

## **PCAA Position Statements for Core Strategy Examination**

The Parish Councils Airport Association is a voluntary organisation that represents 22 Parishes surrounding Bristol Airport in the Districts of North Somerset and Bath and North East Somerset. Our main objective is to minimise the impacts of airport activities on Parishes and the local and global environment. The PCAA responds to consultations at local, regional and national level. The PCAA takes the collective view of its Parishes and each Parish is able to submit its own response to consultations and issues arising from the aviation sector.

This present Response (below) was drafted by a working group incorporating policies which have gained strong, even unanimous support from PCAA members over many years. The draft was circulated to member parishes for comment. This does not mean that all parishes endorse every letter of the Response, indeed some will add emphasis to problems which particularly concern them, some may disagree with specific details; all are free to express their own opinions. Nevertheless the Response broadly reflects the views of some 22 local councils, each responsive to the views of many thousands of electors.

The Response is informed by policies of the PCAA which have gained strong, even unanimous support over many years, in particular to enable the community to enjoy the benefits of the airport while:

1. trying to prevent an increase in noise annoyance by day and night; trying to reduce noise impacts ;
2. containing, preferable reducing, the impact of airports on local infrastructure – road congestion;
3. developing aviation in such a way as is consistent with government greenhouse emission targets;

Since submitting the PCAA representation in February 2011 to the Core Strategy the Department for Transport has published its Scoping Document: *Developing a sustainable framework for UK aviation March 2011*. This document recognises that the 2003 Air Transport White Paper is out of date and no longer fit for purpose. The White Paper failed to recognise the importance of addressing climate change and the impacts of aviation on the local environment. The Department for Transport issued a further two reports in late August. These were the new UK aviation forecasts 2011 and the Government response to the Committee on Climate Change's Aviation report. The PCAA requests that these reports are given substantial weight throughout the examination of the Core Strategy.

*Other Considerations*

*h. Any further soundness points, including with respect to:*

*i. tourism provisions*

*ii. retail provisions*

*iii. climate change provisions*

**Tourism provisions**

Only a minority of inbound passengers at Bristol Airport will be visitors to the South West region or the North Somerset District. The majority of passengers are British passengers flying home from abroad and who live in an area with a two hour travel radius of the airport.

There is no mention throughout CS22 that Bristol Airport is predominantly a leisure-based airport and further expansion will grow **the tourist deficit**. A CAA survey shows business use of BA dropping from 13.3% to 9.6% in 2020, thus the expansion of the airport cannot be linked to business demand. This means that more money is going out of the South West region and North Somerset District, away from the regeneration of Weston super Mare. The South West region including Weston super Mare depends on tourism for jobs and for much of its economy.

With the recession the airport has seen a drop of passengers of 18% (Ref: Evening Post 15 July 09) since the beginning of the year and at the same time there has been an increase of tourism to North Somerset area. Ref: <http://www.southwestbusiness.co.uk/tourism/Staycation-boosting-North-Somerset/article-1140082-detail/article.html> *'People foregoing foreign holidays are providing a much-needed boost to North Somerset's £300 million tourism industry. The so-called 'staycation' trend is seeing record numbers of people visiting the district's top attractions. According to North Somerset Council's tourism team, Clevedon Pier is reporting a 14 per cent increase in visitors, Tyntesfield a 10 per cent boost and the SeaQuarium in Weston a 12 per cent rise. Weston's Tourist Information Centre has seen 61 per cent increase in visitors, mainly due to the Wheel of Weston.'* This demonstrates that increasing leisure flights is detrimental to the tourist industry in the South West and Weston super Mare.

Point 3.289: Monitoring and review needs to include the tourist deficit i.e the numbers of outward bound and inward-bound tourists. Monitoring should take place on an annual basis and be measured against the objective of 'delivering a prosperous economy'. This should reflect the number of jobs created by an increase of inbound tourists and the loss of jobs to outward bound tourists.

## **Position Statement on *climate change provisions* submitted by the Parish Councils' Airport Association**

### **Summary**

Since the Air Transport White Paper of 2003, Government policy on climate change in general and on the implications of climate change policy for the development of the aviation industry have undergone significant development. Section CS23 of the Core Strategy on Bristol airport does not take these developments into account and should be strengthened accordingly.

