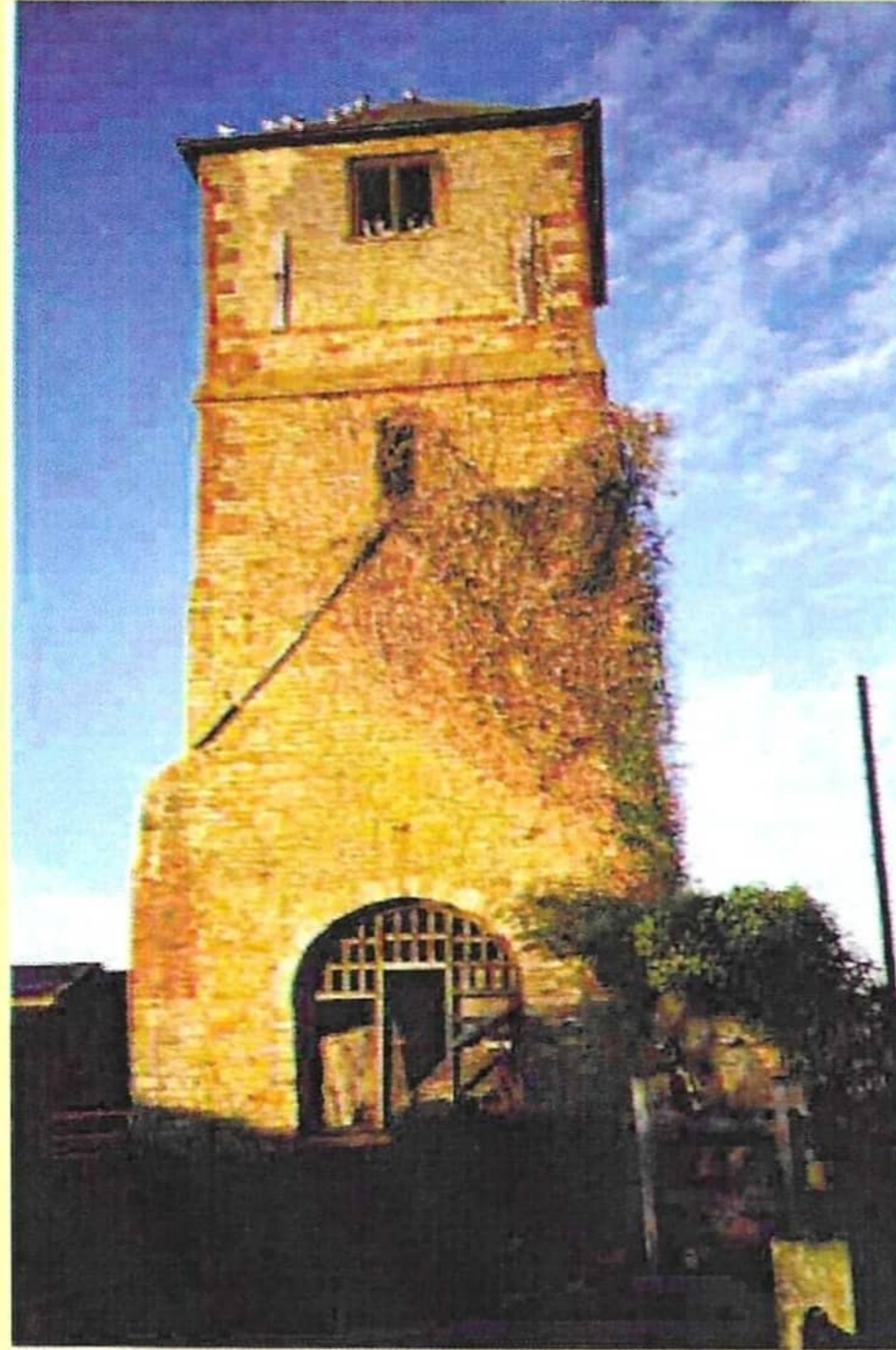


**The Future Development of Air Transport
in the United Kingdom
Midlands**



**RESPONSE FROM
CHURCH LAWFORD
AND KING'S NEWNHAM
ANTI-AIRPORT ACTION GROUP**



NOVEMBER 2002

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INTRODUCTION

This document has been prepared and submitted on behalf of all the residents of Church Lawford and King's Newnham by the Anti-Airport Action Group, elected by the residents at an open meeting. It has been endorsed by Church Lawford Parish Council and King's Newnham Parish Meeting.

The response is structured in line with the Government's request, as detailed in 'The Future Development of Air Transport: Midlands – A National Consultation'.

In addition to responses to all the questions posed in the Government's consultation document, there is a summary sheet that highlights the main points of the response. This summary clearly illustrates the strength of the argument in favour of selecting UK-Wide Constrained as the only valid National Policy Scenario.

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SUMMARY

The UK-Wide Constrained Scenario should form the basis of the UK's national aviation strategy.

This Scenario has been chosen for numerous reasons:

NATIONAL

- There is a heavy weight of evidence which casts grave doubts on the accuracy of the Government's forecasts for anticipated passenger numbers. The forecasts are therefore an unsafe basis on which to establish a national aviation strategy.
- Even assuming the forecast figures are feasible, the policy should be one of 'demand management' rather than 'predict and provide'. Not only has the Government stated its commitment to demand management and employed it within other transport sectors, but the limitations to oil and gas supplies are likely to make it essential.
- Maximum use of operations at existing airports, plus just one new runway in the South East (allowed for under the UK-Wide Constrained Scenario), will meet demand until 2030 when demand management controls are imposed.
- Aviation is currently a protected industry, exempt from certain taxes and VAT payments. Any change in this situation is highly likely to push up ticket prices, and – because travel has been demonstrated to be price sensitive – thereby reduce demand.
- Air transport has damaging environmental effects. Globally, it contributes to global warming and depletion of the ozone layer; locally it gives rise to noise, air pollution and the destruction of the countryside. The Government has signed up to numerous international treaties and agreements committing to protect the environment.
- There have been no comprehensive costs or environmental estimates provided for the surface access developments necessary to meet increased air traveller demand. Equally, there are no figures to show the public transport requirements or the costs of meeting this demand.
- Tourist traffic accounts for almost 80% of airline passengers. However, tourism currently shows a net deficit of £8.6 billion pa. Due to advances in information technology, business travel is likely to decline, while the tourism deficit will grow to £11.7 billion pa by 2030. The industry (excluding freight) therefore cannot be described as a major contributor to the UK economy.

