Developing a Sustainable Framework for UK Aviation: a Scoping Document

Response from Stop Expansion at Manchester Airport

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This submission has been prepared on behalf of the Stop Expansion at Manchester Airport campaign.

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Stop Expansion at Manchester Airport campaign was created in September 2008. www.stopmanchesterairport.org.uk

The aviation sector

5.5   **How, and within what constraints, can aviation growth occur as technological developments and improved operating procedures reduce CO_2, pollutant emissions and noise impacts?**

Whilst some targets for aviation have already been set, for example that emissions in 2050 should not be higher than 2005 levels, a more precautionary approach needs to be taken to account for the non-CO2 impacts of aviation. Given the dangers of climate change, aviation policy should not be guided by overly optimistic scenario predictions about fuel efficiency improvements or the potential uptake of unsustainabe biofuels. In all instances a precautionary principle needs to be applied to make sure that aviation makes a proper and fair contribution to reducing its overall global warming impacts in line with the climate science. Peter Lockley's submission to the Scoping Document explains this position more fully.[1]

5.6 How should decision-makers address trade-offs or competing interests, where these occur both (a) between different aviation objectives, e.g. CO_2 emissions versus local noise reduction, and (b) between aviation and other sectors, e.g. airspace use versus renewable energy objectives, or the use of land for maintaining a viable network of smaller airfields versus housing development?

(a) Where a trade off exists between different aviation objectives, it would be morally consistent to accommodate the least of two evils. Given the well documented dangers of

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1   'Aviation and Climate Change Policy in the UK', Peter Lockley, July 2011

climate change, and the limited technological advances that can be made in reducing aviation emissions, this would mean cutting carbon emissions should be a priority for aviation policy.

(b) The aviation industry already enjoys considerable priviliges as an industry such as tax exemption on its fuel, and a requirement to reduce its greenhouse gas contribution less than other sectors. It is also more of a discretionary activity, rather than a daily requirement such as heating or powering our homes. Given these factors, and its high carbon intensity, measures should be taken to re-balance aviation's favourable position whilst other more universal social needs such as housing and renewable energy production are prioritised.

International connectivity and hub airports

5.9 How important are air transport connections – both international and domestic – to the UK at both national and regional levels?

The argument is often put forward that to reduce carbon emissions in the Northwest, it is better that Air Transport Movements are allowed to increase at Manchester Airport, rather than increasing surface transport emissions by passengers travelling to alternative airports such as Liverpool or Heathrow.[2]

However, the various scenarios for each planned journey are more complex than allowed for in this argument. It depends on a number of other factors such as the method of surface transport used and the distance and thus emissions of the flights in question. Crucially, if flights added at Manchester are done so in addition to, rather than in replacement of flights from Heathrow or another national airport, then although there maybe some carbon savings from sufrface travel, there is likely to be an increased emissions from the extra flights at Manchester. As Jeremy Birch notes in his report on Regional Business Connectivity, "If two planes are flying to a destination rather than one then the emissions from those planes would be higher than previously and is likely to outweigh any emissions saving from surface travel."

5.11 Are direct connections from the UK to some international destinations more important than others? If so, which and why?

As noted below, flights to business destinations may be considered more valuable to the North West economy, since leisure flights have the effect of exarcerbating the tourism deficit. However, given the need to meet carbon reduction targets, catering for business flights should not be seen as a replacement for promoting rail alternatives, video conferencing and replacements using IT.

Birch has noted that most growth at regional airports can be expected to come from stimulating leisure flights rather than business flights.[3] In 2008, 19.5% of passengers at Manchester airport were business passengers. 11.9% of these were to or from international destinations.[4] It can therefore be assumed that the aviation needs of business can continue to be met without physical airport expansion.

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2   For example, Cllr Richard Leese, transcript from Manchester City Council meeting, 2nd December 2009
3   Stephen Birch, "Regional Business Connectivity" paragraph 3.2.9
4   CAA Passenger Survey 2008

5.16 Would it be possible to establish a new 'virtual' hub airport in the UK with better connectivity between existing London and / or major regional airports? Could another UK airport take on a limited hub role? What would be the benefits and other impacts?

It is well established that building additional capacity tends to increase traffic levels and there is therefore a real danger that creating a new hub airport will create additional flights rather than replacing emissions from existing hubs. Since the UK is already close to exceeding its 2050 Target for aviation emissions[5], it does not make sense to risk creating more emissions from an additional hub airport.

Regional connectivity and regional airports

5.17 Can regional airports absorb some of the demand pressures from constrained airports in the south-east? What conditions would facilitate this?

