

THE MIDLANDS' AVIATION MASTERPLAN
Managing Midlands' Air Transport Sustainably for the 21st Century

ACKNOWLEDGEMENTS

This briefing has been produced with the support and involvement of West Midlands Regional Sustainability Forum, East Midlands Transport Activists' Roundtable and funding from The Manuka Trust. This briefing has also been supported and developed by a number of local community airport groups in the East and West Midlands.

The **West Midlands Regional Sustainability Forum** has been established to provide a voice for the wide range of environmental groups as part of the regionalisation process within the West Midlands. The Forum membership includes West Midland representatives from The Campaign to Protect Rural England, Friends of the Earth, The Wildlife Trusts, and Royal Society for the Protection of Birds, Transport 2000, Railfuture, Pedestrians Association, Ramblers Association, Cyclists Touring Club (CTC), Sustrans, Midland Amenity Societies Association, West Midlands New Economics Group and the West Midlands Environment Network.

The East Midlands Transport Activists' Roundtable (EMTAR) is a coalition of environmental groups who campaign for sustainable transport solutions in the East Midlands that are better for the environment and meet the transport needs of everyone in the region. EMTAR brings together local voluntary sector organisations with a keen interest in sustainable transport with the aim of addressing the regional policy agenda on transport and the related issues of land use planning and economic development. The Roundtable membership includes East Midlands representatives from Transport 2000 (T2000), The Campaign to Protect Rural England (CPRE), Friends of the Earth, CTC, Railfuture and Living Streets, amongst others.

The editors would like to express their thanks to the following individuals for their contribution to this document: Peter Langley, Alan Yates, Gill Smith and Norman Jones (West Midlands CPRE); Graham Stocks and Bettina Lange (East Midlands CPRE); Chris Crean (West Midlands Friends of the Earth); Callie Lister (East Midlands Friends of the Earth); Wilf Carey and Jim Froggatt (EMTAR and T2000); Steve Charlish and Dr. John London (East Leicestershire Villages Against Airspace and Demand East Midlands Airport is Now Designated); James Botham (Birmingham Anti Noise Group – BANG, and West Midlands Friends of the Earth); Alexander Kennedy (Peak District CPRE); Richard Dyer (Friends of the Earth's Aviation Campaigner); Paul de Zylva (Friends of the Earth); Angela Scott (proof-reading); and Dave Uden (graphic design).

We would also like to express our thanks to the Aviation Environment Federation and AirportWatch for the supporting research and documentation that has made this publication possible.

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1. INTRODUCTION

The aim of this report is to set the future of air transport in the East and West Midlands in a sustainable development context. Successive governments have worked in close association with the aviation industry since its creation, giving great weight to its commercial objectives. This close relationship is clearly demonstrated in the Air Transport White Paper, which gives the industry most of what it wants. Eminent bodies such as the Sustainable Development Commission,¹ The Royal Commission on Environmental Pollution² and the Environmental Audit Committee³ have criticised the White Paper for giving insufficient weight to key aspects of sustainability such as environmental and social impact. We agree that the White Paper is inherently flawed by failing to meet sustainable development principles – more to the point: it fails to match the promise made for the White Paper, of putting the aviation sector on course for sustainability.

UK air transport has been concentrated in the south east of England and this trend will continue under the White Paper's proposals. The White Paper also opens up opportunity for expanded operations outside the south east. For the Midlands this does not mean giving *carte blanche* to expansion of the region's airports. Indeed, if the Midlands is to avoid the many problems aviation growth has brought to the south east, an entirely different approach is required.

In this report we summarise the wide range of information and debate about aviation from a sustainable development standpoint, and apply it to Midlands' aviation in general and to particular airports. The authors are regional and local campaigners with a wealth of experience of the issues. We have deliberately set our argument in a wide context, in contrast to the Government's thinly disguised commercial for the aviation industry. A list of further reading appears at the end of the report.

The White Paper must not be taken as read or seen as the final word on this subject. Aviation has an important part to play in the future of the Midlands, but not at the expense of the quality of life of those affected. This is not a 'nimby' message: it is the very essence of sustainability. We hope that our report will be read and carefully considered by decision-makers in central and local government and regional organisations, and by the airports themselves.

¹ www.sd-commission.org.uk/news/download_pdf.php?attach_id=N8YBKPR-3L3RF5H-0NO4FT2-RRJCE1K

² <http://www.rcep.org.uk/aviation.htm>

³ On the climate change impact, the Environment Audit Committee reports can be found at:
<http://www.publications.parliament.uk/pa/cm200304/cmselect/cmenvaud/233/23303.htm>
<http://www.publications.parliament.uk/pa/cm200304/cmselect/cmenvaud/623/62303.htm>
<http://www.publications.parliament.uk/pa/cm200304/cmselect/cmenvaud/1063/106303.htm>

2. DEMAND FOR PASSENGER TRAVEL

Background

Between 1999 and 2004, **passenger numbers at UK airports rose by 28%**, from 168 million to 216 million.

As a basis for its consultation on The Future Development of Air Transport in the UK, the Government forecast **an increase to between 400 million and 600 million passengers per annum (mppa) by 2030**. The forecasts are based on an assumption that fares will decline in real terms by 1% per annum, reflecting stabilisation of fuel prices at \$25 per barrel. At the time of publication oil prices stand at \$60 per barrel, and Goldman Sachs have predicted a price rise to \$100/barrel in two years⁴. The predictions have failed to take a “worse case scenario” into account which could severely increase the price of air travel. The forecasts take no account of other factors, such as the effect of wars, terrorism or the introduction of any policies that may have an effect on the industry (e.g. an aviation fuel tax), and they assume that a shortfall in airport capacity will not be allowed to constrain passenger growth.

In 2000, propensity to fly from the Midlands was only about 60% of the national average. The Government assume that it will increase to something approaching 70%. They also assume that Midlands airports will ‘claw back’ much of the demand from residents who currently use airports in other regions.

As a result, the Government reach the view that **demand at major Midlands airports could rise from 10mppa in 2000 to 60mppa in 2030** – an increase from 5.5% to 12% of UK demand. By 2004, the Midlands share had only increased slightly to 6.3%.

At the request of AirportWatch, the coalition for sustainable aviation, the Government’s forecasting model was rerun using different assumptions: – the progressive introduction of fuel tax and VAT, accompanied by the removal of air passenger duty, (this was to illustrate that sensible use of fiscal measures to manage demand for flying could have a dramatic impact on passenger forecast numbers). UK aviation currently enjoys tax concessions worth some £9.2 billion per annum.⁵ The new run resulted in **a forecast of 315mppa using UK airports** (less than two thirds of the Government’s median figure). Other experts such as the Institute for Public Policy Research⁶ have reached similar conclusions.

The White Paper

For its White Paper, the Government took the opportunity to update the forecasting model, taking account of recent market changes. It assumed that aviation would increasingly meet its external costs (the cost of the pollution and other effects on society and the environment), but that this would be balanced by airlines reducing their costs in a variety of ways. Therefore the Government adopted **the same median**

⁴ <http://www.cbc.ca/story/business/national/2005/03/31/markets-050331.html>

⁵ <http://www.cfit.gov.uk/aec/evidence/05.htm>

⁶ http://www.ippr.org.uk/uploadedFiles/projects/s_a_2030_discuss.pdf

assumption as in the earlier forecasts, and the same balance between the South East and other regions.

Crucially, the Government **rejected any attempt to manage demand** by limiting airport capacity or through taxation to raise prices. They therefore concluded that **capacity should be provided to meet forecast demand of 500mppa in full**.

Key Issues

Though Ministers deny it, the Government's approach is indistinguishable from the discredited and self fulfilling policy of **predict and provide**. In reality, future demand will be highly sensitive to a range of unpredictable cost and supply factors. It can be managed by adjusting some of those factors, and does not have to be met in full. Demand management is an established and essential aspect of transport planning, but the Government have refused to adopt it for dealing with aviation, the most environmentally damaging form of transport. This puts current UK aviation policy **directly at odds with the principles of sustainable development** and has been roundly condemned by a wide range of experts and commentators including the Sustainable Development Commission, the Royal Commission on Environmental Pollution and the House of Commons Environmental Audit Committee. The South East of England Regional Assembly (SEERA) has also described the White Paper as "inherently unsustainable."

The Government's demand forecasts are highly suspect and are already discredited by current trends. Their assumption that air fares will fall 1% per annum in real terms seems far-fetched, and the assumption that fuel prices will stabilise at \$25 per barrel has already been undermined by prices more than twice that. The Government have belatedly realised that they would need to factor in higher prices if aviation was to meet its external costs, but invented cost savings to counter that, enabling them to stick with their original forecasts. This was no more than a conjuring trick, the motives for which are explored in this document.

Additional factors the Government have largely ignored in their forecasts are concerns about pensions, moves to raise the average age of retirement, and EU moves to force airlines to pay increased compensation for delayed or cancelled flights. In addition they have failed to acknowledge the expected shakedown in the aviation industry, with airports and airlines competing with one another to attract non-existent customers and a number of low cost airlines already in severe financial difficulty. All these factors will tend to reduce the growth in demand. Some airports already use aviation as a loss-leader to attract customers to other activities such as shopping and parking. Others are likely to follow suit but this can hardly be described as sustainable economic activity.

The Government have grudgingly recognised that growth rates will fall later in the period as market saturation approaches, but have taken far too little account of this factor in their forecasts.

The Government have assumed that the Midlands' share of UK passenger travel will more than double by 2030. Although some 'clawback' from airports in other regions is likely to occur, there is no evidence from existing trends that it will happen to this

extent. Given current trends, the lower propensity to travel of Midland residents⁷, and the presence of other airports adjacent to both the East and West Midlands regions, a figure of somewhere between 9 and 10% may be more realistic. If this was applied to the 315mppa⁸ figure it would result in a demand well below that of the maximum use for Midland runways⁹. This would have the effect of making a business case for additional runways in the two regions very difficult to justify.

Every effort should be made to ensure that the growth in UK aviation is carefully managed because of the environmental and social damage which it causes. The combined ‘maximum use capacity’ of Birmingham and East Midlands airports is said to be 35-40mppa.¹⁰ This still allows for growth, but without the need for a new runway being required at either airport, and there is no case for significantly expanding any other airport in the Midlands. The emphasis should be on making effective use – though not necessarily *maximum* use – of existing capacity. **Most importantly the Midlands’ aviation sector must be managed to minimise its negative environmental, social and economic impacts.**

Another factor which must also be taken into account when referring to passenger forecasts is the issue of climate change and the aviation industry’s growing contribution to this. This we discuss in greater depth in Chapter 5, but it is important to note that **the enormous impact of the aviation industry upon climate change will undoubtedly necessitate further constraints on growth, especially if other sectors of the economy are not to suffer by being required to make up for aviation’s expansion.**

3. DEMAND FOR AIR FREIGHT

Background

Movement of cargo by air in the Midlands is, at present, largely centred on Nottingham East Midlands Airport (NEMA). Coventry Airport also handles significant tonnage of air freight. Birmingham Airport carries freight mainly on passenger aircraft. NEMA, like Coventry, has no restrictions placed on it regarding hours of operation. Consequently, the night time period is used for aircraft movements carrying freight, packages and mail. Ad hoc charters for the movement of special consignments, such as Rolls Royce engines being flown to Toulouse from NEMA, and other examples such as horses and racing cars, tend to take place during the daytime. **However, it is the scheduled night time freight flights that cause the greatest amount of misery and disruption to peoples’ lives.**

⁷ Pp 42 Department for Transport – The Future Development of Air Transport in the United Kingdom: Midlands, July 2002, consultation document.

⁸ This is the figure calculated by the re-run of the Government’s forecast model by AirportWatch: this was to illustrate that sensible use of fiscal measures to manage demand for flying could have a dramatic impact on passenger forecast numbers.

⁹ Department for Transport – The Future Development of Air Transport in the United Kingdom: Midlands, July 2002

¹⁰ Department for Transport – The Future Development of Air Transport in the United Kingdom: Midlands, July 2002

Whilst world passenger air traffic has grown at an average rate of 9% per year since 1960, airfreight has grown even faster at an average of 11% per year, and is forecast to grow faster than air passenger traffic in future. During the last decade the amount of airfreight handled at UK airports has more than doubled from 1 million to over 2 million tonnes. According to Civil Aviation Authority figures, airports in the Midlands were handling almost 250,000 tonnes of airfreight in 2003.

Businesses have increasingly tended to use 'Just-in-Time' (JIT) supply chains and 'lean' manufacturing methods. This allows them to optimise production technology methods to create systems whereby large amounts of stock control, bottlenecks and wastage are eliminated. The concept of Total Quality Management aims to meet customers' requirements and demands more efficiently. In reality this can lead to large under-utilisation of transport and makes suppliers' lives more uncertain and is a mixed blessing.

