

Aviation Position Statement

January 2003

Wildlife and Countryside Link (Link) brings together environmental voluntary organisations in the UK united by their common interest in the conservation and enjoyment of the natural and historic environment. Taken together, Link's thirty-three members turnover more than £500 million per annum, employ 7,200 full-time staff and have the support of approximately 6 million people in the UK.

This statement is supported by the following organisations:

Buglife, The Invertebrate Conservation Trust

The Bat Conservation Trust

Council for British Archaeology

Council for National Parks

Council for the Protection of Rural England

Friends of the Earth

Plantlife

The Ramblers Association

Royal Society for the Protection of Birds

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AVIATION Position Statement

Background

The Government has forecast that aviation will grow from 180 million passengers per annum (mppa) in 2000, to 500 mppa in 2030. To provide for this demand, the Government is consulting as to where to expand major airport infrastructure. A summary of options is provided in the box below.

The options for expansion have been put forward in 7 Regional Air Studies, which will influence the forthcoming Air Transport White Paper due for publication in 2003. The White Paper will form aviation policy for the next 30 years. This paper sets out Wildlife and Countryside Link's position on these issues.

Summary of proposed expansion options for England

South East

Alconbury	Freight and passenger
Cliffe	New 5 runway airport
Stansted	1,2 or 3 new runways
Heathrow	1 more runway
Luton	Additional runway

North

Humberside	Expansion
Leeds Bradford	Expansion
Liverpool	Expansion
Manchester	4 th terminal
Newcastle	Expansion
Teeside	Expansion

South West

Bournemouth	Expansion
Bristol	Expansion as a hub
Exeter	Expansion
Newquay	Expansion
Plymouth	Expansion

Midlands

Birmingham	New runway
East Midlands	New runway
Coventry	Expansion
Coventry/Rugby	New Airport

Environmental damage on an unprecedented scale

The sheer scale of the proposed options represents an unprecedented threat to wildlife and the countryside. Significant pressures for development and land take exist through the infrastructure, extra housing for airport workers, and other associated development like warehousing. The Stansted proposals, for example, could require up to 83,000 extra houses while 21,000 extra homes would be needed if a new airport were built at the Coventry/Rugby site. This would urbanise a vast area of undeveloped land between the two cities.

Surface access infrastructure would also be required with options for major works on the following motorways M1, M2, M3, M4, M5, M6, M11, M25, M42, M56, M60, and M62. These pressures, alongside airport infrastructure of new runways and terminals, and spin-off industrial and leisure development, could affect up to 2,000ha of Green Belt land, two Ramsar sites, two Special Protection Areas, 35 Sites of Special Scientific Interest, 1,000 hectares of ancient woodland, 2 National Parks, 2 proposed National Parks and 7 Areas of Outstanding Natural Beauty. The historic environment is also likely to be very severely affected - the preliminary and extremely cursory appraisals provided in the consultation document identify that *at least* three registered parks and gardens, two conservation areas, 85 listed buildings (2 grade 1s, 2 Grade

II*s and 81 Grade IIs), 7 Scheduled Ancient Monuments and 1 World Heritage Site could be directly affected (but see endnote).

Damaging effects are also not just confined to the immediate locality of airports. The intrusive impact of a threefold increase in the volume of flights on the tranquillity of the wider countryside has so far not been recognised, for example noise pollution associated with a significant increase in the volume of flights emanating from airports adjacent to National Parks will pose a considerable threat to the peace and tranquillity of the Parks. Aviation's contribution to global warming, through emissions of Carbon Dioxide (CO₂), is significant, and growing. This runs counter to Government moves to reduce emissions of greenhouse gases, including a domestic target of a 20% reduction in CO₂ by 2010.

Wildlife and Countryside Link urges the Government to:

Fulfil its pledge to avoid the 'predict and provide' approach to air transport

The Royal Commission on Environmental Pollution in their seminal report, *Transport and the Environment 1994*, said '*An unquestioning attitude towards future growth in air travel, and an acceptance that the projected demand for additional facilities and services must be met, are incompatible with the aim of sustainable development*'. Wildlife and Countryside Link endorses this position.

SERAS states, "The use of the Government's UK air traffic forecasts does not imply a commitment to the "predict and provide approach" (paragraph 5.2, p. 33). Wildlife and Countryside Link welcomes this commitment and believes the White Paper should mark a watershed in ending the 'predict and provide' approach to air transport.

Further, the forecasts that the consultation documents are based on make unrealistic assumptions about future growth in air travel. They assume, for example, that ticket prices will continue to fall, in real terms, by 1% a year. This is mainly due to the continuance of the favourable tax status of the industry, which is exempted from paying many taxes, in 2000 this amounted to £7.5 billion. Such tax exemptions are unjustified and artificially stimulate demand. Aviation pays:

- No tax on aviation fuel; and
- No VAT on aviation fuel/aircraft tickets/aircraft parts etc.

