

UTTLESFORD DISTRICT COUNCIL'S RESPONSE TO THE GOVERNMENT'S CONSULTATION PAPER ON THE FUTURE DEVELOPMENT OF AIR TRANSPORT IN THE UK SECOND EDITION

Introduction

1. **This response supplements the Council's response dated 28 November, 2002, which it has already submitted.** In its earlier submission, the Council made representations about general issues in relation to future airports policy and, additionally, specific issues in relation to Stansted.

General

- UK air transport policy must be set in a European context;
- National policy should seek to make maximum use of regional airport capacity for access for local people;
- Integrated UK transport solutions, such as a future north-south high speed rail link, must be included in the policy framework;
- The aviation industry must be required to meet its external environmental costs and account should be taken of this in planning runway capacity;
- The capacity of the low cost airline sector to grow indefinitely needs to be questioned;
- The UK does not need another hub airport in the South East/ East of England, but if the Government decides another hub is required then, for social, environmental and economic reasons it should be an estuarial or offshore site. The employment, urbanisation and transport effects of new runway development have been underestimated. Noise and air quality assessments are also deficient. The lack of a strategic health assessment of the proposals is a particular concern.
- The Government must also make clearer commitments to mitigating environmental effects;

Stansted

- The construction of additional runway capacity at Stansted conflicts with a number of national Government policies, such as the UK Strategy for Sustainable Development, the Rural White Paper and the Future of Transport White Paper;
- Regional policy objectives would go unmet by expansion at Stansted;
- Airspace in the London Terminal Manoeuvring Area is heavily congested;
- Development at Stansted would result in substantial urbanisation;
- Stansted has limited access to the transport network because of its location in a north-south rail and road corridor;
- The devastating effect of any of the new runway options on the local environment.
- Proposals for new runways are a betrayal of the local community. The Government accepted the conclusion of the 1981-3 inquiries that a second runway could not be justified.
- Proposals for new runways at Stansted have been consistently rejected over many years.

There is nothing in the Second Edition of the Consultation Document that causes the Council to withdraw any of these representations.

All the evidence emerging over recent months reinforces our message that additional runway capacity is not appropriate.

2. In this submission, the Council updates its representations and looks further at three strands:

- Aviation should fully pay its external costs – there should be no more runway capacity in the South East/ East of England
- Making best use of capacity in the regions
- Key issues relating specifically to additional runway capacity at Stansted

It also highlights the lack of support among stakeholders for any new runway capacity at Stansted and the general support for its case from other stakeholders.

Local authorities across the South East and many other organisations all agree predict and provide is the wrong approach.

3. During the extension of the consultation period from November to date, the Council has been considering the submissions of other parties and listened carefully to the national debate. The messages it has identified reinforce its views. Concerns about the environmental effects of air transport and new runways are broadly based. There is growing recognition that predict and provide is the wrong policy approach. Meeting unconstrained demand cannot be accepted as being consistent with a proper interpretation of sustainable development. Sustainable development means meeting economic, social and environmental objectives at the same time, in the UK and in the world as a whole. It does not mean a policy maximising economic benefits and minimising environmental and social disbenefits.

Aviation has to pick up the bill for all its external costs

4. The practice of meeting road traffic demand forecasts has been abandoned. Predict and provide for air transport cannot continue. A recent MORI survey to inform the preparation of the Essex Community Plan underlined that people place more importance on protecting the environment than anything else.

5. Aviation must pay its external costs, including environmental costs. The Council has jointly responded with Essex and Hertfordshire County Councils and East Hertfordshire District Council, the four authorities particularly affected by Stansted, to the Government on its consultation paper Aviation and the Environment: Using Economic Instruments. A copy of the joint representation is appended.

6. The recovery of environmental costs must be comprehensive, not limited to climate change, noise and local air quality. The costs of noise and poor air quality should not be underestimated. Values for noise and local air quality are far too low. They fail, for example, to take account of any perception of noise annoyance beyond predicted 57 dB(A) Leq contours. They should include the costs of relocating people and facilities if statutory limits such as EU limits for NO₂ and PM₁₀ are breached.
7. The House of Commons Environmental Audit Select Committee has been probing the comprehensiveness and accuracy of the environmental costs that the Government has identified. Its report must be considered. The Committee has previously criticised the Department for Transport for giving inadequate weight to the environmental impacts of aviation, in particular the global impacts on climate change.
8. A strategic health impact assessment of the effects of air transport development must be undertaken to identify the cost implications to the community.
9. The Council agrees with the recommended policies for sustainable aviation recently published by the Institute of Public Policy and Research as "the sky's the limit". Subsidies allowed by the Government to air transport cannot be justified. They must be ended.
10. Much of air passenger traffic is for leisure purposes. It predominantly benefits social classes A,B and C. There is no reason for aviation's exemption from excise duty on fuel and VAT on ticket sales, apart from the administrative hurdles of changing the status quo. The Government, with other EU Member states and the EC, should press for a tax on aircraft fuel through re-working of the Chicago Convention. VAT should form a component of the new EU emissions charge, harmonising the VAT structure for air transport within the EU within the context of a European Transport White Paper. Starting with the UN Convention on Tobacco Control, the UK Government should gradually remove all airport duty free sales at the earliest opportunity.
11. European Chambers of Commerce as airport operators pay inducements to airlines to fly services to airports that would not otherwise be viable. The Government must press for this practice to be stopped.