Shipments by air meet time requirements and obviously have an advantage over surface transport if speed of delivery is vital. Indeed, the air cargo providers inform us that they 'have to fly at night' and that their shipments are 'time critical' or are 'time-dependent'. The truth is at variance with these claims. Less than 10% of 'express' air freight is actually time critical. The vast majority of customers choosing express delivery by air do so not for the speed but the dependability and security of guaranteed integrated door-to-door delivery.¹¹

The White Paper

The AWP argues that an ability to meet world-wide rapid delivery and logistics requirements is important to the competitiveness of the UK. However it raises a note of caution in relation to the environment, and night noise in particular, although it does not specifically explore the impact that the increase in air freight will have upon our environment and society (see sections 5, 6 and 7 below).

Key Issues

If the majority of customers do not need rapid, next day delivery why are these cargo flights not taking place during the daytime? This would avoid the misery they cause during the night to the many thousands of people trying to sleep, both here and on the continent. It is important to create a culture change. We believe that approximately 90% of the goods air freighted into and out of the UK is not time sensitive, as revealed by the research undertaken by the industry itself. Customers can be "encouraged" into choosing the 'express' delivery option and given a lack of choice in this. Much of this cargo could be transported by other, less environmentally damaging, modes of transport.

In order to assess the need for night time air freight, we recommend that the Midlands' Regional Development Agencies undertake, in conjunction with the aviation industry and environmentalists, a study of the demand for rapid delivery and the way in which the air freight industry operates to meet that demand. Only an

¹¹ Survey by the International Logistics Quality Institute, reported to the International Air Cargo Association AGM, April 2004.

independent, accountable investigation can establish whether there is a genuine need for damaging night flights from the leading freight airports. We also look to the industry to adopt supply chain environmental awareness and to adopt the principles of corporate social responsibility.

The environmental impact associated with delivering goods by air is enormous¹²: apples air freighted from New Zealand will require 5Kg of CO₂ to be pumped into the atmosphere for every Kg carried. Some companies are so concerned about this environmental impact that they have chosen not to use air freight, but to choose more sustainable means of transporting produce.¹³

4. THE ECONOMICS OF AVIATION

Background

An increase in economic prosperity is often regarded as equivalent to an improved quality of life. The claimed economic benefits of aviation are usually cited as a leading argument in favour of allowing airports to expand to meet demand in full. However some of these claims may be exaggerated and it is rare for their accuracy to be tested after the event. It is also rare for the economic costs of aviation to be taken into account. As Whitelegg¹⁴ says: ‘the debate about the future of aviation would be a much more open and transparent debate if economic realities were factored in and economic assertions factored out’.

One measure of supposed economic benefit is job creation. As far as direct job creation is concerned, the rule of thumb that one full time equivalent aviation job equates to 1,000 passengers can be misleading. A study by DTZ Pieda Consulting¹⁵ found that the ratio varied between airports from 1:521 to 1:2550, with an average of 1:1160. The 2004 figures for BIA and NEMA are as follows.¹⁶

¹² In round numbers, the carbon dioxide emissions for freight carried on long-haul flights are of the order of 1 kg of carbon dioxide per tonne-kilometre. **Carbon dioxide emissions and fuel use for rail freight are a factor 20 - 100 lower.**

¹³ Shipping generates 50 times less carbon dioxide than air freight and six times less than transport by road. Each kiwi fruit shipped by sea from New Zealand would consume its own weight in aviation fuel if it were transported by air. For every calorie of iceberg lettuce flown in from Los Angeles by a supermarket, 127 calories of fuel are burned. According to Sustain, locally-grown spring onions bought through a box scheme generate 300 times less carbon dioxide than a bunch flown in from Mexico and bought from a supermarket on a shopping trip by car. Full article :- <http://observer.guardian.co.uk/foodmonthly/story/0,9950,1388568,00.html>

¹⁴ Prof J Whitelegg – The Economics of Aviation: a North West England Perspective, April 2003

¹⁵ DTZ Pieda – UK Airports Economic Impact. Evidence presented to the Fittingley Airport public inquiry, 1999.

¹⁶ Figures taken from BIA and NEMA websites May 2005 <http://www.bhx.co.uk> and <http://www.nottinghamema.com>

	FTE Employment	Passengers per annum	Ratio
Birmingham	c 7,200	8.9 million	1:1236
Nottingham East Midlands	c 6,750	4.4 million	1:652

The NEMA ratio is artificially low because of the airport's strong emphasis on freight traffic. The Birmingham ratio is more typical, though higher than average. The rise in low cost airlines is likely to have been associated with a fall in the employment/passenger ratio as companies search for cost-cutting measures. The Birmingham Post¹⁷ recently drew attention to the fact that employment at BIA had fallen by about a thousand since 1994 despite a substantial increase in the number of passengers. The economic forecasts in the 1995 Master Plan have proved to be erroneous. Yet the impression persists that expanded airports and passenger numbers automatically lead to increased employment.

In their West Midlands study¹⁸, York Aviation estimate that direct employment at Birmingham Airport could increase to between 13,500 and 16,000 by 2021, with indirect employment accounting for a further 4,600 to 5,600. Coventry and Wolverhampton airports could account for up to 1,800 direct and up to 700 indirect employees between them. However we do not accept the growth rates on which these estimates have been based.

Indirect and induced employment can be even more difficult to ascertain let alone predict. The employment multipliers used for airport expansion vary widely and are not always justified or given a reality check. Whitelegg has shown that the use of multipliers can lead to substantial double counting, with the same jobs being 'claimed' by widely differing industries or developments.

The types of job created and the nature of the job market in the area are also important. Aviation tends to provide low wage jobs which do not accord well with the objectives of regional economic strategies to expand high skill, high wage employment.

A direct link is often assumed between increases in aviation infrastructure and air traffic on the one hand, and wealth creation as measured by GDP or GVA on the other. This again can be misleading. For example, aviation is often claimed as a major factor in encouraging investment by foreign owned companies in the UK. This however ignores the fact that the amount of money invested by UK companies abroad is higher than that invested by foreign companies in the UK. The difference amounted to £190 billion over the five years 1997-2001.¹⁹ As the SACTRA Report²⁰ has shown, transport's impact on the economy is a 'two-way street', with improved facilities and

¹⁷ Campbell Docherty – Airport Growth Predictions Prove Wrong, Birmingham Post , 9 August 2004

¹⁸ The Regional Economic Impact of Airport Expansion in the West Midlands – York Aviation, July 2005

¹⁹ United Nations Conference on Trade and Development, World Investment 2002, Transnational Corporations and Export Competitiveness, September 2002.

²⁰ Standing Advisory Committee on Trunk Road Assessment – Transport and the Economy, 1999

services leading to losses of economic activity as well as gains. An increase in aviation opportunities may lead to a net reduction in investment in the UK.

It is often claimed that aviation adds to expenditure by foreign tourists in the UK. That is undoubtedly true, but again one must look at both sides of the argument. UK tourists spend far more abroad than foreign tourists spend in the UK. Moreover, there is an imbalance in the way income to the UK from overseas visits is distributed across the regions.²¹

Research by Friends of the Earth²² shows the significance of this issue for the Midlands. In 2004, the East and West Midlands had a combined air tourism deficit of £3.019 billion, with outward tourists taking nearly £3.892 billion out of the two regions and inward tourists bringing in only £0.873 billion. The deficit is forecast to increase to £5.875 billion by 2020, based on the growth rates assumed in the White Paper. In addition, there are significant deficits in air transport services (the purchase of air tickets and freight services), civil aerospace products, and purchase of aviation fuel and business travel. In aggregate, these effects undoubtedly cost the regional and national economies large numbers of jobs and income.

There are a number of other economic costs to the Midlands, the principal ones being:

- Traffic congestion. Some experts (e.g. Maddison²³) put the annual cost of traffic congestion to the UK economy at £20 billion. The cost to UK society as a whole will be much higher. As major traffic generators, airports must bear a proportion of that cost. Birmingham Airport, for example, disgorges traffic onto the already congested M42 and M6 motorways, adding to the costs in delay and journey unreliability of other Midlands employers.
- Health expenditure. As we show in section 6, aircraft emit a wide range of pollutants which have a serious effect on public health especially the health of residents near airports. This is likely to translate into major costs to the National Health Service and costs to employers. Again, these are difficult to quantify precisely, but any economic assessment of aviation or of the expansion of a particular airport should include proper assessment of this factor.
- Wider environmental costs. In section 5, we discuss the environmental implications of aviation, and particularly its unique contribution to climate change. The economic implications of climate change are potentially huge, though much will depend on the timescales used in the analysis. Again, an economic analysis must include this item, even if exact quantification proves impossible.

²¹ Ecotec report for Friends of the Earth: The economic impact of the UK aviation industry, Ecotec Research and Consulting, June 2000

²² http://www.foe.co.uk/resource/briefings/regional_tourism_deficit.pdf

²³ Maddison, D (et al), eds – The True Costs of Road Transport, Earthscan, 1996.

Only by looking at the full costs and benefits of aviation can one properly judge the economic claims made for the aviation sector's contribution to the Midlands and the wider UK. Unfortunately the York Aviation report on the West Midlands²⁴ takes only a cursory look at the costs side of the equation, and seeks (unsuccessfully in our view) to dismiss or discount many of these. As a result, the picture it presents of the economic significance of aviation to the region is seriously unbalanced and highly misleading.

The White Paper

The White Paper claims that not providing additional capacity where it is needed would significantly damage the economy and national prosperity (p.9). It sees airports as an important focus for the development of local and regional economies (p.49) and concludes that the Government's policy to encourage the growth of regional airports to serve regional and local demand will support the growth of regional economies (p.54).

A more detailed analysis of economic implications is provided in the Integrated Policy Appraisal, Annex E to the White Paper. It concludes that economic sectors that are likely to be drivers of future growth, such as financial services and high technology manufacturing, rely heavily on air services and that failure to provide extra capacity would have an adverse effect on UK economic growth. Wider benefits to tourism and reduced business costs from reduced delays at airports are mentioned.

The Annex acknowledges that greater numbers of passengers may lead to road congestion, pressure on public transport, overheating of local economies, and pressure on housing, land and wages.

Key Issues

With the exception of a few relatively minor negative effects, the White Paper's treatment of the economic implications of aviation is hopelessly one-sided. It makes a series of unsupported and often questionable assertions to play up the economic benefits of aviation, and completely ignores many of the clear costs, such as the tourism deficit, the investment deficit and costs to the health service and the environment. It does not amount to a serious or rounded attempt to assess either the economic implications of aviation or the expansion of capacity at particular airports.

The link between aviation expansion and regional economic prosperity is not as close as tends to be assumed. For example research carried out by the Campaign to Protect Rural England (East Midlands)²⁵ has shown that:

- Most of the operation of logistics companies consists in road transport or warehousing rather than air transport - they are logistics operators first, air operators second.

²⁴ The Regional Economic Impact of Airport Expansion in the West Midlands – York Aviation, July 2005.

²⁵ See www.cpre-eastmidland.org.uk

- The global logistics operators are an economic threat to existing, East Midlands based haulage companies.
- For the majority of customers of the global logistics integrators reliability and security, rather than speed of delivery, are the key factors; meeting their business needs is therefore not dependent on air transport (see section 3).
- There are no reliable figures and so no sense of how much expansion would be needed to create a specific number of jobs.
- Job creation estimates used by the East Midlands Development Agency are gross, i.e. do not take into account the number of jobs displaced from the region or lost altogether.
- The majority of jobs created by NEMA-related economic activity are low-skilled.

A more general consideration is that many economic benefits will not accrue to the region concerned or even to the UK as a whole. For example global logistics operators are not normally UK companies, so profits go back to the US or Germany while UK locations are affected by the adverse environmental consequences of their operations.

Direct job creation by airports will continue, but probably at a reduced rate as economies of scale are achieved and low cost airlines continue to dominate. As shown above, estimates for particular airports can be wildly inaccurate and should certainly not be taken at face value.

All these issues should be seen against the background that aviation is heavily subsidised by the Exchequer. Sewill²⁶ has used the Treasury's own figures which show that the annual subsidy from the taxpayer to aviation is £9.2 billion. Clearly net economic benefits which fall short of this are highly questionable, and even if they exceed this figure they may be outweighed by environmental and other costs.