The airline industry does pay about £1bn a year in Air Passenger Duty (APD), but this is far outweighed by the tax exemptions it receives. APD does not reflect the environmental and social costs associated with air transport.

Wildlife and Countryside Link believes that the Government should not simply seek to expand infrastructure to meet these unrealistic forecast demand levels

Recognise the true economic status of aviation

The Government's consultation papers are based on inflated assertions over the economic benefits of aviation. These are based on the findings of a report by Oxford Economic Forecasting (OEF) which examined the economic benefits of aviation and was largely paid for by the aviation industry. The report has been widely criticised. Wildlife and Countryside Link

believes it is not a sound basis for preparing the Air Transport White Paper, and draws attention to the fact that:

- aviation, at contributing 1.2% of GDP is ranked only 26th out of 123 industries by the Oxford Economic Foundation;
- the industry's tax concessions cost the public exchequer £7.5 billion a year at current levels in lost revenue;
- UK residents spend £9.1 billion a year more overseas than overseas fliers spend in the UK thus causing a net tourism deficit;
- the consultation states that business will suffer if there is no infrastructure expansion. Business currently accounts for 25% of flights and this is only set to rise to 30% in 2030, achievable within the current available infrastructure. The significant forecast growth is in leisure travel, made up of high-income earners flying for more weekends abroad; and
- investment and jobs forecast to be created by the expansion of the aviation sector could be more productive elsewhere in the economy.

Put demand management at the heart of the forthcoming Air Transport White Paper

Wildlife and Countryside Link supports the following measures that would end the current favourable tax status of the industry and make the use of current airport capacity more efficient:

- Auction slots at congested airports – this will ease congestion, ensuring that airlines are sent the correct economic signals to manage their routes efficiently and within capacity constraints.
- Raise the level of Air Passenger Duty, and/or instigate other taxes to internalise the full environmental costs of flying – the true cost of flying, in terms of pollution, loss of tranquillity, land take and the effect on the quality of life of communities is not reflected in the current economic price signals. Environmental taxes, adhering to the 'polluter pays' principle, should be used to rectify this problem.
- Impose a tax on aviation fuel, and in the short term vigorously press for EU proposals for an emissions charge based on distance flown and pollution emitted to be agreed and implemented– current tax concessions on aviation fuel are equivalent to a £5 billion a year tax subsidy.
- Impose VAT on aviation fuel/tickets/aircraft etc – current VAT concessions are equivalent to a £2.5 billion a year tax subsidy.
- Promote alternatives – for some flights, there are less environmentally damaging alternatives such as the use of high-speed electric trains in place of short haul domestic and European flights. Tele-conferencing and other means of communication should similarly be promoted to reduce the need to travel.
- Maintain a plan led system for development – it is crucial that the White Paper, as a national policy statement, should remain as a broad framework for guiding planning decisions. It should still be within the remit of public inquiries to question the need for a particular project, within that framework.

Conclusion

Wildlife and Countryside Link supports the Government's stated aim of developing a long-term policy for aviation that is based on sustainable development principles. Link is concerned, however, that the current 'predict and provide' approach to policy, based on questionable forecasts of demand, will mean that significant growth in the air transport will be at considerable

damage to the environment and communities, and is not therefore based on sustainable development principles.

Wildlife and Countryside Link calls on the Government to recognise the necessity to develop a policy that respects environmental capacity constraints, manages demand, and makes more efficient use of existing infrastructure.

ENDNOTE:

Historic Environment - The figures quoted in the consultation documents are in themselves gross underestimates. The absence of data for some airports, and the cursory nature of the government's appraisals creates a grossly and dangerously misleading impression. By way of illustration an independent archaeological assessment of the proposals at Cliffe (for Kent County Council, Medway Council and English Heritage by Wessex Archaeology, Nov. 2001, *Cliffe Airport, Hoo Peninsula Kent - Archaeological Desk-Based Assessment*) has shown that impacts are likely to be very greater than the consultation document suggests. It indicates the number of known historic and archaeological sites/assets likely to be affected as being:

Historic Environment Assets Affected	The Site (Footprint of Airfield and ancillary development)	The Study Area (The Hoo Peninsula)
Scheduled Ancient Monuments	0	4
Monuments being considered for Scheduling	2	2
World War II Sites (also future candidates for designation identified as being potentially of national importance)	9	52
Other known archaeological and historic sites or entities on the County Sites & Monuments Record	60	539
Historic Rural Lanes	3	3
Find sites for Portable Antiquities	unknown	146
Listed Buildings	11	55
Conservation Areas	1	2
Buildings and structures - Considered for Listing	1	8

The report indicates that, due to the significant amount of overlying deposits that cover much of the Peninsula, the real number of archaeological sites present is likely to be much higher than currently known, particularly for the earliest periods of human activity in the area. The study also shows that the character of the deposits in the site and wider peninsula means that the area is likely to possess a particularly high potential for palaeo-environmental data of regional and possibly national importance as well as an existing landscape with a layout, fabric and character of considerable historical significance.