

## **Draft PCAA Response to ‘Aviation 2050 – the future of UK Aviation’**

The Parish Councils Airport Association (PCAA) is a group of elected representatives from 21 parishes and one town which represent the local community interests. We cover a large area with parishes from Sedgemoor district, Bath and North East Somerset district as well as North Somerset district. The parishes the association represents are Barrow Gurney, Blagdon, Brockley, Burrington, Butcombe, Churchill, Cleeve, Dundry, Kingston Seymour, Long Ashton, Winford, Wraxall and Failand, Wrington (**North Somerset**) Chew Magna, Compton Dando, Keynsham Town Council, Publow w Pensford, Stowey Sutton, Timsbury, Ubley (**BANES**) Cheddar, Shipham (**Sedgemoor**). The population within the Association equates to over 40,000 residents

The PCAA recognises that the strategy put forward within the document is one of growth. We question whether this document can ensure aviation will grow sustainably and mitigate the environmental impacts adequately to ensure that carbon emission targets can be met at UK level as well as within the West of England region.

### **Response to Chapter 1: The role of aviation in a changing world:**

#### **Connectivity and Tourism:**

The PCAA would argue that Britain is already well connected and can operate adequately within a global connected world. We note that Bristol Airport predominantly supports the leisure sector with only 16% of all passengers on business travel. Business travel is now just 9% of UK residents’ flights versus 18% in 1997. (Travel Trends ONS 2017) Meanwhile leisure travel has increased by 168% over the same twenty year period. The top destinations from Bristol Airport are to leisure destinations such as Palma and Alicante. The UK had a tourism deficit for air travel of £20.6 bn in 2017. This consultation ignores this point.

#### **Jobs:**

The PCAA believes that the Department for Transport inflates the benefits of the aviation sector by combining air/spacecraft manufacturing, military and civil airspace engines together with the air transport sector. This inflates the job figures related to the air transport sector and this approach is not carried out in other sectors. We note from growth at Bristol Airport that the job figure expected at 10 mppa has not materialised. This is due to technological advances at airports, for instance, there were expected to be 69 check-in desks at 10 mppa but now there are only going to be 49 at 12 mppa.

An extract from our submission to the Bristol Airport planning application reference number 18/P/5118/OUT shows the inflation of job numbers. The rate at which jobs have been created at the airport is much less than was promised and reinforces the fact that the airport is not a strong generator of jobs. New technology and working practices have been having a profound impact, despite growth in passenger numbers.

<b>Direct Employment</b>	<b>Fte</b>	<b>Source</b>
2005 actual	2284	Table 4.2 BIA Economic Impact Study Oct. 2006 (amended)
2015 projection	3802	Table 8 BIA Master Plan 2006-30 for 9 mppa
2018 actual	2976	Table 1.1 Workplace Travel Plan (current application)
2018 actual*	3480	Para 4.8 York Aviation Report (current application)
2026 projection (10mppa assumption)	3825	Table 5.1 York Aviation Report (current application)
2026 projection (12mppa assumption)	4525	Table 5.2 York Aviation Report (current application)

\* Note the discrepancy on the actual fte numbers for 2018. The York Aviation figure is 17% higher than the Workplace Travel plan figure introducing significant uncertainty into all of these calculations

- Part of the justification for expansion to 10mppa was based on increasing job numbers to at least 3802 by 2015. In fact, jobs have grown only to 2976 by 2018.
- The airport indicates that the rate of job creation for growth to 12 mppa will be considerably greater than in the recent past. This flies in the face of all the indications arising from technical advances which are becoming realities in airports such as Singapore where the passenger will have no need for human contact throughout the departure process.

	<b>% growth (mppa)</b>	<b>% growth (fte jobs)</b>
Past growth, from 5.2 – 8.2 mppa	58%	30%
Projected growth, from 8.2 – 12 mppa	46%	52%

The aviation industry has consistently over promoted the number of jobs it creates.

### **Ensure Aviation can grow sustainably:**

#### **Slot Allocations:**

Bristol Airport now operates the slot allocation process for night flights in the summer months to ensure that aircraft movements remain within their cap in the summer months of 3,000. The slot allocation process has an impact on residents. There are now numerous flights which arrive shortly before 23.30 hrs. This results in sleep disturbance as do all night aircraft movements. There should be a restriction of night movements which commences at 23.00 hrs which is the onset of the official definition of night time hours.

#### **Carbon emissions:**

It is essential that the Department for Transport accepts all recommendations put forward by the Committee on Climate Change on the issue of emissions from the aviation sector. On the 2 May 2019, the Committee published a report titled ‘Net Zero – the UK’s contribution to stopping global warming’. This report advises the Government to amend its legislation to commit to net zero greenhouse gas emissions by 2050 including emissions from the aviation and shipping industry. It states that aviation will be emitting more CO2 than any other sector by 2050. Any off-setting

should be effective in the UK and not be implemented overseas. The Committee advises the following:

- International aviation emissions should be formally included in carbon budgets at the next available opportunity, beginning with the sixth budget period (2033-37), on which the CCC will advise next year.
- Emissions should be limited to 31 Mt CO<sub>2</sub> in 2050 whilst the Government currently predicts that emissions in 2050 will be over 40 Mt CO<sub>2</sub>. To achieve this limit, it will require a combination of demand constraint to limit passenger numbers to no more than a 60% increase on 2005 levels (for example through ‘policies to manage the use of airport capacity’), biofuels contributing 10% of the sector’s fuel needs, and more efficient aircraft that will improve the overall efficiency of the fleet by around 1.4% per annum for the next few decades. This will be exceedingly difficult to achieve. The PCAA again question whether, with Heathrow and other airports in South East expanding, it is even possible for Bristol to expand beyond 10 mppa and keep within the carbon limits.
- Aviation emissions will have to be removed from the atmosphere through measures such as ‘direct air capture’ or BECCS, to be paid for by the aviation industry. While significant tree planting is required for emissions removal, the aviation sector should not rely on afforestation to remove its emissions.