More efficient use should be made of existing capacity.

12. The Government should ensure that income from retail activity at airports is separated from income from aeronautical activities such as landing charges. The Government must reverse the Competition Commission's decision not to accept the CAA recommended dual till system for airport income. Landing charges should rise at Heathrow and Gatwick to cover the costs of providing daily facilities for aircraft operations. The UK Government should support the European Commission in the introduction of market mechanisms to allocate runway slots. It should support all slots being auctioned over a five year period with proceeds from payments for these public goods going to national

Governments. In the UK receipts should be hypothecated to schemes benefiting the local communities living around airports.

13. EUROCONTROL should impose airspace congestion charging. Even then it is likely that air traffic control's ability to handle demand will not increase to the extent predicted in optimistic assessments. Government policy of the Future of Air Transport should take a more cautious view of feasible airspace capacity. Its policy should be realistic.
14. The Government demand forecasts should be reworked to take into account such measures as the withdrawal of subsidies and the economic price of slots and landing charges. The forecasts should also take into account the cost impact of regulatory controls, such as those imposed to prevent night time disturbance to communities around airports and poor air quality. The revised forecasts would at least provide a better basis on which to make decisions on accommodating any future demand.
15. The aviation industry must not escape its environmental obligations by exploiting emissions trading. Government policy should set clear environmental limits and require the industry to reduce domestic aviation emissions. The Government must support the inclusion of all emissions from international flights to and from all developed countries within national greenhouse gas targets by 2008. It should support EC proposals for an intra European en route emissions charge, levied on CO₂ and NO_x. When emissions from international flights form part of national reductions targets within the UN climate change convention, CO₂ should be tackled by a scheme of open emissions trading under a global cap.

Rail is a viable alternative mode to air transport

16. The Government must take a more holistic view of air transport and see rail as a viable alternative mode to air travel, rather than just a means of transfer between airports and major cities. The Government must ensure that UK airport operators look to ways of transporting potential air passengers by rail wherever possible, so that capacity is available for long haul international traffic. If Paris CDG can do it, why not Heathrow?

Maximum use of regional airport capacity outside the South East and East of England

People must be discouraged from travelling across the UK to fly from South East airports. If they need to interline with long haul, this should be feasible at Frankfurt, Paris CDG, or Schipol.

17. Planning permission has been granted for airport development at Doncaster Finningley since the Council first responded in November 2002. The Council believes that similar developments would enable demand for air transport arising in the regions outside the South East and East to be met locally with interlining to long haul via other European hubs besides London.

18. Manchester Airport is currently consulting on a new strategy to enable it to handle 40 mppa. This is an increase of 10 mppa on the level of development provided for in plans published in 1993. The new strategy for the period up to 2015 would not require any new runway or terminal.
19. The Institute of Public Policy Research has recently pointed out, on the Government's own figures, that constraining runway capacity in the South East would mean 55% of UK flights being taken in the other UK regions by 2030, home to 65% of the population. Relax that constraint and only 48% of flights will go from the regions. Encouraging people to fly closer to home is a central objective on the 1998 Transport White Paper.
20. The Council has received a presentation on proposals for a new airport at Severnside from its promoters, Severnside International Airport Ltd. It appeared to have a number of factors in its favour: take off and landing over the sea, good surface access, regeneration of the Llanwern steelworks site for its terminal facilities. It would seem to have the ability to serve growth in demand in the South West and Wales, and divert demand that would otherwise take up capacity in the London Airports. It is worthy of consideration. Such scope for new runway capacity could enhance maximum use of existing regional capacity.

Stansted is the wrong location for any new runway

Urbanisation needing infrastructure investment on an unprecedented scale is a wholly unrealistic proposition.

