growth' (not economic growth, but growth in aviation activity) as an objective and the failure to explicitly caveat this in any credible way in terms of robust environmental constraints. SASIG supports growth, but not at the expense of environmental sustainability, congestion on local transport networks or additional pressure on local social infrastructure. Moreover the form of 'growth' that we consider important is not increases in passenger numbers, cargo tonnages or air traffic movements; rather it is growth in the economic outputs that aviation supports or helps to stimulate that we are keen to see captured.

20. Hence the policy direction we wish to see, is one that makes growth 'demonstrably *sustainable*'; this can be achieved by:

- (a) Recognising aviation imposes significant impacts on local communities and hence levels of aviation activity can only be allowed to increase if it remains within the envelope of sustainable environmental thresholds that are clearly defined at local, national and international levels. Where it does not, and the required mitigation or compensation is not affordable, then we believe there is an argument for limits to growth (especially where high density urban areas or sensitive natural habitats are materially affected).
- (b) Is truly national, rather than South East focused in scope, following the precedent of the 2003 White Paper, which was a model in this regard.
- (c) Eschews a one size fits all approach to policy and regulation, recognises the strategic importance of smaller airports, addresses the disproportionate costs Government directives impose upon them and supports interventions that help to level the commercial playing field they operate upon while maximizes the economic opportunities they can generate for their local, city and regional economies.

- (d) Acknowledges that aviation is a long way from a perfect market displaying as it does many features associated with market failure, including:
- a *natural monopoly* (e.g. airport catchments and single airline routings)
 - infrastructure (i.e. runways and surface access to airports) which de facto has the characteristics of a *public good* – and indeed in many instances are owned by public authorities;
 - clear evidence of *bounded rationality* (e.g. in consumers choices and the industry’s ability to deliver capacity in the right place in a timely manner); and
 - failure to fully address *externalities* (e.g. environmental and secondary impacts).

And the consequently in certain circumstances targeted intervention by public agencies may be appropriate.

- (e) Abandons the pre-conception that only the private sector can manage airports effectively and therefore that public authorities should neither own nor be engaged in supporting airport development and operations, when - despite what the consultation document implies - many in Europe, North America and indeed in the UK operate successfully in public ownership.
- (f) Adopts a more system-wide approach¹, including Government interventions to constrain or direct activity to airports best place to accommodate them sustainably (this is done in many other parts of the world); and discards the obsessive belief that market forces will always allocate capacity efficiently.
- (g) Avoids putting the cart before horse in terms of policy development by adopting a National Policy Statement in the absence of a coherent UK wide aviation strategy and any clear understanding of the outcome of Brexit and its implications for the aviation sector.

21. Consequently we neither agree with all of the supporting objectives set out in the consultation document that have been derived from this over-arching policy aim, nor do we think they are comprehensive. Hence in addition to commenting on the objectives set out in the consultation document, we have also identified a number of others that we the Government should be considering. These include:

- a. Maximising the wider economic benefits of airports and the air transport sector more generally – this requires intervention and support at both a national and local level;
- b. Recognising aviation’s strategic catalytic in relation to other industries and sectors (e.g. aerospace and defence, tourism, advanced producer services, high technology sectors, research and development activity, tertiary education and other parts of the public sector);
- c. Securing more balanced growth across the country, by helping to boost regional economies outside London and the South East of England;

¹ The Davies Commission was prevented from doing by its terms of reference that focused on finding the location for the next runway and in the South East only.

- d. Ensuring that there is a comprehensive network of airports that remain commercially sustainable, well connected in terms of surface transport links and capable of accommodating a wide range of aviation related and associated activities
- e. Levelling the commercial playing field for all airports by recognising the disproportionate cost burdens imposed on smaller airports and mitigating or compensating for this.
- f. Ensuring essential infrastructure is properly maintained for all future eventualities, while also having the capacity to operate effectively, minimise delays and accommodate a wide range of contingencies – military or civil.
- g. Developing a holistic transport policy that links airport development to the infrastructure requirements of emerging local plans and the extensive house building, including garden communities that it attracts.

