

October 2004



**Friends of
the Earth**

Briefing

Airport Master Plans

The risks and potential pitfalls for local authorities

The 2003 Air Transport White Paper (ATWP) asked airport operators to produce or update their Airport Master Plans (AMPs) as soon as possible.

This briefing:-

- Shows how airport development has major impacts on people and the environment.
- Warns how AMPs can form the start of an unstoppable 'conveyor belt' from commercial plan to concrete reality
- Explains how AMPs fit in the new local and regional planning frameworks introduced in the Planning and Compulsory Purchase Act 2004.
- Highlights the obligations of, and potential pitfalls for, planning authorities working on their Local Development Frameworks (LDFs).

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- a unique network of campaigning local groups, working in over 200 communities throughout England, Wales and Northern Ireland
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Aviation Expansion – development with big impacts

Aviation is a rapidly growing industry that some local authorities have been keen to encourage. Aviation is frequently promoted as an important source of jobs and economic growth. Whilst Friends of the Earth recognises that aviation has a role to play in both commerce and tourism, we believe that airport expansion on the scale currently envisaged (and actively promoted) is unsustainable and that the claimed benefits arising from aviation are frequently overstated and do not justify the huge indirect subsidies that the industry receives through various tax exemptions.

Airport expansion: The other side of the story

Climate change: aviation is the UK's fastest growing source of carbon dioxide emissions, the all party Environmental Audit Committee has said that the projected growth in aviation emissions will render Government targets to tackle climate change *'meaningless and unachievable'*.ⁱ

Local pollution: from both aircraft and airport related surface transport is a serious health problem, BAA estimates that at least 5000 people will breath air that breaches EU health limits on Nitrogen Oxides as a result of airport expansion.

Noise: especially at night is a major health issue and it doesn't only effect people who live near airports, additional flight paths and holding stacks will mean double the number of people subjected to unacceptable levels of noise by 2030, over 600,000 people nationally.ⁱⁱ

Economics: much of the predicted growth in aviation will be in leisure travel, mainly better off people flying more often - even on the budget airlinesⁱⁱⁱ. In 2003 UK residents spent £17 billion more abroad than tourists from overseas spent here.^{iv} This is bad for our own tourism industry, particularly in the regions which receive relatively few foreign tourists. Despite this, aviation receives indirect subsidies of over £9billion per year through duty free and exemption from fuel tax and VAT.^v

Job creation: as a result of airport development is frequently exaggerated, e.g Birmingham International Airport claimed in 1994 that 80% more people would be employed by the airport by 2004, in reality there has been a slight decline^{vi}. The low cost airline business model requires the minimising of employment.

Heritage and Countryside: the additional land needed for airport expansion nationally threatens at least one hundred ancient woods and 180 listed buildings.^{vii}

A Sustainable Aviation policy – an alternative vision

Friends of the Earth has an alternative vision for aviation

National Policies

- The polluter must pay: aviation must pay for its impacts on people and the local and global environment.
- Respect for environmental limits: demand for aviation must be managed within the earths limits, truly sustainable aviation development should preserve quality of life for current and future generations.

AMPs – The risks and pitfalls for Local Authorities

- Presumption against airport development: no expansion of airport capacity should be sanctioned until it is demonstrated that best use has been made of existing capacity.
- Aviation must contribute to general taxation like other industries.
- No new runways: Government modelling has shown that none are necessary if fair taxation measures were applied to the aviation industry.^{viii}

Regional Policies

- LDFs must conform with Regional Spatial Strategies (RSS) which in turn are supposed to conform with the Air Transport White Paper. Any proposals for airport expansion **not** identified in the White Paper will need to be challenged early by concerned Local Authorities during the preparation of the RSS. ‘Airport communities’ may well do the same during the LDF process. Equally, local authorities will need to see strong proposals for environmental and social protection, and challenging targets for public transport modal share, incorporated into RSS.

Local Policies

- Airports are significant generators of road traffic, ambitious targets should be set for access by public transport modes.
- Night flights are a major noise nuisance and cannot be justified on economic grounds, they should be banned.
- Planning permission should not be granted for any airport development which will result in breaches of local air quality limits.
- Noise impacts on local residents should be minimised through controls on flight paths, aircraft types and through provision of sound proofing for affected residents by the airport operator.
- Speculative claims for economic and employment benefits made for airport developments by airport operators should be subject to rigorous independent analysis.

