

New Government, New Year, New Policy

2011 will see the Government take its first steps towards the development of a new aviation policy. Having taken the welcome decision not to build new runways at Heathrow, Stansted and Gatwick, the Government sees little value in proceeding with a National Policy Statement (introduced to guide decisions on major infrastructure) as there will be no qualifying airports. Instead, it will replace the existing Air Transport White Paper 2003 (ATWP) with a new policy to be published early in 2013.

The process will begin this March with a six-month consultation on its scope. Unlike the ATWP and its focus on

airport capacity, there will be a broader remit including airspace and general aviation issues. The Department of Transport has indicated that it is unlikely that the new policy will refer to individual airports and their role in a UK airports system, instead, concentrating on themes such as aviation role in a low carbon society. The scoping consultation will inform a draft policy to be published around March 2012.

Interestingly, the Government still plans to respond to the Committee on Climate Change report on aviation and the 2050 CO2 target in July, midway through the consultation. To inform that response, the

Department has commissioned a study into the cost and efficiency of various abatement options. This will be released during the consultation.

Combined with the launch of the consultation on revised night-time limits at the three main London airports, the tabling of an Economic Regulation Bill, the close of the Civil Aviation Authority's consultation on a Future Airspace Strategy (7 February), revised guidance on the CAA's environmental responsibilities and, revision of the guidelines for consultative committees, 2011 will be a busy year for AEF staff and members.

Tim Johnson

Some things never change

Our chairman, Richard Roads, has dug out and avidly read a fascinating book "Cublington – A Blueprint For Resistance". Cublington was proposed as the site for a new London airport, situated in north Buckinghamshire about 20 miles north-west of the edge of London.

Published in 1973, the book describes the battle fought by people of Cublington and the surrounding area to stop the airport being built. They were appalled when they realised their villages, homes, countryside and lives would be devastated. Sounds familiar?

Here are a few extracts:

"To lose this bit of unconscious, intimate and friendly country so near to London is to lose part of ourselves" [quoting Sir John Betjemen].

Sir Colin Buchanon, in his note of dissent to the Roskill report that supported Cublington, said it would *".. constitute nothing less than an environmental disaster."*

"The crux of the problem, as many people see it, is how to make modern jet aircraft learn to live with people. The Roskill



As they are today

St Nicholas Church and the Unicorn in Cublington would have disappeared under the new airport

Crash risk around airports – who can we trust?

Even after 7 years grappling with safety around airports, I frequently find a new context which elicits D P Gumbly's catchphrase: "My brain hurts". I keep hoping that I will find someone who, or an institution which, can be trusted to get it right consistently.

National Air Traffic Services (NATS)

NATS should be reliable as it now appears to have acquired the commercial rights to the risk model which generates the Public Safety Zone (PSZ) maps for the larger airports. Sadly, its assessment of risk in the London City Airport PSZ contained a schoolboy howler which led to a conclusion that someone driving in circles within a PSZ (Lewis Hamilton?) would be less at risk than someone standing still. Speed and the time taken to traverse the PSZ are, of course, related but they are not the same.

The Department for Transport (DfT)

The sponsor of the PSZ policy, DfT has had little expertise in this area for some years. It commissioned the NATS study mentioned above and, when I pointed out how risible the risk calculation was, responded by refusing to debate the issue and adopting it as an "extension of existing PSZ risk methodology". Fortunately, its revised PSZ Circular (1/2010) avoided adding motor racing circuits (without spectators) and fairground rides to the list of development permitted within PSZs!

I do not expect DfT's ability to deal with risk around airports to be enhanced by the cuts now being implemented.

The Civil Aviation Authority (CAA)

CAA was given responsibility for administering PSZ policy last



This signpost, which was knocked down months ago, is intended to direct emergency vehicles to part of the Luton PSZ. Do local authorities and airports take crash risks seriously?

year but it repeats two common fallacies in the Frequently Asked Questions (FAQs) on its web site. First it states that people within the PSZ have "approximately a 1 in 100,000 chance per year of being killed as a result of an aircraft accident". In fact, they may be subject to up to ten times this risk because the PSZ is the area between the 1 in 10,000 and 1 in 100,000 risk contours. The CAA also suggests that 1 in 100,000 is a low level of risk compared with accidents on the road or in the home, not a valid comparison because people in PSZs are "third parties" who do not, in general, derive any direct benefit from being exposed to the risk of aircraft crashes.