22. In terms of the objectives set out in the consultation document:

- i. As indicated above in paragraph 15, while we recognise the importance of the industry being responsive to the *consumer*, not believe the objective should be limited to them alone – the *needs of the economy and local communities* impacted.
- ii. In relation to the role of Government its primary function should be to set national policy, legislate accordingly, provide appropriate regulation and accept that *certain activities are the responsibility of the State* to fund and provide. In respect of the latter, they should not re-direct the costs of meeting them to consumers/private sector companies, especially when other transport modes (trains, ports, roads) are not expected to pay for equivalent facilities and aviation already has its own dedicated tax. The State should also ensure public agencies like the *Border force and CAA* operate efficiently and to standards that benchmark competitively with countries where security and safety threats and the potential for economic migration are similar.
- iii. The consultation document exaggerates the extent to which *competition* exists within the industry. In reality it is only present where airlines compete directly or indirectly to serve a market (this tends to only be on high density routes); there is no competition on less busy ones. At anything other than large airports it is rarely present in ground handling, car hire and even retail; and is reserved tendered procurement processes.
- iv. It also refers to *cargo and non-scheduled (i.e. business and general) aviation*, but makes no commitment to examine these issues in detail. There is a need for dedicated runway capacity to be provided where night movements are more acceptable and in locations where cross-channel freight transshipments can be minimised. The current proclivity for trucking air cargo from the UK regions to London Airports also needs to be examined and better more localised solutions found.
- v. The consultation document's attempt to present *competition and market forces* as the answer to all the challenges facing the aviation industry's, is either a product of blissful ignorance or wilful dogmatism that quietly ignores internal contradictions or all the evidence that they are not. Examples of a fully functioning competitive market in aviation are small in number. They are likely to remain so because the barriers to entry and the monopolistic/oligopolistic characteristics of the industry are simply too great. Competition is useful in terms of ensuring choice, allocative efficiency and downward pressure on prices

for consumers; but it cannot be presented as the only policy instrument that will bring about positive change in the industry.

- vi. The passages on *surface access* only consider schemes associated with large airports and the focus of those projects is on relieving congestion, when it also needs to address smaller initiatives that enhance surface links to smaller airports and in doing help to improve accessibility to air services – particularly in places where this may be poor. The approach to funding articulated in the consultation document is not helpful in this regard and needs to be revisited. A better starting point is the principle articulated in paragraph 4.56 of the 2003 Air Transport White Paper, which was exactly in tune with the strategic role and needs of airports.
- vii. Paragraphs 7.20-7.21, which discusses ‘*growth*’ reads like something of a development charter, effectively giving a blanket ‘presumption in favour’ to all proposals for airport development, when in reality increased capacity must be caveated in the normal way by environmental constraints and measures.
- viii. The suggestion in the document that the Government should explore whether a *new approach to reducing noise annoyance* is needed (i.e. better information and engagement, creating a greater sense of ‘fairness’ and sharing the benefits of aviation growth, including new forms of compensation and community investment), is welcome but misses the most important point. And that is the requirement for the strategy to explore how sustainable growth should be defined in terms of noise – e.g., whether it is possible to design targets for noise reduction and how best to monitor and report aviation noise at a national and local level.
- ix. The *CO2 metrics* in the document are misleading as they reference aviation’s share of emissions rather than changes in absolute limits or the position relative to legal limits. It is aviation’s contribution in relation to the latter which is important in the context of the UK meeting its climate change commitments.
- x. SASIG is very supportive of a co-ordinated *skills initiative* covering air transport as well as aerospace, but with the focus being on working with smaller airlines and airports that have difficulty recruiting. Large enterprises usually do not and indeed tend to feed in a predatory manner on resources from their smaller counterparts.
- xi. Achieve better co-ordination between the needs of the aerospace sector and airport infrastructure.

_(Q4) In what order of importance should the policy challenges listed below be tackled and why?