MIDLANDS

- Birmingham International Airport is a major feature of the UK's second city and should remain open along with East Midlands Airport, operating at maximum use levels to service the overall Midlands demand.
- We strongly believe the proposed new Rugby/Coventry airport is ill conceived, financially unsound and not necessary.
- If a new Rugby/Coventry airport were to be built it would have a devastating effect on the rural communities of many villages. In particular, Church Lawford and King's Newnham, which have a very close knit and caring communal spirit, would be destroyed.
- The area of the proposed Rugby/Coventry airport is rural land – largely green belt – which is currently farmed productively. It is rich in cultural heritage and biodiversity.
- The River Avon passes through the site of the proposed airport. There are major concerns that the airport would exacerbate the problems with flooding of the valley.
- The labour market in Rugby, Coventry and surrounding towns is buoyant, with unemployment ranging between 1.8% (Rugby) and 3.1% (Coventry) – giving a total unemployed figure of 5,500 in towns within a 10-mile radius of the new site. It would be inconceivable that 59,000 'new' jobs could be satisfied locally.
- The proposed Rugby/Coventry airport, combined with the closure of Birmingham Airport, would move employment opportunities from an area of high unemployment to one of low unemployment, thus exacerbating social exclusion rather than aiding social inclusion.
- The housing market in the Rugby/Coventry area is already close to overheating. There is no thorough discussion of how thousands of extra workers could be accommodated or catered for in terms of education, health, etc, and no analysis of the costs involved.
- The new Rugby/Coventry airport would increase journey times for a large proportion of Midlands fliers originating in the West, South West and North West Midlands, as well as those from the South East of England.

NATIONAL POLICY SCENARIOS

QUESTION 1

Which, if any, of the National Policy Scenarios do you think should form the basis of the UK's national airport strategy to 2030 and why?

ANSWER

The UK-Wide Constrained Scenario should form the basis of the UK National Airport Strategy to 2030 – i.e. ‘that very little growth be permitted at SE or regional airports, or that growth will be permitted only where it would have no significant environmental impacts’.

There are five important reasons why this is the scenario of choice.

Reason 1: EVIDENCE THAT CONTRADICTS THE GOVERNMENT'S FORECAST FIGURES

The Government's consultation document (Midlands) states: ‘Our forecasts for 2030 indicate that, if unconstrained, total demand across the UK may rise to between 400–600mppa’ (para 1.6.1). These figures appear to be extrapolated from 2001 passenger levels of 180mppa, of which 117mppa currently use SE airports, and 10mppa use Midlands airports. The numbers are predicted to rise to 301mppa for the SE and 60mppa for the Midlands by 2030.

Because all the planning within the consultation documents, both for the Midlands and the South East, is based upon these predictions, the figures themselves need to be rigorously examined.

This is particularly important in light of the fact that much of our research has directly contradicted the assumptions on which the predictions have been based.

1.1 Supporting reports and surveys

There are numerous reports and surveys, two which are cited below, that call into question the accuracy of the report upon which the Government's planning process has been based.

1.1.1 The Office for National Statistics (ONS) Omnibus Survey, February 2002

The Department of Transport, Local Government and the Regions included a range of questions regarding public attitudes to flying in this survey. Diagram 1A of the survey showed the following results (from 1850 adults):

- 49% of respondents used air travel during the preceding 12 months. Of those, 50% flew once, while only 5% (3% of total respondents) flew 5 or 6 times.
- 51% of respondents had not flown at all.

- 51% of all respondents expected to make the same number of flights in 2002 (including those who had not flown at all).
- 21% of respondents expected to make more flights in 2002.
- 13% of respondents expected to make fewer flights in 2002.
- 15% were not sure of their activity levels.
- 87% of respondents who had flown did so mainly for leisure purposes, with 9% flying for mainly business purposes.

The survey also included an analysis of why people might make fewer flights in future. Diagram 7 of the report ('The Analysis of Reasons for Fewer Trips') shows that 45% of respondents would make fewer flights for reasons that would actually need to be reversed, if they were to impact upon the forecast numbers of air travellers:

- 20% - flights too expensive.
- 10% - fewer business trips.
- 8% - better holidays in the UK.
- 7% - could not afford it.

Taking the points one at a time:

- **Flights too expensive:** It is unlikely that flights will become cheaper – particularly in light of the other considerations included under the 'Managing Demand' and 'Environmental' headings below. On the contrary, flights will probably only increase in price, thereby enlarging the percentage of consumers discouraged from flying by cost considerations.

- **Fewer business trips:** One has to question whether business travel is likely to reduce even further with advances in technology and as companies constantly strive to cut costs.

- **Better holidays in the UK:** These respondents raise the speculation that many more UK inhabitants might fly less if the huge investment required for new runway/airport development was used instead to create state-of-the-art tourist attractions within Britain.

Diagram 6 of the report ('The Analysis of Factors Affecting People's Desire to Make More Trips by Plane') showed that 21% of respondents wanted to make more flights. However, of these:

- 62% (13% of total respondents) said cost was a factor.
- 40% said car parking costs were critical.

Even where respondents would like to make more flights, a high percentage of them said that their ability – and intentions – to do so is affected by cost considerations. Flight prices today are extremely cheap, especially in view of the fact that airline fares are exempt from tax (*see 'Flying costs are likely to increase' below*). So if they do rise in price, as anticipated, this will have a significant effect on the rate of expansion in air travel.

In conclusion, the figures quoted within the ONS survey simply do not translate into the sort of expansion in air travel that the Government is predicting.