This report clearly shows that aviation emissions can no longer be ignored. Legislation needs now to be put in place to ensure that there is a reduction in aviation emissions and the proposed emissions limit recommended by the Committee in the Net Zero report should now be accepted. This should replace the previous target suggested in this consultation - that emissions from UK-departing flights should be at or below 2005 levels in 2050 which represents a limit of 37.5 Mt CO<sub>2</sub>.

### **Point 3.96 Planning Applications:**

The PCAA fully support the proposal that planning applications are required for capacity growth and should provide a full assessment of emissions, drawing on all feasible, cost-effective measures to limit their climate impact, and demonstrating that their project will not have a material impact on the government’s ability to meet its carbon reduction targets. We suggest that this should not just be for full planning applications but also for permitted development applications as these can increase aircraft stands and thus movements which create emissions.

### **Point 3.100 Sustainable journeys to the airport:**

The government’s analysis shows that by 2050 there are expected to be 70% more surface access journeys as a result of increased aviation demand. Even with cleaner technology and rail electrification, surface transport carbon emissions may remain at similar levels as today unless airports deliver more ambitious mode share targets. The Bristol Airport planning application reference number 18/P/5118/OUT for growth to 12 mppa shows that there will be a growth in vehicle emissions to and from the airport of 16%. The growth in vehicle emissions to the airport undermines the West

of England Authorities emission reduction targets to 2035. Obviously if surface transport carbon emissions can't be reduced, as is the case at Bristol Airport, no further expansion should take place as it is not sustainable development. There is no rail link, metro service or mass transit to the airport. For example, targets for use of public transport set under the Bristol Airport planning consent of 2011 have not been met of a modal split of 15%. The modal transport split in 2018 was 12.5%. The Bristol Airport planning consent of 2018 is not ambitious with the modal transport split being set at 15% which remains the same as in the last planning application.

The PCAA question how the Government will reduce surface transport emissions unless growth is constrained at airports situated in the wrong location without good public transport links.

### **Noise:**

#### **Point 3.121**

Under the 'Polluter pays Principle' noise insulation funding should fund the total cost of the insulation of a dwelling rather than just part-funding. The 'Polluter pays Principle' is the commonly accepted practice that those who produce pollution should bear the costs of managing it, to prevent damage to human health or the environment. Currently the aviation sector funding of noise insulation is very low. If we look at the compensation from the Treasury Green Book which estimates the monetary values to support the assessment of the effects of environmental noise, we can see that the Green Book figure is more than double the value of the scheme run at Bristol Airport.

The PCAA requests that airports should pay the full cost of noise insulation to each dwelling within defined noise contour levels. Bristol Airport is situated in a rural location and the dominant man-made noise is from air and ground operations

#### **Point 3.110:**

*'In the Airports NPS the government has set out its expectation for a ban of six and a half hours on scheduled night flights at an expanded Heathrow.'*

The PCAA demand that night flights are reduced at Bristol Airport particularly in the summer months when people have their windows open. The screen shot below demonstrates the sleep disturbance caused by continual movements through the night, and this just shows arrivals. The current planning application for growth at Bristol Airport has suggested an extra four flights per night in the summer months, which we have strongly objected to.

**Figure 2**  
**Some of the arrivals, night of 18-19 July 2018**

Malaga	Ryanair	FR 8122	23:25	
Faro	Ryanair	FR 8249	23:40	
Alicante	Ryanair	FR 8297	23:45	
Flights from 19/07/2018 from 00:05				
Rhodes	TUI	TOM 6365	00:05	
Faro	easyJet	EZY 6010	00:30	
Heraklion	easyJet	EZY 6288	00:30	
Kefalonia	easyJet	EZY 6134	00:40	
Palma	easyJet	EZY 6046	00:55	
Paphos	easyJet	EZY 6262	00:55	01:10
Ibiza	TUI	TOM 6315	00:55	
Cape Verde	TUI	TOM 245	01:05	
Alicante	easyJet	EZY 6076	01:15	
Dalaman	easyJet	EZY 6272	01:15	
Malaga	easyJet	EZY 6058	01:30	
Larnaca	Thomascook	MT 1155	02:15	
Rhodes	Thomascook	MT 1521	03:25	
Larnaca	TUI	TOM 6391	03:40	
Antalya	Thomascook	MT 115	03:50	

Point 3.106

The consultation notes the recent publication of updated recommendations from the World Health Organisation's Europe office on the levels of aviation noise that pose a risk to public health, but makes no commitment to meet them, or even to attempt to meet them. The PCAA requests that the Government takes action on this point and brings forward suitable legislation to support the recommendation with the WHO publication.