

Department for Transport
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76 Marsham Street
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London
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Dear Sir or Madam,

**Consultation on the Future Development of Air Transport in the UK –
North**

Manchester Friends of the Earth is writing in response to the aforementioned consultation. The enclosed document has been voted on by the group as representative of our views. It is our strong feeling that the Government should pursue policies that constrain the growth of the aviation industry. We base this concern on environmental, social and economic reasons, some of which we outline below. We also find aspects of the consultation process itself dissatisfactory, which is why we feel it necessary to write this letter rather than simply fill in the questionnaire provided. Fundamentally, we believe that it is wrong to take a "predict and provide" approach, rather than trying to manage, actively, the spiralling growth in the number of flights taken. The "predict and provide" approach is completely at odds with any commitments the Government has previously made to sustainable development.

We have broken down our reply into sections, in keeping with the structure of the consultation:

- The consultation itself
- Demand
- People and Communities
- The economy
- The environment
- Surface transportation integration
- Key recommendations

Our arguments are based mainly on Manchester, but the issues are of relevance to the whole country. We would appreciate acknowledgement that you have received this letter and welcome discussion on any of the points contained within it.

Yours Sincerely,

Mr Graeme Sherriff
Co-ordinator, and on behalf of, Manchester Friends of the Earth

The Future Development of Air Transport in the United Kingdom

**A response to the 2002 national
consultation**

**Manchester Friends of the Earth,
November 2002**

The Consultation

We feel that the consultation process has not been made very accessible to the public. Many people who will be directly affected by airport expansion know nothing about any consultation, and the documents, including the summaries, are not easy understandable by those who do not have a good grasp of aviation and economic issues. Our members were unable to attend a recent consultation event on 14th October in Knutsford because it was held during the daytime and in a location virtually inaccessible by public transport. Publicity for the event occurred just a few days beforehand. We are sure that other similarly concerned residents were also unable to attend, if indeed they even knew about the event. The public transport information for the exhibition on 15th November in Cheadle was poor: the bus number that visitors were recommended to get to the exhibition did not exist. The consultation period itself has been short, and has been over the summer when people are least likely to have time available to put thought into the issues raised.

We are also aware that the local authorities in Greater Manchester own shares in Manchester Airport. Is the consultation process accounting for this potential bias?

There are also several conclusions in the consultation document with which we take issue, and these are dealt with in the following sections.

Demand

The current Government plans contain no proposals whatsoever for managing the demand for air travel (increasing at 8% per annum because of an assumed 44% reduction in air fares; which occurs in turn because air travel does not meet its social & environmental costs - see above). This approach represents an unsustainable return to the discredited 'predict and provide' policies of the past. The minimum growth option being proposed at Manchester is an 117% increase; this is a denial of genuine choice. The minimum growth option being proposed at Manchester is an 117% increase; this is a denial of genuine choice because the hundreds of thousands of local residents under the flightpath have not been offered any option that genuinely restricts the growth of the airport. We have noted that they are seeing this consultation as a 'charade' and the proposals a 'foregone conclusion' and 'fait accompli' precisely for this reason. To reiterate, Manchester Friends of the Earth is of the firm opinion that the Government should take immediate action to stop any growth in air travel.

Aviation's Impact on People and Communities

Airport expansion will be at the expense of local air quality and the health of residents who live close by. Emissions, both pollutants and noise, from aircraft pose a serious danger to thousands of residents and we believe the Government should be working to reduce these emissions – that is to constrain the number of flights made. On top of this, any airport expansion will generate significant increases in the volume of road traffic, both locally and nationally. Improving access to airports by public transport will do little to redress the existing reliance of travellers on arriving/departing by private car.

At most airports, even with improved public transport facilities, the proportion of travellers arriving by car could remain as high as 90%. Even dramatic improvements in increased use of public transport to access airports will be wiped out by increasing the amounts of flights to and from an airport.

Studies have shown air pollution to be a major cause of respiratory problems, chronic ill health and death. There is a growing body of evidence, particularly from the USA, which points to higher levels of cancer around major airports. Airport expansion that increases air pollution, or prevents it being reduced, will damage the health and quality of life of citizens. It will infringe an important human right - the right to breathe clean air.

It should be explicit that expansion at any airport is unacceptable until a Local Air Quality Strategy is in place and that this strategy can show that there would be no breaches of objectives. Mandatory objectives on air quality must be met. However, given the uncertainty of forecasting air pollution, it should be an objective to reduce air pollution as much as possible, not just to minimum limits. Increases in air pollution should not be allowed just because standards would not be breached.

Airport expansion raises the inevitable prospect of an increase in the already unacceptable noise levels around many airports. The growth in the number and frequency of flights will almost certainly cancel out the benefits of any technological improvements which produce quieter aircraft.

