

March 2009



**Friends of
the Earth**

Briefing

Robin Hood Airport Master Plan

Friends of the Earth submission

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Introduction

Friends of the Earth is one of the UK's most influential campaigning organisations and its network of over 200 local groups across England, Wales and Northern Ireland aim to ensure sustainable development in their communities.

This consultation response is a collaboration between the regional campaign office for Yorkshire and the Humber and the local group, Doncaster and District friends of the Earth, which is made up of local Doncaster residents.

Friends of the Earth opposed the opening of the airport and were represented at the resulting Public Inquiry. We continue to have grave concerns over the future development of Robin Hood Airport Doncaster-Sheffield (RHADS). This document sets out in detail the grounds for these concerns.

Our first comment is about the timing of this master plan submission. The national guidance required that final master plans be submitted no later than December 2005 (paragraphs 15). That this draft is already three years late is unacceptable, and it remains a possibility that it has been delayed in the hope that public funding support for the airport link road could be obtained *before* the AMP came to be considered. Of course, the purpose of AMPs is that they are meant to inform all subsequent stages of relevant decision processes, including those for transport infrastructure. As we will see, the passenger forecasts contained in this draft AMP are deeply questionable; consequently the case for an airport link road is also undermined.

Our submission in two parts: in the first we examine the AMP passenger growth forecasts in detail; in the second we look at other issues including the critical contribution that UK aviation emissions will increasingly make to an ever reducing UK total carbon budget.

Passenger Growth Forecasts

In assessing the passenger growth forecasts contained in the draft AMP, we firstly need to establish how actual growth passenger growth at the airport since it opened in May 2005 compare to the forecasts previously prepared by the airport operator to secure its opening.

	Peel forecast 2001 pax thousands p.a		Actual CAA Pax thousands p.a		Shortfall actual v forecast pax thousands p.a	% Shortfall
		<i>% growth</i>		<i>% growth</i>		
2004 (forecast opening year)	319					
2005	682		601		-81	11.9%
2006	1068	56.6%	900	49.8%	-168	15.7%
2007	1430	33.9%	1061	17.9%	-369	25.8%
2008	1624	13.6%	968	-8.8%	-656	40.4%
2009	1737	7.0%	<i>Est.970</i>		-767	44.2%
2010	1845	6.2%	<i>Est.970</i>		-875	47.4%

This table compares the final passenger forecast submitted by the airport operators Peel to the Public Inquiry in 2001 (source: PAL 3/4 as accepted by the Inspector - see Table 1 p.215 of the Inquiry report) to the actual passenger numbers achieved after the airport opened in May 2005. What it demonstrates is that:

- In 2005 its first year of opening the airport actually and quickly achieved the forecast number of passengers it was scheduled to attain by forecast Year 2
- but immediately after in Years 2 and 3 (2006 and 2007) the actual passenger growth started to lag behind the forecast so that by Year 3 - that is **before** the current economic recession began to affect passenger numbers - it was already some 25% below forecast.
- In this year passenger numbers reached their maximum of around 1mppa
- In Year 4 (2008) the passenger numbers went into reverse, from May onwards and at an accelerating rate of reduction. Compared to Leeds Bradford airport during 2008, Doncaster has also shown itself to be more vulnerable to the impact of recession (although the LBA monthly figures have lately also demonstrated the same order of year-on-year reduction).
- By Year 4 actual passenger numbers were now some 40% below forecast, and the first returns for Year 5 (2009) show that the downward trend is, as everyone would expect, continuing.

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If we simply take as a working assumption that the 2009 and 2010 years passenger numbers achieve approximately the same as 2008 (that is, neither higher or lower) then the shortfall against forecast would escalate to approaching 50% in those years.

From this we can conclude that expressed demand at Doncaster Airport had already reached a first peak of around 1mppa **before** the impact of first higher oil prices and then economic recession; that the airport has shown itself to be significantly more vulnerable to reductions in passenger numbers than competitors; that the forecasts previously used by the airport operator to promote its opening have proved to be highly optimistic and unreliable; and that the first questions to be addressed by this masterplan are: when or whether airport passenger growth will resume any increase above the current 1mppa ceiling, and then when might it hope to achieve much reduced forecast levels of say 1.5 and then 2mppa?

