

M87. Aviation

- (a) **Are the requirements of Policy T8 necessary to address the strategic priorities of London and, if so, would they be effective in that regard?**
- (b) **Or does policy T8 cover matters that are dealt with by national policy and/or would be more appropriately dealt with through local plans or neighbourhood plans?**

- 87.1 All the requirements of Policy T8 are necessary to address the strategic priorities of London.
- 87.2 Individual London airports function as part of a single aviation system and the provision and utilisation of capacity needs to be considered holistically. Moreover, the benefits and impacts of an airport are felt beyond the narrow confines of the host local authority. These include development in the key transport corridors serving the airport as well as the environmental impacts of the airport's activity, including noise and air quality.
- 87.3 National policy alone is insufficient to capture the specifics of aviation in London, including the interrelation between the six major airports in the London airport system¹ as well as the scale and concentration of demand for general and business aviation, as well as helicopter flights. The Policy also reflects the objectives set out in other statutory Mayoral documents, notably the Mayor's Transport Strategy and the London Environment Strategy.
- 87.4 Given the above context, all of the requirements of T8 are considered necessary in providing a strategic policy framework for London as well as providing an appropriate framework for local and neighbourhood plans. Policy T8 is essential in helping to satisfy the Good Growth principles of economically and socially inclusive and environmentally sustainable growth (as set out in policies GG3, GG5, GG6). Each part of T8 is discussed in turn below.
- 87.5 Part A of the Policy provides strategic direction on aviation capacity for the city in the context of the Wider South East and meeting London's passenger and freight needs.
- 87.6 Part B grounds national aviation policy in the specificity of the spatial growth put set out in the draft London Plan. In particular, it relates to Policy SD1, which outlines the Opportunity Areas (OA) that have the most significant potential for growth, unlocked through substantial infrastructure upgrades. A number of the OAs are positioned in transit corridors that are (or will be) very well connected to one or more of London's airports, placing them in prime position to be airport gateways, as well as convenient locations for residents (potential future employees and passengers) to access airports via sustainable transport.

¹ These being London City, Gatwick, Heathrow, Luton, Southend and Stanstead airports.

- 87.7 The national Aviation Policy Framework (2013) recognises the importance of aviation connectivity in helping to '*sustain clusters of specialised high-value industries in the UK*'² as well as in supporting the economy more generally. Draft London Plan Policy T8A stresses this importance as a strategic priority across London and part B develops this spatially, by supporting the connection of the concentrated jobs growth located in OAs to airports. Many of the OAs with the largest capacity for employment growth will be well connected to international opportunities via airports; for example, Old Oak Common (65,000 jobs) to Heathrow, Croydon (10,500) to Gatwick, and the Royal Docks (41,500) to London City. A local or neighbourhood plan-based approach would not be able to accommodate this kind of London-wide strategic view.
- 87.8 Parts C and F of the Policy are essential in ensuring that the environmental and health impacts on London are taken into account and that the expansion of aviation capacity meets Good Growth objectives, in particular GG3, both with regard to the delivery of new runway capacity and to the achievement of incremental growth. Part D of Policy T8 then takes this as a starting point, to consider the specific, strategic issue of Heathrow Airport expansion. As with the Mayor's response to the Airports National Policy Statement consultation, Policy T8 Part D is clear that the current plans for Heathrow expansion are unacceptable on environmental and health grounds. Thus, parts C, D and F are essential as they address the strategic priorities of not harming London's environment or Londoners' health, providing a further level of detail and clarity on top of national policy. A local or neighbourhood plan on its own would not be suitable for these purposes, given the London-wide environmental impact of airport expansion.
- 87.9 Part F also asserts that airspace allocation must be carried out equitably between London's airports. This, along with Part G, reflects the specifics of London's airport system and aims to use limited runway capacity in the most efficient way, while spreading the benefits of growth. As mentioned above, given that the six major airports in the London area function as a system, national or local policy alone cannot sufficiently address the strategic challenge of making the most efficient use of London's existing and future aviation capacity.
- 87.10 Parts E, G and H seek to ensure that high-quality and inclusive sustainable surface access is at the heart of aviation policy in London. London's airports are well connected by public transport (with further improvements set out in Policy T3), but further progress must be made in order to meet the mode share targets set out in the Mayor's Transport Strategy, and to achieve sustainable growth. Given the significant impacts that airport expansion (and air travel more generally) will have on London's strategic rail and road networks, with passenger, staff and freight demand moving across borough boundaries, these Policies are deemed essential to ensuring that the strategic public transport network serving London's airports is adequately planned and that its use is maximised relative to private car-based

² Department for Transport, Aviation Policy Framework, March 2013, paragraph 1.39

travel. National policy does not consider these aspects at a detailed enough level to capture the specifics of London airports' surface access networks.