We recommend that any proposals for the expansion of particular airports or of aviation in general, should be subject to an independent economic audit, not one commissioned by the proponents of the scheme. Such an audit must clearly identify the uncertainties inherent in the estimation of economic benefits, and must give as much attention and weight to the economic costs as to the benefits. Only if this type of audit is carried out will the general public have the confidence that the economic implications of aviation have been fully and fairly assessed.

5. ENVIRONMENTAL IMPLICATIONS

Background

Aviation is one of many truly global industries which does not meet the external costs it places upon society and the planet. The cheap flight revolution which has helped to fuel demand in the UK is spreading across the planet.

²⁶ Sewill, B, 2003. The Hidden Cost of Flying. Aviation Environment Federation. <http://www.airportwatch.org.uk/publications/Hidden%20Cost%20Final.pdf>. *Fly Now – Grieve Later* deals with climate change and the use of 'economic instruments' and is available from the Aviation Environment Federation website: http://www.aef.org.uk/publications/detail.php?art_id=152

UK Greenhouse gas emissions from aviation rose by almost 90% between 1990 and 2003.²⁷ Aeroplane use consumes scarce fossil fuels and leads to a wide range of emissions (see section 6). Emissions of carbon dioxide, nitrogen oxides and water vapour contribute to the 'greenhouse effect' threatening the world's climate. Emissions of nitrogen oxides in the stratosphere are believed to damage the ozone layer. Emissions of nitrogen oxides and hydrocarbons at lower levels contribute to health-threatening regional smog problems by reacting to form low-level ozone on calm summer days. The lack of an alternative to fossil fuels to power modern aircraft results in huge amounts of carbon dioxide being released into the wider environment. As carbon dioxide is a climate-changing gas the aviation industry makes a huge contribution to global climate change.²⁸

Globally, aircraft are estimated to contribute about three per cent of the carbon dioxide that comes from human sources and two to three per cent of human emissions of nitrogen oxides. Because of the disproportionate effect of emissions in the upper troposphere, aviation is believed to be responsible for five to six per cent of the total warming effect caused by 'greenhouse gases'. Some scientists believe it may be responsible for as much as ten per cent of the warming effect.²⁹

Quite apart from the global impacts of aviation, airports can have severe environmental impacts on the areas which surround them. The pattern differs from one airport to another, but typical effects include:

- Noise – often severe enough to disrupt daily lives, damage children's education and (where night flying occurs) cause serious sleep disturbance (see section 6 below).
- Air Pollution – shown by a number of studies to damage people's health, particularly that of children (see section 6).³⁰
- Pollution of watercourses and underground water sources.
- Noise and pollution from additional traffic.
- Biodiversity – severe effects on habitats; birds being cleared from airfields.
- Loss of landscape and settlement character, rurality and tranquillity.
- Impact on heritage, listed buildings and archaeological sites.

²⁷ From "Sustainable Development Indicators in Your Pocket", <http://www.sustainable-development.gov.uk/publications/documents/SustainabledevelopmentindicatorsFINAL12005.pdf>

²⁸ *The fuel use and carbon dioxide emissions per passenger-kilometre for a fully-loaded cruising airliner are comparable to a passenger car carrying three or four people. The Commission has already pointed out in its Eighteenth and Twentieth Reports that passenger cars are more environmentally damaging than any other form of surface transport. The comparisons presented here show that air transport is in the same category- **The Environmental Effects Of Civil Aircraft In Flight**, Royal Commission On Environmental Pollution, 2002*

²⁹ Growth in aviation could undermine the efforts made elsewhere to decrease emissions. In its paper "Aviation and the Environment: Using Economic Instruments" (DfT, 2003), the Government accepts that aviation pollution is 2.7 times more damaging than indicated by its carbon dioxide emissions.

³⁰ Since December 1997 each local authority in the UK has been carrying out a review and assessment of air quality in its area. Any place where national air quality objectives are unlikely to be achieved must be declared an Air Quality Management Area (AQMA). This has important implications for communities close to airport sites - e.g. Kegworth, near NEMA, has been declared an AQMA because of high Nitrogen Dioxide levels which will have to be closely monitored as airport operations expand. Further info on AQMA's in the UK from: - <http://www.airquality.co.uk/archive/laqm/laqm.php>

- Loss of green belt, productive agricultural land and other open land from airport and associated development.
- Increased risk of flooding from increased run-off of water from hard surfacing.

The White Paper

The White Paper concedes that there are already significant detrimental environmental impacts as a result of the operation of the aviation sector. There is a recognition that aviation significantly affects society and the environment in terms of global warming, noise pollution, degraded local air quality, human health, loss of landscape and built heritage, degraded water quality and loss of biodiversity.

The White Paper calls for a wide-ranging and balanced approach involving stringent limits on emissions and noise, cleaner and quieter operational practices, withdrawal of the noisiest and dirtiest aircraft, economic incentives to cut noise and emissions, and careful planning and management close to airports.

Aviation should meet its external costs, including the impact on climate change and other environmental and health costs. The 'polluter pays' principle should be seriously addressed by the industry.

What is less clear is how to remedy or minimise those impacts given the large scale expansion plans proposed. Many of the proposals to help mitigate the effects of aviation upon the environment and upon local communities appear to rely on the compliance and goodwill of the aviation sector itself, and this is entirely inadequate given the sector's vested interest. The White Paper therefore has little to show as to how environmental effects will be dealt with.

Key Issues

Without strong regulation the dirty, noisy, polluting aviation industry will be free to continue, and unaccountable for its damage. Globally the impacts of climate change are already being felt by communities, many of whom may never have the opportunity to fly, but are paying the price for the cheap flight revolution as weather patterns change, crops fail and flooding devastates lives and livelihoods and raises insurance premium levels. The unique form of pollution caused by aircraft must be taken fully into account. It would be most effective to apply direct emissions charges to every flight, initially those starting and ending in the EU. Every landing and take-off should be taxed according to the emissions of the aircraft.

In 2000 the Government introduced a series of policies and measures to meet the UK's pledge to cut carbon dioxide levels to 20 per cent below 1990 levels by 2010. But UK emissions of carbon dioxide in 2005 stand at only 7.5 per cent below the 1990 baseline, the same as when Labour came to power in 1997. As a result the UK is expected to miss its target by a wide margin and achieve cuts of only 15 per cent by the end of the decade. The UK Government says that it wants climate change to be the priority for its presidency of the G8 and EU, and yet it continues to fail to gain control over emissions at home in the UK, and promotes an extensive airport expansion policy that is set to wipe out any benefits that may be derived from technological advances or gains made by other industrial sectors.

Research for Friends of the Earth by the Tyndall Centre for Climate Change Research, shows that unless the Government takes action to reduce the growth in aviation emissions the industry's emissions will wipe out all the savings those other sectors of the economy could make. The research shows that UK reduction targets will be almost impossible to meet if aviation emissions continue to grow at the rates analysed by the Tyndall Centre.

Tyndall, the UK's leading independent climate change research body, concludes that if aviation growth continues, it could take up the entire emissions budget for all sectors of the EU economy by 2040 and all sectors of the UK economy by 2037, if we are to keep within safe limits. This would mean that schools, hospitals, commerce, houses and industry would not be able to release any emissions if the UK and the EU are to stay within environmental limits.³¹

On a regional and local scale the implications of the Government's Aviation White paper will be keenly felt. Anyone already living next to an airport can point to the negative effects such as local air pollution, noise, and huge industrial scale developments of offices, warehouses, car parks, and terminals as well as ever larger roads. This associated development carries with it environmental impacts of its own such as reduction of the number and types of natural habitats, which in turn can lead to decreases in biodiversity and increases in species-poor environments.

The irony in this is that bio diverse habitats are increasingly important to our ability to absorb pollution and cope with the climate change damage exacerbated by aviation's operations and growth.

An airport has a huge local footprint which spreads far beyond the runway. Indeed the runway is the catalyst for a plethora of unintended consequences including increased landtake for terminals, offices, hotels, industrial developments, car parks and wider (or even new) roads and railways (see sections 8 and 9).

The Strategic Environmental Assessment, which was introduced in July 2004, is an important new tool for assessing the environmental impact of major projects. It will be applicable to Regional Spatial Strategies and other plans affecting aviation.³²

We have already shown in section 2 that there is great uncertainty about future demand for air travel and that demand does not necessarily have to be met in full. The huge environmental impact of aviation, both globally and locally, argues for careful control of demand, and for high environmental standards to be imposed on any future development via planning conditions and agreements.

³¹ The research looked at growth trends in the aviation industry and calculated that emissions from the sector would rise rapidly between now and 2050, assuming these trends continued. It also took account of the way in which air transport markets mature and assumed that significant improvements in fuel efficiencies would be achieved. A summary of the Tyndall report is available at:-

http://www.foe.co.uk/resource/reports/aviation_tyndall_summary.pdf

The full report is available at:-

http://www.foe.co.uk/resource/reports/aviation_tyndall_research.pdf

³² For further information, see : - <http://www.parliament.uk/documents/upload/POSTpn223.pdf>

6. IMPACTS ON HEALTH

There are particular medical risks to persons living adjacent to busy airports and for persons living beneath flight paths which we explore in this section. These risks are compounded by additional factors such as the large volume of road traffic going to and from the airport and additional air pollution arising from movements of aircraft on the ground, engine testing and refuelling. The two main risks to health arise from air pollution and noise.

Air Pollution

Background

The Committee on the Medical Effects of Air Pollutants reports that "air pollution kills up to 24,000 people each year in Britain".³³ Aircraft engines emit a wide variety of pollutants including carbon, benzene, sulphur dioxide, ozone, nitric oxide, nitrogen dioxide, nitrous oxide etc. Some of these substances, e.g. benzene, are carcinogenic. Particle size is measured in 'microns', one micron being 1000th of a millimetre. They are normally referred to as Particulate Matter, with PM10s being up to 10 microns, and PM2.5s being up to 2.5 microns.

Research has demonstrated that the smaller particles are the most dangerous, and particles of 1 micron or less are particularly so. The commonly used measuring techniques such as for PM10s are based on weight and are not good indicators of the number of very small particles in the air. Ultrafine particles can cause very severe damage to the lungs by virtue of their small size and not just their chemical composition. They can pass deep into the lungs, where they cause inflammation and potentially permanent damage. The British Medical Journal has reported on research which proves a direct link between ultrafine particles and disease of the lungs, heart and other blood vessels.³⁴ Air pollution thickens the blood and boosts inflammation, which may help to explain why it is associated with increased risk of heart attacks, strokes and worsening respiratory problems. Particularly at risk are children, the elderly, and persons suffering from any form of cardiopulmonary disease.

The White Paper

The White Paper recognises air quality as a threat to local communities and calls for significant progress in reducing the expected impacts of aviation on local air quality, in order to meet mandatory EU limits. It recognises that this will be a particular challenge at busy airports surrounded by high levels of road traffic.

Key Issues

As shown above, there is a lack of monitoring of those ultra fine particulates which pose the greatest threat to human health. Until widespread monitoring is undertaken,

³³ Day, M (1998): City dwellers dying for a breath of fresh air. *New Scientist*, **157**, 16.

³⁴ Occupational Environ Med 2005; 65: 164-71 British Medical Journal

and studies are carried out to examine the extent of health impacts upon local communities, it will be impossible to adequately address this issue.

Fine particulate matter and its effects at night will be worsened by the diurnal cooling of the atmosphere so night flying is more likely to lead to community health aggravation.

Sufficient aviation-related health impact assessment research has not been undertaken and therefore there is no precise understanding of the health consequences of aviation. We recommend that the Government urgently commissions substantive research into air quality monitoring of ultrafine and fine particulates relating to aircraft emissions at the major airports, including Birmingham and NEMA.

Noise

Background

Aviation noise is unwanted sound generated by aircraft, and is a serious and growing problem in the UK. As airports expand and air services increase, more and more homes are exposed, for large parts of the day, to persistent background noise from aircraft. Between 70 and 75% of England now lies beneath lower controlled airspace.

Noise from aircraft is subject to an entirely different regulatory regime to other noise pollution. The Civil Aviation Act 1982 provides that no action for trespass or nuisance can be taken as long as an aircraft observes the Rules of the Air and Air Traffic Control Regulations, which also cover ground movements of aircraft.

The Air Navigation Act 1920 provided the basis of the UK's aviation noise regulation regime, by exempting aviation from nuisance sanctions in order to stimulate the nascent industry. However, noise at larger airports can be controlled through a process of "designation", which, to date, has only been applied to Heathrow, Gatwick and Stansted, making the Secretary of State for Transport responsible for regulating take-off and landing noise at these airports. In practice, noise restrictions at designated airports have been implemented through restrictions on departing aircraft noise, controls on night flying and (at Heathrow and Gatwick) some limited housing noise insulation schemes.