23. Our response to this question in the consultation questionnaire is as follows:

- Expanding our access to markets and trade (1)
- Keeping pace with technology and developing skills for the future (2)
- Meeting increasing demand through sustainable growth (3)
- Keeping pace with consumer expectations (4)
- Encouraging competitiveness (5)

24. Our rationale for this ranking is based on our view that:

- Safety and security are a pre-requisite in aviation and therefore should not be competing with other issue for policy attention.
- That said, the most important role of aviation is its facilitation of the efficient operation of other sectors (not least aerospace) and their access to markets – both domestic and overseas.
- Technological innovation is the key to reducing the environmental impact of the sector and keeping its UK participants competitive in a global market
- As the voice and political representatives of local communities, we place greater emphasis on safety and sustainability than meeting consumer expectations and encouraging competition within the air transport sector.

(Q6) Our views on the proposed Policy Principles:

The consultation document says that it will be guided by three over-arching principles:

- 1) Consumer focused – it will put passengers and businesses at the centre of everything we do.
- 2) Market driven – it will emphasise the role of government as an enabler, helping to make the market work effectively.
- 3) Evidence led – it will target intervention on specific problems which government can address, avoiding activity that does not respond to a clear problem.

25. We think these policy principles are too partial and narrow. The chapter on consumers focuses on improving the cost and experience of existing consumers, while ignoring the needs of those marginalised by the failure of market mechanisms to address poor geographical access to air services and the social and economic costs this poor accessibility imposes. The strategy should therefore include, as a core principle, improving equity of access to air services across all parts of the UK in the same way that Sweden and other nations have done. It should also adopt universal accessibility standards that facilitate a day's business in the UK and short haul markets and access to long haul destinations in 24 hours.

26. The almost obsessional emphasis placed on market mechanisms and the exaggerated claims made for private ownership throughout the document are a fundamental weakness created by what almost appears to be a state of denial about the limitations of these aspects of the UK industry:

- a. Is the USA really a less competitive airline market?
- b. Are sectors with high entry costs such as transport and other forms of strategic infrastructure not frequently characterised by monopoly or oligopoly control, and
- c. Is it ever likely that other important aspects of the sector (e.g. aircraft manufacture, air traffic services and surface access links) ever will be?
- d. While the statement that “over 50 airports offer commercial flights, with many more airfields offering cargo and non-scheduled aviation facilities” – is

misleading. There is no dedicated cargo airfield in the UK (Manston closed and Coventry no longer accepts such traffic); and

- e. The number of business aviation airfields offering a material number of non-scheduled passenger services can be counted on one hand. It is only General Aviation and military airfields that are can be considered 'numerous'.

27. We believe, that as in most other developed countries, markets have a role in the operation of the sector where they can function effectively, but that Government should also recognise their limitations. This in turn implies a for Government and other public agencies to make targeted interventions to ensure broader objectives such as accessibility, maximising economic (as opposed to commercial benefits), resilience, consumer fairness sustainability and effective mitigation or compensation of local direct and secondary impacts, are also delivered.

28. SASIG is willing to provide government with feedback and evidence to help inform the development of policy. Indeed it is open to commissioning research on aviation related issues where its membership has a clear locus and which DfT has appeared to have not planned to address in sufficient detail. These include:

- Communicating information on safeguarding and environmental effects more effectively;
- Devising mitigation measures and compensation measures that are fit for purpose and legal mechanisms for imposing them
- Highlighting secondary impacts of airports and how these might be addressed,
- Enhancing surface access to all airports,
- Improving the operation of the planning system in relation to airports – not least the reflection of masterplans in local development plans, noise policy formerly in PPG 24 and the costs of handling applications for major airport developments and airspace change
- Undertaking research on how airport developed impacts on city and regional growth and can channelled through pro-active strategies to maximising the economic benefits of investment in air transport and the enhanced connectivity it offers for all part of the UK, not just London and the South East.

29. SASIG is open to forward planning such work so that it aligns with the department's work programme. It would also be happy to collaborate with other strategic partners such as LEPs, the Devolved Administrations, statutory authorities and city representative groups in commissioning/steering research to ensure that required outputs in areas it considers important are timely and add value.

(Q7) Our views on the proposed policy tests:

30. We agree that it is important that Government bases the new strategy on what the evidence says, taking into account all options and with a clear understanding of what the effectiveness of the action is likely to be. We do not agree, however, the scope of the policy should be set by what the Government alone is trying to achieve, but rather by what the needs of the sector, the economy and society right across the UK. The aviation sector has been badly served over the last 20 years by lack of a clear and consistent policy framework and the apparently irresistible temptation for successive Governments to overturn the work of their predecessor or to respond to exigencies of short term political pressures.