- 87.11 Parts I and J are important in ensuring that aviation is viewed comprehensively, as they consider general and business aviation and helicopter operation. While the Aviation Policy Framework recognises the diversity of the general and business aviation and its contribution to the economy, Policy T8 looks specifically at the sector in relation to the wider strategic aviation network in London. The Policy requires that general and business aviation in London should not be to the detriment of public health, the environment or scheduled flight operations and should consider their connectivity to London's sustainable surface access networks. Given the interrelations between different general and business aviation aerodromes, the wider strategic aviation network in London, surface access networks and the London economy, the strategic coordination brought about through parts I and J of Policy T8 could not be appropriately addressed through a local policy approach.
- 87.12 While the Aviation Policy Framework specifically cites '*ongoing concerns about disturbance from helicopter traffic in London*'³, in its consideration of the noise impacts of helicopter flights, Policy T8 Part J is essential for providing a strategic direction for this issue in London. In addition to stipulating a specific development control measure (the refusal of new non-emergency services heliports), paragraph 10.8.12 urges a review of helicopter flights over London, which, as well as taking into account the existing impact, considers the noise and safety impacts on London's future population as defined in the draft Plan's Spatial Development Patterns Policies. Given the geography of helicopter flights and their impacts, local or neighbourhood policies would not have sufficient scope to influence this at the necessary city-wide scale.
- 87.13 Taken together, parts A-J of Policy T8 will be effective in addressing the strategic aviation priority of meeting London's passenger and freight needs in a sustainable manner that protects its health and environment. To ensure its effectiveness, the Policy combines strategic direction with practical steps to be taken. For example, parts C and D stipulate how environmental costs should be assessed in any consideration of airport expansion; part E stresses that any proposed mitigation should be credible in terms of funding and delivery; part H (as well as paragraph 10.8.2) identifies the joint-working and consultation that will be necessary between stakeholders; and parts I and J propose specific development control measures.
- 87.14 A Further Suggested Change is proposed in the supporting text of Policy D13 to clarify that aviation noise is dealt with via policy T8. This is set out in the Appendix to this statement.

(c) Are changes to Policy T8 and/or other parts of the Plan necessary to ensure consistency with national policy relating to Heathrow including the Airports

³ Department for Transport, Aviation Policy Framework, March 2013, paragraph 3.45

National Policy Statement: new runway capacity and infrastructure at airports in the South East of England (June 2018)?

- 87.15 This question is addressed in the Mayor's response to Preliminary Question 13.
- 87.16 No changes are required to Policy T8 to ensure consistency with national policy relating to Heathrow and specifically the Airports National Policy Statement (NPS).
- 87.17 The Policy has an important role to play in supplementing the NPS on strategic matters specific to the Mayor's areas of responsibility, including those reflected in the objectives of other statutory Mayoral documents, notably the Mayor's Transport Strategy and the London Environment Strategy.
- 87.18 When the draft London Plan was first published for consultation in December 2017, no draft NPS had been published. Even after it has been finalised, a London Plan policy in relation to Heathrow is considered essential for the Development Consent Order (DCO) process and to be consistent with EU directives in relation to Air Quality. As part of the DCO process, the Mayor will be invited to submit a Local Impact Report, which, among other things, will include an assessment of the proposals against the London Plan. Moreover, the London Plan will need to be taken into account – alongside the NPS – by the Secretary of State as part of the decision-making process.
- 87.19 It should be noted that a Judicial Review of the NPS for Heathrow is underway and is expected to be heard in March 2019. A particular focus of the Judicial Review is the approach to air quality. The outcome of the Judicial Review does not impact on Policy T8.

Appendix 1: M87 Further Suggested Changes

The Mayor is suggesting the following further changes to the supporting text of Policy T8:

- **Blue** – new text

Change ref no	Policy/para /table/map	Further suggested change
M87.1	paragraph 3.13.5	Heathrow and London City Airport Operators have responsibility for noise action plans for airports. Policy T8 Aviation sets out the Mayor’s approach to aviation-related development, and how impacts including noise should be considered.