Successive governments have continued to favour local resolution at regional airports, including those in the Midlands. Councils' main instruments are agreements and Section 106 conditions on planning permission - see section 15 below. London City Airport and Luton Airport, for example, have agreed maximum noise exposure contours, which must not be exceeded. Nottingham East Midlands Airport (NEMA) and Birmingham's controlled airspace gives a total of 2,010 square miles of the Midlands which will be subjected to low-level aircraft noise, much of it through the night as NEMA's business expands. NEMA has no controls over the number of night flights it operates. The ambition, it seems, is to create a colossal 'Midlands Terminal Manoeuvring Area', as described in the consultation documentation, that led to the publication of the Air Transport White Paper.

The newly proposed Civil Aviation Bill³⁵ is set to give increased responsibility to airports to manage the problems associated with aircraft noise. However campaigners and those living close to airports fear that this may diminish the scope of redress for local authorities and members of the public to pursue damages and claims of negligence against airport operators,³⁶ as the balance of power is being firmly shifted in favour of the operators.

Noise is particularly damaging to community health from night flying, resulting in sleep deprivation, heightened awareness during sleep and heightened risk of cardiovascular and pulmonary conditions.

The UK's main measure of aviation noise is Equivalent Continuous Sound Level (Leq dBa). This averages the sound energy monitored from all aircraft noise events in a certain area over a 16 hour period each day (0700 and 2300 hrs). Under this system Low Community Annoyance is registered at 57 Leq, Medium Annoyance at 63 Leq and High Annoyance at 69 Leq. Noise from aircraft can present problems arising from the time of day it occurs as well as the level of noise.³⁷ The World Health Organisation has proposed more stringent standards (see below).

Daytime noise can lead to people feeling stressed and angry. It may interfere with conversations and leisure activities in the home, disrupt activities requiring concentration, and discourage people from using outdoor spaces. Noise may be more annoying if it occurs repeatedly. Lack of control, i.e. inability to alter or escape from the source of the noise, may make it much more annoying.³⁸

An in depth study of noise at Munich airport found there is good evidence that aircraft noise at night causes increased stress levels associated with sustained release of catecholamines and cortisol. These can cause a raised blood pressure and consequent cardiovascular disease, depression, osteoporosis and diabetes³⁹. It may also lead to harmful behaviour such as social isolation, aggression, and resorting to the excessive consumption of alcohol, tobacco, food and drugs. Sleep disturbance may impair the ability of victims to perform efficiently the following day, leading to an increased risk of accidents, both at work and on the roads, amongst the chronically tired.

The Department of Health in 2002 reported the results of an investigation into the effect of noise on schoolchildren in West London.⁴⁰ It found that aircraft noise exposure was associated with a poorer reading performance and raised annoyance. In 2000 a Department of Transport report concluded that there was a very strong case to

³⁵ http://www.dft.gov.uk/stellent/groups/dft_aviation/documents/page/dft_aviation_038204.pdf

³⁶ Section 1-4 of the proposed Civil Aviation Bill is about noise and emissions from aircraft, but potentially legislating new and additional powers to the airports to penalise and set emission charges for noise levels infringements immediately around the airports and under flight paths. It is worrying that additional powers should be given to airports that have traditionally been poor at providing remediation solutions for the environmental effects of their commercial activities.

³⁷ Levels of noise are measured in "Decibels" (abbreviated to dBa) and the scale is logarithmic. This means that, for example, 60 decibels is not one fifth louder than 50 decibels but is 10 times as loud.

³⁸ The DfT uses a level of 57dBa as an indicator of the level at which daytime noise will cause annoyance.

³⁹ For further information on the impacts of sleep deprivation see article

<http://news.bbc.co.uk/1/hi/health/4307331.stm>

⁴⁰ http://www.lho.org.uk/HIL/Determinants_Of_Health/Environment/Noise.htm

support further research into the adverse impact on human health from noise disturbance from aircraft.⁴¹

The White Paper

The AWP states that the Government will take account of guidelines from the World Health Organisation (WHO) in relation to noise. In respect of night time noise WHO recognises that people are disturbed by noise levels as low as 45 dBa, but noise mapping exercises for Midlands airports were calculated for 57 dBa noise contours, and therefore are not an accurate representation either of areas that would be affected by night time noise or of actual tolerance of noise. This is particularly relevant to Nottingham East Midlands and Coventry airports which conduct round the clock operations.

The AWP also admits that further research is needed to fully understand the impacts of aircraft noise upon human health.

Key Issues

The UK's Leq standard of noise measurement is not internationally recognised, is unresponsive to the number of noise events, and does not give special weighting to night and other sensitive times of day. The use of Community Annoyance Thresholds to assess noise effects is out of date and "annoyance" is an inappropriate term to describe a phenomenon with the associated health risks of aviation noise.

We recommend that the UK Government should undertake substantive research into community noise related health effects and formulate a unit of measurement which takes full account of the difference in the effect of noise at different times of day, for all communities exposed to the adverse effects of aviation. The human experience of aircraft noise is inevitably subjective. It cannot be understood and measured simply by the scientific technique of calculating average sound energy contours. Social surveys should be more extensively used to assess subjective responses to noise within an affected population.

In the meantime, all Midlands airports should be brought up to the standards of noise protection of the best UK airports. This means banning noisier aircraft and strictly controlling night flights through the use of noise quotas and caps on the number of flights. As night time noise imposes unacceptable health and disturbance impacts upon communities which the questionable and unproven economic benefits of night flights fail to justify, we believe that in the long term night flights should be banned across Europe.

⁴¹ *Adverse Effects of Night-Time Aircraft Noise* DORA R&D Report 9964, March 2000

7. SOCIAL IMPLICATIONS

Background

The expansion of aviation over the past 10 years, and in particular the rapid growth in low-cost airlines, is often portrayed as a major success story in opening up opportunities for foreign travel to lower income groups who could not previously have afforded them. While it is undeniable that some people now fly who could not previously afford to do so, the overwhelming majority of fliers and those taking budget flights come from higher socio-economic groups. The growth in aviation has widened inequalities between income and social groups instead of narrowing them.

Research by the aviation industry's own lobby group,⁴² Freedom to Fly, showed that people in the top three social classes fly four times as often as those in the three lower classes. In a typical year, less than 50% of the population fly, of which only 11% come from social classes D and E. The poorest 10% of the population hardly ever fly. Even on budget airlines, people from the top three social classes account for more than 75% of passengers.

Figures from the Civil Aviation Authority, published in November 2004,⁴³ reinforce these trends. Those in social groups D and E (27% of the population) took only 6% of flights in 2003. Even at Stansted, an airport dominated by budget airlines, the average income of British passengers was over £47,000. More than 177,000 UK households now have a second home overseas. Second home owners take an average of 6 return flights per annum.

Easyjet confirmed that the rapid growth in budget airlines is being fuelled by people with very high disposable incomes who book dozens of trips a year: 'We have at least 1,000 people who fly every week from London to their second homes in Nice, Malaga, Palma and Barcelona', a spokesman said: 'There is a misconception that budget airlines are used mainly by people on lower incomes. If you look in the airport car park at Luton, you will find it full of BMWs and Mercedes.'⁴⁴

In the case of Birmingham Airport in particular, the negative environmental impact of aviation and airport surface traffic falls disproportionately on lower income groups. Those living and working close to the airport tend to have below average incomes, and are most likely to be affected by noise disturbance and air pollution.

The White Paper

The White Paper itself has little to say about the social implications of air transport. The Strategic Framework refers briefly to the growth in aviation having brought air travel within the reach of many more people, expanding horizons, opportunities and expectations.

⁴² The aviation industry lobby group, Freedom to Fly's own MORI poll (Attitudes Towards Air Travel, 14 January 2002) shows that "those most likely to have flown in the last 12 months can be classified as 'high flyers':- ABs, those working full time, those with household incomes of , 30,000 p.a. or more and/or broadsheet readers."

⁴³ 'Rich Snap Up Cheap Flights' – Ben Webster, The Times, 1 November 2004.

⁴⁴ www.timesonline.co.uk/article/0,,4161-1490009,00.html

A more detailed analysis is found in the Integrated Policy Appraisal attached to the White Paper where the following disadvantages are acknowledged:

- More noise and air pollution, more surface traffic and potential impacts on amenity and social capital.
- Risks of the spread of infectious diseases, but these are not thought to be significant.
- Potential additional demands on UK health services from foreign tourists.
- Pressures on the local housing stock near airports.
- Possible overheating of local economies.
- Noise causing annoyance and possible sleep disturbance;
- Possible effects on children's cognitive development, but little hard evidence as yet.
- Possible damage to people's enjoyment of the rural environment and outdoor events.

Key Issues

While both positive and negative effects of aviation are recognised in the White Paper, the Integrated Policy Appraisal appears overall to take a rose-tinted view of the social implications of the growth in aviation. It completely ignores the distributional effects outlined above.

This is another aspect of the White Paper which is plainly inadequate. The Government has ignored the clear evidence that opportunities for air travel disproportionately benefit richer sections of society at the expense of poorer people adversely affected by environmental consequences on the ground, such as noise disturbance and air pollution.

8. ASSOCIATED DEVELOPMENT

Background

Airports generate substantial amounts of related development. One has only to look at the environs of major airports such as Heathrow, Gatwick or Manchester to see the effect. Broadly speaking, development associated with an airport or its expansion can be separated into two categories:

- a. Directly related development such as cargo, maintenance and support facilities, airline offices, fuel storage, warehousing for air freight, access roads and car parking.
- b. Development likely to be generated by the presence of the airport, such as business parks, service areas and parking, other commercial development, housing for workers, support facilities for housing such as schools, medical facilities and shops, hotels, and wider surface transport improvements.

Most directly related development will cluster close to the airport (some of it perhaps within the airport curtilage) whereas generated development may cover a much wider area, though some of it may still be relatively close to the airport.

Little attention was given to the development implications of airport expansion in the work leading to the Government's consultation and the White Paper. There was some weak and speculative analysis by the Halcrow Group⁴⁵ of potential development implications of expanding Birmingham and Nottingham East Midlands' airports, but this looked at only two categories of development – employment and housing – and made some sweeping assumptions to reach rather complacent conclusions.

The White Paper

The White Paper is almost silent on the subject of associated development, although it admits that 'urbanisation' emerged as a concern from the consultation responses. It merely suggests that new development should be consistent with existing planning policies, including green belt protection, and that it may be appropriate to designate green belts around substantial new airport developments to safeguard the countryside from further encroachment.

Key Issues

The Government's treatment of this issue is inadequate. Although the development which airports bring with them causes great public concern, the Government has not seen it as an issue which should affect its approach to airport expansion, and has made only passing reference to it. The consultancy work on this subject for Birmingham and East Midlands is very weak and covers only a very small proportion of the types of development likely to be generated. There has been no corresponding work for smaller airports such as Coventry and Wolverhampton.

Experience suggests that development generated in the vicinity of an airport can cover twice the area of the airport itself. Indirect development over a wider area is likely to exceed this. Car parking is a particularly heavy user of land for which proximity to the airport is usually important. In some cases, landowners provide 'unofficial parking', sometimes without planning permission. While cars can sometimes be parked on land not fit for other uses, they still have a major urbanising effect. Airport master plans and development proposals need to make clear predictions of the demand for associated development so that the implications can be properly debated and managed.

Birmingham Airport is situated in the Meriden Gap area of the West Midlands Green Belt. A good deal of airport-related development has already been allowed as an exception to green belt policy, and with major expansion this is likely to continue and perhaps accelerate. With the area to the west of the M42 filling up, there is a real danger of major encroachment into the unspoilt rural area to the east. This could set a dangerous precedent for non-airport-related development between

⁴⁵ Regional Air Services 3: Midlands – Part B – Appraisal – Birmingham and east Midlands Airport – Final Report, July 2002

Birmingham/Solihull and Coventry, and threaten the integrity of the green belt as a whole.

East Midlands Airport is not in the green belt, but the surrounding area still has significant rural character and is (rather ineffectively) protected by various countryside designations. The pressure for urbanising development would undoubtedly accelerate with major expansion. We consider that a new green belt should be designated urgently to help protect the vulnerable surrounding area from indiscriminate development (see also section 11).

Coventry airport has green belt on its rural southern and eastern sides, and Wolverhampton airport is within green belt. In neither case would associated green field development be acceptable in planning terms, but it is difficult to see how major expansion could take place without it.

Because airports are located on the edge of, or outside, urban areas, the development associated with them tend to reinforce a trend towards decentralisation of employment from the major urban areas. This is directly contrary to the spatial strategies of the East and West Midlands, which aim to concentrate new development within the major urban areas.