### **1. Core Strategy emphasises importance of reduction of greenhouse gas emissions**

The publication version of the North Somerset Core Strategy<sup>1</sup> starts with an important section (CS1) "*Addressing climate change and carbon reduction*" where, consonant with government climate change policy, it is insisted that "development should demonstrate a commitment to **reducing** carbon emissions" (emphasis added). In paragraph 3.6 it emphasises that addressing the challenge of climate change is "among the most significant challenges facing local communities, and planning policies can support this by supporting a **reduction** in non-renewable energy .... use" (emphasis added). The importance is hammered home in paragraph 3.7 which explicitly states the government policy for reduction of greenhouse gas (ghg) emissions:

*"Tackling climate change is a key priority for the planning system and in particular implementing the national carbon reduction strategy of an 80% reduction in carbon dioxide emissions by 2050".*

### **2. Inconsistency over carbon reduction within the Core Strategy document**

Over the past decade there have been important developments in the climate change policy of the national government and consequently also of local government. These developments are reflected within CS1, just discussed, but are not carried forward to CS23 on Bristol airport. *In particular important parts of section CS23 on Bristol airport are in direct conflict with CS1.*

### **3. Developments in Government policy on greenhouse gas emissions and aviation since the 2003 Air Transport White Paper**

*{An extended and fully-referenced version of this section is given below as an Appendix}*

The background to CS23, as presently written, is quite explicitly the 2003 Air Transport White Paper<sup>2</sup> which envisaged massive growth of U.K. civil aviation. It has long been

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<sup>1</sup> NSC Core Strategy Publication Version January 2011, <http://www.n-somerset.gov.uk/NR/rdonlyres/A95AD396-A2F5-4842-AD19-AFA93CD40ADD/0/20340LDFCcorestrategyFIN.pdf>

<sup>2</sup> 2003 Air Transport White Paper

known that such growth in aviation was *incompatible with reduction of g.h.g. emissions to a "safe" level*.

Since 2003 Government thinking on climate change has developed considerably. **The Climate Change Act 2008** adopted "a legally binding target of at least an 80% cut in greenhouse gas emissions by 2050, to be achieved through action in the UK and abroad. Also a reduction in emissions of at least 34% by 2020. Both targets are against a 1990 baseline"<sup>3</sup>.

Government concern over the threat of climate change has continued to intensify. In October 2008 it was confirmed that international aviation was to be included in the emissions reduction target<sup>4</sup>, and the Government has established a **target for aviation emissions in 2050 at or below 2005 levels**<sup>5</sup>.

The Government asked the **Committee on Climate Change** to consider the extent to which government policy might be reconciled with the growth of aviation. The Committee's 2009 report<sup>6</sup> showed that the allowable demand must be "far below that which would result if demand were unconstrained" (p. 3); unconstrained growth would be over 200% between 2005 and 2050 (p. 60). **Deliberate policies to limit demand below its unconstrained level are therefore essential**, if the target is to be met, and serious consequences of climate change minimised.

The Climate Change Committee's recommendations were endorsed and extended by a **response by the Department for Transport**, published in August 2011. Emphasis was laid on the cost-effectiveness of "promotion of behavioural change", by which it means "reductions in leisure travel", as a means of approaching ghg emissions targets.

*{See Appendix below for an extended and fully-referenced version of section 3}*

#### **4. Bristol airport expansion and greenhouse gas emissions**

Bristol airport has recently been given planning permission for expansion to 10 million passengers per annum. Much of the additional passengers are planned to travel to and from the airport by car. Thus this expansion will increase ghg emissions from road transport violating the aspirations of CS1. The additional flights will also lead to increased ghg emissions. Clearly *further* development of the airport, the subject of CS23, are likely to lead to further ghg emissions associated with road and air traffic and further breach of CS1. These further developments unambiguously contravene the principles of *sustainable development*<sup>7, 8</sup> which the Government supports and which will be a

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<sup>3</sup> [http://www.decc.gov.uk/en/content/cms/legislation/cc\\_act\\_08/cc\\_act\\_08.aspx](http://www.decc.gov.uk/en/content/cms/legislation/cc_act_08/cc_act_08.aspx)

<sup>4</sup> Statement by Secretary of State for Environment, Ed Miliband of 16 October 2008

<sup>5</sup> 15 Jan 2009 : Commons Hansard, vol. 486, Column 355-360

<sup>6</sup> Committee on Climate Change, "Meeting the UK aviation target – options for reducing emissions to 2050", December 2009.

