

Cleeve Parish Council's Response to 'Aviation 2050 – the future of UK Aviation'

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

Connectivity and Tourism:

The Council 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 Council 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.

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.

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 CO2.

Point 3.96 Planning Applications:

The Parish Council 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 Council 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 Council 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 Council demand that night flights are reduced at Bristol Airport particularly in the summer months when people have their windows open. This is a frequent complaint from residents. 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.