At most airports, noise levels already exceed World Health Organisation guidelines which adopt 54 decibels as the upper limit when people start to get annoyed by noise. By contrast, the study only estimates the number of people that will be affected when the daytime noise averages out at 57 decibels. No justification has been given by the Government for the use of this higher figure. A large number of complaints are often received from areas outside the noise contour band used by the Government to represent the threshold of disturbance.

The study notes that very considerable noise impacts would occur as a result of expansion at Manchester Airport. In particular, the number of people exposed to noise within the 57 dBA limit would increase from 43,000 to between 52-83,000. Such an increase would be wholly unacceptable.

The World Health Organisation has identified a long list of health implications arising from prolonged exposure to excessive noise levels, including hearing difficulties, stress related illnesses and heart disease. Annoyance responses to community noise exposure such as aggressive and anti-social behaviour are also common. The effects on performance (e.g. reading, attentiveness, problem solving and memory), arising in part from sleep disruption, can also be debilitating and in some cases may result in accidents. Worryingly, studies have shown a possible link between community noise and mental health problems suggested by demand for tranquilizers and sleeping pills, incidence of psychiatric symptoms and the number of admissions to hospital.

Aviation has been afforded protection from legal action for noise nuisance since the 1920s. Section 76 of the Civil Aviation Act 1982 still offers this anomalous protection today, leaving local authorities and their communities with no redress in the law. To offer long term safeguards to communities, environmental limits should be defined for each airport in respect of noise, air quality, land take and safety. These limits should not be exceeded, even as traffic grows. This could provide a much needed incentive to air carriers to operate the cleanest and quietest technology available.

The Economy

Much is made in the consultation documents of the freedom air travel affords to citizens. However, it fails to recognise that a large proportion of trips generated over the next 30 years if airport capacity is expanded will be discretionary leisure trips i.e. a relatively small number of wealthier people flying abroad on weekend breaks. By contrast, 75% of the population made no or just one journey by air in 2001. In this respect, the direct benefits of airport expansion can be seen to be limited to only a small proportion of the population. It is improved public transport and road safety that would be more equitable improvements to our transport infrastructure. A fast and affordable rail link from Manchester to London and on to the Channel Tunnel would allow people to take short breaks in Europe with much less environmental damage than flying.

In terms of job creation, the *Contribution of Aviation to the UK Economy* study on which the consultation is based claims significant benefits. However, the study has been heavily criticised by economists, think-tanks, local authorities and pressure groups. The study was commissioned from consultants Oxford Economic Forecasting and was 95% paid for by the aviation industry. It cannot, therefore, be considered impartial. Indeed, all independent studies carried out do not support the findings of the OEF study. In respect of the option for Manchester Airport to develop as a 'secondary European hub' the study claims that in excess of 15,000 'additional' jobs could be created but (i) these jobs are not genuinely additional – simply additional *at the airport site* - which is not necessarily the right location or sector in sustainability terms for job creation; and (ii) this fails to explain why Wythenshawe Benchill, just two miles from the site, has remained the most deprived ward in the country despite decades of nearby airport expansion. In fact, the Trade and General Workers Union commented in January this year that the 5,000 extra jobs promised (although the original claim was higher than this) by the developers of Manchester's second runway have not materialised. It would be wrong to continue arguing for airport expansion on the basis of jobs when the reality does not back up the claims.

Environment

Aviation is the fastest growing source of greenhouse gas emissions, accounting for 3.5% of anthropogenic climate change. Decreasing emissions achieved through advances in technology are being offset by the growth in aviation in traffic. In the UK, Government studies have shown that by 2050, aviation alone will represent between 10-28% of total energy use. Aviation's

contribution to global warming must be afforded considerable weight in any decisions regarding the future role of the industry.

In 1999 the world's top climate scientists, the Intergovernmental Panel on Climate Change (IPCC), published a detailed study of the impact of aircraft pollution on our atmosphere - Aviation and the Global Atmosphere. The report's findings support the following:

- Aircraft release more than 600 million tonnes of carbon dioxide (CO₂) into the atmosphere each year.
- Aircraft currently cause about 3.5% of global warming from all human activities.
- Aircraft greenhouse emissions will continue to rise and could contribute up to 15% of global warming from all human activities within 50 years.
- Nitrogen oxides (NO_x) and water vapour from aircraft engines are important greenhouse gases. Water vapour contributes to the formation of contrails, often visible from the ground, which in turn are linked to an increase in the formation of cirrus clouds. Both contrails and cirrus clouds warm the Earth's surface magnifying the global warming effect of aviation. Together, NO_x and water vapour account for nearly two-thirds of aviation's impact on the atmosphere. Hence any strategy to reduce aircraft emissions will need to consider other gases and not just CO₂.
- An increase in the number of supersonic aircraft could further damage the ozone layer as aircraft emissions of NO_x deplete ozone concentrations at high altitudes, where these aircraft typically fly.