<sup>7</sup> World Commission on Environment and Development *Our common future*, (the Brundtland Report) Oxford University Press, 1987.

<sup>8</sup> Department for Environment, Food and Rural Affairs, *Sustainable development*,

<http://sd.defra.gov.uk/what/> "The goal of sustainable development is to ensure all people throughout the

planning requirement should the current proposals for National Planning Policy Framework come into law<sup>9</sup>.

There are potential, perhaps even actual, technological developments which might enable road and air transport to develop without an increase in ghg emissions. If the important provisions of CS1 are to be honoured it would appear essential that any "proposals for development" of Bristol airport are only approved where a reduction in ghg emissions is incontrovertibly demonstrated.

## **5. Revision of CS23**

NSC has proposed a revision to CS23 which makes reference to additional government emphasis on the climate change impacts of aviation. In view of the evidence presented above (and in the Appendix below), we consider this revision to be far too weak. We propose the revision following.

### **CS23: Bristol Airport**

Proposals for the development of Bristol Airport will be required to be consistent with the principles of Sustainable Development and to demonstrate the satisfactory resolution of environmental issues, including (i) a reduction of greenhouse gas emissions associated with both aircraft in flight and ground transport associated with the development; (ii) the impact of growth on surrounding communities and (iii) surface access infrastructure.

Such a change would remove the serious incompatibility between the present CS23 and the vitally important CS1:

***"Tackling climate change is a key priority for the planning system and in particular implementing the national carbon reduction strategy of an 80% reduction in carbon dioxide emissions by 2050".***

### **Appendix: extended version of section 3 Developments in Government policy on greenhouse gas emissions and aviation since the 2003 Air Transport White Paper**

It has long been known that the growth in aviation projected in the 2003 White Paper was *incompatible with reduction of g.h.g. emissions to a "safe" level*. Some of the evidence for this can be found in the papers cited from reputable institutions<sup>10, 11, 12, 13, 14</sup>, and

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world are able to satisfy their basic needs, while making sure future generations can enjoy the same quality of life".

<sup>9</sup> Draft National Planning Policy Framework (NPPF) "presumption in favour of sustainable development as their starting point".

<sup>10</sup> House of Commons Select Committee on Environmental Audit Third Report, 10.3.04

<sup>11</sup> Tyndall Centre for Climate Change, Decarbonising the UK, 21 Sept. 2005

<sup>12</sup> House of Commons Environmental Audit Committee Reducing Carbon Emissions from Transport, Ninth Report of Session 2005–06, July 2006

<sup>13</sup> S. Cairns and C. Newson, "Predict and decide: Aviation, climate change and UK policy, Oxford University Environmental Change Institute, 2006.

<sup>14</sup> A. Bows, K. Anderson, S. Mander *Technology Analysis & Strategic Management* **21**(1), 17-37(2009)

from the report on aviation emissions by the government's Climate Change Committee<sup>15</sup>. The Department for Transport has recently responded to the Climate Change Committee report, broadly endorsing it and developing the implications of its conclusions<sup>16</sup>.

### **Climate Change Act 2008**

Since the 2003 White Paper, the U.K. has tightened its ghg target for 2050 from 550 to 450 ppmv CO<sub>2</sub> equivalent: the 2008 Climate Change Act, has adopted "a legally binding target of at least an 80% cut in greenhouse gas emissions by 2050, to be achieved through action in the UK and abroad. Also a reduction in emissions of at least 34% by 2020. Both targets are against a 1990 baseline"<sup>17</sup>.

Government concern over the threat of climate change has intensified recently. In October 2008 it was confirmed that international aviation was to be included in the emissions reduction target<sup>18</sup>, and the Government has established a target to get aviation emissions in 2050 below 2005 levels<sup>19</sup>.

### **Committee on Climate Change**

The Committee on Climate Change (CCC) report "*Meeting the UK aviation target – options for reducing emissions to 2050*", published in December 2009, considered the extent to which government policy:

- (i) U.K. aviation emissions (those in 2050 should be at or below 2005 levels)
- (ii) the g.h.g. emissions target for 2050 (80% cut in greenhouse gas emissions against a 1990 baseline)

might be reconciled with:

- (iii) the growth of aviation.