In the previous forecasts Doncaster was anticipating achieving around 2mppa by 2012 with steady increases thereafter. Since there is now absolutely no prospect of that forecast being achieved, **we would expect the masterplan forecasts now to be revised to reflect the real-world baseline of 2008 and 2009 and to include realistic assumptions for passenger levels for the next three years that factor in the impact of economic recession.** Without formally anticipating the outcome of that necessary reforecasting exercise, our starting assumption would be that passenger numbers in 2012 would still be in the vicinity of 1mppa.

As a second step we then need to consider the Department for Transport forecasts as they relate to Doncaster and which factor in the assumptions of the national allocation model concerning the relative competitiveness of this airport compared to all others; and also the particular context for Doncaster established by the air transport White Paper 2003. The most recent DfT forecasts were published in January 2009 and so can be assumed to reflect uptodate assumptions (see para.1.5).

Firstly we should note that the DfT is maintaining its forecasts for strong air travel growth similar to those in the 2003 White Paper (see paragraphs 1.6 and 1.9); this is important for understanding the judgment that the national forecasts then make as to the market share that Doncaster airport will take by 2030.

Secondly, and related to our comments about aviation's contribution to climate change, we should note the ever increasing proportion that aviation emissions take up of the National carbon budget, up to 2050 (see figure 1 .4).

The forecast from the national model for Doncaster airport are provided in annex F and table F1, as follows:

2015 Low/Central/High forecast: **less than 1mppa**

2030 Low forecast: **less than 1mppa** ; Central/High forecast: **1mppa**

These are remarkably bleak forecasts - from the airport operator's perspective. Essentially, they are saying two things: that Doncaster airport has already approximately reached its future maximum growth potential, and is destined to remain a small facility serving a sub-regional market, with an extremely small proportion of the total of national air passengers; and secondly that the airport operator's own forecasts and approach to forecasting, both at the time of the public inquiry in 2001 and now within this AMP - as we are about to see - are wildly optimistic and fundamentally flawed. It should be emphasised that this is not a judgment on the airport business model as deployed by Peel Airports, because the national forecasts for Liverpool airport on the other hand achieve consistent growth within the same model.

We should note by comparison that the DfT national forecasts for Leeds Bradford continued to support growth up to 5-7mppa in 2030, in marked contrast to the position at Doncaster. The national model is therefore also forecasting that LBA will remain by far the dominant regional airport.

Having established both the real-world context, and the government's judgment about the strength of the offer that Doncaster might provide into the future, we can now turn to the passenger forecasts that are being promoted by the airport operator. These are set out in chapter 6 of the draft AMP and we will firstly make some specific comments on individual paragraphs before returning to the central question of the relationship between the various forecasts, and with the real-world:

- Paragraph 6.3 refers to 'impressive levels of growth since opening' but now needs to be updated to refer to the peaking and then downturn in growth that has happened since May 2008.
- Paragraph 6.4 states that "The fastest growing UK airports have all benefited from the significant expansion of Low Cost Scheduled airline operations." However Figure 3.3 depicts the limited network of scheduled services available from Doncaster airport - for example no services to France, Holland, Germany, Italy, Scandinavia etc - and also a concentration in Poland, which might first have reflected the influx of East European migration in 2006-7, which has however subsequently declined.
- Paragraph 6.7 refers to the inbound market but identifies this at just 11%. See our comments below on the 'tourism deficit' that needs to be identified as an economic disbenefit alongside the 'benefits' that are claimed for airports.
- Paragraph 6.11 identifies the considerable extent to which Doncaster airport is serving primarily the South Yorkshire sub-region, market segments from which may be more adversely affected by economic recession over the next few years.
- We note in paragraph 6.13 that "RHADS' presence in the Belly-hold market is minimal, primarily because major Low Cost passenger operators do not presently take freight, as this

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involves longer aircraft time on the ground” and that there is no statement as to the airport's market share in the ‘dedicated freight aircraft’ segment (and see also the absence of actual freight data in Table 6.2). Again this indicates that the operators claims before opening appear to have turned out to be significantly optimistic.

- Paragraph 6.20 (and table 6.2) states first of all that "It can be seen that actual performance has exceeded that projected in respect of passenger throughput to date” and then that "Slightly revised forecasts were produced during the Public Inquiry held in 2001/02 to reflect the passage of time the scheme had spent in planning and consequently a later projected opening date; however, given the figures were not materially different, they are not reproduced here.”