This criticism turns out to be a little unfair as, while this issue of Flying Green was in production, AEF was informed by DfT that they, not CAA, wrote these FAQs. Red faces all round then as surely both of these organisations should have some kind of "sanity check" in place to weed out such obvious errors.

Local Planners mislead their Councillors

Even though the national bodies responsible for policy are apparently so confused about the technicalities of risk, I find it difficult to understand why local council planners struggle to interpret the simplified guidance in the DfT Circular which embodies an, apparently failed, attempt to absolve them of the responsibility to understand the complexities.

I have lost count of the number of times that planning committees have been advised that people using roads are only briefly at risk and so can be ignored despite a clear statement in the Circular (paragraph 18) that risk to individuals is not the appropriate criterion for transport facilities. And I will scream if I am told that the DfT regards risk below 1 in 100,000 as tolerable when in fact it simply regards the potential cost of casualties in the areas outside PSZs to be lower than the cost of removing people there from harm's way.

Consultants

What of the consultants to the industry? With one exception, consulting firms seem to take the view that people around airports must tolerate higher risk for the greater public good that airports deliver. When supporting airport planning applications, they usually fall back on waffle about PSZs in order to confuse, knowing full-well that PSZ policy has nothing to say about developments at airports. The notable exception I have encountered is ESR Technology which has roots in the nuclear industry which, like the chemical and oil industries, is regulated by the Health and Safety Executive (HSE).

Where is the HSE when you need it?

Much of the HSE's expertise is applicable to aviation and most studies of risk around airports are based on HSE criteria. But despite this, the HSE has no role in the industry, another example of light regulation for aviation. I can only wonder, "what if?"

Roger Wood

Some things never change

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Commission, although for national economic reasons recommended Cublington, also urged that the compensation laws should be extended to those whose homes are rendered almost uninhabitable by noise."

"In the short term the [noise] will get worse. That is why the anti-noise lobby has not in any way relaxed its campaign since the Conservative government revealed its environmental strategy for airports."

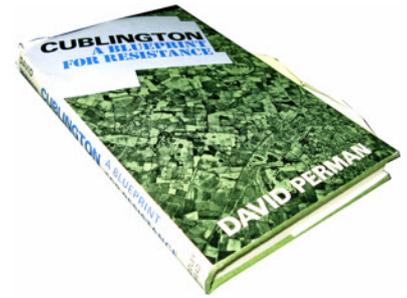
What happened next

An alternative proposal to Cublington was a new airport in the Thames estuary – Foulness. Following a cost-benefit analysis, Foulness and other potential sites were rejected by the Roskill Commission. But in 1973 the government over-turned the Roskill recommendation and chose Foulness. This was largely in response to the powerful Cublington campaign.

Soon afterwards, there was another twist. The Labour government, entering an age of austerity, decided Foulness was too difficult and expensive. Although it was rejected prior to Roskill as the new London airport, the government decided that Stansted could be expanded to meet increasing demand. It would thus become the third of three London airports – Heathrow, Gatwick and Stansted.

The rest - as they say - is history.

Nic Ferriday



Soundscape makes progress

The Soundscape pilot project has been awaiting funding and at last AEF has a grant from the Big Lottery to start with. Its aim is to enable children from very noisy overflow schools to use the nearest quiet natural setting for environmental experience in lieu of their school grounds. We have many schools willing to participate, eagerly awaiting news. Mairi Mcleod, a freelance teacher, has been a major help in planning the project and, with Julia Welchman, will keep AEF and Flying Green up to date.

In the meantime schools have certainly made use of their sites, noisy though they are, but

the prospect of quiet is very exciting.



The adobe under construction at Hounslow Heath School

Hounslow Heath Infant and Nursery School on the west side of Hounslow has been fortunate to raise funding for an adobe dwelling built from soil on site which, set almost underground, offers considerable respite for children to gather for multiple activities.

If further Ash Cloud disruption to flights occurs the sensory experience of all the affected schools will be hugely enhanced, as it was last year. Soundscape will bring quieter areas of the local geography into the environment that participating children will gradually get to explore and value.