1.1.2 Warwickshire County Council consultants' report

(full copy available at

<http://www.warwickshire.gov.uk/Web/corporate/pages.nsf/Links/D248C15F36C8B20580256C290039EF00>)

Jacobs Consultancy were employed by Warwickshire County Council to conduct an independent analysis of the case for creating new airport capacity within the Midlands. Their report came up with a forecast figure of 33mppa for the Midlands in 2030 – around 45% lower than the Government's forecast of 60mppa (RRC Midlands Summary Document, para 1.3). This finding took into account numerous factors, detailed within the report that can be found at the above website.

1.2 The questionable source of the figures

The figures forecasting passenger demand used in the consultation document were derived from a report from the Oxford Economic Forecasting Unit (*The Contribution of the Aviation Industry to the UK Economy*), which was prepared for a consortium of the UK's major airport operators and airlines and DETR. It is therefore reasonable to question the degree of objectivity that this report can bring to bear on the UK's national aviation strategy.

1.3 The size of range in Government forecasts

The range of 200mppa between the Government's lowest and highest passenger number estimates (400–600mppa) for 2030 is greater than the actual total number of passengers in 2002. One has to ask the question as to whether the sheer size of that range casts doubt on the validity of the forecast figures.

Reason 2: THE DESIRABILITY OF MANAGING DEMAND

Even in the event that the increases in passenger demand forecast by the Government were feasible, proposals for the national aviation strategy should not be based on the outdated methodology of 'predict and provide'. Instead, we believe that the Government has a duty to monitor and manage demand – a policy which it already recommends for other forms of transport (motorists, for example, pay high fuel and car taxes, and charges are now being implemented for road access to inner cities). Air travel has a massive and growing environmental impact, and it is essential from a local, national and international perspective that the Government takes steps to reduce its impact.

There are four major factors which would make management of demand a sensible and painless policy to implement:

1. It is already stated government intention.
2. Travel is price sensitive – therefore imposing reasonable levels of tax on airlines would increase fares and diminish demand as a consequence.

3. Public opinion would seem to favour managed demand.
4. World supplies of gas and oil are not inexhaustible.

2.1 Stated Government intention

The Government has stated its own commitment to the policy of managing demand in numerous important national and international reviews and agreements. For example:

**The Government Performance and Innovation Unit Energy Review,
February 2002**

<http://www.cabinet-office.gov.uk/innovation/2002/energy/report/TheEnergyReview.PDF>

The Energy Review, published by the Government's Performance and Innovation Unit in February 2002 and with a foreword by the Prime Minister, Rt. Hon. Tony Blair MP states:

Para 7.101 – 'Aviation is a major problem with demand outstripping energy efficiency. With no alternative to kerosene on the horizon, handling the projected growth in aviation energy use and CO2 emissions must become a priority for the transport community. Air transport issues need to be considered in wider transport planning. DTLR should prioritise discussion of taxation and other measures to manage aviation demand in EU and international forums.'

Para 7 Summary – 'Transport energy use is a major issue in the long term. Policy should support improved energy efficiency in vehicles, development of long-term low and zero carbon options and reduction in aviation demand.'

Para 7.94 – 'The transport sector is likely to remain primarily oil-based until at least 2020. While oil security is not a major current concern, our economic dependence on transport, increasing dependency on fuel imports, constraints on fuel diversity in the transport sector in the medium term, and potential resource depletion in the long term, all reinforce the need to monitor the oil supply situation.'

Main Recommendation 32 – 'DTLR should prioritise discussion of taxation and other measures to manage aviation demand in EU and international forums.'

2.2 Flying costs are likely to increase

There is no doubt that, for whatever economic rationale, the aviation industry receives special treatment from governments across Europe. It pays no tax on aviation fuel, and no VAT on the purchase of planes, servicing or fares. Landing fees and other airport charges at the main airports are repressed by the CAA to well below market levels. Despite statements of good intent, the Government continues to subsidise the aviation industry to the extent of £182pa for every UK resident (*Aviation's Economic Downside J.Whitelegg and S. Fitz-Gibbon, Green Party of*

England and Wales, August 2001). However, this situation looks set to change. For example:

- The UK was party to the World Health Organisation treaty on Health and Air Transport which says, the “polluter pays”. (*WHO Charter on Transport, Environment and Health, 1999*, http://www.who.dk/document/peh-ehp/charter_transporte.pdf)
- The UK Government has signed the Amsterdam Treaty which says, ‘The ticket price should reflect the true external costs of air travel’

Both of these treaties have implications for the aviation industry, implying that operators will be forced to raise their prices.

The consultation documents themselves show that air travel is price sensitive, suggesting that a 10% rise in prices would lead to a 10% reduction in demand (South-east Summary Section 9.3). The introduction of a reasonable level of tax on air fuel and VAT on airline tickets would therefore substantially reduce growth.

Indeed, the former Treasury economist, Brendon Sewill, advocated a tax on aircraft fuel at 50% the rate of that levied on motor fuel, VAT on airline tickets, and an environmental charge reflecting the cost of air and noise pollution. Combined with realistic landing fees, these taxes would limit the growth in air travel by 66% over the next 20 years (*Tax Free Aviation, by Brendon Sewill published by the Aviation Environment Federation*)

2.3 Public opinion would favour managed demand

The February 2002 Omnibus Survey conducted by the Office of National Statistics (mentioned above) found that:

- Diagram 10 – less than 10% of respondents said ‘they should be able to fly even if it harms the environment’
- Diagram 14 – over 60% of respondents ‘agreed that air travel harmed the environment’
- Diagram 16 – 79% of respondents said they ‘would find a 5% increase in flying costs to cover environmental costs acceptable’; 50% said ‘a 10% increase in costs would be acceptable’; 25% would accept a 15% increase in cost.

This evidence suggests that the majority of consumers would find it entirely acceptable if the Government imposed just a 5% increase in costs – which, at the same time, would also help significantly to reduce the growth in air travel.

2.4 Limitations to availability of oil and gas

One obvious reason for managing demand is that the worldwide supply of oil and gas has a natural limit. This has been pointed out by many experts – for example:

- Dr C.J. Campbell (*The Hubbert Peak for World Oil Study, conducted on behalf of Petroconsultants of Geneva*): ‘The dependence of the developed

nations upon the Middle East oil producers will dramatically increase over the next 20 years. World oil output will decrease from around 60 Mbd to 30Mbd by 2030 and will continue to decrease thereafter.'