9. SURFACE TRANSPORT

Background

Significant additional road traffic is generated by passengers, staff and other visitors to access an airport, and by the demands of freight traffic. Often this traffic puts unacceptable pressure on a transport system which is already overloaded for other reasons. It is also not unusual for airport-related surface transport to result in higher emissions than the aircraft themselves (see section 6).

Birmingham Airport is served by the M42 motorway, the A45 dual carriageway and also by the West Coast Main Rail Line from London to Birmingham. Efforts have been made to increase the proportion of passenger and staff trips by public transport (the current figure is about 15%) but the limited capacity of the West Coast Main Line is a significant constraint and there are no plans to increase its capacity beyond the current upgrade. Along with other traffic generators such as the National Exhibition Centre, the airport imposes very substantial extra traffic on this busy part of the strategic road network. While there is the possibility of widening the M42, it is unlikely that this on its own would cope with anything like the traffic generated if a second runway was built. There are no plans to widen the A45. New public transport interchanges are being proposed close to the airport and at Coleshill.

Access to Nottingham East Midlands Airport has been looked at by multi-modal studies for the M1 and West Midlands to East Midlands.⁴⁶ Very substantial widening

⁴⁶ Evidence has shown that the bulk of the traffic on this part of the M1 is local, using the motorway to travel only a few junctions. This implies that other measures in the area to improve public transport and create genuine non-car alternatives could deal with any congestion problems. The cost escalation of this scheme has so far been 271%. Three local nature reserves could be affected by this scheme –

and other changes to the M1 and other strategic roads would be needed to cater for even 15mppa, let alone the higher figures associated with a possible second runway. Public transport access is poor at present, and the studies suggest that it could account for only between 4 and 13.5% of trips for a high usage, two runway airport. Planning permission has recently been given for an East Midlands Parkway station and a new bus service to Nottingham has been introduced but it is far from clear whether they will have a significant impact on mode share.

Coventry Airport is accessed from an extremely busy trunk road junction on the south-east side of the city. There is no rail access and bus services are minimal. A planned grade separation will provide easier access by private car.

Wolverhampton Airport is accessed by a network of poor standard single carriageway roads linking it to the West Midlands conurbation. Bus access is negligible and there is no rail access. The airport company has proposed a handful of minor road and bus improvements to support its expansion proposals, but these are plainly inadequate. There was at one time a fanciful proposal for a light rail link to the conurbation, but this seems to have been dropped.

The White Paper

The White Paper deals with surface transport mainly in the context of individual airports.

For Birmingham, the operator is asked to work closely with the Strategic Rail Authority (now in the process of being abolished) and the Highways Agency and 'regional stakeholders' to develop a strategy for surface access. There should be a long-term target of 25% of trips by public transport, supported by improved rail, bus and coach services, a new interchange at Birmingham International and a Sky Rail connection. For the M42, there is talk of widening, traffic management and improved airport access.

For Nottingham East Midlands, there is no reference whatsoever to surface access. There are references to surface access constraints at Coventry and Wolverhampton but these are not developed further.

Key Issues

The Government has expressed little interest in the issue of surface access, leaving it to be resolved by operators locally. However, this could be a huge problem at Midlands' airports, leading to congestion, overcrowding and delay on existing transport routes, not to mention the severe local and wider environmental impact of the extra traffic and the road improvements which may be required. It is not clear whether the operator is expected to pay for such improvements, or whether they

source - "Paying for better transport: costing the 'Way to Go' manifesto"
www.foe.co.uk/resource/reports/paying_for_better_transport.pdf

would be subsidised by the public purse.⁴⁷ If the latter is the answer, a shortage of funds for transport infrastructure means that many necessary schemes may not happen. The cost of transport projects often escalates sharply from the initial estimate to the final bill, exacerbating the problem.

In the case of Birmingham, the Government assumes that passenger numbers will rise at least four-fold, and perhaps five-fold, with a second runway. Even if the public transport share of trips could be increased to more than 20% (which is most unlikely unless the Government funds a doubling of capacity on the West Coast Main Line), this would mean that airport-related road traffic would increase by well over 250%, and possibly by as much as 350%. Even a widened M42 would be swamped by such figures, and the A45 – the main road between Birmingham and Coventry – would be permanently congested. This does not amount to a sustainable solution. The only obvious answer to this basic conundrum is to seek to prevent the adverse, non sustainable, modal shift by restricting the increase in flights from Birmingham.

Even the most ambitious road improvements currently on offer in the vicinity of Nottingham East Midlands will cater for no more than modest growth in the use of the existing runway. The prospect of significantly increasing the public transport share seems remote unless, as it should, the airport operator assumes financial responsibility for a major and costly programme of bus and rail improvements. We consider it unlikely, as do Midland Main Line, that significant numbers of airport users will use East Midlands Parkway.

Access to Coventry Airport other than by private car is a serious problem. Bus access is unlikely to provide a solution, and rail access appears to be out of the question.

High quality access to Wolverhampton Airport cannot be provided without causing severe damage to the surrounding unspoilt rural area, and would also be prohibitively expensive.

The application of public transport targets to Midlands' airports is very uneven. Only Birmingham currently has a demanding target. It looks unlikely that this will be met, and there is little effective sanction on the airport if it is not met.

Our overall conclusion is that access limitations will severely constrain the ability of each of the Midlands airports to expand over the next 25 years. The general public will be reluctant to accept lower standards of service, and some of the transport improvements needed to maintain current standards would be prohibitively expensive and environmentally disastrous. At present, scant attention is being paid to the PPG13⁴⁸ policies of reducing the need to travel and encouraging travel by more environmentally friendly means. In the interests of sustainable transport, all airports should see a much higher proportion of passengers and employees travelling by public

⁴⁷ The new project appraisal rules, building in “optimism bias” or cost overruns, further expose the high costs of road building. For example, the cost of widening the M1 through the East Midlands, estimated at £700 million in the multi modal study Final Report (December 2001), has risen dramatically to £1.9 billion upon entry into the Targeted Programme of Improvements (April 2004). This is a 271% cost escalation. Paying for better transport: costing the ‘Way to Go’ manifesto – http://www.foe.co.uk/resource/reports/paying_for_better_transport.pdf

⁴⁸ Planning Policy Guidance Note 13

transport, but this will be very difficult to achieve without proper investment. And even where higher public transport percentages can be achieved, there is still likely to be a substantial increase in the volume of road traffic if the airport expands significantly.

10. BIRMINGHAM INTERNATIONAL AIRPORT (BIA)

Background

Birmingham (Elmdon) Airport first opened in 1939 as a municipal airport owned and operated by Birmingham City Council. Control passed to the West Midlands County Council from its formation in 1974 until its demise in 1986, when it passed in turn to the seven metropolitan districts. By 1993, the local authorities had reduced their shareholding to below 50% and Birmingham International Airport became a private sector company. This enabled BIA to finance a £260 million development programme in line with the Master Plan to 2005. A new main terminal was opened in 1984 on the Bickenhill side of the airport closer to the NEC. By 1990 the main runway had been extended to 2,600m and by 1991 a second terminal had also been built.

The airport has been one of the fastest growing in the UK in recent years and now has an annual throughput of about 9mppa. However in 2004, passenger numbers fell 2.3% compared with the previous year. Scheduled traffic to a range of European and some inter-continental destinations accounts for just over half the passenger traffic, with charter and low cost flights making up the rest. According to the Midlands Consultation Document,⁴⁹ maximum use of the runway could accommodate up to 22 mppa, which makes it well under half full at present.

The airport is, in principle, well served by both road and rail. However it is situated in a busy area on the south-eastern side of Birmingham, close to other major traffic generators such as the National Exhibition Centre and Birmingham Business Park. Congestion is already a serious problem and could become a major impediment to the growth of the airport. There is a public transport modal share target of 20% by 2005, but with the share currently only at about 15% it seems certain that this will not be met.

The White Paper

The Government is persuaded that there is a need for additional runway capacity in the Midlands and its preferred location for a new runway to meet passenger demand is Birmingham Airport. The White Paper supports the development of a short, wide-spaced second runway (as proposed by the airport themselves) to cater for growth to between 32mppa & 40mppa, with the caveat that this would have to be subject to stringent limits on the area affected by aircraft noise. In order to achieve this, the new runway's use would be limited to aircraft with a noise quota of 0.5 or less, and daytime operation only (07:00 to 23:00 hrs). BIA are required to prepare an Airport

⁴⁹ Department for Transport: The Future Development of Air Transport in the United Kingdom: Midlands (July 2002) – Table 7.5

Master Plan setting out in detail proposals for development up to 2015,⁵⁰ including surface access, environmental controls and mitigation, and measures to address blight.

In the meantime, BIA has published a ‘High Level Statement of Intent’⁵¹ setting out their response to the White Paper and summarising their work on the master plan. It suggests that the target date for the second runway could be deferred from the Government’s 2016. The second runway would be used by quieter aircraft, and not at all at night. The Statement of Intent also calls for a 400 metre south-eastwards extension of the present runway, but gives no date for this.

The Regional Spatial Strategy for the West Midlands (policy T11) indicates that Birmingham will continue to be developed as the West Midlands’ principal international airport, with appropriate facilities to increase the range of destinations served. Reference is made to additional terminal capacity and a runway extension. Environmental and surface access criteria are mentioned. The policy requires review in the light of the White Paper.

Key Issues

It is likely that use of the airport will continue to grow, but we have shown in Section 2 that the growth of aviation in the Midlands is likely to be much slower than the Government have forecast. Given that the present runway is currently being used at less than half its capacity, there is no reason to believe at this stage that a second runway will be required.

An extension to the present runway would inevitably cause further environmental damage to the surrounding area, and more intensive use of the airport could add significantly to problems of noise, air pollution etc which already seriously affect local people. We will want to look closely at the proposals when they are published to assess the extent of these effects and their relationship to any benefits of the proposal.

It is inevitable that further airport growth would directly conflict with green belt policy. Birmingham Airport has already generated a good deal of associated development in the surrounding area. A two runway airport would directly consume nearly 300 hectares of extra green belt and become a major focus for urban development beyond that. This could fatally undermine the role of the Meriden Gap Green Belt in providing a rural buffer between Birmingham/Solihull and Coventry. It could also threaten the regional urban renaissance spatial strategy by encouraging further decentralisation of jobs and people from the conurbation.

If Birmingham Airport were to grow in order to handle the capacity suggested in the Airport White Paper the car-parking requirement could not be met within the airport site, and would inevitably lead to difficult decisions about off-site car parks in the surrounding green belt countryside. There would be huge overloads on the motorway and trunk road network which presently planned road improvements, such as the

⁵⁰ AWP, §12.8 and DfT Press Release (2004/0080, 12 July 2004) announcing new guidance for the preparation of Master Plans and the list of 30 airports, including Birmingham, expected to produce a Master Plan by the end of 2004.

⁵¹ Birmingham International Airport – High Level Statement of Intent, January 2005.

Active Traffic Management Scheme on the M42, could not resolve. Similarly, capacity limits on the West Coast Main Line make it unlikely that the 20% target for public transport could ever be met, let alone the 25% target mooted in the White Paper and supported by the Statement of Intent. Under any scenario we recommend that measures to achieve a year on year reduction in car use and/or a year on year increase in public transport use, irrespective of the growth or decrease in the total number of people flying, must be pursued.

In 2000, 33,700 people were affected by aircraft noise greater than 57dB. A new runway would be likely to increase this number to over 100,000 people. Although the Government mentions mitigation measures, and a compensation scheme has already been proposed, this would be a very high price to pay for a second runway.

Our overall conclusion, in the light of our comments on demand, is that continued growth of Birmingham International Airport should be carefully controlled in accordance with the principles of sustainable development. With patronage having fallen in 2004 and the future uncertain, **there is no case whatsoever for a second runway in the foreseeable future, and the case for a runway extension is not proven**

11. NOTTINGHAM EAST MIDLANDS AIRPORT (NEMA)

Background

Nottingham East Midlands Airport (NEMA) belongs to the 10 local authorities in the Greater Manchester area comprising the Manchester Airport Group, which also owns Bournemouth and Manchester airports and has a controlling interest in Humberside airport. Expansion of NEMA has been rapid since its privatisation during the 1990's, and particularly so during the last two years. In 2004, the airport authority added the prefix "Nottingham" to the airport's name. It has always been the home airport of British Midland, who have transformed their operations largely into a no frills system.