Regional airports should not be allowed to absorb additional demand from constrained airports in the South East if this comes at the prices of an overall increase in emissions. Again, the danger with absorbing demand is that this creates additional emissions rather than replacing them.

5.18 What more can be done – and by whom – to encourage a switch from domestic air travel to rail?

Development of rail is a vital component of transport strategies that encourage modal shift and a reduction in demand for travel by less sustainable modes, such as air and private cars. The price of rail travel is an important factor in determining transport modes. Rail fares in the UK are among the highest in the Europe. Measures should be taken to address this, including increasing the subsidy and investment from central government. These funds could be provided to the Exchequer by removing the special treatment of the aviation industry with regards to fuel tax and VAT exemptions.

In particular, an improved high speed rail service between Scotland and Northern England, which could then connect onto existing lines to London, could help draw passengers away from planes and onto trains on London to Scotland domestic flight routes. We are beginning to see better integrated ticket options to mainland Europe via the Eurostar (e.g. through to Germany) and would encourage the further development and promotion of these.

However, we would echo the points made by Lockley that any new rail services must be designed with emissions reductions in mind and to minimise the local environmental impacts.[6] The current proposals for HS2 do not seem to meet these critiria. In a broader sense, overall improvements in rail and regional transport networks can also help to reduce the demand for aviation, by making British cities more attractive places to do business and our tourist destinations more accessible. High speed rail developments must therefore not be at the expense of continuing investment in quality, integrated and reliable transport networks in our cities and regions.

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5   Peter Lockley, "Aviation and Climate Change Policy", July 2011, page 5.
6   Peter Lockley, "Aviation and Climate Change Policy", July 2011, page 6.

5.20 How can regional airports and the aviation sector as a whole support the rebalancing of the economy across the UK?

The economic benefits of airport expansion, especially in terms of job creation, have been historically overstated by Manchester Airports Group and their supporters at Manchester City Council. This is particularly true regarding job creation. As Brendan Sewill notes,

"When Manchester Airport announced in 1991 that it wanted to build a second runway, the Chairman of the Airport company claimed that this would create 50,000 new jobs. A subsequent report, presented by the Airport to the public inquiry, revised the figure to 18,000 new jobs. This figure included indirect and induced employment, and employment in firms which would be attracted to the Manchester area. It also included jobs created by inward tourism - without taking account of outward tourism. The media continued to use the 50,000 figure, and indeed it was repeated by the airport chief executive in 1997 after planning permission was granted."[7]

Manchester Airport takes more money out of the regional economy than it brings in:

When assessing the role of airports in local economies, it is important to include the role of outbound tourism in creating a tourism defecit in the UK and in each region. That is, the difference between what Britons flying abroad spend in foreign countries and what foreign visitors spend in certain parts of the UK. In 2008 the tourism deficit was over £20 billion.[8] For the Northwest region, this tourism defecit has been calculated to be around £2.2 billion.[9]

Job Displacement
The role of airports in displacing jobs must be considered as well. For example, if jobs are created in retail at Manchester Airport, these may not be additional jobs - but merely displacing jobs and trade from other retail centres in the Manchester region. Therefore, expanding airports should not be justified on the basis of this type of job creation, since these jobs could be created or maintained elsewhere without the increase in carbon emissions that would accompany the expansion of airports.

Ignoring outbound tourism

As with the 2003 White Paper, which highlighted the role of aviation in facilitating inbound tourism but ignored the role of aviation in facilitating outbound tourism, similar omissions have been made by Manchester Airport. Point 8.3 of the Pre-Publication Partial Consultation on Manchester's Core Strategy, produced by Manchester City Council in August 2010, noted that, "The Airport also plays a significant role in attracting inbound tourism to the region." No mention was made of its role in facilitating outbound tourism however, or the proportion of inbound leisure to outbound leisure flights. In 2009, only 9.4% of flights were for inbound tourism (holiday plus visiting friends and family).[10]

These outgoing leisure flights are affecting the UK tourism industry. The House of Commons Select Committee for Culture, Media and Sport conducted an inquiry into the UK tourism industry in 2008 and one of the UK's largest hotel companies, Travelodge,

7 Brendan Sewill, "Airport Jobs: Cruel Hoax, False Hopes", 2009, page 11.
8 Jeremy Birch, "Airports, Tourism and Regional Economies" - August 2011,
9   Brendan Sewill, "Airport Jobs: Cruel Hoax, False Hopes", 2009, page 21.
10 Travel Trends 2009l, cited in Jeremy Birch, "Airports, Tourism and Regional Economies" - August 2011

gave evidence to the Committee, which included the following:

"Budget airlines are the single biggest cause of decline in traditional tourism resorts and we urge the Inquiry and Government to investigate the airlines' unfair grip on holidaymakers that is squeezing the life out of British tourism.'
...
For every two foreign visitors that are coming into this country at the moment five Brits are going the other way, and that speaks volumes." [11]

Given the current tourism defecit in the Northwest, and the high likeliness of growth at Manchester Airport being stimulated by increasing leisure flights by UK passengers rather than business flights, claims by the industry and their supporters at Manchester City Council that expansion of Air Transport Movements at Manchester Airport will bring economic benefits need to be scrutinised closely. .