21. The Stansted/ M11 study commissioned by regional stakeholders to inform the preparation of new regional planning guidance for the East of England may suggest considerably more homes than SERAS has assumed. Urbanisation on such a scale could not be accommodated without the loss of swathes of greenfield sites, but it would also raise the need for investment in infrastructure on an unprecedented scale. This is a wholly unrealistic proposition.
22. Since the Council submitted its views in November, the position on the key issue of surface access remains unclear. The Orbit, London to Ipswich and London to South Midlands Multi Modal Studies final reports have been published. BAA and the SRA have issued a joint statement on rail access to Stansted.
23. The Orbit study final recommendations have not resolved how to address the stress that the M25 is under even without new runways. The LSM MMS has identified the M1 and M11 as the two north - south interregional routes. It is unclear whether the 30 year programme of schemes it recommends would address the traffic generation associated with another runway since it was based on a "business as usual" scenario with planned housing growth and employment rates simply rolled forward. It says that the airport access implications and infrastructure requirements of options should be subject to rigorous study and take account of the strategy emerging from the LSM MMS. The LSM MMS did look at a "market driven scenario" in which policy was more accommodating

of growth. This scenario, however, appears to include only maximum use of the existing runway. The LSM MMS and LOIS MMS 30 year programme schemes fail to address Stansted's strategic locational disadvantage – its lack of east west road and rail connections.

24. The rail investment that BAA and the SRA have identified to support one runway is clearly substantial even if they cannot say exactly what would be required, particularly the nature of improvements between Harlow and London and the options for terminal/interchange capacity in the capital. Liverpool Street certainly cannot cope without major changes.
25. Both the SRA and BAA point to the Government needing to fund supporting infrastructure in the London Stansted Cambridge corridor as the Government is proposing housing and employment growth. BAA, while acknowledging that it will need to fund the necessary additional infrastructure to serve growth in airport activity, is clear that the Government should fund rail schemes “proportionate to the value non airport traffic derives from them”. BAA must not be allowed to pass infrastructure costs on to the taxpayer. They must be borne by the industry and air transport users.
26. Conflicting positions over who will pay for the rail improvements and strategic road improvements necessary to improve levels of service for non-airport users while accommodating airport related growth in traffic suggest that these costs of any new runway at Stansted have not been properly considered. If the Government expects the airport operator to pay, rather than funding improvements as part of its regional development programme, this is a further factor impacting on the commercial viability of any new runway proposal at Stansted. If the investment is not made in strategic road and rail links, the existing local road network would totally fail to function.

Stansted is not a financially viable proposition without cross subsidy within BAA's London Airports monopoly

27. Whilst BAA is suggesting that one new runway at Stansted would be financially viable, it is only on the basis that investment costs are shared across users of the London airports system as a whole rather than applied to Stansted users only. The Council believes the implication behind this is important. If the Government wants to pursue a market driven approach to air transport, because it believes the economic benefits outweigh the social and environmental costs, the market would not deliver an additional runway at Stansted. The Council believes that BAA's monopoly over much of the capacity in the London Airports system significantly skews consideration of investment proposals. Whilst the Civil Aviation Authority is in a position to prevent abuse of this monopoly position, its perspective is that of air passenger consumer, rather than the local community that has to bear the environmental costs.

Conclusion

- The support for no more runway development at Stansted is very broadly based.
- The aviation industry does not want a hub airport at Stansted.
- The aviation industry has serious concerns about the viability of one new runway at Stansted.
- The regional planning body opposes a further runway.
- The local communities oppose it.
- The Second Edition consultation document is a missed opportunity.
- The failure of the Government
 - to ensure that all the issues have been fully explored
 - to justify its conclusions as to the effect of the options and their implications
 - to consider a Europe wide approach
 - to accept uncritically its 'predict and provide' growthwill lead to a wrong decision, a decision that will not be broadly accepted as resolving the issue.
- The Government seems already to have accepted the need to make full use of existing airport capacity, notwithstanding local impacts, in the South East. There is enough existing runway capacity to meet demand up to 2015, perhaps longer if the Government begins to introduce, for example, emissions and noise charging at a level that will start to affect demand.
- There is no need to take a decision now based on the inadequate material currently available.
- The Government should use the time it still has to address such concerns properly, so that policy for the period beyond 2015 is founded on a basis that commands respect from the spectrum of stakeholders.
- But what is clear now, stated many years ago, and yet again confirmed by many others recently is that

THERE MUST BE NO FURTHER RUNWAYS AT STANSED

The Council will also be submitting a 'No' book containing quotes from important organisations, local bodies and individuals which in different ways all have the same simple message

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