



DEVELOPING A SUSTAINABLE FRAMEWORK FOR UK AVIATION: SCOPING DOCUMENT

A Response by the Campaign to Protect Rural England to the Department for Transport's Consultation

October 2011

Introduction

We welcome the opportunity to respond to the Department for Transport's (DfT's) scoping document for developing a sustainable framework for UK aviation. As a leading environmental charity, the Campaign to Protect Rural England (CPRE) has worked to promote and protect the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources since our formation in 1926. We have more than 60,000 supporters, including a branch in every English county, and about a third of parish councils are CPRE members.

CPRE fights for a better future for England's unique, essential and precious countryside. From giving parish councils and local groups expert advice on planning issues to influencing national and European policies, we work to protect and enhance the countryside. We believe a beautiful, thriving countryside is important for everyone, no matter where they live.

Besides our expertise on the countryside and planning, we have long had involvement in aviation issues, including being one of the claimants in the successful judicial review into the Heathrow third runway decision and working with the Civil Aviation Authority to improve understanding of the impact of aviation on tranquillity and develop new metrics in relation to this.

This consultation response is based on our national policy which has been drawn up following thorough consultation with our members. This has included a member-led review of our transport policy in 2010, creating new [Policy Guidance Notes on Transport](#). We broadly support the main points in the [consultation response of the Aviation Environment Federation \(AEF\)](#) and have focused on only answering the questions that have greatest relevance to us.

Consultation questions

5.3 Are some sub-sectors of aviation more important than others? If so, which and why?

We agree with the AEF that the benefits of General Aviation (GA) are more limited than other sub-sectors. GA tends to be in rural areas where background levels of noise are lower and so can be particularly intrusive. GA is concentrated in certain areas, such as where there is circuit flying, and at the weekends and the summer. It therefore causes high levels of disturbance in the countryside at the times when people value peace and quiet the most. The planning process tends to be the only constraint on GA as most aerodromes are too small to have to draw up noise action plans.

We share the concerns of CPRE Hampshire made in its consultation response that the impacts of Business Aviation (specifically 'bizjets') tend to be disproportionately significant compared to its benefits.

5.5 How, and within what constraints, can aviation growth occur as technological developments and improved operating procedures reduce CO₂, pollutant emissions and noise impacts?

The Government's response to the Climate Change Committee (CCC) on Aviation and the DfT's revised aviation growth forecasts rely on a number of assumptions to justify very significant increases in aviation, albeit lower than the extremely high forecasts of the 2003 Future of Aviation White Paper. We believe that there are fundamental problems with the approach taken:

- No allowance has made for the higher Global Warming Potential (GWP) of aviation emissions. Although there is scientific uncertainty about the precise multiplier that should be used to take account of their greater impact, there is not uncertainty about the fact that there is a greater impact. Many organisations, including the CCC, have suggested that a multiplier of two would be appropriate, which means that aviation's impact on the climate would be twice that which the revised forecasts anticipate.
- No allowance has been made about the fact that the use of biofuels as an aviation fuel produces climate changing impacts, even if their production leads to no net carbon emissions. The GWP of biofuels needs to be factored-in fully.
- As explained in the answer to question 5.34, there has been significant over-reliance on the penetration of biofuels in future scenarios as a means to reduce aviation emissions.
- No allowance has been made about the higher emissions factor of unconventional or harder to reach sources such as tar sands or deep sea drilled oil, which will form a growing proportion of aviation fuel as the availability of conventional sources reduces. CPRE first raised this with the DfT in 2009 and we understand that work to provide new metrics is ongoing.
- Reliance has been made on the fact that aviation can trade its way to growth within the EU Emissions Trading Scheme. The UK will have to make much deeper cuts, however, than other EU member states, particularly those that have joined more recently, that have lower emissions per capita. Our aviation sector in particular has higher emissions per capita compared to other European countries.

So the scope for further expansion through emissions trading should be viewed as very limited.

Taken together these points demonstrate a pressing need for a further fundamental revision of forecasts for aviation, which are likely to mean at most a far lower rate of growth.

5.6 How should decision-makers address trade-offs or competing interests, where these occur both (a) between different aviation objectives, e.g. CO2 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?

Delivering sustainable development and, as a key part of this, a sustainable transport system needs to be underpinned by two fundamental principles that should provide the starting point to answering this question. First, solutions should be sought that deliver multiple goals. Growth in aviation is not the only solution and we need to move away from the perspective that all sub-sectors of aviation will inevitably have a right to grow at similar rates to which they have done in the past.