Climate change impacts

5.31 What role should aviation play relative to other sectors of the economy in reducing greenhouse gas emissions in the medium and long term?

Although aviation is unable to make significant reductions in its greenhouse gas emissions through technological advances, it does not follow that it should be awarded special treatment by way of allocating disportionately large amounts of our shrinking carbon budget to this sector. This is especially true considering that air travel is pre-dominantly used more by more affluent members of society than the least well off.[12] Other sectors such as heating and electiricity generation that provide for more essential needs should not have to make larger cuts in emissions more quickly in order to accommodate special treatment for the aviation industry.

5.34 What is the potential for increased use of sustainable biofuels in aviation and over what timeframe? What are the barriers to bringing this about?
The introduction of biofuels to aircraft fuel mix presents a number of serious problems that need to be acknowledged and accounted for in a new aviation policy. These include stimulating deforestation as demand land to grow crops for fuel increases as well as the increase in food prices this can cause. Industry ambitions to introduce used cooking oil into the fuel mix ignores the fact that there is unlikely to ever be enough used cooking oil to make a significant dent in aviation's emissions.

Whilst it may be argued that 'second generation' biofuels such as jatropha can be grown on 'marginal land', the negative reprecussions in terms of displacement for people who use these 'marginal lands' needs to be recognised. Existing safeguards against these developments and accountability measures may not be sufficient in other parts of the world to mitigate these dangers.

5.39 What scope is there to influence people and industry to make choices aimed at reducing aviation's climate change impacts, e.g. modal shift, alternatives to travel, better information for passengers, fuller planes, airspace management (which can also help reduce local environmental impacts)?

11   Transcript of oral evidence to House of Commons Culture, Media and Sport Committee, 29 Jan 2008, and Travelodge press release of same date. Cited in "Aviation, Economics and the UK economy" – by Stop Stanstead Expansion, Aug 2011
12 See "For Richer or Pooer? - Who really benefits from cheap flights?" - Stop Stansted Expansion. August 2011

It is clear from the boom in cheap flights over the last 15 years that market forces will not be sufficient to ensure that aviation makes a fair contribution to reducing its global warming impact. This is especially true considering the tax breaks and competitive advantage enjoyed by the aviation industry over other industries. Crucially, rail fares must come down in price in order to stimulate a modal shift away from aviation towards rail. Improved timetabling and intergration with the European high speed network can also help to encourage this shift.

Local impacts

5.40   What do you consider to be the most significant impacts – positive and negative - of aviation for local communities? Can more be done to enhance and / or mitigate those impacts? If so, what and by whom?

Noise
For local communities living close to Manchester Airport such as in Knutsford, Mobberley, Heald Green and Stockport, the noise impacts of aviation present a serious local environmental impact. Measuring noise levels using an average from the whole day can obscure the true impact of noise from aircraft. For more infromation on noise effects and local communities see: Airport Watch's report, "Aircraft noise: Time for a Rethink" http://www.airportwatch.org.uk/downloads/AirportWatch_Biofuels_&_Aviation_1.doc

Loss of greenspaces near to airports
Manchester Airport has plans to remove green spaces such as parts of Sunbank Wood from the Greenbelt in order to build more carparks and freight sheds.[13] Conservation and environmental groups in the Greater Manchester region have joined together in opposing this.[14] Whilst Manchester Airport may claim to have mitigation procedures in place, these often involve planting trees in new areas to replace much more ancient woodland. One local resident of Hasty Lane, Holly Johnson, whose family home is threatened with demolition, commented in the *Manchester Evening News,* "You cannot replace a 400-year-old ancient woodland by planting some new trees down the road – that's not how biodiversity works."[15]

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13 Manchester's Core Strategy, Manchester Airport Issues Paper, Refining Options Consultation April 2009 - page 8
14 Airport green crusaders join forces to clip bosses' wings" Manchester Evening News, 7th May 2010
15 Airport green crusaders join forces to clip bosses' wings" Manchester Evening News, 7th May 2010