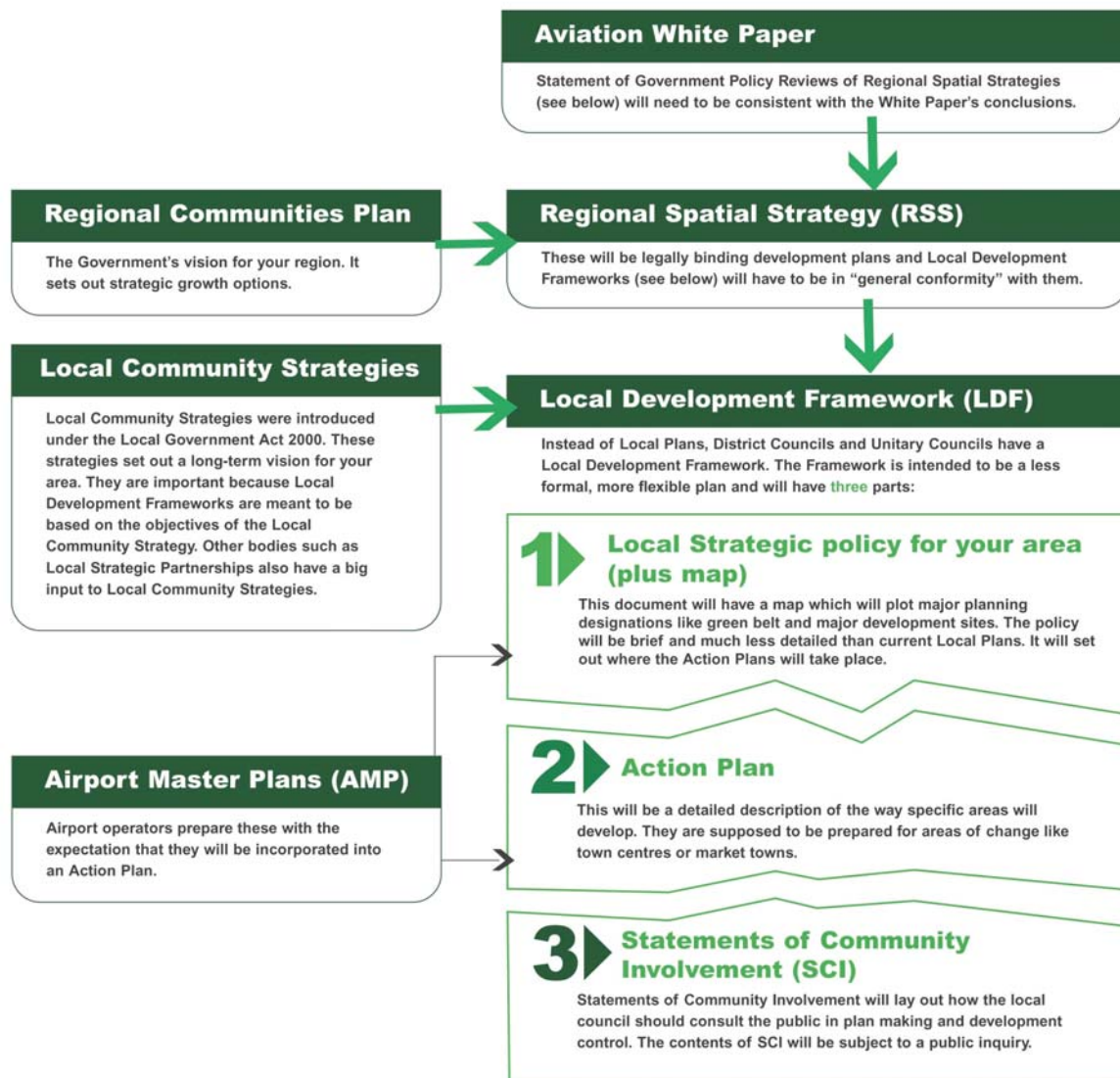
Airport Master Plans – how they fit in the new planning system

