

**Response to the Department for Transport's National  
Consultation on the future development of Air Transport in the  
United Kingdom (South East region)**

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## 1.0 Introduction

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I welcome the opportunity to respond to the Department for Transport's National Consultation on the future development of Air Transport in the United Kingdom for the South East region. I particularly welcome the objective set out in the consultation to *"ensure that the long-term development of aviation is sustainable...*

*striking a balance between the social and economic benefits of air travel and the environmental effects of any development.”*

The consultation poses a number of questions, of which the key ones are:

- Should new airport capacity be provided in the South East over the next 30 years, and if so, how much? A particular issue is whether there is a case for having at least one major hub airport.
- Where should any additional runway capacity be provided? A particular issue is whether or not Heathrow should be developed further.
- What controls, mitigation measures and compensation should be put in place to limit and manage the adverse impacts of any additional airport development on people and on the nature and built environment?

I will argue that in following the outdated and dangerous “predict-and-provide” policy, the consultation document fails to formulate a policy for aviation which is sustainable in either the short- or long-term. The answer to the first question therefore to a great extent negates any answer to the subsequent two; however, I shall also point out the particular disadvantages of the proposed development at Cliffe airport, numerous small airports in the South East and at Heathrow.

As Rapporteur for the report “Air transport: environmental impact, towards a sustainable development” for the Committee for Regional Policy and Transport within the European Parliament, I have been instrumental in calling for an emissions charge on all flights entering or leaving EU airports. The Government’s claim that the impacts of such a charge (introduced on either global or European level) on the cost of airline tickets will be counterbalanced by the growth of the sector (section 5.9) misses the point entirely. Similarly, the claim that technological advances will help counteract the growth in demand and therefore the growth in emissions (section 5.11) grossly underestimates the magnitude of the problem.

## **2.0 Summary of recommendations**

The Government should formulate, adopt and implement a more sustainable national aviation policy, including all of the following elements:

- The rejection of environmentally-unsustainable growth rates for air travel;
- The application of legally-binding environmental limits around airports to prevent noise and air pollution from exceeding socially-acceptable and environmentally-sustainable levels; and, protective measures to prevent airport infrastructure, associated development and traffic from having adverse impacts on communities, countryside, heritage sites and biodiversity;
- The application of an emissions charge on airlines entering or leaving UK airports.
- An end to all public subsidies to aviation, and all its tax exemptions.
- The application of measures to fully internalise aviation's social and environmental costs, and;
- Promotion and support of less environmentally damaging alternatives to air travel.

The Government should reject the outdated "predict and provide" model for the development of the aviation sector, and concentrate instead on limiting the growth in the sector and developing viable alternatives. The Government should *not* develop any airports in the South-East region as this would merely encourage more growth, exacerbating old problems and creating new ones.

In calling for these measures, I would draw your attention to the Green Party's call for:

- a. A European-level charge on aviation, based on emissions.
- b. An end to all public subsidies to aviation, and all its tax exemptions.
- c. Investment in less-polluting travel alternatives. Because 70% of European air trips are less than 1000 kilometres, there is huge scope for transfer to alternatives.
- d. Research into, and promotion of, further alternatives to business air travel, including video-conferencing, telepresence etc.
- e. Optimisation of air traffic control, which alone could reduce aviation's CO2 emissions by 6-12% over 20 years.
- f. Changes in land-use planning law, requiring all applications for airport development to give full consideration to climate change, health, external costs and alternative job-creation.
- g. A public education programme on the negative economic and ecological consequences of air transportation.

**3.0 Should new airport capacity be provided in the South East over the next 30 years, and if so, how much? A particular issue is whether there is a case for having at least one major hub airport.**

The consultation document is based on the scenario of unconstrained, or only slightly limited, growth. It exaggerates the advantages of the growth of the industry and ignores the costs.

**3.1 Predicted growth** Air traffic is forecast to almost double in the next 15 years. Government figures indicate that UK air passenger numbers are set to increase from 180 million per annum to day to around 400 million in 20 years time. If the "predict and provide" model were applied to that level of demand, the resulting increase of 240 million passengers would require the equivalent of 4 new airports the size of Heathrow or 8 new airports the size of Gatwick. By 2020 the forecasts indicate that demand will be rising by about 15 million a year, equivalent to a new Gatwick every 2 years.