- Dr C.J. Campbell (*The Imminent Peak of World Oil Production – a talk presented to a House of Commons All-Party Committee, July 7th 1999*): during this talk, Dr Campbell highlighted the inescapable decline in oil production and reserves (we take out four barrels of oil for every new one we discover), with its consequential inflationary effect on the price of oil.
- Independent analyst Douglas Westwood (*The World Oil Supply Report, 2002 - 2050*): This report concludes: 'The world's known and estimated "yet to find" oil reserves will not satisfy even the present level of production beyond 2022. A 1% demand growth would bring the peak year forward to 2016, whereas a 3% demand growth would bring it forward to 2006. In short, during the first 25 years of this century we will witness the beginnings of the end of the age of oil.'

Reason 3: ADHERENCE TO NATIONAL AND INTERNATIONAL POLICIES ON THE ENVIRONMENT

All the different Policy Scenarios postulated by the consultation document would appear to assume the continuance of existing environmental frameworks, and the upholding of current international conventions and agreements on the care of the environment.

Just one example of such an agreement is the Kyoto Protocol, under which the UK agreed to reduce emission of greenhouse gases by 12.5% below 1990 levels by 2008-2012 (Midlands Consultation document, paragraph 7.7.12). The Prime Minister, Rt. Hon. Tony Blair MP, said in his speech at the 2002 Johannesburg Summit: 'And it means the world, the whole world, facing up to the challenge of climate change.'

Nationally, Rt. Hon. Margaret Beckett MP (*DEFRA New Release 231/02 – 18th June 2002*) said of a new DEFRA strategy 'Foundations for our Future', "we will work hard to ensure that the environmental, social and economic costs and benefits of our work are understood and addressed".

However, none of the Policy Scenarios – except the UK-Wide Constrained – mentions in its policy mechanism any commitment to environmental issues.

The UK-Wide Constrained Scenario allows for some development where there would be no significant environmental impact, and where such development would comply with the requirements of existing frameworks, conventions and agreements. It also recognises the need to mitigate environmental impacts as far as is reasonably practicable.

The UK-Wide Constrained Scenario would therefore seem the only policy of choice, if the UK Government is to comply with its environmental commitments.

Reason 4. UNSUITABILITY OF THE OTHER POLICY SCENARIOS

There are strong reasons for arguing against the adoption of any of the proposed Policy Scenarios, other than the UK-Wide Constrained.

Facilitating Growth Scenario

As discussed above in 'The desirability of managing demand', the Government has a duty to manage demand, whereas a policy of 'predict and provide' has the potential to turn into a self-fulfilling prophecy. The creation of a new airport, or airports, does not allow for incremental growth or adjustments to the forecasts to be accommodated, and would provide a massive increase in supply which would in itself create extra demand. Prices might be kept artificially low to attract customers, and more people would fly than would otherwise be the case.

South East Constrained Scenario

Assuming that the Government's forecast figures are accurate, passenger demand in the South East would rise from the current level of 117mppa to 301mppa – an increase of 184mppa. If capacity at London airports were fixed at around 150mppa, there would be another 151mppa needing to travel from elsewhere.

The anticipated increase in passenger numbers alone would require two more airports the size of Heathrow (which, according to the consultation document, can handle 90mppa if terminal 5 is built). It is difficult to see how any airport development outside the South East could sensibly serve anything like these levels of demand, when prospective fliers would have to travel for two or three hours to reach their airport.

Even if people were willing to travel a further hundred miles to an airport, this would have heavy implications for the road and rail networks. Extensive enhancements would be required at huge environmental and financial cost, which – but for this specific demand – would not have been necessary.

RASCO Reference Case Scenario

As discussed in Reason 1 above, there are convincing reasons to believe that the Government's forecast figures are in error. This implies that there would be no need for the extensive extra capacity proposed (300mppa) to be provided at London airports – particularly since this scenario takes no account of the additional capacity which could be supplied by existing airports (*see Reason 5 below*).

Reason 5: CAPACITY OF EXISTING AIRPORTS TO MEET INCREASED DEMAND

In order to safeguard the commercial viability of existing airports, and the considerable investment that they represent, it is essential that there is a drive to ensure maximum use is being made of existing facilities, before any new runway capacity is considered.

This is particularly important in view of the fact that, between them, existing airports already have the capacity to support a considerable increase in demand.

The South East

The current SE volume is 117mppa, with a projected rise to 242mppa by 2020 and 301 mppa by 2030. However, through the introduction of effective demand management controls, these figures could be reduced by between 25% and 50% (*Air Transport Policy - A Taxing Matter, David Hurdle, www.cilt.dial.pipex.com/airtransport.htm*). working *pro rata* basis, we are therefore looking at satisfying SE demand levels of between:

- 121mppa - 180mppa in 2020.
- 150mppa - 225mppa in 2030.

These levels can be accommodated by current facilities, as illustrated in the following table (*data for SE Consultation Document*):

Airport	Current mppa levels	Maximum use figures
Stansted	12	35
Luton	6	31
Gatwick	32	46.5
Heathrow	64	89 (inc. terminal 5 but no new runway)
Total	114	201.5

The creation of just one new runway at Stansted would increase capacity by a further 39mppa, taking SE capacity to a total of 240.5mppa.

In other words, even without the new runway at Stansted, the major SE airports – operating at maximum use levels – would have more than sufficient capacity to handle demand until at least 2012 (assuming unconstrained growth), and to 2030 (assuming the introduction of demand management).

The Midlands

The mid-point forecast figure for the Midlands is 33mppa in 2030. The question therefore is – can Birmingham Airport and other small regional airports cope with that number of passengers?