NEMA is currently the third largest freight airport in the UK, and is the leading UK airport for freight carried in all-cargo aircraft. It is the main centre of operations in the UK for two of the four major global express freight operators, and a regional base for another two. Currently NEMA is handling over 200,000 tonnes of freight per year, but forecasts indicate that NEMA could be handling as much as 2.5 million tonnes of freight a year, possibly more, by 2030.⁵²

NEMA has seen a huge growth from the 'no frills' sector in recent years and is now the ninth largest passenger airport in the UK, offering a growing range of scheduled

⁵² Air Charter Service was the most recent integrator to move to NEMA. The company switched from Ostend Airport, where there are restrictions on night flights, to NEMA, where the only restrictions are those imposed by the airport itself and adhered to by voluntary agreement by airlines. Justin Bowman, Air Charter Service's commercial director has been quoted as having said "We can fly into and out of Nottingham East Midlands at any time we like, there are no night restrictions. Generally across Europe aircraft are being restricted at night because of 'green' environmentally-minded people."
<http://www.serco.com/media/industrynews/ItemPage.asp?ItemID=8425305>

and charter destinations throughout the world. Passenger traffic at NEMA has virtually doubled in 2002-2003, with two 'no-frills' carriers, in addition to British Midland, developing significant bases at the airport. It is now handling around 4.5 mppa. The forecasts in the original Midlands consultation document suggested that by 2030 NEMA could attract between 12mppa and 14mppa, but this could be a conservative estimate if the no frills sector continues to expand at NEMA in preference to other airports in the Midlands.

The projected growth of the airport would increase the size of its noise contour to include over 10,000 people. Moreover, the nature of the air-cargo operations means that many flights are at night, when background noise levels are lower and the 57dBA level is not a suitable measurement of noise intrusion. There is likely to be a large increase in the number of flights at night; forecasts indicate that there could be over 60,000 cargo flights a year by 2030 and a substantial proportion of these are likely to be during the late evening or at night. The Government was asked to consider designation in 2002 but decided in favour of the airport's 10-point plan of voluntary noise controls, which are highly unlikely to be effective.

The airport owners foresee a need for a second runway at the airport around 2020, regardless of decisions about runways at other airports. However, this assessment is based on higher estimates of traffic during late evening critical hours than the Air Transport White Paper forecast for the airport, which challenges the economic case for the development of a second runway.

NEMA has almost doubled the extent of its controlled airspace to 1,130 square miles over the East Midlands region. By contrast, Heathrow's (67.3 million passengers in 2004) controlled airspace extends over a mere 460 square miles and even Gatwick (31.5 million passengers in 2004) gets by with 370 square miles of controlled airspace. NEMA has dealt poorly with its desire to expand its air space, allowing little consultation with local residents who would be affected by noise and pollution from the new corridors of plane movements. Indeed it has only been as a result of intervention by local authorities and airport community groups that NEMA saw fit to reissue the consultation document in light of the fact that so many directly affected groups were excluded from the first round of the process.

The White Paper

The AWP states that at current rates of operation there is no reason for a second runway. However it could still be built if greater growth than predicted takes place. The AWP also recognises that there are real problems with night flights and noise but is less forthcoming on what to do about them, and favours the expansion of air freight operations.

Key Issues

The Midlands consultation document⁵³ states that with maximum use of the existing runway NEMA could increase throughput to 15 mppa. The proposals for road

⁵³ The Future Development of Air Transport in the United Kingdom: Midlands – Department for Transport, July 2002.

expansion recommended by multi-modal studies for the M1 and A453 are said to be sufficient for a throughput of up to 8 mppa. It is claimed that, above that, more road capacity would be needed.⁵⁴ The Midlands consultation document glossed over the demands that would be placed on surface access to the airport. The massive number of vehicle movements which would be associated with airport expansion calls into question the practicability of the proposals.

The demands for road capacity for a maximum use single runway airport can only be met by implementation of the maximum levels of road building recommended by the various multi-modal studies. The demands for road capacity from expansion to a two runway airport cannot reasonably be met. To avoid unacceptable levels of road building, a very different approach to the provision and financing of public transport services to the airport would need to be taken.⁵⁵

While air quality at ground level outside NEMA is unlikely to be significantly degraded by additional aircraft movements, air quality along access roads would deteriorate significantly with more traffic and more congestion. Studies indicate that improved technology will reduce aircraft emissions by 1% a year over the coming decades. But the forecast rate of annual growth in aviation - between 4%-6% - will wipe out any technological improvements.⁵⁶

Although approximately two dozen airports in the UK have 24 hour operations, NEMA is unusual in having no curfews or any requirement to obtain permissions for out-of-hours flights. Round-the-clock noise generated by aircraft using NEMA's controlled airspace is already beyond endurance for many, most particularly at night. The airport's operations deny proper restorative sleep to many of those living in a wide radius of this airport. The reliance on the use of the 57dBA (Leq16h) contour does not give a true account of actual single-event noise levels experienced by people in and around their homes (see section 6). Expansion will cause a significantly greater number of people to be adversely affected by noise, especially at night, in a belt across the East Midlands extending from Kettering in Northamptonshire to Chesterfield in North Derbyshire. The noise generated by the expansion of NEMA with unrestricted night flying will impact across the whole region, with many individuals experiencing aircraft noise in their localities for the first time.

The areas within the region in need of jobs are not in the vicinity of the airport but are instead in the cities of Derby, Leicester and Nottingham and the North Nottinghamshire/North Derbyshire former coalfields. Many jobs created at airports are of the low-skill, low-wage variety and seasonal; this is inconsistent with the East Midlands Development Agency's stated aim to move the East Midlands towards a

⁵⁴ East Midlands Regional Planning Guidance Public Examination, 2003.

⁵⁵ The Midlands consultation document admits to the need to carry out all the widening proposed in the M1MMS to cater for the unrestrained growth single runway base case, i.e. up to 15 mppa. It also states that, in addition to M1 capacity increases, the A453 from the airport to junction 24 would need to be increased to dual 3 lanes and the A42 westwards would need widening. Models give values from a pessimistic 4% of passengers on buses, trains or trams up to an optimistic 13.5% for a high usage two runway airport.

⁵⁶ December 2000 study by the Arthur D Little consultancy, published alongside the document, *The Future of Aviation* consultation into the role of technological advances: Study into the Potential Impact of Changes in Technology on the Development of Air Transport in the UK.

high-skill, high-wage economy viable in the long term. Moreover how can we be confident that those jobs “created” at NEMA are not merely a result of the relocation of some companies e.g. Powergen from Nottingham to Pegasus Business Park? Moreover it may be that any relocation that occurs will be encouraging unsustainable modes of travel to work along already congested roads, as people have to travel further to their place of work.

The more development there is at NEMA the greater the pressure for further development, e.g. for warehousing, employment and housing, potentially leading to a new urban centre on what is now green fields. This new centre would then compete economically in an unhelpful way with existing urban areas. Follow-on development would be located in the Derby-Nottingham Green Belt. Expansion at NEMA could then lead to pressure to review green belt boundaries. This pressure should be resisted and the green belt be safeguarded as an important buffer zone between built up areas and a recreational and environmental asset for this part of the region. A new green belt should be designated urgently to help protect the vulnerable surrounding area from indiscriminate development.

NEMA's voluntary 'Ten-Point Plan' as the de facto 'stringent controls' promised in the Aviation White Paper is considered by those impacted by airport operations to be insubstantial and simply means 'business as usual', offering very little in the way of relief to those who currently suffer the blight of night time aircraft noise. Similarly the operation of the Airport's Independent Consultative Committee (ICC) is regarded as unsatisfactory by many.⁵⁷

We recommend that demand management measures should be implemented to help control the growth in both passenger and freight flights. The Government's approach to managing road traffic should be similarly applied to the aviation sector, given the huge environmental and social impacts of this industry. There is no robust economic case to support the development of a second runway, and thus this option should be firmly rejected. The guidance given in the AWP - “*stringent controls on night noise*” – should be translated into stringent regulations and curbs on night time flights to and from the airport. This would be achieved by designation of the airport under the 1982 Civil Aviation Act. This would bring the airport in line with Heathrow, Gatwick and Stansted, giving ministers the power to cap night flight numbers.

12. COVENTRY AIRPORT

Background

The original (Baginton) airfield opened in 1936. Initially used in connection with aircraft manufacture by Armstrong Whitworth it became a municipal airport during

⁵⁷ The main aim of an airport's independent consultative committee is to ensure “*that the management of East Midlands Airport can take into account the views of interested parties when making decisions concerning the management, operation and development of the Airport, and keep those parties informed of matters affecting them*”, but many local people have expressed the view that it is not fully representative of the whole area affected by airport operations and indeed even certain local authorities whose areas are affected by airport operations are currently not represented on the ICC.

the 1950s and was owned by Coventry City Council. It was used for general aviation, including flying schools, with a small commercial passenger flight throughput. Commercial passenger flights reached a peak of 84,000ppa in 1988. During the 1990s this gave way to increased air freight operations, with new buildings established on land to the south and west of the airport, the most recent built for Parcellforce. As part of these developments a new terminal building was planned in the same area in exchange for demolition of the old terminal on the Baginton side. However the general outline permission that included this terminal lapsed in 2003.

Meanwhile Air Atlantique took over operation of the airport under lease. They renamed the airport managing company West Midlands International Airport Limited (WMIAL) and in March 2003, whilst the Regional Air Transport consultation was in progress, made a detailed planning application for a new terminal building capable of handling 2mppa. This was refused by the local authority (Warwick District Council) in September 2004 which has now been appealed with a planning inquiry due to start in January 2006. Since then, planning permission has been sought for an even larger terminal to handle a similar number of flights.

On the day the Airport White Paper was placed before Parliament, WMIAL announced that a no frills carrier (Thomsonfly) would commence operations from Coventry Airport in March 2004. Temporary buildings were erected and flights commenced, with TUI (parent company of Thomsonfly) taking over the lease of the Airport. The local authority took enforcement action and served an Injunction on the airport company to cease using the buildings, which failed in the Courts. The enforcement action is still outstanding, with the outcome of a protracted public inquiry not expected before 2006.

The White Paper

The AWP considers that Coventry Airport serves a specialist role within the region catering for business aviation, airmail and some freight and can continue to perform this role.⁵⁸ The March 2003 application is mentioned and it is made clear that this and any subsequent applications should be decided locally. Whatever the outcome, in view of the surface access, environmental and airspace constraints, no development of passenger throughput beyond 2 mppa is envisaged.

The Regional Spatial Strategy for the West Midlands⁵⁹ states that development plans should include policies for the assessment of proposals for the expansion of Coventry Airport. Detailed criteria should apply to the environmental assessment of any proposals, and use of the airport by charter or scheduled passenger flights should be subject to the availability of public transport to serve the airport.

Key Issues

Coventry and Birmingham Airports are about 12 miles apart as the crow flies and the alignment of their runways are at 90 degrees to each other. This results in airspace conflicts where the flight paths intersect (in the vicinity of Leek Wootton). The

⁵⁸ AWP, §9.31

⁵⁹ www.wmra.gov.uk/regional_planning.htm

development of passenger services at Coventry may thus inhibit the ability of Birmingham Airport to handle the passenger numbers envisaged in the White Paper. A similar view is expressed in Birmingham International Airport's 'High Level Statement of Intent'⁶⁰. The results of an ongoing study by National Air Traffic Services (NATS) are awaited.

Coventry Airport has a 24-hour operating licence and currently there are no restrictions on the number or type of aircraft allowed to fly to and from it at night. This causes significant night noise, leading to sleep deprivation for local people on the edge of Coventry and in the surrounding villages.

As a result of the introduction of flights by Thomsonfly, nearly 1 mppa could now fly from Coventry. Although TUI have repeatedly stated that they have no intention of carrying more than 2mppa there is considerable doubt that this limit could be enforced in the long term. Such restraint would be out of character for the aviation industry.

Coventry Airport is situated close to the edge of the city. Its activities affect the landscape, village character, natural habitats, and ancient woodland and historic houses over a wide and largely unspoilt rural area to the east and south. Many residents of Coventry are also directly affected, and there was a fatal air crash in the suburb of Willenhall a few years ago.

Coventry Airport has minimal public transport access, with no rail service and infrequent buses only from the centre of Coventry. Because the Airport is on a small site there is limited capacity for car parking and there has been pressure on other land in the area for off-site car parking, although planning permission for a new on-site car park is expected to be granted.

There is a risk that flying schools currently using Coventry could be pushed out to smaller and more rural airports as a result of the more profitable (for the airport) no frills flights.

The case for significant expansion at Coventry has not been adequately made. Cheap flights of the sort currently using the airport are unnecessary and unsustainable in the long term, and bring very limited economic benefit. There is plenty of capacity at other airports to accommodate passenger need in the short-term. Coventry Airport is poorly located in transport terms, and its expansion would do significant damage to the environment and the lives of local people.