Clearly, it would be impossible politically, environmentally and socially to respond to that level of demand. The projections only serve to demonstrate the nonsense of assuming the possibility of continuing exponential growth.

**3.2 Problems associated with aviation growth** The disadvantages associated with the growth of aviation are well known and so will not be repeated at length here. Briefly:

- **Pollution** Aviation is the most highly polluting transport mode on earth. This includes noise pollution (with associated health costs in lost sleep, damage to children's education etc) and air pollution (including CO<sub>2</sub>, Nitrogen Oxides, Carbon Monoxide). The consultation document claims that disbenefits caused by pollution are "...local [apart from climate change] and hence best handled at the level of each airport individually." This argument is irresponsible and true only to a very limited extent. The problems may be felt only in a localised area (though in the case of air pollution, this must be questionable), but the associated costs are born more generally e.g. through the health service and the education system. Pollution from aviation constitutes a major hidden cost to the economy, which is born not by the industry but by society as a whole.
- **Climate change** Aviation currently accounts for just over 3.5% of total CO<sub>2</sub> emissions. According to a recent report by the Intergovernmental Panel on Climate Change, by 2050 emissions from aircraft could be responsible for up to 15% of the overall global warming produced by human activities. The consultation document dodges the question of the impact of the growth of aviation travel by stating that "...over 95% of these emissions \cause by the growth of aviation by 2030\ will relate to international flights." and would therefore be exempt from the government's commitments under the Kyoto protocol (section 16.20). This evasion of the responsibility the government would bear by increasing the capacity for international air travel is irresponsible in the extreme.
- **Fuel availability** Fuel availability is certain to decline considerably over the next 30 years, with petroleum production set to peak around 2005. Unless the air transport sector can appropriate a rapidly increasing proportion of declining world oil production, its growth cannot proceed as the industry expects. At the very least, the real cost of fuel will increase dramatically.
- **Economic disbenefits** Airlines pay no duty or VAT on aviation fuel, which distorts competition between aviation and other modes of transport. The cost to HM Treasury in lost revenue from VAT alone is £1.8 billion. If the fuel was taxed at the same rate as, for example, unleaded petrol, the income from the tax would amount to another £5 billion a year. Through externalising costs and escaping taxation, the Government artificially subsidises the growth of the aviation sector.

**3.3 Benefits of aviation growth** Claims made within the document that aviation is of benefit to the economy are extremely questionable. Many of the arguments are based on the simplistic assumption that airports generate wealth, whereas in reality airport expansion is only driven by consumer choice. If the price of air travel reflected its true costs to society, and if it paid its way through taxation as other modes must, then it would not appear to be such good value, and demand would fail.

The document claims that a number of economic benefits will result from the proposed expansion of airports (section 3.4). It neglects to mention that these claims are based on conclusions drawn from a report, prepared by the consultants Oxford Economic Forecasting, which was 95% funded by the aviation industry. Independent studies on the subject have not supported the claims made.

- **Opportunity for travel** The document argues that, if new runway capacity was not built in the South East, large numbers of people would be prevented from flying at all (section 3.15). What it fails to say is that over the next 30 years a substantial section of the projected growth in air travel will come from wealthier people flying abroad on increased numbers of weekend breaks. Only 20% of flights are made for business purposes, and this figure is not expected to change. The rise in air travel is not expected to effect those who cannot afford to fly at all to any marked degree.