Birmingham has current capacity of 190,000 air traffic movements (ATMs) and 21–22mppa, with no new runways and no new terminal facilities. Referring to the figures for Stansted, Luton and Gatwick above, the key point appears to be that if Birmingham – through a combination of increased ATMs and increased passengers per aircraft – could achieve the same levels of efficiency as any of the above, the projected increase in air travel within the Midlands is accommodated without the need for additional runway capacity. In addition, there is scope to increase passenger levels slightly at East Midlands Airport, and Coventry Airport is currently planning to add passenger flights to its existing services.

QUESTION 2

If you think additional capacity should be provided in the SE to meet the demands of regional air passengers interlining or accessing services from London via surface modes:

- *how much capacity do you think should be provided?*
- *where in the SE should it be located?*

ANSWER

The UK-Wide Constrained Scenario should be the adopted policy scenario, and therefore there should be no extra capacity to meet the demands of passengers interlining or accessing services from London via surface modes.

QUESTION 3

Which of the scenarios will most enhance consumer choice and accessibility to services in:

- *the UK as a whole.*
- *the Midlands.*

ANSWER

The definition of 'consumer choice' has to be wide enough to include options regarding damage to the environment, pollution, genuine job creation, effect on industry, consequences for residents, the use of other forms of transport, and so on. The interpretation cannot be solely related to options on air travel – i.e. the range of destinations available from the nearest airport, the different prices of flights to a particular destination, or the range of destinations available through interlining.

Using this broader definition of customer choice, the UK-Wide Constrained Scenario is the one which most effectively enhances customer choice. The detailed comments to support this statement occur elsewhere in this document.

QUESTION 4

Are there any other policy scenarios, including any combination of those set out in the document, which would better meet your aspirations for the development of regional air services and airports in the Midlands.

ANSWER

The UK-Wide Constrained Scenario is the policy which best meets aspiration for the development of regional air services and airports in the Midlands.

QUESTION 5

The Government is committed to bringing forward policies for civil aviation and airports that are sustainable. Please explain why you think your preferred scenario best supports the Government's sustainable objective.

ANSWER

The detailed response to Question 1 answers this question adequately.

QUESTION 6

Which of the policy mechanisms set out in chapter 3 do you think are essential to delivering your preferred scenario? Are there any that you consider might assist in doing so but you do not consider essential? Are there any policy mechanisms not covered in chapter 3 that you think should be considered?

ANSWER

It is essential that the planning system precludes any major airport development but allows for the most effective and efficient use of existing facilities. This would, in effect, allow for maximum use options at most UK locations.

Also essential is that the Government adopts a demand management process which ensures the airline industry covers its environmental costs and is treated in common business tax regimes in line with other transport sectors – such as road transport.

There are no policy mechanisms not covered in para 3 that should be considered.

CONCLUSION – NATIONAL POLICY SCENARIOS

Given the weight of evidence contradicting the Government's forecast figures; the desirability of managing demand; the concerns regarding global and local environmental issues, and the potential additional capacity of existing airports, there is in our view only one viable policy scenario: the UK-Wide Constrained Scenario.

This model, which allows for gradual, incremental expansion is sound because it:

- increases efficiency of use of current investment.
- avoids use of long-term and uncertain forecasting.
- allows for the continuance of existing environmental, fiscal and political frameworks.
- limits environmental damage.
- takes account of diminishing oil and gas resources.
- provides expansion sensitive to and justified by actual need levels.
- allows transition from a demand-led to a demand-managed economy.

- encourages development that is cohesive and coherent with other Government policies and planning.

LOCATION OF AIRPORT CAPACITY

QUESTION 1

This document has described how airports in the region might develop if policy is to meet demand. Do you have any comments on these suggestions for new infrastructure?

ANSWER

The adoption of the UK-Wide Constrained Scenario, under which existing airports operate at maximum use, does not require any major changes or developments to the infrastructure. Therefore the only change is that airports operate at maximum efficiency levels.

QUESTION 2

If your preferred strategy for the Midlands involves accommodating growth in air services, where would the projected levels of growth best be accommodated and what form of airport development should be supported in order to achieve this?

ANSWER

The UK-Wide Constrained Scenario allows for growth up to a maximum use capacity which, as discussed at length in 'National Policy Scenarios – Question 1, Reason 5', is sufficient to take us through to 2030 levels of activity. This statement is based on our strongly evidenced premise that the Government's forecasts are unsound.

QUESTION 3

If it is not, does the Midlands need all of its current complement of airports and are there particular airports whose development should be constrained and why?

ANSWER

See the answer to Question 2 above.

QUESTION 4

If you are of the view that the Midlands should seek to accommodate its own demand (and abstract demand from the SE, SW and Wales) how might this be achieved?

Can the existing airports be developed to provide sufficient capacity?

ANSWER

Yes. See answer to 'National Policy Scenarios' Question 1, Reason 5.

Should the case for constructing a new airport between Rugby and Coventry (replacing the existing airport at Birmingham) be considered? What would be the basis of such a case? When would it be built and how would it be funded?

ANSWER

There is no case for constructing a new airport between Rugby and Coventry. The primary reason for this is that the forecasts do not support such a scenario and there is, in any case, the preferred option of incremental increases in runway capacity once the maximum use capacity has been reached. The points made in answer to National Policy Scenario Question 1, along with other sections of this response, cover this point adequately.

QUESTION 5

Is it important that demand should be met direct from the Midlands, or can the needs of the region be met by passengers interlining at hubs elsewhere in the UK or on continental Europe?

ANSWER

It is not practical to believe that total demand from any region can be met from within that region. There will always be a small percentage of passengers for whom interlining to a hub either in Europe or elsewhere in the UK is a necessity or a preferred option.

COMPETITION V COMPLEMENTARY DEVELOPMENT

QUESTION 1

Do you support greater partnership between airports, airlines, and the public sector to foster the wider economic interests of the region? If you do, what form might it take?

ANSWER

This question suggests that the airport/airline industry should be further involved in the detailed planning process related to the development of air travel. This clearly would be opening the door to undue influence from an industry with a vested interest.

The whole issue of planning within the transport sector should be completed exclusive of any sector service providers. It is inconceivable that the service providers – i.e. those with most to gain financially – should be involved with decision making affecting the development of transport policy and strategy.