31. Other policy tests that need to be applied are:

- Is it one size fits all
- Does it address the needs of the whole of the UK in terms of aviation, not just London and the South East
- Is it coherent with other policy areas – e.g. industrial strategy, devolution deals, tourism strategy
- Does it move beyond the political dogmatism of markets/private ownership are good, government intervention/public ownership is bad to one which recognises the practical and differentiated needs of airports and the regions they serve
- Does it ensure equity in accessibility to air services/economic markets for all parts of the UK

(Q8) What are your views on the government’s proposal to support airports throughout the UK making the best use of their existing runways, subject to environmental issues being addressed?

32. The document says: “The government agrees with the Airports Commission’s recommendation that there is a requirement for more intensive use of existing airport capacity and is minded to be supportive of all airports who wish to make best use of their existing runways including those in the South East”. SASIG needs to understand what form of support does the Department have in mind and is this programme envisaged as being concerned with all airports across the UK, which we would support, or only the second tier UK regional’s, which we would not. Any expansion of South East airports also needs to reflect appropriate environmental ad surface access limits and not be given carte blanche, which is the inference in some parts of the consultation document.

(Q9) Are there any other specific questions on the six objectives that you think should be included in the planned consultations?

33. See above. But SASIG has concerns about how the Aviation Strategy will ‘dovetail’ with the NPS as the two processes are sequential rather than in parallel. Is the intention to bring the documents into alignment and how?

(Q10) Are there any other sources of information or evidence that the government should bear in mind when developing the strategy?

34. Yes: research commissioned by strategically important consultees, independent organisations such as think tanks and universities and benchmarking of policy frameworks in other countries.

(Q12) Does the proposed timetable (set out in chapter 2), provide enough time to examine the issues in sufficient depth?

35. Probably not given Brexit and also the decision on Heathrow expansion but it should also not be allowed to meander along indefinitely. Page 21 of the document says “Developing such a broad strategy will not be a quick process, and the government makes no apologies for taking the time to get it right.” Are the Government confident themselves that they are going to stay within their given timetable or do they anticipate that more time will be needed?

(Q13) If no, please provide feedback on the timescale here.

36. The issue was a big enough one to face pre-Brexit but now that that particular process has already begun and is utilising significant Government resources and manpower over a fairly short timetable, there is concern for a final, suitable strategy to be in place in time for a post-Brexit UK.

(Q14) What action could the government take in order to ensure that the maximum number of people, communities and organisations are engaged in the process and are able to have their views heard?

37. One of the easiest ways to achieve this is to ensure that organisations such as SASIG, one of the largest of the SIGs within the Local Government Association and which represents nearly one-fifth of the country's population, are fully included in any consultation events, meetings, forums, etc. SASIG can communicate to its member authorities who can then reach out to their own constituents.

38. For non-industry members within the general public, it would be ineffective to rely solely on posting notifications, etc. on the DfT, CAA and other industry websites alone. This will not be a guarantee of reaching the target audience – the general consumer and affected local householders. Notices in newspapers and journals and engagement with local media programmes will assist.

39. The Government also needs to commit to undertaking research that can then be made public, covering a number of key areas where the available analysis is poor, out of date, or partial. Examples include:

- Air freight market and forecasts;
- Detailed look at future skills requirements and how they can be provided;
- The significance of other users of airports and the implications if their needs are not met;
- Is there a minimum threshold of airport infrastructure below which the UK should not fall in terms of the number/regional distribution/length and operational capabilities;
- Benchmarking UK international air connections across the UK vs comparator airports/cities/regions and counties; understanding better the catalytic economic impacts of airports/air services;
- How can concepts like the circular economy and CSR be rolled out within the aviation sectors
- New/ prospective aviation technologies and how the UK can participate/lead these markets;
- What does the UK's core future airspace structure/operation look like and what is needed to deliver it quickly and efficiently so the UK is a market leader
- Surface access projects to better connect all the UK's airports

(Q15) Would your organisation be willing to take part or help organise events to help the development of the strategy?