However, the consultation documents fail to disclose the rise in climate change emissions derived from the forecast growth despite the fact that the Transport Minister identifies this as "by far the biggest element in the environment debate"; and the analysis only applies to CO₂ and not the full GHG effects. We understand from national Friends of the Earth that, late in the consultation, the Government has produced forecasts for the CO₂ growth (which have not however been publicised on the Consultation website) which indicate that this will be of the magnitude of 102-130% in the period 2000-30, and from which it can be calculated that the growth at regional airports such as Manchester will be of the magnitude of 315-380%. This increase has to be set against not the Kyoto and additional UK government targets, but the Prime Minister's recent call to go beyond Kyoto towards the -60% by 2050 target.

Finally, the UK Climate Change Programme 2000 noted that: "If the Kyoto target is achieved, then aviation's share of total emissions is likely to be even higher. If no measures are taken in the aviation industry to reduce emissions, reductions achieved under the Kyoto Protocol could by 2012 be offset by between 30% to 50% due to increasing emissions from aviation depending on the growth scenario used. This therefore makes action to reduce emissions both urgent and pressing." *Section 2, chpt.5 para.76*. However, no reference is made in the Documents to this issue, no updating of the 'offset' forecasts has been made, and no 'action to reduce emissions' is proposed; indeed, just the opposite.

The effects of rising surface air temperatures as a result of global warming will be significant. It is likely to lead to more natural disasters such as hurricanes, droughts and floods. The likely increase in warmer and wetter weather could enable infectious diseases such as malaria and yellow fever to spread to new areas. Global warming could lead to the displacement of millions of people as rising sea levels, food shortages, floods and drought make former land uninhabitable creating environmental refugees of millions of people.

If aviation had to meet its external environmental and social costs in full, and did not benefit from large subsidies, the growth in demand for air travel would be much lower. The absence of an aviation fuel tax, or an emissions based levy, allows airlines to charge artificially low fares as the cost of pollution is passed on to society and not the passenger. It has been suggested that if the aviation industry paid its way, 2 pence could have been taken of income tax in 2002 (<http://www.airportwatch.org.uk/briefings/econ6.htm>), a total of 7 billion pounds of public money. A Mori survey (same source) has shown that those most likely to fly were those with incomes in excess of £30k per annum. The better-off gain disproportionately, therefore, whereas the less well off, i.e. those in most need, would stand to gain if this money were available to improve public services. We believe that the Government should immediately introduce taxation on aviation fuel and VAT on all aspects of the industry.

Airport growth means the loss of countryside, often Greenbelt, and of valuable wildlife habitats and heritage. Towns and villages close to airports could lose their character, or in some cases, may be demolished to make way for new airport development. The implications of these external costs on existing communities and their quality of life are often unquantifiable, but nonetheless significant. Airport communities should have the opportunity for concerns to be channelled constructively. Formal powers to protect their interests are needed. The right of local communities properly to challenge the principle and location of airport expansion must be maintained. In particular we are concerned that any expansion of Manchester Airport will result in considerable, irreversible, damage to Cotterill Clough SSSI (see below)

Habitat

Up to 590 hectares (52 hectares in the North of England) of ancient woodland nationwide, the Woodlands Trust estimates, would be under threat as a result of current aviation proposals. These woods not only soak up approximately 147 tons of carbon dioxide they are also home to more threatened species than any other UK habitat (no fewer than 78 threatened species in all). As things stand, British people have less woodland to escape to than almost any other European country. Trees only cover a mere 10% of the UK's landscape (compared to a European average of 30%). Only 20% of the UK's woodland is classified as ancient and of this 20% only 14% is protected by UK law.

Ancient woodland is land continuously wooded for at least 400 years (and often much longer) and is one of the great glories of our natural heritage. Today, 8 out of 10 ancient woods in England and Wales are less than 20 hectares in area, yet smaller woods are more prone to environmental pressures. Ancient woods are our richest habitat for wildlife. They are places

of inordinate beauty, reservoirs of evidence for environmental change, archaeology and economic history, and a source of inspiration for local culture and folklore. Our resource of ancient woodland is finite and cannot increase, so what remains is precious and irreplaceable

Since the 1930s, 45% of our ancient woods have been lost to agriculture or commercial plantations. If the planned expansion of Manchester airport is implemented it could cause the destruction of a further 22.5 hectares of ancient woodland. The specific areas that are under risk a result of current aviation proposals for Manchester airport are:

Cotterill Clough (ASNW, SSSI [Site of Special Scientific Interest]; 11.32ha) “Depending on the location chosen, new terminal capacity could affect the green belt and the Cotterill Clough SSSI, and impacts on the SSSI would have to be considered in layout planning”

Oversley Farm Wood (ASNW, 3.4ha) Already damaged by runway 2 could be further degraded by construction of a parallel taxiway.