The decision-making process should lie with an objective body formed from public sector and customer groups, both private and business.

That body should be responsible for the development of integrated transport policies which would, by definition, address the issue of complementary v competition in the provision of air and other services as part of its remit.

Airlines and airports, along with other transport providers, should be consulted only when the fundamental decisions on structure, philosophy and strategy have been finalised. They are then consulted as potential service providers, with their role in implementing an agreed transport policy clearly defined by the commissioning body.

QUESTION 2

Is competition always preferable to complementary development? Do you think there are any circumstances in which the latter approach would bring wider economic or other benefits?

ANSWER

This question can only be answered sensibly through close analysis of specific situations and opportunities. It implies that the debate on complementary v competition applies to the airline industry in isolation, when in fact it should apply to the transport sector as a whole.

The planning body established as discussed in the answer to Question 1 above would be the authority responsible for deciding, after careful consideration of all the facts, on the specific approach to be adopted in any given set of circumstances.

ECONOMIC BENEFITS

QUESTION 1

How important is the contribution of aviation to the Midlands economy? How and where can the benefits be captured?

ANSWER

The effect of the aviation industry on the Midlands economy needs to be analysed through direct and indirect effects.

- The industry does not directly employ sufficient people to be considered a major Midlands industry, or to be considered as being more than fairly important.
- Indirectly the airport acts as a lubricant to a wide range of industries in the Midlands and contributes to the success of companies both exporting and importing goods and parts.

However, it could be argued that the aviation industry is actually a net exporter of wealth, in that currently over 60% of traffic volumes through Midlands airports consists of outbound tourists (*Midlands consultation document p31*). The wealth these tourists generate is of benefit only to the countries being visited and, as the aviation industry is subsidised through the absence of taxes on various aspects of its operations, the net contribution of the industry is very small.

It could further be argued that the aviation industry is indirectly a barrier to the development of the home tourist industry. Certainly the inbound tourist industry through Midlands airports does not match the numbers of outbound tourists, and the discrepancy between the two makes it unlikely that there will ever be a balance. For the industry to be regarded as a significant contributor to the Midlands economy, it would need to show that its contribution as a direct employer, as a contributor to the success of Midlands companies, and as a factor in inward investment, outweighed the net loss to the economy of the tourism balance sheet.

Given that the UK had a tourist spending deficit of £8.6 billion in 2000 and this is set to rise to £11.7 billion by 2030, (*Office for National Statistics – Overseas Travel and Tourism 2002*), it is unlikely that the industry could be seen as a net contributor to the wealth and growth of the Midlands economy.

QUESTION 2

What barriers need to be addressed if the jobless, particularly in low employment areas, are to take advantage of the employment opportunities that arise from the growth in aviation and airport services? Are there solutions?

ANSWER

The question assumes that low employment exists in areas being considered for growth in aviation and aviation services within the Midlands. This is not the case.

Unemployment rates in the Midlands are:

- Midlands region – 3.5%
- Birmingham – 7.5%
- Coventry – 3.7%
- Rugby – 1.9%
- Warwickshire – 1.8%

(Birmingham Economic Information Centre, Unemployment Briefing August 2002, and Warwickshire County Council "The Coventry and Warwickshire Unemployment Report" May 2002)

The figures for Warwickshire and Rugby represent, in real terms, zero unemployment, whereas Birmingham and the west and north west parts of the Midlands region do have significantly higher unemployment rates. These figures are a significant factor in the strongly stated opposition of Advantage West Midlands, Birmingham City Council, Birmingham Chamber of Commerce and Warwickshire County Council to the closure of Birmingham International Airport.

The Midlands options for the development of air services within the region described in the consultation document centre upon:

1. The expansion of Birmingham International.
2. The expansion of East Midlands.
3. The closure of Birmingham International, and the construction of a new, three-runway airport at Rugby.

This question needs to be examined in relation to each of those options.

1. The adoption of the maximum use scenario at Birmingham would have no significant impact on the local employment picture, other than the preservation of 7,000+ jobs at Birmingham Airport, plus the creation of the necessary few extra airport jobs required to handle increased capacity.

It would also ensure that the UK's second city retained its international airport; that companies relying on the close proximity of an airport would continue to be well served (with the resultant safeguarding of jobs); and that the air travel demands of the Midlands were being satisfied.

The creation of a new runway at Birmingham would create an extra demand for labour in the Birmingham area, but given the unemployment rate in Birmingham and the west/north west of the city, there would be a reasonable chance of satisfying that demand from within the local labour markets.

2. The adoption of the maximum use scenario at East Midlands Airport would have no significant effect on the local employment picture, except to improve the

job security of those people employed at the airport. It would also allow for the predicted expansion in air freight business through the airport.

The construction of a new runway at East Midlands would create extra demand for people from within the Notts, Derbys and Leics areas, and could be satisfied primarily through these local labour markets

3. The creation of a new three-runway airport at Rugby and the consequential closure of Birmingham International Airport would:

- Result in the loss of a significant number (7000+) of jobs at Birmingham Airport.
- Result in the loss of a significant number of additional jobs in and around Birmingham.
- Create a 10-year stagnation period, from the time of the decision to proceed with a new airport (2003) until the date of closure of Birmingham International (2011), when there would be no inward investment to the airport or its associated business/industry parks.
- Seriously undermine the position of Birmingham as the UK's second city and as a city of progress and vision.
- Create an extended period of uncertainty in the minds of the affected workforce in the Birmingham area.
- According to Government figures, create 59,000 jobs in an area of low unemployment around Rugby. Para 7.12.28 'Regeneration' of the consultation document talks of the creation of 'additional jobs... in regeneration areas of the core catchment area (Coventry and Rugby)' needing to be offset against 'the regeneration benefits that would be lost... in the locality of the existing Birmingham site'. The question then is, how and when do we fill those vacancies?

Taking the latter point, as at May 2002, Coventry had 5,851 (3.7%) people registered as unemployed, whilst Nuneaton/Bedworth had 1303 (3.3%) and Rugby had 966 (1.9%) – a total of 8090 people within a 10-mile radius of the new site. It is widely accepted that anything lower than 2% unemployed is, in real terms, zero unemployment. There are therefore just fewer than 5000 people in the relevant areas looking for employment.