Friends of the Earth would understand the situation somewhat differently, and we also don't accept the interpretation that there is little material difference at issue. The forecasts presented in this table do not represent the final version submitted to the public inquiry in 2001 (as in document PAL 3/4, and reflected in Table 1 p.215 of the inquiry report), but some other version. The forecasts accepted by the Inspector had significantly higher passenger levels for current years than those in Table 6.2: for example 1.43 million rather than 0.835m for 2007; 1.845m rather than 1.477m for 2010.

This careful re-presentation of the forecasting information has the effect of making it appear that the airport has performed better than forecast, rather than in fact worse than forecast. The final AMP also needs to include the actual passenger numbers for 2008 to show the subsequent reduction.

Paragraph 6.21 onwards sets out the forecasting methodology and assumptions used, which are then aggregated in paragraph 6.26 into two scenarios: ‘Base Case’ and ‘Low Case’. It comments that “Recent slowing in the UK economy suggests the Low Case may be more applicable in the near term if current circumstances persist” and we would certainly agree with the general sentiment - but not with the subsequent figures. The critical causal role of the proposed airport link road in potentially moving the airport up to the higher growth scenario is also identified, and we will return to this point.

Paragraph 6.31 and figure 6.1 then set out the output of the airport’s modelling assumptions. To comment firstly on the 2016 forecasts, these are suggesting passenger levels of either of 4.4mppa (Low) or 6.6mppa (Base) - from that is a level that we will generously assume to be 0.97m in 2009. For the Low case this would imply equal annual increases of around 0.5 million every year (and for the Base case 0.8 million). Alternatively this requires annual growth of 24% and 31.5%.

Even in the absence of economic recession **this forecast rate of growth would have been absolutely beyond the ability of this airport to exploit from its niche sub-regional market; in the context of current economic circumstances either of the 2016 forecasts are simply a work of fiction.** Since forecast growth rates are critical to the utility, integrity and credibility of the entire masterplan and the processes that surround it, the submission by the airport

operator of these forecasts must cast a major doubt on their judgment and motives in so doing.

For 2030 the airport is forecasting 7.2mppa (Low Case) and 10.8mppa (Base Case) - that is annual equal increments of around 0.3m and over 0.45m p.a respectively; or expressed as percentage annual growth, 10% and 12% respectively. What this also indicates is the intention of Doncaster to accelerate past and beyond Leeds to become the largest single airport in the region; even know as we have seen that intention is not at all supported other national forecasts.

And to set a wider context we should also note the proposed combined 2015/16 and 2030 targets of the two airports, compared to actual numbers in 2008: thus around 9.4mppa in 2015/16 (5mppa LBA and 4.4mppa Donc) and around 15.2-18.8mppa in 2030 (8mppa LBA and 7.2/10.8mppa Donc) – compared to actual figures for 2008 of 3.9mppa (2.9mppa LBA and 1mppa Donc). This just displays the extent of the self-interested, unsustainable and unachievable ambitions for growth of these two now competing private-sector airport operators.

Paragraph 27 of the DfT 2005 AMP Guidance states that:

"The Government's forecasts for the UK's principal airports prepared using the Department for Transport traffic forecasting model are in the White Paper and in a supporting document. If airport operators intend to use traffic forecasts that disagree with these to underpin their master plans, it would be helpful if their proposed approach could be discussed with the Department at an early stage. Forecasts should be presented for 2030, but figures for 2010 and 2015 or 2020 will also be important, depending on the planning horizon being worked to for more detailed assessment and would ideally include sensitivity tests, particularly if forecasts are materially different from the Department's."

Since the Doncaster airport forecasts are so obviously at extraordinary variance from the DfT modelling it will be important to understand if the airport operator has as required complied with this guidance to validate their forecasting approach with the Department of Transport. Since their own modelling work has become completely disconnected - from the real world, and from the DfT national modeling - all other aspects of the masterplan process become almost worthless and **in this situation we will be writing immediately to the Department for Transport asking them to 'call in' the draft AMP before it proceeds any further.**

This is particularly the case because of the anomalous position that Doncaster airport occupies within the 2003 White Paper framework. Ordinarily other national airports are able to call upon the support provided for a particular level of growth within the White Paper; so e.g for Leeds Bradford airport this is 'around 7mppa by 2030'. However no such supported level was set for Doncaster airport; instead paragraph 8.42 of the White Paper states: "The long-term development of Finningley will need to be considered in any future review of this White Paper or, if required sooner through normal regional and local planning

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processes."