- **Tourism** The consultation points to the fact that *"inward tourism is worth about £13 billion to the UK each year"*, set to rise in the future, and that *"tourism would undoubtedly suffer if there were significant constraints on air services"* (section 3.33). It does not mention, however, that annually, Britons spend £17.7 billion a year on holidays abroad, compared to only £9.1 billion spent by visitors to the UK. In other words, the UK suffers from a tourism deficit of £8.6 billion a year – a deficit which can only be exacerbated by increasing the opportunity to travel abroad. The document also argues that *"consumer choice by UK residents is limited if they cannot go on holiday by air."* This is certainly the case – however, I would respond that, for the general public, the significant costs (e.g. more extreme weather events, spread of infectious diseases, increasing world-wide uncertainty resulting from climate-change) should outweigh the luxury of ever-cheaper flights to foreign holiday destinations.
- **Competition** It claims that the UK is losing out to its European "competitors" because other cities are building more runways than this country (section 4.7). It fails to say that not all the runways at leading airports like Charles de Gaulle in Paris and Schiphol in Amsterdam are in use at the same time – for example, Amsterdam generally only operates from 2 of its 5 runways at any one time and the decision to build the fifth runway was partly based on the need to give relief to residents under existing flight paths. Additionally, if EU-wide measures such as the emission charge were introduced effectively, the demand at *all* EU airports would be reduced. This would significantly lessen the competitive pressure on individual airports to expand - negating the government's argument that it is necessary to expand for competitive purposes.

**3.4 Should an airport be developed as a "hub"** It is evident from the consultation that the airport being considered in this capacity is Heathrow (section 4.2), with Cliffe or Stansted as alternatives if this proves impractical (section 4.19).

The development of an airport as a hub would mainly bring benefit to airlines (of both foreign and GB) and not to the UK economy – certainly not to the local communities who would suffer the effects. The advantages of developing a "hub," as detailed in the consultation document (section 4.9) all relate to consumer access, such as *"a greater number of destinations served direct."* As detailed above, I consider that these advantages would be hugely outweighed for the average traveller by the massive costs to society as a whole.

Over the next 30 years, it is also physically impossible for Heathrow to expand sufficiently to remain the main European hub. As is detailed in the consultation document, Paris, Amsterdam and Frankfurt all have more runways and more space to expand. Heathrow is surrounded by too many centres of population, and is only one fifth of the area of Charles de Gaulle. The costs associated with development of Cliffe and Stansted are outlined below.

**3.5 Sustainable development** As was stated in the Royal Commission on Environmental Pollution's *18th Report on Transport and the Environment*, *"...an unquestioning attitude toward future growth in air travel, and an acceptance that the projected demand for additional facilities must be met, are incompatible with the aims of sustainable development."*

If the Government truly wishes to formulate a "sustainable" aviation policy, it should not be by providing new airport capacity in the already overstretched South East, but by seeking ways to limit the growth of aviation and encouraging alternative modes of transport.

#### **4.0 Where should any additional runway capacity be provided? A particular issue is whether or not Heathrow should be developed further.**

Given that the disadvantages of aviation expansion far outweigh the benefits, creation of additional runway capacity should *not* take place anywhere within the South-East region. Having said this, however, it is worth elucidating the specific problems associated with some of the different suggested sites, in order to highlight the dangers and inconsistencies inherent in the Government's approach.

**4.1 Heathrow** Last year, the Government placed a cap of 480 000 flights per year using Heathrow, on the recommendation of the Terminal Five Public Inquiry Inspector and as a *condition of its construction*. As is acknowledged in the consultation *"the 480,000 limit...would clearly be exceeded with a new runway"* (section 7.8). With massive hypocrisy, the consultation chooses to honour a previous agreement not to develop Gatwick before 2019 (chapter 8), but ignore the agreement made only last November with regard to Heathrow. The document argues that the agreement can be overridden with noise and quality controls. It ignores the fact that the 480 000 cap was placed precisely because the Inspector believed that the contours used to estimate noise levels did not reflect reality. Therefore, it is a nonsense to try and override the decision using those same contours as a basis for the calculation (section 16.33).

Noise calculations are also based on an estimated "annoyance threshold" for planes at more than 57 decibels/ day. The Government is alone, however, in using this figure - WHO estimates people are annoyed at 51 – 54 decibels.

The consultation also admits that, should a Third Runway be constructed, 35 000 people would be exposed to NO<sub>2</sub> levels above the EU legal limit (section 16.29). It fails to spell out, however, that this would mean that 10 000 homes would have to be compulsorily purchased and/ or destroyed in order to conform to the EU limits, should the runway be constructed. In striking contrast to this figure, the consultation directly states that just 260 homes would need to be destroyed in order to make way for the runway.