Second, environmental limits and constraints need to be respected by ensuring that they are not breached or traded off. Where limits conflict then there may be a need to reduce Air Traffic Movements rather than breach environmental limits. Besides Greenhouse Gas Emissions, these should include protecting quiet areas of countryside, a requirement in the EU Environmental Noise Directive, which is likely to be defined more clearly in future iterations of the directive.

Protecting areas of tranquillity, in which there is an absence or relative absence of forms of visual intrusion as well that from noise, should also be recognised. Extensive and rigorous research has been carried out by Northumbria and Newcastle Universities for CPRE and Natural England on the experience of tranquillity (CPRE, *Saving Tranquil Places*, 2006). This research and the mapping outputs - maps and data - have been used by numerous National Park authorities, AONBs and by county, unitary and district councils so is well established enough to use in the framework.

5.14 How important are transfer and transit passengers to the UK economy?

We have no major comments on this question, other than to note that transit and transfer passengers pay no air passenger duty yet contribute to the range of environmental impacts caused by aviation. This is discussed elsewhere in our response.

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

See answer to question 5.19

5.19 How could the benefits from any future high speed rail network be maximised for aviation?

The needs of aviation should not be prioritised unduly when designing a high speed network, particularly where this would conflict with other needs, such as making efficient use of land and securing modal shift from road to rail.

CPRE's report *Getting Back on Track* (2011) provides more detail on the better planning of high speed rail in relation to station location and aviation at pages 6-7 and 24-30: www.cpre.org.uk/resources/transport/rail/item/download/379

One 'win-win' policy area is to make it easier to take luggage by rail, as struggling across interchanges, whether rail-rail or rail-air, with heavy luggage is a significant disincentive. It would be beneficial to enable people to check luggage in early on in their journey and be confident that they will be able to pick it up at their destination. Such services were common when the cost of labour was much lower. It should be possible to automate luggage handling more in the near future so as to make it more cost effective.

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

There is a substantial risk that increasing capacity at regional airports could increase the tourism deficit in regional economies by encouraging people to holiday abroad. As the *Government Tourism Policy* (Department for Culture, Media and Sport, 2011) notes, the UK runs a significant trade deficit on tourism and this has an 'extremely strong' impact on our balance of payments (paragraph 3.3.2). Although increasing the capacity of regional airports can lead to more inbound as well as outbound tourism, this rarely reaches beyond major cities and honey pot destinations in the countryside, such as Stonehenge and the Cotswolds.

Domestic tourism is crucial for the vitality and diversification of the economy of many rural areas. CPRE therefore strongly supports the Government's aim to boost domestic tourism spend. Regional airports have attracted significant subsidies, whether to expand or simply remain open, often due to the belief that an area needs an airport for its economy to do well. With the improvement of rail services, the case for such support is becoming even weaker. As public funding comes under more pressure, it is important that it is refocused where it can have a greater impact at the local level, such as improving skills and supporting domestic tourism.

5.26 Could existing airport capacity be more efficiently used by changing the slot allocation process, for example, if the European Commission were to alter grandfather rights? If so, what process of slot allocation should replace it?

We support the UK's support for slot auctioning, as it would make more efficient use of limited capacity at major airports, reducing any perceived need for their expansion.

5.30 What do you consider to be the most significant impacts of aviation, including its non-CO₂ emissions, on climate change? How can these impacts best be addressed?

We share the concerns of the AEF about the failure to deal properly with non-CO₂ impacts. As noted in our answer to question 5.5, a multiplier of two should be adopted in policy and this should be kept under review as the evidence becomes more robust.

Further measures to manage demand will be needed, such as a sector specific cap and greater control of aviation expansion through the planning system.

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?

The policy of the previous Government, to ensure that UK aviation emissions would be back to 2005 levels by 2050, was a welcome first step towards a fair sector-specific target for aviation. It means, however, that the aviation sector could increase its emissions by 120% as against 1990 levels, while the economy as a whole is committed to at least an 80% reduction.

Given the higher Global Warming Potential of aviation, the rest of the economy would have to almost completely decarbonise by 2050 if aviation is to be given such a loose target. Indeed, because this target does not include any interim trajectory, such a policy could mean the rest of the economy would have to be decarbonised far sooner.

This policy was drawn up as a last-minute compromise by the Cabinet in relation to Heathrow's Third Runway. There was no wider analysis about the knock-on impacts to other sectors of the economy or indeed the social and environmental impacts of providing such largesse to the aviation sector. This overlooked, therefore, impacts such as the cost of transport or heating in rural areas or the greater need for renewable energy infrastructure impacting on sensitive landscapes. It is critical that such analysis is carried out and published in advance of the consultation on the aviation framework, so that the public can understand the likely trade-offs.

5.32 How effective do you believe the EU ETS will be in addressing the climate impacts of aviation? Should the UK consider unilateral measures in addition to the EU ETS? If so, what?