For whatever reason 'the long-term development of Finningley' was not however considered in the December 2006 review of the White Paper, so that there is no supported level for growth for the airport operator to rely on. In this situation we would submit that the national DfT forecasts remain the only stated public policy location which decision-makers can rely on; but that therefore it is essential for this masterplan to reconcile its forecasting approach with the national model, as we have requested.

To provide three final comments we should also note that the Doncaster modelling is implying at paragraph 6.34 ("Around 65% of RHADS' traffic is expected to come from Yorkshire and the Humber and it is anticipated that it will attract around 22% of the Region's total traffic in 2016 and 25% in 2030 (Base Case scenario)" that the regional market could be around 30mppa in 2016.

Secondly we should note at paragraph 6.35 the determination of this airport operator – as is the case with the new private sector operator for Leeds Bradford - to aggressively stimulate, and as a deliberate act of company policy, the expansion of the aviation market and therefore also the expansion of the climate changing emissions that this will generate: "It is also estimated that circa 30% of RHADS' Scheduled traffic will be stimulated, i.e. this is traffic that would not have arisen without the availability of RHADS and the large number of new low fares available."

This demonstrates the extent of the irresponsibility of the airport operator company, and to which it is prepared to cause damage to all other economic sectors across the regional and subregional future low carbon economy which will all find their individual carbon budgets constrained or increased in price as a result of the emissions increasing plans of this single business.

Finally we should note that the ATMs forecast for 2016 and 2030 in Table 6 .6 are all substantially in excess of the limit set by the Secretary of State in approving planning permission in 2003; and therefore a new planning permission would be required (see Air Transport White Paper 2003 paragraph 8.41). This is not identified at this point in the AMP (para.6.74 et seq).

Surface transport access

The Regional Spatial Strategy policy on airports (Policy T6) states that the considerations applying to airport development should include:

- "Contribution towards an overall strategy of achieving better access, particularly by rail and other public transport ...
- "Fully meets the principles of sustainable development..."
- "Making best use of existing transport infrastructure (including ... minimising generation of car-borne traffic ...) and wherever possible improving or providing new access by public transport."

The draft Airport Master Plan is based largely on the premise that the Finningley and Rossington Regeneration Route Study (FARRRS) will proceed and be completed to generate the passenger numbers proposed. This, in our opinion, shows that the overriding mode of transport for access to the airport will be based on car use. This would, therefore, contravene RSS Policy T6.

Table 9.6 of the draft AMP illustrates clearly how much the expansion of the airport will generate car traffic. The growth from about 4000 car journeys per day to nearly 14000 represents a further increase in carbon dioxide emissions as well as exacerbating the air quality problems around the sub-region's motorway networks caused by nitrogen dioxide emissions from traffic.

But beyond the above, and in view of the wholly unrealistic nature of the passenger forecasts within the draft AMP - which act as a 'driver' for all other impacts and aspects of policy, we will not be submitting the proposed surface access approach to the usual level of required scrutiny. On the basis of the DfT national forecasts, the airport will remain at passenger levels well below the 2.2mppa level considered at the public inquiry above which the airport operator stated that a new airport link road would be required. We have also already noted (in respect of AMP paragraph 6.26) that the link road is identified as a significant causal difference between the Low and Base Case forecasts; in other words that the intended purpose of the link road is to contribute to the 'business stimulation' model of the airport operator.

Just for a moment looking at this issue narrowly, this might be all very well if the airport were prepared to pay, in full or in part, for the cost of providing the link road. We note on page 4 of the Surface Access Strategy (SAS) document that paragraphs 4.55-56 of the Air Transport White Paper are quoted to identify the policy context for surface access provision; but that paragraph 4.58 which then continues to establish the financial obligations on airport operators is omitted.

We are aware that the airport operator has offered a proposed financial contribution to the FARRRS costs within the business case for the project (quoted below); possibly a substantial contribution. However because the business case and the process surrounding it is relatively inaccessible to public scrutiny, and is also being we suspect constantly manipulated by the attempts to add in additional justifications for public sector contributions (such as the Rossington 'Ecotown'), we are not able to establish whether the airport contribution would meet the requirements of the White Paper.