Hooksbank Wood (ASNW, 7.80ha) Also already damaged by runway 2 could be further degraded by construction of a parallel taxiway (between 2010 and 2015).

The consultation documents also note the possibility of a Third Runway at Manchester Airport, another development that would be very destructive to local biodiversity sites.

Surface transport integration

The expansion of airports will encourage road traffic and, as stated above, the percentage of passengers arriving by car is likely to remain high unless strong incentives – by means of public transport provision and fuel and/or road tax – are put in place to counter this.

Manchester Friends of the Earth welcomes efforts to improve public transport access to airports, however it is important also to see surface transport as an alternative to aviation. The growth in domestic air transport in the UK cannot be completely unrelated to the unreliability and expense of the trains. Trains offer travellers the following benefits when compared with air travel:

- easier access: most stations are located in city centres and are well connected to local public transport networks. In contrast, airports are often located several tens of kilometres outside of a city, often with poor public transport provision;
- shorter check-in times: without the need to check in and out with baggage, trains can be boarded minutes before departure, with onward travel to the final destination commencing immediately after disembarking;
- greater flexibility: it is not always necessary to book rail tickets in advance, and trains provide more frequent connections;
- greater scope for the business traveller to use their time productively: few trains have restrictions on the use of mobile telecommunications

and electronic equipment. Indeed, new trains on the West Coast Line encourage use of mobile electronic equipment with the provision of electrical sockets.

We feel that the consultation document for the North of England seriously underestimates the environmental benefits of trains/rail. It is environmentally irresponsible to continue to take a 'predict and provide' approach to an under-taxed aviation industry, whilst not even providing enough government money to pay for the rail improvements suggested by the government's own Strategy Rail Authority.

A recent comparison of rail and air transport was compiled for the IPCC Special Report on "Aviation and the Global Atmosphere" (1999). The Report shows that short-haul air travel emits up to 98 grams of carbon per passenger-km compared to just 50 by a high-speed train using coal-fired electricity and only about 2 gC/p-km for trains using non-fossil electricity (e.g. hydroelectric). This is for passenger aircraft only: the differential for freight aircraft can be considerably higher. The consultation document's (p189, North of England document) statements that short-haul air journeys have higher CO₂ emissions per passenger km than high speed rail, needs to be reassessed in this light and remodeled to take into account the potential for trains that run on renewable energy. It also needs to account for the fact that water vapour contributes to the greenhouse effect when released in the upper atmosphere, and that aircraft emit NO_x gases that catalyses the production of Ozone, another greenhouse gas (see above).

The consultation document downplays these energy efficiency and pollution advantages, claiming that rail has only a small advantage over air for domestic journeys. We believe that, by taking into account this energy saving, by recognizing that greenhouse gases are more potent when emitted at altitude as opposed to ground level, and by allowing for the fact that noise mitigation is generally easier for trains than for planes, the advantage of rail over air needs to be reassessed. The consultation document's (p189, North of England document) assertion that 'The environmental case for air-to-rail substitution is therefore marginal at best' seems to be misled.

Key Recommendations

In answer to your consultation, and backed up by the above arguments, we call on the Government to:

- opt for a "no growth" scenario. According to the Government, 'constrained growth' is in fact up to 35-40mppa, a doubling of the Airport's present size, because planning permissions may have already been granted to permit this (see 5.2.5 in the consultation document). The Government will therefore need to take alternative steps to constrain capacity within severe environmental and site limits, as well as by applying a general demand management policy.
- reject unsustainable growth rates for air travel but promote alternatives to air travel including high speed rail links and video-conferencing

- implement an effective fiscal & charging regime for aviation to manage demand for air travel & remove unfair distortions
- adopt a "strong presumption against" new airport development until environmental safeguards are guaranteed; & promote sustainable development in the UK regions
- respond to criticisms of the flawed OEF Economic study and to commission a comparable Strategic Environmental Impact study
- set up an Independent Regulatory Authority for airports with the responsibility to impose all pollution control regimes
- set environmental limits at airports and tough, legally binding targets for a progressive reduction in noise & pollution levels
- maintain the right of local communities to properly challenge the principle & location of airport expansion
- give local communities a formal role in the regulation of the operation & development of their airport

If the Government is serious about its commitment to sustainable development, including stopping climate change, then any expansion of the UK aviation industry has to be considered extremely carefully. It is the view of Manchester Friends of the Earth that the Government must act to curtail the growth of the industry, favouring instead public transport on land and sea where possible. The Government must also work to ensure that the industry reduces its pollution and noise levels as much as possible.