How Airport Master Plans fit in the new planning system

As the flow chart below highlights, the new Planning and Compulsory Purchase Act envisages that AMPs could be adopted by Local Planning Authorities into Area Action Plans (AAPs) and thereby become statutory local planning policy. So we could have a situation where a commercial business development plan (the AMP), produced effectively by a large industrial plant (the airport operator) becomes statutory planning policy. **If this were to be the case, it would place clear responsibilities and extensive duties on the local planning authority, which objectors to airport development will expect to see met in full.**

AMPs – the risks and pitfalls for Local Authorities

The new planning system – the Planning and Compulsory Purchase Act 2004 brings big changes



The requirements of the new planning system

It is important to recognise that airport master plans have no statutory status in the new land use planning system. The decision to incorporate any of the development proposals of an AMP into an LDF, by incorporating them into an Area Action Plan, needs to be carefully considered before its inclusion in the LDF.

Regardless of any consultation organised for the AMP, local authorities are legally obliged to organise inclusive and widespread participation in the preparation of an action plan in line with the requirements of the local Statement of Community Involvement, national guidance and the SEA directive.

Local planning authorities will need to be aware of the obligations and duties placed upon them by SA and particular SEA which requires clear and detailed identification of environmental impacts likely to arise from policy and also that any policy proposals are produced in an open and democratic way.

Other pitfalls and how to avoid them

Would a commercial development plan by (for example) a steel works (which also has economic and employment benefits) receive the same favourable treatment?

Local planning authorities need to be alert to this ‘conveyor belt’ and need to critically analyse AMPs to ensure that statutory development plans also reflect their obligations to take into account the interests of the community and impacts on the environment. Unavoidably, AMPs will represent the interests of the airport operator which in many cases differ from those of the local community.

In Particular Local Planning Authorities should recognise that:-

- They have Sustainable Development, Noise and Transport policy obligations imposed on them by Planning Policy Statement 1 (PPS1)(draft), Planning Policy Guidance 24 (PPG24) (planning and noise), and PPG13 (transport), that may conflict with the proposals put forward by airport operators in AMPs.
- The analysis of economic, employment and environmental impacts contained in AMPs prepared by the airport operator should be subjected to independent scrutiny / not be accepted at face value.
- Airports are major sources of pollution and noise and impact negatively on the quality of life of local people.

Key Tests for Airport Master Plans

Friends of the Earth recommends that planning authorities apply 5 tests to AMPs:-

- Growth forecasts – Local Planning Authorities are under no obligation to accommodate growth not supported by the ATWP; compliant forecasts for 2030 and intermediate years (according to the planning horizon) will be required.
- Jobs and economic benefit claims should be subject to rigorous independent scrutiny.
- Targets for public transport access should be ambitious and the airport operator should pay all the capital/ revenue costs of new facilities/ services attributable to airport traffic, to avoid diversion of scarce public funding from other local priorities.
- Action to address community disturbance – flight paths, restrictions on noisy aircraft, compensation packages for residents.
- Community participation – the Airport Consultative Committee will not be enough! All affected local residents should be given a right to be heard in a public consultation on expansion proposals contained in AMPs.

Conclusion

Friends of the Earth believes Local Authorities need to adopt a cautious approach and be sensitive to community needs and concerns when considering AMPs as part of the LDF process. They will also need to meet in full their responsibilities under the new Planning system.

Please contact Simon Bowens from our transport team if you need further information on any of the issues raised.

0113 242 8151 or simonbw@foe.co.uk

notes

ⁱ Pre-Budget 2003: Aviation follow-up, third report of session 2003-4, March 2004

ⁱⁱ Flying to Distraction: CPRE 2003

ⁱⁱⁱ The top three social classes take more than 75% of all low cost flights:- ‘The Sky’s the Limit’ : IPPR 2003

^{iv} International Passenger Survey: Office of National Statistics 2003

^v The Hidden Cost of Flying : Brendon Sewill 2003

^{vi} Airport Growth Predictions Prove Wrong – Birmingham Post 9th August 2004

^{vii} Woodland Trust / Society for Protection of Ancient Buildings

^{viii} ‘SPASM’ computer model re-run from:- The Hidden Cost of Flying : Brendon Sewill 2003