Julia Welchman

High Speed Rail - some views from the country

Due to pressure on space, we were unable to include these comments from amenity organisations with our article "High Speed Rail vs aviation" in the autumn issue of Flying Green. For further news on their positions, please visit their web sites.

The Chilterns Conservation Board

The Board believes that the net benefits of the new line, both environmental and economic, have not been proven and therefore there is not a strong enough case to justify causing irreversible damage to the Chilterns AONB.

"The Chilterns is protected as an Area of Outstanding Natural Beauty, part of the same family as National Parks - its countryside is nationally important," says Steve Rodrick, Chief Officer of the Conservation Board. "It is not an appropriate place for any major development. Even if High Speed 2 is considered to be in the national interest that case has yet to be proven and accepted as beyond doubt. In our view there are realistic alternatives to achieving the same environmental and economic gains."

AONBs, like National Parks, are designated as some of our finest countryside. National planning law states that major development within an AONB can only be considered if it is clearly in the national interest and cannot go anywhere else. The Conservation Board does not believe that High Speed 2 meets either of these tests.

For more information go to www.chilternsaonb.org

Campaign to Protect Rural England (CPRE)

Building new high speed rail (HSR) lines has been promoted as a valuable means to tackle climate change. Yet as a stand alone solution it would have a limited effect in reducing carbon emissions. Only with demand management measures, such as increasing the cost of flying and driving as well as limiting road and runway capacity, can HSR be part of a sustainable solution. The other side of the coin is that these measures would require a step change in rail capacity, which on the busiest corridors may be best catered for by additional tracks or new lines.

HSR may reduce flights at airports and traffic on the roads but without policies to lock in the reduction in demand, additional traffic and flights will fill the space freed up at Heathrow or on the M40. Research published in 2009 by the Committee on Climate Change, the Government's statutory advisors, made clear that road traffic needs to be capped and aviation severely limited if 2050 targets to tackle climate change are to be met.

Carbon emissions, in terms of grams per seat per kilometre travelled, are higher for HSR than for conventional rail due to the extra energy needed to travel faster. Promoters of HSR argue, however, that per passenger emissions are lower as HSR tends to have fewer empty seats than average rail services. Yet Intercity services in the UK are already packed, while the planned roll out of smart ticketing over the next decade could help improve passenger loadings on conventional rail services.

The major problem with justifying HSR on the basis of carbon savings is that experience shows new HSR services generate new travel, such as by making long distance commuting an option. Even if HSR has significantly lower emissions than flying or driving per kilometre travelled, by stimulating new demand it could increase total carbon emissions or at best lead to no overall change. By 2026, when HS2 could first open, UK carbon emissions need to be reduced by

Aims and Objectives

The objectives of the Federation are as follows:

- to foster a climate of opinion which takes full account of the environmental issues arising from aircraft and aerodrome use;
- to promote a relationship between the environment and aviation in which the detrimental effects of aviation on quality of life and on the natural and man-made environment are kept to a minimum;
- to encourage wide discussion of the problems involved and to seek practical solutions;
- to consult and co-operate with local, national and international governments, the aviation industry, regulatory authorities, universities, professional institutions, research bodies, and any others for the purpose of reducing noise, disturbance and all forms of pollution by technical and operational means;
- to pursue these objectives with policy-making and legislative bodies - local, national and international - so that laws and policies include measures for effective environmental protection;
- to provide relevant advice and information to assist its members;
- to publicise and promote the viewpoint of the Federation through the media and through representation among bodies responsible for aviation matters as appropriate.

40%. HS2 needs to help meet that level of reduction. Yet HS2's research shows that it could increase or decrease UK transport emissions by -0.3% to +0.3%, depending on other transport and energy policies.

In conclusion, for HSR to work we need a more integrated approach to transport and planning, which may be a long time coming."

CPRE recently published a major report which you can find at:
www.cpre.org.uk/campaigns/transport/rail/highspeed2

Guest Editor: Roger Wood

Published by: Aviation Environment Federation, Broken Wharf House, 2 Broken Wharf, London EC4V 3DT

t: 020 7248 2223 w: www.aef.org.uk e: info@aef.org.uk f: 020 7329 8160