Given that there are 59,000 new jobs to fill, and insufficient labour within the area to do so, the following issues needing to be considered:

- **Jobs migration** – Established businesses within the local economy may find themselves losing staff or having to raise salary levels to compete with the new jobs. This poses a serious risk of inflationary problems.
- **Travel for workers transferring from Birmingham International** – Would these workers want to travel; who would bear the cost (including travel time) of travel, and for how long would they be prepared to add 2 hours travelling time to their normal working day? By road it could take between 40 minutes and 75 minutes each way,

and by rail it could take the 15 to 20-minute rail journey, plus accessing the rail point at the beginning/end of the journey.

- **Housing for workers transferring from Birmingham** – Would these workers want to move house and, if so, who would cover the cost? Where would they live, given that housing in the Rugby area is in critically short supply and the housing market very close to overheating?
- **Housing and facilities for additional workforce** – Even allowing for the transfer of workers from the closed Birmingham Airport, there remains an additional housing demand for the many thousands of people required to fill the remaining jobs (59,000 – 5,500 + those transferred from Birmingham). Given the number involved, what provision would be made for schooling, healthcare, public transport and possible public/subsidised housing? Has the cost of these extra provisions been included in the cost estimates for the new airport? Do the land-take projections take any account of the need for what effectively would amount to a new town? Even if the former Birmingham Airport site were redeveloped to provide housing, as suggested in the consultation document, there would still be the travel issues for the workers, as mentioned above.

Conclusion

The weight of the concerns discussed above suggests that Government research into the labour market and regeneration issue in the Midlands has been, at best, inadequate. This seems particularly true if one looks at the current employment situation at Birmingham Airport: the airport already has difficulty filling its job vacancies, and relies heavily on temporary and casual staff to carry out necessary duties. A huge increase in the number of air industry vacancies, created by the building of a new airport, would greatly aggravate the problem.

This being the case, it seems that this question is the wrong way round. Because unemployment in the area is so low, the focus should be not on how people find jobs, but how employers find people to fill jobs – and this applies whichever National Policy Scenario is selected. The question posed should read instead: *'What barriers are there to employers in the aviation and aviation services industry finding the right number of people with the right skills, or the ability to attain the right skills, to enable the industry to operate effectively and meet the air travel demands of the Midlands until 2030?'*

In answering this question (which applies to all locations and all options at each location), the considerations should be:

- Are employers looking at subsidised transport to and from work, training and development, equal opportunities policies, fair and equitable salary levels, etc. (in short, all of the issues that any employer having difficulty in recruiting the right staff should be looking at)?
- Are Government policies – as implemented through the employment, education and training agencies – assisting in overcoming barriers to employers?

The solutions to overcoming barriers lie in the answers to these questions. Without significant intervention from the Government on assisting would-be investors in the new airport project with the attraction, training, housing and retention of workers, the project is not viable.

QUESTION 3

What systems or processes will help improve links between aviation industry employers and intermediaries assisting the jobless and why?

ANSWER

This question is adequately answered by the 'Conclusion' section of the answer to Question 2.

QUESTION 4

What should be the role of the Government Office West Midlands/Government Office East Midlands and Regional Development Agencies in achieving this, and what should be their priorities? What mechanisms are available to them to support any approach that is agreed?

ANSWER

The adoption of the UK-Wide Constrained Scenario as the policy of choice eliminates the possibility of abnormal employment demands arising, thereby rendering this question irrelevant. Any other scenario requires the answer to this question to be considered in the light of the new question posed in the 'Conclusion' section of the answer to Question 2.

QUESTION 5

Would improved air links help to increase inbound tourism to the Midlands and/or reduce reliance on London as the primary point of interest for airborne inbound tourists?

ANSWER

Improved air links would increase, only marginally, inbound tourism to the Midlands and it would not reduce reliance on London as the primary point of interest for airborne inbound tourists.

There are few tourist attractions in the Midlands outside of the traditional heritage/historical attractions. London remains the key focus for tourists with such

interests, and this will continue to be the case, irrespective of the amount of air transport development in the Midlands. Any increase therefore would only come through providing tourists with an alternative start/finish point to their visit – the probability remains that the majority of tourists would continue to fly into London and utilise ground travel to access the Midlands. Any improvement needs therefore to be concentrated on road and rail links.

QUESTION 6

If you think it would, what measures could Government, regional tourism interests and the aviation industry take to facilitate this?

ANSWER

Not relevant, see the answer to Question 5 above.

QUESTION 7

Is there a role for airports in the Midlands as a focus for economic clusters? And should such clusters be encouraged?

ANSWER

Precisely what is the definition of an economic cluster? Is it geographically, occupationally, or industrially centred?

There is a role for airports to act as a focus for economic development, as evidenced by Birmingham Airport. Such development should be encouraged, as long as all factors affecting the environment, commercial viability, social inclusion etc are taken into account and given due weight. Indeed, the possibility for this kind of development is part of our rationale for opting for the UK-Wide Constrained Scenario, which incorporates the principles of incremental growth and demand management within its maximum use option.

There should be absolutely no encouragement for any form of airport-associated economic/industrial development which would detract from or impinge upon green belt areas, or have other adverse environmental effects.

QUESTION 8

How important are air cargo services for the economic objectives of the Midlands? What measures are needed to give air freight and mail operators confidence to plan their long-term investment in airport facilities? Should night-time slots be guaranteed

for air freight and mail? Should such guarantees be contingent upon noise/emissions standards of the aircraft being operated?

ANSWER

Air cargo services are of some importance to the economic objectives of the Midlands.

Freight and mail operators need to have confidence in the long-term planning processes of government. They do not expect to hear that airports will close (Birmingham and Coventry) to make way for a possible new airport. Two of the major freight and mail operators in the UK have stated quite clearly that there is no need for new airport or runway capacity, and that existing facilities should be effectively utilised – i.e. an incremental and demand management approach should be adopted. *(Tom Bell, managing director of TNT, quoted in conjunction with the Royal Mail in the Birmingham Evening Telegraph).*

Night-time slots should be guaranteed for freight operators, but these guarantees should be contingent upon noise/emissions standards being adhered to.

