Airports Commission

Suggested Criteria for consideration by the Airports Commission

Consultation submission by CPRE Protect Kent* in response to paragraph 1.19 of the Airports Commission's Guidance Document 01: "Submitting evidence and proposals to the Airports Commission", February 2013

Specifically: *"We would welcome suggestions for criteria that might be used to identify the most plausible options ahead of the interim report and would ask that they be submitted to us by **15 March 2013**."*

Suggested Criteria

1. Holistic Assessment

In the light of global warming/carbon emissions, take account of likely international air transport issues, viz:

- Increasing and adverse impact on the cost of air travel and a consequent reduction in the demand for seats/cargo ?
- Potential for governments to impose restraints on 'food miles', 'holiday miles' and 'eco-tourism' ?
- Pricing of air travel to increasingly reflect society's shift to more responsible environmental governance? And how will these issues affect the economy in the short term and long term ?
- Opportunities for the UK to take a lead in setting new standards of best practice aviation in terms of people, welfare and environmental responsibility ?

Other holistic criteria:

- Avoiding 'trading' *potential impacts* – e.g. if emissions are reduced, there must be no increase in noise and vice versa.
- Re-assessing the impact of travel and air fare pricing to countries where impact adversely affects bio-diversity – assess the environmental and economic implications.

2. Climate change

- EU imposed global warming and carbon emissions targets – based on total emissions, not just those relating to carbon dioxide.
- In view of the uniquely damaging emissions from aircraft in flight, which makes their global warming effect at least double of that of the carbon dioxide alone (see: www.newscientist.com/article/dn20304-contrails-warm-the-world-more-than-aviation-emissions.html) all emissions should be considered, and include cirrus, contrails, water (H_2O), Black Carbon, sulphate (SO_4), methane (CH_4), ozone (O_3) as well as carbon dioxide (CO_2).

3. Resource Use

- Land use strategies: is there justification for trade-off between land used for expansion of the air transport system versus agriculture, housing, recreation and other uses ? Should there be a renewed obligation to use brownfield land for recreation and/or nature reserves or other uses, e.g. the potential to use the large land areas associated with disused or under-used airports (such as Manston airport) for intensive farming.
- Establish the principle of 'trading equality': conversion of greenfield/grassland sites for new airports/airport extensions equal to the release of equivalent industrial/commercial/domestic use land for recreational or nature reservation purposes.
- Obligations and commitments to reduce likelihood of breaching 'planetary boundaries' (water, bio-diversity, carbon emissions, ozone layer, ocean acidification, etc.).

4. Quality of Life, Environment and Health

- Health: encompassing pollution of air, land and water – as a result of noise, emissions, fuel, anti-freeze, etc. caused by airport construction and use. Measuring the effects on/impact on mental and physical health and any consequent impact on NHS and healthcare costs.
- Enhancing visual amenity and protecting the landscape and bio-diversity.
- Assessing the impact of airports on the tranquillity of the countryside.

5. Transport

- Recognising the economic, social and environmental benefits of an integrated approach to transport provision and management – from walking, cycling, bus, rail, car, ships and aircraft.
- Economic benefits/rewards for low noise, low carbon aircraft/airlines.
- Adopting flexible airline schedules to reduce under-utilised capacity – providing both economic and environmental benefits.

6. Economic

- Adopting more enlightened pricing structures (and tax/subsidy regimes) for air travel – including carbon emission costs.
- Assessing the impact of less air travel/more air travel impact on the UK's Balance of Payments deficit as a result of tourism and business travel.
- Short term and long term impact of policies on jobs – opportunities to reduce imports through better/higher travel costing and consequential increase in job growth in the UK.

7. Consequential impacts of new airport facilities

- Impacts of airport and aircraft operations on the required infrastructure (fuel supplies, support services, housing, water, etc).

8. Forecasting

- Current baseline measurement ,e.g. capacity, need, aims, obligations, projections etc.?
- Why the growth assumption ? Why is this justified when the Earth's resources are limited - why the desire to grow passenger miles ?
- Limit the 'capacity versus need' projections to 20 years to 25 years – is it practical to consider a 2050 outlook because of the number of variables, illustrated by what has happened in the past 30 to 40 years.
- Why follow others – opportunity for competitive distinction ?
- Assess, over time, the likely impact of science and technology on air transport.

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Air Transport Sub-Group

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**CPRE Protect Kent: the Kent Branch of the Campaign to Protect Rural England. We are a registered charity (number 1092012) and is also a company limited by guarantee, registered in England (number 4335730).*