Page 13 of the SAS states that:

"Road access to the Airport is generally good. In December 2007 the Airport opened the Airport Access Road (AAR) which forms the first stage of development for the Finningley and Rossington Route Regeneration Strategy (FARRRS). The M18 FARRRS link route, via the A1(T)/A1(M), the M1 and the M18, provides long term strategic accessibility to increase the

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ability of the Airport to stem the high leakage of air passenger trips out the Region (and North Nottinghamshire and Lincolnshire) to more distant airports.

“The FARRRS Link scheme includes a junction with the A638 at Parrots Corner, connecting it with the local road network, including the QBC. This connection reduces the journey time for buses serving the Airport using the QBC, enhancing this key strategic public transport corridor between the Airport and Doncaster Interchange.

Connectivity is vital for competitiveness and the local road network will handle a large proportion of passengers, freight and staff journeys. Limited capacity on local roads and the absence of major capacity such as FARRRS reduces the competitiveness of RHADS against other regional Airports with quick and convenient access.”

And is followed by the following proposed actions:

Short Term (1-5 years)

_ “Continue to support DMBC and lobby for the FARRRS link road to ensure long term strategic accessibility to the Airport and the regeneration of Rossington.

_ Continue to work with Doncaster MBC to oppose the establishment of offsite car parks close to the Airport, which conflict with the aims of this strategy document and wider Government policy.”

[FOE note: This approach is commendable, compared to the one at LBA where there is a major provision of off-site car parks. We should observe however that the airport operator's motive is commercial because of the high proportion of airport income that is derived from car parking].

Medium to Long Term (5 years and beyond)

_ “The Airport has committed to support DMBC and contribute substantially towards the full implementation of the FARRRS link road within an agreed timetable. The scheme is likely to be delivered in 2011/12 at the earliest.”

At this point we should just note that the scheme was assessed by the Regional Transport Board in January 2009 as still being stuck at ‘Pre Major Scheme Business Case’ status, where it has remained for the last few years whilst the DfT have continued to remain sceptical about the passenger forecasts for the airport; and that the individual assessment measures are recorded as follows:

Value for Money Assessment: VfM Risk **High** Comment *BCR above 2, but significant uncertainty about developments.*

Deliverability Assessment: *Cost Risk* Cost 82.3 £m RFA out-turn (unadjusted promoter estimate) *Cost Risk* **High** Comment *Uncertain funding position re developer contributions.*

Programme Risk: Promoter start date 2014 Programme Risk High Comment **High risk**

[FOE note: compare the 2014 start date with the earlier date suggested above]

Deliverability (showstopper) risk: Deliverability risk **High** Comment *Reliant on development, and development funding.*

The conclusion Friends of the Earth would like to make in relation to this AMP process is that, on the analysis above, the DfT national forecasts undermine the airport operator's own forecasts and cannot justify support for the FARRRS business case. Accordingly the road scheme should be removed from the Yorkshire and Humber Regional Funding Allocation in order to make way for much more sustainable and less risky projects. At the current level of passenger throughput – around 1mppa - the airport should be required to move as quickly as possible towards its 2016 public transport mode share target set in its surface access strategy. However, and depending on the definitions of 'public transport' used, it is quite possible that this 20% does not represent the 'challenging' target required by the DfT in its guidance on SASs.

An additional consideration in relation to the FARRRS road is its location particularly the fact that much of the route will be across low lying land, some of it flood plain, and that there is likely to be an increase in the susceptibility of adjacent land to flooding as a result of increased run off from the roads impermeable surfaces and impact on drainage systems. This is also the case for the increased built areas and increased surface run off for the proposed additional building and car parking areas within the airport area itself.

Climate Change

Climate change has been recognised as the gravest environmental threat facing the world and the evidence that immediate and urgent action is required to tackle it is growing.

The International Panel on Climate Change (IPCC) published its Fourth Assessment Reportⁱ which highlighted the likely impacts of climate change and the reductions in emissions which are required to ensure that temperature increases due to man-made climate change are no greater than the supposedly "safe" level of 2°C.

At a UK level, the Stern Review on the Economics on Climate Changeⁱⁱ highlighted the fact that failure to tackle climate change effectively would be far more costly to the economy than the measures required to mitigate emissions. The Stern Review highlighted the deployment of low carbon technologies as one of the three key strands of action –the corollary of this is that there should be a movement away from carbon-intensive activity such as aviation.

