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7th December 2006

Dear Sir/Madam,

*Re: Response to BIA Master Plan, Ref: 06/P2701/MP*

I enclose Stroud District Green party's comments on the final Master Plan.  
Our conclusion is that the Master Plan cannot be supported.

Yours faithfully,

Cllr. Philip Booth, Press Officer,  
On behalf of the Stroud District Green Party.

# **Stroud District Green party response to BIA Master Plan**

**Ref: 06/P2701/MP**

**Our "Response to Bristol International Airport Master Plan 2005 to 2030" dated 12th December 2005 raised many key issues. Many of those have not been answered satisfactorily. We write now in response to the most important issues raised in the final Master Plan.**

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## **1. Forecasts: section 5**

**The forecasts in the Master Plan fail to take account of:**

- expected large price rises in fuel resulting from 'Peak Oil'**
- likely cuts to current tax subsidies to aviation and the introduction of international legislation and taxes to curb aviation in the light of climate change**
- the impact of growing public concern about aviation and any increase in people seeking alternatives to aviation**

Incredibly the current forecasts by the the government are based this paper on assumptions that the price of flying would continue to fall by 1% or more per year until 2030. Yet oil prices have already more than doubled per barrel since that forecast was made.

While oil prices may stabilise the reality is that we are or will be facing 'Peak Oil': the moment in history when our global oil supply can no longer keep pace with demand. In other words all the easy-to-get at oil is extracted first, then the slightly harder-to-get-

at oil, then a variety of methods are used to get the harder-still-to-get-at-oil and then, finally, when you are spending as much energy getting the remaining oil out as the energy embedded in that oil itself, you just give up and leave it there. There is simply no point in trying to remove the remainder. The best estimates of this point by oil companies and scientists are sometime between 2002 and 2012.

We quote again James May, CEO of the Air Transport Association writing in the New York Times, who said: "No business model of any airline can survive with sustained jet-fuel prices of \$90 to \$100 a barrel." Yet those are exactly the prices predicted by many experts in the relatively near future; a major natural or manmade disruption could bring them about in a day. There is no relief in sight. This situation cannot be sustained. Within some years or less affordable passenger flight will be history. It is quite extraordinary that the Master Plan has not addressed this issue.

## **2. Tourism: section 6.21 to 6.29**

**The Master Plan does not argue the case to our satisfaction that tourism is beneficial for the region: nor does it consider the implications of a changing climate for the region.**

It is argued that we can only speculate on how people might spend holidays if growth in BIA didn't go ahead. Yet we know that increasing availability of flights will lead to an increase in those flying: more particularly those flying several times a year. It is also largely the well-off that are flying more: the lowest paid groups in this country are flying less than in 2000 (Cairns report).

It is also claimed that constraining growth on BIA will not act as a control on outbound international tourism. We disagree with this analysis. We also see the claim that the notion of constraining growth of air travel would serve to reduce the UK tourism deficit is fundamentally flawed

In 2004, British tourists spent around £30bn abroad, and overseas visitors spent around £13bn here: a deficit of £17bn per year. Visitors in both cases spend about the same amount per visit, the deficit is caused by there being far more outbound tourists than inbound ones. Low cost aviation has driven the rise yet tourists using ferries and the channel tunnel has not changed very much in that time. The London airports contribute less to this deficit due to most inbound tourists visiting London. The deficit is largely caused by regional airports. BIA causes around £500m per year of the UK tourism deficit, and around £60m-£80m of this is lost from the South West region – costing jobs in this tourist region.

Developing domestic tourism that is not reliant on the car is not considered by the Plan, nor is the fact that in some areas tourism can have a significantly detrimental effect on many other aspects of the local communities like affordable housing.

### **3. Economic arguments: section 6**

**There appears to have been no in depth independent analysis of the economic benefits to the region of expanding the airport. Many of the 'benefits' outlined in the draft Master Plan are very questionable and final Master Plan has done little to provide better analysis.**

Friends of the Earth analysis performed by Ecologica shows many ways in which the expansion will harm the economy. They note that the "The Government admitted no analysis had been done, and had only been extrapolated from work done for the South East – and even there most of the 'benefits' were actually time savings 30 years in the future for passengers who don't currently use those airports. This is not an economic benefit that increases the wealth of the country, increases tax revenue that can be spent on health, public transport etc, and if it just means more money can be spent abroad by British tourists then it is to the positive detriment to the economy."

The Master Plan mentions the largest tax levied on aviation is Air Passenger Duty. This raises less than £1bn per year, and falling, despite ever increasing passengers. The airlines operating from BIA receive a tax break on the fuel they use of around £73m each year, relative to the cost of the same volume of petrol used by private motorists. It is not fair or reasonable to compare aviation to other forms of public transport which on the whole are also considerably less polluting: flying for example is 7 to 10 times worse for the environment than using a train.

The Master Plan does not properly consider all the costs aviation has on communities like noise, subsidies etc. Several reports argue aviation receives a £9bn tax subsidy. This is the main reason airfares are unfairly low and why many people choose to fly abroad rather than drive to holidays in the UK, even for short breaks.

No analysis has been done to look at alternatives to airport expansion.

### **4. Business travelers: section 6**

**Improvements to business travel to do seem to have been fully analysed and alternatives have not been considered.**

The final Master Plan estimates that business travel cost and time savings will reach £120 million a year by 2030 (Section 6.38). This figure is deeply suspect in view of the points made in section 1 above. Have issues like rising fuel prices been considered? What are these figures based on?