13. WOLVERHAMPTON BUSINESS AIRPORT

Background

Wolverhampton Airport is an ex-RAF airfield, better known as Halfpenny Green. It is situated in the green belt west of the Birmingham/Black Country conurbation, between Dudley and Bridgnorth. Civil flights started in 1960 and the Air Ministry

⁶⁰ Birmingham International Airport – High Level Statement of Intent, January 2005.

sold the airfield four years later. The three runways and the majority of the buildings are ex-RAF. A group of smaller hangars for helicopters has been added recently.

The approach roads are little more than improved country lanes. It is some ten miles to the nearest motorway and mainline railway station. There are no bus services which could satisfactorily link the airport to passengers or workforce. The surrounding area is attractive countryside with scattered farms and villages and includes an area of special landscape value and Highgate Common – all with high recreational value for visitors from the conurbation.

The airport still relies on a 1967 planning permission which excludes jet flights but allows light aircraft (not defined). It is unclear whether valid permission exists for the use of helicopters or for maintenance and servicing, both of which take place. Jet helicopters and fixed wing aircraft use the airport regularly and little attempt has been made to stop them. The South Staffordshire Local Plan is under review and a Local Development Framework is being produced. The plan sets out the airport's role as dealing with flights for business, recreation and training. It is generally accepted that individual fare paying passengers are excluded.

Wolverhampton Airport produced a Business Plan as part of the Government's consultation exercise, but the airport did not publicise this document or allow for community involvement in its development. The Plan is understood to propose scheduled passenger flights with 1 million ppa within four years, followed by a further 7 million ppa over the next five years, and investment of £700 million. A change of name to Birmingham Wolverhampton Airport was proposed. The expansion proposals caused outrage locally and an action group was formed to fight them.

More recently, the airport operators have applied for planning permission for phase 1 of their development, including a new runway, an engine testing facility and scheduled passenger services. The District Council have commissioned consultants to examine the proposals and have requested further information. A decision seems some way off.

The White Paper

The AWP says that Wolverhampton Airport should continue its role of serving business and general aviation. Commercial services on a limited scale may be possible, but only if they are in line with regional planning and transport priorities. The scale of any development must take account of constraints imposed by the lack of strategic road access. Development is a matter for local decision. Wolverhampton is not on the list of 30 airports considered suitable for development over the next thirty years.

The West Midlands Regional Spatial Strategy⁶¹ does not mention Wolverhampton by name, but says that the development of 'other airports' will be supported if they provide complementary services to Birmingham International, their development can be justified following rigorous environmental assessment; mitigation or compensation

⁶¹ West Midlands Regional Spatial Strategy, policy T11

can be provided and new proposals for charter or scheduled passenger services rely on the availability of public transport.

Key Issues

Scheduled passenger services at Wolverhampton Airport would not complement services at Birmingham Airport, and would tend to duplicate its role. The Government has stressed the importance of general aviation, and much of the present activity could be lost if development took place to accommodate commercial passenger flights.

There are no exceptional circumstances to justify development of this scale and type in the green belt, and it would have a serious effect on the local environment. The airport would expand beyond its present boundaries and require additional buildings out of scale with the present ones, and would also need to provide for car parking, fuel storage, security fencing and night lighting. There would be continuous noise from large jet aircraft on the ground and in the air, with attendant air pollution. Increased road traffic would be unavoidable. The new raised runway and the engine testing facility would be conspicuous, and the greater frequency of flights would threaten the tranquillity of the area for local residents and visitors alike.

The airport is poorly located in relation to its potential passengers and staff. Given its rural location, there seems little prospect of serving it effectively by public transport. Substantial road improvements would be required, which would not only be expensive but would be inappropriate in such a quiet rural area.

There can be no justification for the introduction of scheduled, charter or low-cost passenger air services at Wolverhampton Airport. The airport should continue to serve its present functions, preferably with tighter controls over its environmental impact on the surrounding area.

14. ROBIN HOOD DONCASTER SHEFFIELD AIRPORT

Background

This airport is situated 3 to 4 miles north of the border with the East Midlands region. Flight paths may impact upon people living in the East Midlands, as may the increased traffic generated on the strategic and local road networks.

This £80 million development, which opened on 28 April 2005, is the first full service airport to open in the UK in over 50 years, and is on the site of the former R.A.F. Finningley, south of Doncaster. Peel Holdings bought the site in 1999 and applied for planning permission to develop it as an international airport. Doncaster Metropolitan Borough Council, which is anxious to use the site to promote regeneration and to provide new job opportunities, supported them. Finningley is a flat site with a long runway, which can accept the largest aircraft.

In April 2004 planning permission was granted, after a public inquiry saw Peel Holdings' business case win out over other economic, social and environmental considerations.

There is currently a limit of 57,000 air transport movements per year. Operators are aiming for transatlantic carriers and they also highlight the fact that they have the only runway in the North that can handle the new Airbus 380. Thomsonfly.com alone predicts it will carry 730,000 passengers through the airport in their first year of operation, which could be an underestimate given the rush to buy seats to date – the airline sold more than 7,500 seats on the day they were released.

NEMA will face new competition with the opening of this regional rival. Robin Hood Airport is trying to appeal to four million potential customers who live within an hour's drive. About 500,000 of them would currently be expected to use NEMA. According to a Nottinghamshire County Council report; the rivalry could restrict NEMA's growth. It states: "Rate of growth is expected to slow as Robin Hood Airport develops services to popular destinations that will be the same or similar to those already served by East Midlands."⁶²

The White Paper

This airport was excluded from consultations on the future of air transport in the UK, and as a result it is difficult to know what impact the operation of this airport will have upon forecast numbers for both freight and passenger traffic at other airports, and at Nottingham East Midlands Airport in particular.

Key Issues

The operators of Britain's, and Yorkshire's, newest airport should be condemned for the irresponsible growth in air travel they are encouraging, which crashes through the forecasts they made just 5 years ago. In itself this shows aviation industry forecasts to be so unreliable that planning bodies need to treat them with utmost caution lest they be used merely to gain permission after which, it seems, anything goes. Moreover, this will have major consequences for the airport's environmental impacts. At the public inquiry in 2002 Peel forecast that just 300,000 passengers would use it in its first year; now they state that this number has surged to almost 1.5 million passengers. Peel are also forecasting that Finningley will reach its 2.3 million passengers limit in just half the projected time - by 2010. With these runaway growth rates will come soaring and dangerous climate change emissions.

The runaway growth rates bring ever closer the date when the highway network around the airport, essentially country lanes, becomes overloaded with a huge loss of amenity and increased road danger. In the absence of any rail service, almost all users of the airport will arrive by car; some 2500 parking spaces have already been provided. In 2002 Peel claimed that the airport would not need a better road link until after 2015 (then 13 years away). Immediately after the inquiry they then reversed their position and, with Doncaster Council, are seeking to drive a £50 million road link across open countryside from M18 Junction 3, almost entirely at the public expense. But the traffic now being generated by the Airport's growth would require the proposed road link to be provided in just 5 years, and that cannot be done. The road

⁶² A review of the Cross Service and External Affairs Select Committee April 2005 Referred to the Cabinet, April 2005. More information on any of these studies is available from the County Council scrutiny team. Please e-mail: matthew.garrard@nottscc.gov.uk

has neither funding nor planning approval and it is highly unlikely that it would be ready before 2010 even if these were approved.

The reopening of the airfield also brings aircraft noise back to the quiet skies over Finningley and surrounding villages, which will extend as far as Bawtry. This will include night noise from the thousands of aircraft movements that will be permitted (Finningley will have a 'quota count' set at around 40% that at Heathrow, but its use of smaller aircraft could permit a larger number of movements).

If Peel Holdings' new growth ambitions are to be permitted they must be required to meet legal conditions including any road building to be preceded and moderated by the development of an excellent public transport network. The development of airport services on the adjacent railway line should be progressed as soon as possible. Public transport planning in Doncaster should take the airport into account. We support plans for a Quality Bus Corridor along the A638 (the old Great North Road), which runs just west of the airfield. Every effort needs to be made to limit environmental damage caused by surface access, proposed new roads and to protect the surrounding farmland, which is classified as a Countryside Policy Area in the Urban Development Plan. The number of flights permitted at the airport should be capped at the original forecast figures submitted to the Planning Inquiry, and every effort made to manage the demand for flying.

15. INFLUENCING AND CONTROLLING AIRPORT DEVELOPMENT

Airports do not have a divine right to expand at will. Like other forms of development, they are subject to the planning system which is supposed to balance the advantages of expansion against the disadvantages, on behalf of society as a whole. A claim that the demand to fly may in future outstrip the supply is not a conclusive argument in favour of airport expansion. It is merely one of many issues to be taken into account in the decision. A sustainable development approach does not necessarily involve meeting demand in full.

The Government's Air Transport White Paper examines the subject from a sectoral viewpoint which gives far more weight to the unsustainable demands and aspirations of the aviation industry than to the wider interests of society and the environment. It also conflicts with other areas of Government policy, not least cutting our climate changing emissions. It has been heavily and deservedly criticised for that by a wide range of respected and authoritative organisations and commentators. While it sets out the present government's views on which airports should expand and to what degree, these proposals need to be tested against the wider public interest through the planning system. Local planning authorities should do their utmost to ensure that they consider all the arguments and do not simply acquiesce to the White Paper's view.

Among the steps which local authorities can take to ensure fairness and balance in decisions about airport expansion are the following:

At regional level:

- Adopt the principles of sustainable development in assessing the arguments for and against airport development.⁶³ It is all too easy to take on trust claims that airport expansion will automatically benefit the regional economy and ignore other issues such as the hidden economic downsides and effect on the environment, use of natural resources and the overall planning strategy. Aviation should be viewed in the light of the PPG13 policy⁶⁴ of reducing the need to travel. Even the economic benefits may prove to be illusory when they are studied in depth. For example, any jobs created at the airport itself may be offset by loss of jobs in the tourism industry and the economy generally thanks to the airport's contribution to a growing 'tourism deficit'.

At local level:

- Include clear policies about airports in development plans. Too many policies are vague and leave loopholes which can be exploited by those in favour of expansion at all costs. The content of Airport Master Plans (see below) should not be incorporated uncritically.
- Make clear to airport owners and operators that they are subject to the full range of development plan policies. As these policies may lead in different directions, it will be important for the local authority to make clear how they see the full range of policies bearing on a proposal for expansion when they enter into discussions with the owner or operator at a formative stage.
- Make good use of the wider literature, much of which challenges the glib claims often made by the aviation industry. A reading list appears at the end of this report.
- Take an active and critical interest in the airport master plans being produced for Birmingham and Nottingham East Midlands airports. Without constructive criticism from the local authority and others, the master plan may become simply a way for the airport to develop and cement its own views about future airport development, which may be based more on narrow commercial interests than sustainable planning considerations. If the master plan then becomes a material consideration in the planning decision about a specific expansion proposal, or is incorporated into the Local Development Framework without proper consideration, it may distort planning decisions. Airport Consultative Committees do not necessarily represent the full range of views: for example the Birmingham ACC does not include environmental representatives.

⁶³ The South East of England Regional Assembly (SEERA) has commissioned a study from Roger Tym & Partners on the sustainability or otherwise of the government's airport expansion proposals for the South East. The report is expected to support SEERAs inclination to refuse to adopt the Air Transport White Paper into the regional spatial strategy for the South East http://www.southeast-ra.gov.uk/our_work/planning/transport/airports/future_air_transport/final_aviation_report.pdf

⁶⁴ Planning Policy Guidance Note 13 – Transport

Friends of the Earth⁶⁵ suggest five key tests for airport master plans –

- Critical examination of growth forecasts.
 - Rigorous independent scrutiny of jobs and economic benefit claims.
 - Ambitious targets for public transport access.
 - Action to address community disturbance.
 - Community participation which goes beyond discussion with the Airport Consultative Committee.
-
- Ensure that actions and decisions are based on sound legal advice. Planning control over airports and aviation involves a number of ‘grey areas’

 - When a specific expansion proposal comes forward, give due weight to public opinion as expressed in letters, public meetings, petitions etc. Most of these views will be based on direct personal experience of the impact of airport operation. They are deeply held and deserve respect. Affected communities must be given plenty of opportunity to contribute to the decision-making process, not just be consulted late in the process when decisions have already been taken. Relevant information, including notes of any meetings or other contacts between the local planning authority and the airport owners or operators, should be made publicly available in the spirit of the Freedom of Information Act.