**4.2 Cliffe** Since this consultation was launched in June of this year, I have personally received more than 100 letters from constituents expressing their opposition to the construction of an airport at Cliffe, and I would like to speak on their behalf as well as my own. Public meetings about the proposed developments have attracted thousands of people opposing the plans. This level of anger should perhaps cause the Government to rethink its arrogant assumption that relatively low numbers of people would be affected by the development (section 11.2). It is perhaps the case that a relatively lower number of people would be *directly* affected by the airport – however, we would all suffer from the loss of a unique natural resource that is a part of the country's heritage.

The consultation document itself admits that developing an airport at Cliffe would have *"major environmental impacts."* It does not admit the truth, which is that it would be a major environmental disaster:

- The development would destroy valuable wildlife habitats. The Cliffe site includes four Sites of Special Scientific Interest (protected under national law) and the Thames Estuary and Marshes Special Protection Area (European law) and Ramsar Site (International law).
- The Thames is one of the most important sites for waterfowl in the UK, supporting an average of over 155 000 wintering waders and wildfowl. The proposed airport would also destroy the RSPB's Nature Reserve at Northward Hill, currently supporting the largest breeding heronry in the UK, 45 pairs of avocet and 20% of the UK population of little egret.
- The location of the airport in the middle of the feeding and breeding areas for what is also essentially a "hub" for birds, is likely to have impacts on the populations which are extremely hard to predict.

The consultation admits that in order to comply with the EC Habitats Directive, the Government must demonstrate that it has considered all reasonable alternatives and that it will put compensatory measures in place – possibly in the form of creating alternative habitats.

The indirect effects from the airport would be considerable, including:

- an increased risk of flooding on the Hoo peninsula, which could have devastating effects on marsh wildlife, homes and farmland
- changes in existing water flows and groundwater levels on which wildlife depends
- threats to c.50 species which are protected by the UK Government's own Biodiversity Action Plan.

Many of the wildfowl at Cliffe are heavy birds such as swans and geese, which would pose considerable risk of "bird strike" to aircraft, as birds fly at similar flight paths and altitudes to aircraft. Though the consultation suggests that "*bird control measures will be necessary*" and acknowledges that further research will be needed into these measures (section 11.18), it does not state what they might be, or how they might work. If, as seems likely, it is simply impossible to control the birds without large-scale culling, the impact of the airport will be all the greater.

**4.3 Manston** Whilst various planning permissions have been granted, no permission has ever been sought for aviation to take place at Manston. Under Crown ownership, the airfield was exempt from elements of the planning process which apply to civil projects. The absence of planning consent has further ramifications. European legislation has sought to ensure that a properly conducted environmental impact assessment is prepared prior to any project which is likely to have a significant environmental impact. Without a major planning application there is no effective trigger for such an assessment.

In essence, Manston provides a stark warning of the Catch 22 situation facing those living near operational military airfields. Military activity can be used to confer legality upon similar civilian operations, bypassing the normal process of planning and environmental impact assessment.

**4.4 Luton** The consultation includes two options for Luton. One is to build a new runway 200 metres south of the existing one, with the current runway being used as a taxiway. The other is to build a new runway on a new alignment (NNE-SSW) and a new parallel taxiway. For both options a capacity of 240,000 flights per year is assumed.

The study estimates the number of people that would be affected by the new proposals, but it fails to spell out their flight path implications. This is particularly astonishing in the case of Luton where one of the proposals is to change the direction of the runway.

The study discusses daytime noise, but it fails to say anything about night-time noise....despite the fact that freight and low-cost flights, both of which have significant night-time operations, are expected to be heavy users of the airport.

**4.5 Alconbury** The proposal is for a new airport to be built on the site of the former military airfield to cater for air freight and low-cost airlines.

The study fails to spell out the flight paths.

The study fails to estimate the number of flights that will use the airport

The study fails to say anything about night-time noise, despite freight and low-cost flights having extensive night operations.