We share the concerns raised by the AEF, in particular about the failure of the EU ETS to address the non-CO2 effects of aviation (in other words its higher GWP) and the possible social consequences touched on in our answer to question 5.31 of allowing aviation to take up a disproportionate share of permitted Greenhouse Gas Emissions in future.

We believe that a sector-specific emissions cap is needed. There also needs to be a credible process through which the planning system can ensure any expansion in aviation will fit within this cap. If future aviation strategy is not going to be spatial, that is to say one that provides a ceiling for Air Traffic Movements at each airport, then a new mechanism would be needed to allocate any additional room for expansion to particular airports within that cap. It is difficult to foresee how such alternative mechanism could work, particularly following the abolition of the regional tier of planning.

CPRE believes the consultation draft of the National Planning Policy Framework (NPPF) is certainly unfit for this purpose. Although the revised aviation forecasts assume no increase in runway capacity for all scenarios, it is difficult to see how new runways could be refused on carbon grounds if the draft NPPF was brought into force without significant amendment. For more details about our concerns see CPRE's full consultation response to the NPPF, specifically paragraph 88 of the response and paragraph 7 of the associated legal opinion in Annex 1:

www.cpre.org.uk/resources/housing-and-planning/planning/item/2583-cpres-response-to-the-draft-national-planning-policy-framework-consultation

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?

It is essential for the new aviation policy to state clearly what is meant by the expression 'sustainable biofuel'. The suggestion in the DfT's revised forecasts that up to 40% of aviation fuel could be made up of biofuels is not credible. This is in line with the AEF's concerns.

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)?

The focus of the Government's High Speed Rail strategy is on trips to and from London. Other rail improvements to cross-country routes are needed to reduce domestic flights that do not involve London as an origin or destination. Changes to border control would facilitate the viability of international rail services that do not involve changing trains in London, which thereby adds a time penalty.

Measures are needed to reduce the perceived status of aviation or at least increase the status of alternatives, as taking flights can be associated with status. In particular domestic tourism should be promoted more.

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?

Besides visual intrusion and noise, air and light pollution from aviation and airports, it is also important to take into account pollution from road traffic accessing airports, as well as increased congestion on surrounding surface transport networks. This can lead to pressure for inefficient use of land for more car parking and roads.

Current practice demonstrates that airports can act as a significant magnet for low density development in Green Belt and greenfield locations. This can reduce the viability of reusing brownfield sites and regenerating urban areas: although such developments can create new jobs these are effectively abstracted from city centre locations that would be far more sustainable.

The *Analysis of the Manchester "Airport City" Enterprise Zone* carried out by the Metropolitan Transport Research Unit for CPRE North West in 2011 highlights how these impacts could arise in relation to Manchester Airport.

www.cprelancashire.org.uk/uploads/reports/MAEZ%20MTRU%20print%20july.pdf

These negative impacts need to be prevented by ensuring that national, sub-national and local planning policies prevent unsustainable development. The abolition of the strategic tier of planning is particularly problematic as the impact of airports is often 'larger than local' and there is no mechanism to address these problems in a balanced

way as the Local Enterprise Partnerships fail to give due weight to the social and environmental strands of sustainable development.

5.44 Is it better to minimise the total number of people affected by aircraft noise (e.g. through noise preferential routes) or to share the burden more evenly (e.g. through wider flight path dispersion) so that a greater number of people are affected by noise less frequently?

Everyone should be able to access space where they can 'get away from it all', away from the noise and bustle of modern life. It is therefore important that areas of tranquillity are protected from aviation noise, whether in large parks or accessible natural greenspace in or near urban areas, or more generally in the countryside.

Appendix A of the *Government Tourism Policy* highlights that Britain scores weakly on perceptions of natural beauty, one of the five most important criteria for attracting visitors. It highlights the need to strengthen the performance of our visitor economy in the areas where it is relatively weak, in order to maintain the international competitiveness of the UK as a destination. It is therefore critical that our protected landscapes and wider areas of tranquillity are protected from intrusion by aviation.

5.49 If you have comments on any strategic issues not covered in this scoping document, which you consider to be relevant to the development of the aviation policy framework, please include them in your response.

CPRE is concerned about the lack of consideration given to how the planning system will need to help deliver the objectives of the aviation framework. Though there will be transitional arrangements, the Government has committed to issuing the final NPPF by the end of this financial year. Given the timeline for consultation of the aviation framework next year, this means that it will almost certainly come too late to influence it.

Deregulation of the planning system could mean that it is harder for local planning authorities to manage aviation emissions from airports in their area as well as tackle the impacts of GA. Additional policy levers may be needed.

CPRE
October 2011