The report showed that the allowable demand must be "far below that which would result if demand were unconstrained" (p. 3); unconstrained growth would be over 200% between 2005 and 2050 (p. 60). **Deliberate policies to limit demand below its unconstrained level are therefore essential**, if the target is to be met, and serious consequences of climate change minimised.

The CCC considered how the aviation emissions target might be met according to several different scenarios. The starting point for each was growth constrained by runway capacity which was estimated to lead to 150% growth over 2005 levels by 2050 (p. 60). The CCC then considered the extent to which factors such as increased carbon price, increased aviation efficiency ("carbon intensity reduction") and biofuels use might reduce the 2050 emissions towards the government target level.

The conclusions for the CCC's most plausible scenario (called the "Likely Scenario") are given in Figure 1, and show **that the emissions target cannot be met without**

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<sup>15</sup> Committee on Climate Change, "Meeting the UK aviation target – options for reducing emissions to 2050", December 2009.

<sup>16</sup> Department for Transport, *Government Response to the Committee on Climate Change Report on Reducing CO<sub>2</sub> Emissions from UK Aviation to 2050*, August 2011

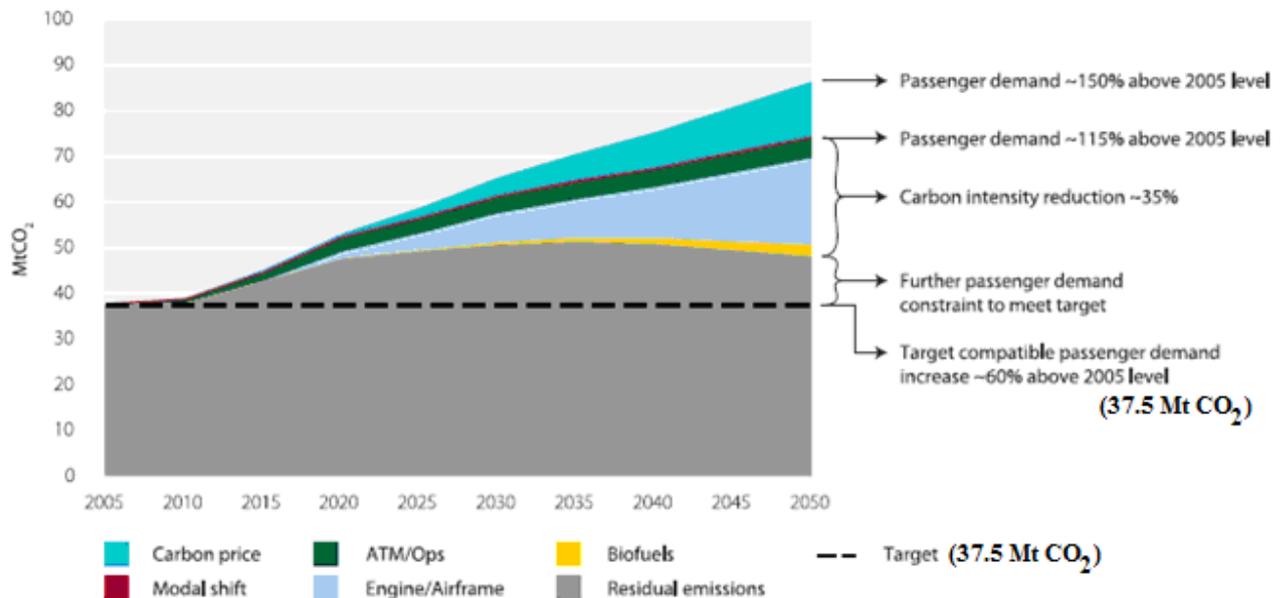
<sup>17</sup> [http://www.decc.gov.uk/en/content/cms/legislation/cc\\_act\\_08/cc\\_act\\_08.aspx](http://www.decc.gov.uk/en/content/cms/legislation/cc_act_08/cc_act_08.aspx)

<sup>18</sup> Statement by Secretary of State for Environment, Ed Miliband of 16 October 2008

<sup>19</sup> 15 Jan 2009 : Commons Hansard, vol. 486, Column 355-360

**additional constraint in passenger demand.** An increase of no more than 60% above the 2005 level would be possible.

**Figure 1**  
**Climate Change Committee's "Likely Scenario" for aviation CO<sub>2</sub> emissions to 2050.**  
 (Committee on Climate Change, "Meeting the UK aviation target – options for reducing emissions to 2050", 2009)



**Additional constraint expected beyond present policy.**

The CCC report shows very clearly that **the government target for aviation emissions in 2050 (that these should be at or below 2005 levels, 37.5 Mt CO<sub>2</sub>) is actually much too high**, and will have to be made more stringent in the future. There are *two* reasons for this.