40. Yes. SASIG has long been considered an efficient and important voice for local authorities, their strategic partners and ultimately their constituents, to be heard

within the aviation industry. As such SASIG is always willing to take part in or help organise any such events that will ultimately lead to the formation of better aviation policies for the UK’.

(Q16) Are there any issues that we have not covered in this document, which you think should be included in the consultation process? If yes, please describe what you think these issues are.

41. Yes there are a lot. For brevity we have listed them here but would like the opportunity to expand upon them either face to face, via evidence statements we are compiling and in responses to the promised consultations on subsequent Discussion Documents

Noise & Environment:

- Restoration of PPG24 or some equivalent
- Long term potential off bio-fuels and fuel cells and how they can be encouraged
- Carbon neutrality initiatives
- How circular economy principles can be introduced to the sector.
- The importance of CSRs for engaging airports with their communities
- The need to address secondary as well as primary environmental and other impacts of airport development.
- Mechanisms, through which external costs can be addressed, captured and compensated (e.g. S106 agreements, CILs, noise/community levies, congestion charges, and local passenger taxes to replace APD).

Safety & Security:

- Safeguarding procedures and information

Consumer interests:

- Disproportionate costs being imposed on the industry in general (by comparison with other modes) and smaller airports in particular, though passenger levies/charges to cover security and Border Force operations, the cost of regulation (i.e. the funding of the CAA) and flat rate APD at all airports, indirectly increasing the costs of access to aviation to consumers.
- Encouraging competition

Surface access issues:

A coherent look at surface access policy in relation to airports and how it operates in detail in the light of the Government’s poor record of delivering on promises to support key projects and the changing emphasis on who pays for connections to what amounts to strategic infrastructure (i.e. airports). This should cover:

- Accessibility of air services
- Airport parking
- ASAS
- Funding and operations

- Mode split targets
- Public transport requirements

City and Regional Economic Development:

- Relationship with aerospace sector
- Airports and city/regional economic growth (the devolved nations, Northern Powerhouse, Midlands Engine, England's Economic Heartland, combined authorities and core and key cities)
- EZs, free trade zones, airport clusters, agglomeration economies, airport cities
- Freight and Business aviation
- Recognition of regional differentiation-responsibilities of the Devolved Administrations, Crown Dependencies, remote and peripheral areas, British Overseas Territories
- Stakeholder relationships and support
- Strategic role of smaller airports

Airport Planning and Investment:

- Forecasts and their dependencies (updates not yet published or consulted upon, but are key to understanding other issues)
- Governance and competition policy
- Government contribution to essential infrastructure in remote and peripheral airports.
- Planning issues: Masterplan status, Use Classes Order changes, LDOs, DCOs, S106
- Ownership and investment

(Q17) Do you have any other comments on the issues raised by this call for evidence? If so, you can either give these in your response to this consultation, or in the themed consultations that we have planned for each of the objectives.

42. Yes.

43. First, the need for an overarching infrastructure policy that recognises airports as transport gateways and ensures that their development is properly co-ordinated with other forms of planned development (e.g. housing) and the Government's other strategic policy initiatives such as its Industrial Strategy, its environmental, city deal and balanced growth commitments and its trade, and Brexit negotiations. We need a holistic approach that considers these aspects and provides additional powers for local authorities to ensure the surrounding, local and regional infrastructure is compatible with the airport and regional transport needs.

44. Second, it is far from clear that the timeline set out in the consultation document, that previously expressed intentions to consult on an actual draft strategy document or Green Paper, will actually occur. The timeline suggests a direct jump from responses to the discussion papers to publishing a final strategy document. We assume this is an inadvertent omission; it certainly should not be allowed to happen and, on an issue as controversial as this, would certainly result in judicial reviews if it did.

45. Finally, it will also be important to articulate exactly how it is intended to co-ordinate and make coherent the parallel policy process relating to the NPS for Heathrow (because it is not for Airports as a whole) and the Aviation Strategy. Since in both cases, since we understand Lord Justice Sullivan has been retained to advise the Government on consultation, we think he should be asked to opine and his opinion published so the route map to a sensible and accepted conclusion is clear to everyone.

Keith Artus
Chairman of SASIG

13 October 2017