Many high-tech businesses in the South West are not serviced by the airport because their customers are in the Far East and the West coast of America. It makes much

more sense for these travellers to use Heathrow to reach those locations directly rather than flying from BIA to another hub airport and changing planes. Using Heathrow they have a choice of reliable flights to those destinations.

Business use could significantly increase if needed without any increase in flights by changing the flight schedule to give more reliable services to business destinations and less frequent flights to leisure ones. Business travellers are not attracted by low price flights but by reliable services to business destinations where they can avoid unnecessary overnight stays.

Another aspect not covered is that in view of climate change and rising fuel prices many companies will be looking to avoid business travel by improving use of phone and video conferencing and the internet.

## **5. Transport: section 9**

**The claim that new roads and mitigation measures on key roads like the A38 and B3130 will be needed, whether the Airport is developed or not, is highly questionable.**

Improvements to public transport are clearly welcomed but we disagree in the strongest terms with the final Master Plans' suggestion that road improvements will ease congestion. There has been a vast amount of research showing that new roads and road improvements just lead to more traffic. The way to reduce congestion lies in other measures like London's congestion charge and radical improvements to public transport.

The draft Regional Spatial Strategy for the South West also makes the point that any improvement to strategic road routes will increase the volume of traffic flow.

## **6. Climate change: section 10**

**The justification that BIA's emissions rises will be negligible is completely bogus. Furthermore the region is already expected to make cuts of 60% by 2050 and latest research suggests cuts need to be much more than this: there is no justification for aviation being excluded from cuts.**

The Master Plan claims emissions amount to 0.4% of the regions emissions and will rise to 0.7% at 9 million passengers per annum. It also notes elsewhere that the Government estimate by 2030 aviation could account for 25% of emissions.

We know that the effect of burning fuel in the air is considerably higher than burning

the fuel at ground level and more than the carbon dioxide alone would imply – at least 90% more. The Cairns report suggests that over a 20 year period the enhanced effect is roughly 3.7 times that of the CO<sub>2</sub> alone, falling to 1.7 times over 100 years. The current multiplier being recommended by the Intergovernmental Panel on Climate Change is 1.9 times, but this excludes cirrus clouds not because they have no effect but because no one is certain how big that effect is. Some studies suggest that these clouds may more than double the effect.

Friends of the Earth have noted: "From BIA's own calculations, the flights in 2005 produced 430000 tonnes of CO<sub>2</sub>, and this will grow to 730000 tonnes by 2019. According to DEFRA, the traffic emissions for the whole of the City of Bristol are 390000 tonnes per year – so BIA already does more damage to the climate than the whole of Bristol's traffic. When you take into account the high altitude effects, it already produces more than twice the effect of all of Bristol's traffic. By 2019, if a high altitude multiplier of 1.9 is applied, BIA's emissions will be equivalent to 1.387 million tonnes of CO<sub>2</sub>, more than the current emissions of the whole of B&NES (1.1 million tonnes), and almost the same as the current emissions of North Somerset (1.5 million tonnes). Bristol, B&NES and North Somerset councils are all committed to cutting their own emissions and those in their areas by 60% by 2050, and much of these cuts will be cancelled out by the growth in emissions by BIA."

BIA's comparison of emissions with the whole of the South West is not useful as most of its travelers come from the old Avon area, rather than the whole region, other airports in the region are also planning significant expansions, the multiplier due to emissions high in the atmosphere is ignored, the figures compare local emissions with those that happen only during take-off and landing (thus ignoring the huge amount emitted during flight) and they use old and inaccurate figures which reduce emissions.

Friends of the Earth state: "BIA, as noted state that their current emissions are 0.4% of those from the South West, but according to DEFRA the total for the South West is 40.972m tonnes, so 430k tonnes is actually 1.04% of that figure. If the high altitude effects are taking into account this is 2%. BIA state that by 2019 their emissions will only be 0.7% of the South West, but assuming the South West emissions do not grow by that time the figure will in fact be 1.78% and taking into account high altitude effects this is 3.4%. But over this period all areas are meant to be making cuts in line with the Government target for 2050, so assuming this means cuts of around 3% per year from 2010 (24% cut by 2019) the emissions of the South West should have fallen to 31.1m tonnes, hence BIA's raw CO<sub>2</sub> will be 2.3% of the total, and its effect will be 4.5% if the total. If you analyse emissions by where the passengers live, this gives you the increase in a persons emissions due to using BIA (rather than not flying). If this is done for the areas of the South West that deliver 85% of BIA's passengers, that flying from BIA increases its customers' CO<sub>2</sub> emissions by 27%. If the high altitude effects are included, this becomes a 51% increase in its customers climate footprint."

It is clear that allowing BIA to expand as planned will significantly reduce the effectiveness of expensive reductions in emissions being made in all other sectors of society in the South West. This is a point made very strongly by the Strategic Sustainability Assessment (SSA) made for the draft Regional Spatial Strategy earlier this year. It states: "...policy SD2 recognises the importance of climate change as the greatest threat facing life in the South West, but evidence suggests that the region will be unlikely to achieve the targets set in the policy without in particular a major shift in transport behaviour and much higher performance in energy efficiency across the domestic, industrial and commercial sectors."

The SSA goes on to conclude: "The RSS should explicitly resist airport expansion, because it would undermine all the efforts within other sections of the draft RSS to reduce greenhouse gas emissions."

Lastly while we applaud the intentions to consider on-site renewables, the Master Plan is far from specific about what is planned. A clear stated aim of carbon-neutral buildings would be a considerable improvement.

## **7. Conclusion**

**Our conclusion is that the Master Plan cannot be supported.**