*First*, the present target gives aviation an emissions *increase* of 120% over its 1990 levels, whereas nationally a *decrease* of 80% is required. This means that for aviation to enjoy this increase, the rest of industry and civil society must achieve a 90% reduction in emissions. It would seem difficult to sustain an argument that aviation is so important to the wellbeing of the country that it must be afforded this privilege, especially when most of the emissions result from British tourists going abroad to spend their holiday money.

*Secondly* a recent government publication on aviation ghg emissions reminded its readers that it is "now well known and understood [that] aviation exerts a number of effects on climate through other emissions and effects other than CO<sub>2</sub>"<sup>20</sup>. The CCC calculations are concerned simply with carbon dioxide emissions: non- CO<sub>2</sub> emissions are explicitly

<sup>20</sup> DfT Aviation MACC study: Technical Report: Final, A Marginal Abatement Cost Curve Model For The UK Aviation Sector, Contract: PPRO 4/8/56, published 9.8.11

omitted because the present 2050 target for aviation ignores them. The exact quantitative effect of these non-CO<sub>2</sub> aviation emissions is an area of scientific uncertainty: what no serious study disputes is that "*Aviation has a larger impact on radiative forcing than that from its CO<sub>2</sub> forcing alone*"<sup>21</sup>. ***A modest working response would be to double the carbon dioxide emission levels when allowing for the global warming effects of aviation emissions.*** In 2009 the DfT<sup>22</sup> used factors between 1.9 and 4. The CCC report (passim) is clear that these non- CO<sub>2</sub> emissions must be incorporated into future aviation emissions policy.

### **Confirmation from DfT publications in August 2011**

In August 2011 the Department for Transport published its response to the 2009 Climate Change Report, discussed above<sup>23</sup>. The response built upon the evidence of the CCC report, and extended its analysis by considering the cost effectiveness of the different measures for reducing aviation's CO<sub>2</sub> emissions and the policies that might achieve them. The response emphasises the importance of the non-CO<sub>2</sub> effects of aviation and the need in future to address their impact (p. 6, para. 1.9). Emphasis is laid (p. 19, para. 3.20) the cost-effectiveness of "promotion of behavioural change", by which it means "reductions in leisure travel".

Much of the detailed analysis on which the DfT Response was based was published simultaneously in the aviation marginal abatement cost (MACC) study<sup>24</sup>. This modelled low, medium and high demand scenarios, and considered the effect for each of the application of a number of policy "levers" associated with aviation technology, aviation operation, biofuels and behavioural change. Without the application of "policy levers", the 37.5 Mt CO<sub>2</sub> target would not be met, even in the low demand scenario. The MACC study emphasises (p. 5) that great caution is needed in interpreting the results. Further the Climate Change Committee warning must be remembered that the 37.5 Mt CO<sub>2</sub> target is actually too high, and will have to be made more stringent in the future. Non-CO<sub>2</sub> emissions are not included in it.

The MACC study further estimates the cost-effectiveness of different policy levers, and argues (p 6) that behavioural change, constraints on airport capacity and mandatory use of biofuels, particularly under conditions of high demand.

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<sup>21</sup> D. S. Lee et al., Aviation and global climate change in the 21st century, *Atmospheric Environment* **43**, 3520-3537(2009)

<sup>22</sup> Department for Transport. (2009). UK air passenger demand and CO<sub>2</sub> forecasts. Department for Transport. London. January 2009, sect 3.22

<sup>23</sup> Department for Transport, *Government Response to the Committee on Climate Change Report on Reducing CO<sub>2</sub> Emissions from UK Aviation to 2050*, August 2011

<sup>24</sup> Department for Transport, *Aviation MACC study: Technical Report: Final, A Marginal Abatement Cost Curve Model for The UK Aviation Sector*, published 9.8.11