 - Critically examine Environmental Statements, Traffic Assessments and any other documents provided by the airport operators and others in support of an expansion proposal. These documents, commissioned by the proponents of the expansion, cannot be assumed to be independent and objective. They often use the available information and other evidence selectively to make the case for the proposal.

 - Take a close interest, on behalf of their electors, in any compensation scheme associated with a proposal for airport expansion. Airports are understandably keen to minimise the resources they devote to compensation, and this often results in schemes which are less than fair on those affected by noise, pollution and direct loss of property. It is much more effective for local authorities to seek to influence schemes before they are introduced than to be faced by a long string of public complaints and negative publicity at a later date.

 - Where expansion can be justified, ensure that the highest environmental and other standards are met by imposing appropriate planning conditions and concluding Section 106 Agreements. Local authorities should learn from best practice at other airports to secure conditions and agreements which genuinely safeguard the environment and the interests of local people, instead of paying lip-service to these factors. The history of airport development is littered with broken promises by owners and operators to control the volume and pattern of flights. Conditions and agreements must be designed, in the public interest, to hold them to their word.

⁶⁵ Friends of the Earth Briefing – Airport Master Plans (October 2004) concerning permitted development rights. It is vital that local planning authorities have a clear understanding of case law and precedent in dealing with airports. http://www.foe.co.uk/resource/briefings/airport_master_plans.pdf

- Monitor airport activities closely to ensure that conditions and agreements are being met. The clearer the conditions and agreements, the easier this will be. Local authorities should not be afraid to take enforcement action where the need arises.

Aviation is by far the most environmentally damaging form of transport. Local authorities affected by proposals for airport development have a duty to ensure that environmental and other disadvantages do not become buried beneath a mountain of hype about jobs, wealth creation and ‘freedom to fly’. To do so effectively means devoting substantial human and financial resources to the subject. There are few short cuts. Some authorities are already doing an excellent job; others could learn from their example, for the benefit of us all.

We believe that some relatively small district councils are ill-equipped to deal with major airport expansion proposals with regional or national significance. In such cases, there is a strong argument for call-in of the proposal by the First Secretary of State for his own decision. If this happens, it is important that the decision is taken independently and not unduly influenced by the overtly pro-aviation stance of the Department for Transport.

16. CONCLUSIONS

We have shown in this report that there is a different way of looking at aviation – a way which recognises its contribution to the economy and in providing greater travel opportunities, but puts those factors in context by giving equal weight to the damage it does to economies, to the natural and built environment and to the lives of people affected by it.

The task for decision-makers is not merely to balance these issues for the benefit of society but to achieve sustainable aviation policy. The expansion of aviation, or of individual airports, cannot proceed without limits. More than ever before it needs to be carefully managed to ensure that the price we pay for its benefits is not excessive. Unfortunately the Government’s Air Transport White Paper has failed to observe these principles, and it is left to regional and local decision-makers to redress the balance.

It would be the line of least resistance for local planning authorities to tacitly accept the overall philosophy of the White Paper and concern themselves only with the local implications of the ‘decisions’ taken there. We have demonstrated that the White Paper was seriously deficient and flawed both in its general approach and in its treatment of the Midlands. Consequently, decision-makers must return to first principles and not accept the Government’s partial approach by default. In this report we have challenged them to do just that, and have given them the questions they need to ask in the process.

17. FURTHER READING

Recommended Links

www.airportwatch.org.uk

www.aef.org.uk

Demand for Passenger Travel

<http://www.cfit.gov.uk/aec/evidence/05.htm>

http://www.dft.gov.uk/stellent/groups/dft_aviation/documents/page/dft_aviation_022495.hcsp

Demand for Air Freight

<http://observer.guardian.co.uk/foodmonthly/story/0,9950,1388568,00.html>

The Economics of Aviation

Sewill, B, 2003. The Hidden Cost of Flying. Aviation Environment Federation.

<http://www.airportwatch.org.uk/publications/Hidden%20Cost%20Final.pdf>

Fly Now – Grieve Later deals with climate change and the use of ‘economic instruments’ and is available from the Aviation Environment Federation website:

http://www.aef.org.uk/publications/detail.php?art_id=152

CPRE’s research into the Economics of Aviation in the North West.

www.cprenorthwest.org.uk/policy_and_campaigns/aviation.html

ONS produced a report on the tourism deficit last year which showed a record deficit at £17bn. This report is at

www.statistics.gov.uk/downloads/theme_transport/tt2003web.pdf

Prof J Whitelegg – The Economics of Aviation: a North West England Perspective, April 2003

Friends of the Earth research into regional tourism deficits:

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

www.dft.gov.uk/stellent/groups/dft_aviation/documents/page/dft_aviation_031543.pdf

Climate change poses great risks to financial institutions - A copy of the report is available from Climate Change Capital, please contact Lucy Thom or Emily Weston at Financial Dynamics on 020 7269 7111/7231

<http://www.guardian.co.uk/letters/story/0,,1491448,00.html> -The flight from reality Wednesday May 25, 2005 The Guardian. The government's aviation expansion plans will do nothing to close the alarming trade deficit that has built up in the UK's tourism sector

Environmental Implications

A summary of the Tyndall report is available at:-

http://www.foe.co.uk/resource/reports/aviation_tyndall_summary.pdf The full report

is available at: http://www.foe.co.uk/resource/reports/aviation_tyndall_research.pdf

<http://education.guardian.co.uk/egweekly/story/0,,1479749,00.html>

<http://www.sei.se/aviation/index.html>

<http://www.cfit.gov.uk/reports/racomp/pdf/racomp.pdf>

<http://www.rcep.org.uk/aviation.htm>

223-Strategic Environmental Assessment (SEA) - Four page POSTnote, July 2004

<http://www.parliament.uk/documents/upload/POSTpn223.pdf>

<http://www.airquality.co.uk/archive/laqm/laqm.php>

Volume 11, Number 1 (2005) of "World Transport Policy & Practice", a quarterly journal edited by Professor John Whitelegg. Contents of Volume 11, Number 1, 2005:

Allocating aircraft carbon dioxide emissions to airports on the basis of passenger share: scenarios for Manchester Airport; A Sustainability risk analysis of the Low Cost Airline sector <http://www.eco-logica.co.uk/WTPPhome.html>

Robin McKie and Nick Mathiason: Sunday June 26, 2005

The Observer

The majority of Britons believe that there must be restrictions on cheap air travel if the increasing problem of global warming is going to be tackled.

<http://observer.guardian.co.uk/politics/story/0,6903,1514962,00.html>

Assessing a carbon tax on aviation

<http://www.royalsoc.ac.uk/displaypagedoc.asp?id=12404>

<http://www.royalsoc.ac.uk/document.asp?latest=1&id=3078>

On the climate change impact, the Environment Audit Committee reports can be found at:

<http://www.publications.parliament.uk/pa/cm200304/cmselect/cmenvaud/233/23303.htm>

<http://www.publications.parliament.uk/pa/cm200304/cmselect/cmenvaud/623/62303.htm>

<http://www.publications.parliament.uk/pa/cm200304/cmselect/cmenvaud/1063/106303.htm>

Sustainable Development commission report:

[http://www.sd-](http://www.sd-commission.org.uk/news/resource_download.php?attach_id=N8YBKPR-3L3RF5H-0NO4FT2-RRJCE1K)

[commission.org.uk/news/resource_download.php?attach_id=N8YBKPR-3L3RF5H-0NO4FT2-RRJCE1K](http://www.sd-commission.org.uk/news/resource_download.php?attach_id=N8YBKPR-3L3RF5H-0NO4FT2-RRJCE1K)

Two stories from the Guardian indicating rise in air travel emissions are embarrassing to Department for Transport

http://www.guardian.co.uk/uk_news/story/0,,1488103,00.html

http://www.guardian.co.uk/uk_news/story/0,,1225523,00.html

Revealed: The real cost of air travel By Michael McCarthy, Marie Woolf and Michael Harrison 28 May 2005 -The Independent *Tony Juniper: Aviation is fastest-growing source of CO2 emissions. Leading article: The hidden costs of cheap flights*

http://news.independent.co.uk/low_res/story.jsp?story=642009&host=3&dir=507

"Measures to Curb the Climate Change Impacts of Aviation", see <http://www.t-e.nu/Downloads-index-req-getit-lid-365.html>

Impacts on Health

<http://www.whyverne.co.uk/acoustics/Pages/research.htm>

<http://news.bbc.co.uk/1/hi/england/manchester/4532097.stm>

<http://www.railwayforum.com/pressreleases.php>

http://europa.eu.int/eurlex/pri/en/oj/dat/2002/l_189/l_18920020718en00120025.pdf

http://www.londonhealth.gov.uk/pdf/noise_links.pdf

Index of research into contrails and health issues:

<http://www.contrails.nl/contrails%20research/index.htm>

For article on deaths in Europe as a result of air pollution see

<http://news.bbc.co.uk/go/pr/fr/-/1/hi/health/4283295.stm>

<http://news.bbc.co.uk/go/pr/fr/-/1/hi/health/4307331.stm>

http://www.lho.org.uk/HIL/Determinants_Of_Health/Environment/Noise.htm

Health Effects of Airports <http://www.lead.org.au/Lanv7n3/L73-4.html>

http://www.caap.org/Airport_Noise_Pollution_Research.html

Is noise bad for your health? *Peter M Rabinowitz* Yale Occupational and Environmental Medicine Program, Peter.rabinowitz@yale.edu *Lancet* 365, 1908-9. In this Commentary the author reviews: Stansfeld, SA, Berglund, B Clark, C et al. (2005): 'Aircraft and road traffic noise and children's cognition and health: a cross-national study'. *Lancet* 365, 1942-49

UK in Breach of EU Particles Law - www.nasca.org.uk

HYENA - Hypertension and Exposure to Noise near Airports. A four year Key action 4 Environment and Health study. 1 December 2002 - 31 January 2006

<http://www.hyena.eu.com/default.htm>

"Controlling Airport-Related Air Pollution" can be downloaded from

<http://www.nescaum.org/resources/reports/index.html>.

Aircraft noise may impair kids' mental development - Exposure to aircraft noise around schools located near major airports may adversely affect children's development of mental skills, especially reading comprehension, findings from a new study suggest. SOURCE: Lancet, June 4, 2005.

<http://www.reuters.com/newsArticle.jhtml?type=healthNews&storyID=8692175>

Social Implications

Take Back the Sky: Protecting Communities in the Path of Aviation Expansion By Rae André 192 pages ISBN: 1578051169 Price: \$19.95 paperback

<http://raeandre.com/work1.htm>

Associated Development and Surface Transport

'Way to Go' manifesto: www.foe.co.uk/resource/reports/paying_for_better_transport.pdf

Planning Policy Guidance Note 13: www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606896.hcsp

Influencing and Controlling Development

http://www.odpm.gov.uk/pns//DisplayPN.cgi?pn_id=2004_0259

http://www.planet-thenet.fsnet.co.uk/referendum1/review_of_s106_agreement.htm

BBC - iCan - - A1181783 - How to influence airport expansion

<http://www.bbc.co.uk/dna/ican/A1181783>

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

<http://www.parliament.uk/documents/upload/POSTpn223.pdf>

Cheap flights spark runway chaos

Expansion of Heathrow and Gatwick is condemned by planners as 'unnecessary and environmentally unsustainable' Gaby Hinsliff and Mark Townsend Sunday June 5, 2005 [The Observer](http://www.theobserver.com)

General

http://www.dft.gov.uk/stellent/groups/dft_aviation/documents/page/dft_aviation_026254-01.hcsp#P18_1219

www.sd-commission.org.uk/news/download_pdf.php?attach_id=N8YBKPR-3L3RF5H-0NO4FT2-RRJCE1K

EU aviation statistics:

http://www.europa.eu.int/comm/transport/air/rules/studies_en.htm

Regional airports

West Midlands Regional Spatial Strategy -

www.wmra.gov.uk/regional_planning.htm

East Midlands Regional Spatial Strategy www.emra.gov.uk/publications/rpg.asp

The South East of England Regional Assembly (SEERA) has commissioned a study from Roger Tym & Partners on the sustainability or otherwise of the government's airport expansion proposals for the South East. The report is expected to support SEERAs inclination to refuse to adopt the Airports White Paper into the regional spatial strategy for the South East – the report will appear on

<http://www.eera.gov.uk/category.asp?cat=382>

Further copies of **“The Midlands’ Aviation Masterplan: Managing Midlands’ Air Transport Sustainably for the 21st Century”** can be downloaded from:

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

To order printed copies of the report please contact:

West Midlands Friends of the Earth
54-57 Allison Street,
Digbeth
Birmingham
B5 5TH
Tel: 0121 643 9117
Email: chrisc@foe.co.uk