**4.6 General statement on runway capacity** The statements above detail the major problems associated with specific associated sites. I would like to re-state, however, that the lack of specific reference to other suggested sites in the consultation document (e.g. Stansted, Shoreham, Biggin Hill) *does not* mean that I would support development to those sites. Given that the disadvantages of aviation expansion far outweigh the benefits, creation of additional runway capacity should *not* take place anywhere within the South-East region.

## **5.0 What controls, mitigation measures and compensation should be put in place to limit and manage the adverse impacts of any additional airport development on people and on nature and the built environment?**

I welcome the recognition in the consultation that *"aviation should meet its external costs, including environmental costs – that is, the costs to society of aviation noise, and other adverse impacts on, for example, climate change, local air quality landscape, biodiversity and heritage."* (section 5.5).

As has been demonstrated earlier in this document, however, the very title *"Meeting the costs of global warming"* (section 5) is an absurdity. As has been clearly shown, it would be impossible to meet the costs of aviation growth through economic measures alone.

Reference is made in the consultation to the introduction of an emissions charge on aviation fuel and to the Government's commitments under the Kyoto protocol. However:

- The consultation states that 95% of emissions result from international flights, which are exempt from the Kyoto Treaty. The Government therefore feels free to ignore its significant responsibility for an increased level of international travel and the impacts this will have on climate change. This is wholly unacceptable.
- The Government's argument that the expanded capacity of the industry will absorb the price rise in tickets resulting from an emissions charge (section 5.7) is deeply flawed. To argue that the price impacts of the tax can be absorbed by the growth of the sector ignores the very point of the tax! I would also argue the assumption that a 100% tax on fuel would in any way "pay for" the environmental impacts on climate change is an absurdity. The consultation even goes so far as to state that, *"if no new runways were built then this would constrain demand growth by more than its environmental costs..."* (Annex E).
- The document also solely tackles the impacts of CO<sub>2</sub>. The fact that CO<sub>2</sub> is used as *"the standard indicator in a wide range of transport appraisals"* (Annex E) should not be used as an excuse to ignore the significant effects of other gases. For example, there is significant evidence to show that aircraft pollution from NO<sub>x</sub> effectively doubles the contribution to climate change caused by emissions of CO<sub>2</sub>.

I would strongly dispute the assertion that 100% fuel tax would "pay for" the environmental costs of CO<sub>2</sub> emission (section 5.7). According to the report, introducing an aviation fuel tax at 100% would reduce demand by 10%. Taxing aviation fuel at 25p a litre - just half the rate applied to motor fuel (ie at around 140%) - might therefore be expected to reduce demand by about 14%. This would reduce the mid-point forecast for the number of passengers passing through UK airports in 2020 from 400 million to 344 million. VAT on air travel (including fuel and aircraft purchases) would put air fares up by 17.5%.

Government figures indicate that this would reduce demand by about 22%. Imposing both a fuel tax and VAT would reduce forecast demand to around 268 million. Trebling airport charges at Heathrow and Gatwick would raise average UK airport charges by about 100%. The government's figures indicate that this could be expected to reduce demand by a further 11%. The abolition of the remaining duty-free might knock off a further 1%, reducing the total demand in 2020 to 236 million.

It would seem reasonable to conclude that the total effect of introducing realistic landing fees and a fairer tax regime - *even with aviation fuel taxed at only half the rate of unleaded petrol* - would be to bring about a situation where demand for air travel rises from 160 million passengers using UK airports in 1998 to about 236 million in 2020. This would represent a significant reduction in the growth of CO<sub>2</sub> emissions and of the various hidden costs, but would still represent an increase in passenger numbers of 147.5% over 22 years.

A greater reduction in growth would be desirable in order to help the UK meet serious emissions-reduction targets and further reduce the growth of aviation's hidden costs. This could probably be achieved through a combination of measures:

- a. Higher rates of aviation fuel tax.
- b. Public education on the impacts of aviation - especially with reference to climate change, which is of growing concern to the public.
- c. Provision and active promotion of alternatives to air travel.
- d. Encouragement of UK holiday options not requiring air travel.

## **6.0 Biography**

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