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Aviation is one of the fastest rising sources of carbon dioxide emissions. It currently represents 6.4* per cent of UK carbon dioxide emissions – but when the impact of other gases is included, represents 13 per cent of total climate damageⁱⁱⁱ. A study by the respected and independent Tyndall Centre for Climate Change Research in 2005 found that if current growth and technology improvement rates continue, aviation could use up the entire UK carbon budget by 2050^{iv}.

The Government's new climate change law – which Friends of the Earth led the campaign for through its Big Ask campaign – requires an 80 per cent reduction in UK greenhouse gas emissions by 2050, based on 1990 levels. Interim five year greenhouse gas 'budgets' will be set to keep the UK on track including having regard for international aviation and shipping emissions.

The Committee on Climate Change has recommended that the UK cuts its greenhouse gas emissions by 80% by 2050 with up to 40% of these cuts occurring before 2020. Friends of the Earth is deeply concerned that the Government may find it impossible to achieve this reduction if it allows the proposed expansion at RHADS and other UK airports.

It is our opinion that the statement included in Section 4.46 of the Sustainability Appraisal of the draft Airport Master Plan that

“Climate change is an issue that must be tackled at the national and international level, and is not considered in detail within the draft Master Plan and draft Master Plan SA.”

Is inherently irresponsible and is indicative of the aviation industry's attitude that expansion can continue unabated and the rest of the economy will just have to cope with that.

* **Important note:** The Sustainability Appraisal for the draft Airport Master Plan states that international aviation fuel use accounts for 1.7% of the UK's greenhouse gas emissions. This assertion is factually incorrect and steps should be taken by Peel Holdings to correct this error and publicise this correction to all stakeholders.

Regional and Local Spatial Policy

The Regional Spatial Strategy for Yorkshire and the Humber^v (published in May 2008) has adopted policy YH2 on climate change and resource use of reducing greenhouse gas emissions in the region by 20-25% by 2016 on 1990 levels. This is the target that has been adopted in the Regional Economic Strategy.

It is clear that the growth in aviation emissions from an expansion of RHADS will undermine progress towards this challenging target. This has been highlighted in a report in 2008 from JMP Consulting and the Stockholm Environmental Interchange.^{vi} It estimates that per capita aviation emissions will double between 2001 and 2021. This expansion will lead to an extra 3 million tonnes of carbon dioxide per year (the equivalent of about 1.2 million cars) with aviation emissions making up about 40% of the region's emissions profile by 2021. This is an unacceptable level of emissions growth.

The contribution that RHADS will make to this growth is significant. A tenfold increase in passenger numbers and air transport movements would add substantially to the emissions profile of the Yorkshire and Humber region. This coupled with the extent of air freight movements would be unsustainable.

The draft Airport Master Plan emphasises Peel Holdings' membership of the Sustainable Aviation Initiative. This body has recently reported^{vii} that they anticipate an 80% reduction in carbon dioxide emissions by utilising aircraft design improvements and operational efficiencies by 2050. Even assuming that these extremely optimistic reductions were put in place by 2030 this would still leave RHADS overall emissions doubling in this time period. It is also noted that even this press release anticipated an increase in emissions between now and 2020 which, given the extreme importance of total accumulative emissions and the need to substantially reduce emissions over the next decade, will be highly counterproductive to action on climate change.

Biodiversity effects

The area around the airport which has been identified in the draft Airport Master Plan is characterised by Countryside Policy Areas which are protected under Doncaster Metropolitan Borough Council's Unitary Development Plan.

There are also specific considerations to be made following further analysis from local residents. These include:

- Under the proposed expansion the Marr Flats plantation will become increasingly cut off by building development and that this was not good practice and contrary to PS9.
- Under the phase 1 developments reptiles were captured and relocated to areas that it was now proposed to develop in phase 2. Sensitive capture and movement will again be necessary if the development goes ahead
- There are currently barn owls living in the golf course area and they could potentially be adversely impacted by the airport expansion

Noise

Friends of the Earth has concerns over the rights of local residents affected by increased noise from aircraft particularly in frequency of night flights. The recent application from RHADS to waive the S106 agreement allowing more and larger aircraft to land and take off during the designated night time hours is a blight on the local community.

Economic impact

Much of the justification made in the draft AMP is based upon supposed economic benefits for the region. It is the opinion of Friends of the Earth that these economic benefits are overstated.

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Cost of climate change and other impacts The airport's case heavily underestimates the cost of climate change. It assumes the rest of the world will take strong action to cut carbon emissions - but this is not something we can rely on. The Stern Review estimates the real cost of climate change to be far higher, and when a more realistic value such as this is considered, the net economic benefit of airport expansion quickly turns into a net economic loss.

Tourism deficit - The draft AMP claims that the airport "will increasingly become an important driver of tourism to the surrounding area". But the Yorkshire and Humber region currently runs a major economic deficit from flying. There are far more residents flying abroad than there are foreigners coming to the UK. Overall, in 2004 foreign visitors arriving by air spent nearly £11 billion in the UK in 2004, but UK residents flying out spent £26 billion abroad – a loss to the UK economy of £15 billion pounds, £1.6 billion of which is incurred by the Yorkshire and Humber region. As aviation expansion increases this is likely to lead to an annual loss to the regional economy of about £3.2 billion by 2020.^{viii}

Interests of UK economy - Only one per cent of the Institute of Directors think airport expansion is a priority^{ix}. Video conferencing is becoming a popular, time saving, low carbon alternative to business travel. With only six per cent^x of passengers using RHADS for business purposes in 2007 the benefits for the regional business sector are questionable.

It is noted that following the Public Inquiry, the Inspector concluded that "In essence it will be necessary to strike a balance between on the one hand, the adverse environmental impact from the proposed airport..... and, on the other hand beneficial effects."

Given that the economic benefits are likely to be substantially short of expectations combined with the growing evidence around climate change, the crux of the question should be whether the balance of this trade-off has tipped away from the future development of the airport.

Summary

Friends of the Earth:

- believe that the air passenger forecasts driving this AMP are without credibility, and differ to an extraordinary extent from the forecasts of the DfT national model; consequently the entire master plan needs to be completely revised in order to be reconciled with the latter.
- are opposed to the further expansion of RHADS as the environmental costs of increased carbon emissions from resultant flights and surface transport activity coupled with the damage to local air quality and biodiversity far outweigh any benefits that may be realised.

ⁱ Intergovernmental Panel on Climate Change 2007 Synthesis Report http://www.ipcc.ch/pdf/assessment-report/ar4/syr/ar4_syr.pdf

ⁱⁱ Stern Review – The Economics of Climate Change. HM Treasury December 2006 http://www.hm-treasury.gov.uk/stern_review_report.htm

ⁱⁱⁱ Parliamentary Answer from Gillian Merron (then Minister of State in Department for Transport) – May 2007 http://www.publications.parliament.uk/pa/cm200607/cmhansrd/cm070502/text/70502w0005.htm#column_1671W

^{iv} “Growth Scenarios for UK and EU aviation”, see:

http://www.foe.co.uk/campaigns/transport/news/tyndall_launch.html

^v The Yorkshire and Humber Plan – Regional Spatial Strategy to 2026 – May 2008

http://www.goyh.gov.uk/497763/docs/199734/199799/689582/1_Y_H_Published_RSS_May_2008.pdf

^{vi} Achieving low carbon and sustainable transport systems in Yorkshire and Humber – JMP/SEI – March 2008

<http://www.yhassembly.gov.uk/dnlds/JMP%20SEI%20Final%20Report%20%20310308.pdf>

^{vii} Sustainable Aviation unveils path to future lower air travel CO2 emissions – Press release Sustainable Aviation – December 2008

<http://www.sustainableaviation.co.uk/images/stories/key%20documents/sa%20co2%20roadmap%20pr%2012-12-08.pdf>

^{viii} Why airport expansion is bad for regional economies – Friends of the Earth – August 2005

http://www.foe.co.uk/resource/briefings/regional_tourism_deficit.pdf

^{ix} 2005 “Transport Matters” survey – Institute of Directors – September 2006

http://www.iod.com/intershoproot/eCS/Store/en/pdfs/policy_paper_transport_matters.pdf

^x CAA Air Passenger Survey 2007

<http://www.caa.co.uk/application.aspx?catid=14&pagetype=65&appid=7&newstype=n&mode=detail&nid=1679>