QUESTION 9

Is there scope for capturing more of the UK and global aircraft maintenance market at Midlands airports and how might this best be achieved? What would be the advantages and disadvantages of encouraging growth in this sector? What support can be given for proposals for a centre of excellence for aircraft maintenance at RAF Cosford?

ANSWER

This is difficult to answer without having in depth knowledge of the skills required, the availability of skilled people within the Midlands area, the anticipated number of ATMs, and the size and value of the maintenance market. However, given that the UK-Wide Constrained Scenario is the only viable option, it would appear that there is virtually no change to existing arrangements required to handle locally-generated maintenance and servicing activities. Deliberately to attract aircraft maintenance to the area is to be operating in contradiction to the UK-Wide Constrained Scenario: therefore it is clear that there should be no development of the maintenance/servicing market.

QUESTION 10

How important is business aviation for inward investment and other economic objectives of the Midlands? If business aviation cannot be accommodated at the major airports, how should the needs of the sector be met?

ANSWER

Clearly business aviation is important regarding inward investment and other economic objectives of the Midlands.

Given that the inward/outward tourism balance sheet shows a net deficit, with the only beneficiary being the aviation industry itself, the needs of business aviation should not be jeopardised by or sacrificed for the benefit of outbound tourist aviation. Therefore the needs of business aviation must always be met through the existing major airports.

QUESTION 11

How important is it for your business/organisation that the UK remains the aviation gateway to Europe?

ANSWER

This response is not being prepared by a business/organisation. The question is therefore not applicable here.

QUESTION 12

Would the relaxation of the UK's current policy in relation to international air service agreements to allow unlimited 5th Freedoms from regional airports materially affect the ability of the Midlands airports to capture new services?

ANSWER

The ability of the Midlands airports to capture new services would not be materially affected by the relaxation of the UK's current policy and the granting of unlimited 5th Freedoms from regional airports. There should therefore be no change to the existing arrangements.

SOCIAL INCLUSION

QUESTION 1

Can the development of aviation within the Midlands help to address deprivation and social exclusion?

ANSWER

It is widely held and promoted by Government and trades unions alike that deprivation and social exclusion are more apparent in areas of high unemployment – hence the policy of grants and subsidies aimed at such areas by the relevant agencies of both the UK and the EU.

The answer to this question clearly ties in with the answer to ‘Economic Benefit’ Question 2 – i.e. that the only acceptable development of air travel capacity within the Midlands should occur in the area of highest unemployment, and that any such development should be restricted to the maximum use options. The adoption of the UK-Wide Constrained Scenario (allowing for the development of Birmingham Airport to its maximum use capacity) would not only safeguard the employment prospects of those who would be threatened by the closure of the airport in favour of the proposed new site at Rugby, but would also create additional direct employment opportunities.

Additionally, the closure of Birmingham Airport would exacerbate the social problems in the areas of high unemployment being serviced by the airport. Conversely, because the Rugby/Coventry area has a comparatively low level of unemployment, there would be insufficient positive impact on social exclusion to compensate for the adverse effects caused by the closure of Birmingham.

The adoption of any scenario other than UK-Wide Constrained could have a net adverse effect on social exclusion.

QUESTION 2

What measures are needed to ensure benefits of growth in the air transport industry are transmitted to less economically successful areas of the Midlands?

ANSWER

The measures needed relate to the location of the airports and local accessibility to those airports. Clearly, as stated in the answer to Question 1, the airports should be located in, or as close as possible to, areas of high unemployment, social deprivation and social exclusion. It is highly likely that the majority of people affected will be seeking the less well-paid, irregular hours etc. type of work, where any travel to and from work needs to be kept to an absolute minimum. What is definitely not needed is to close Birmingham Airport which is in, or serves as a major employer to, the area of

the Midlands with the highest number of socially deprived, and which is less economically successful.

In our view it would be folly to close Birmingham Airport on the justification that a major new airport needed to be opened, when that new airport would be located in an area of very high employment and minimal social deprivation. To do so on these grounds would ensure that the benefits of the air transport industry were in fact being denied to the less economically successful areas of the Midlands.

ENVIRONMENTAL IMPACTS

QUESTION 1

Are there any environmental impacts from the National Policy Scenarios or infrastructure projects appraised in this document which you regard as unacceptable?

ANSWER

Yes. All environmental effects should be considered and carefully balanced against benefits. Many of the infrastructure projects involve unacceptable environmental damage, but the UK-Wide Constrained Scenario has the lowest environmental impact.

We have a detailed knowledge of the area covered by the proposed new Midlands airport and consider the environmental impacts on that area to be totally unacceptable.

QUESTION 2

Could these environmental disbenefits be controlled or mitigated to reduce them to acceptable levels? Do you have particular views on this in respect of:

- *noise (day-time and night-time)*
- *air quality (air traffic and surface access impacts)*
- *climate change*
- *land and property take (residential, agricultural, green belt, landscape)*
- *biodiversity*
- *other environmental impacts*

either in general, or at particular Midlands' airports.

ANSWER

Yes, environmental disbenefits can be controlled or mitigated – through demand management and other environmental controls, legislation on noise and pollution levels.

We have carried out considerable research into each of the issues mentioned above, the results of which are as follows:

Noise (day-time and night-time)

High noise levels associated with airports can lead to deleterious effects on health.

- The obvious effects are annoyance, stress and sleep disturbance, which can lead to other health problems (*World Health Organisation (1993) Community Noise p83*).

- There is published evidence of the negative effect of noise on reading achievements in children (*USA Natural Resources Defense Council 1996*), so the impact on local schools and nurseries needs to be taken into account.
- The actual disease impact of noise in the vicinity of an airport has not been quantified (*Health Council of the Netherlands, 1999*) but it is believed to include cardiac disease, immune system disorders, respiratory illness, hypertension and brain function problems.
- Night time noise is a particular cause of concern (*Department for Transport, Aircraft Noise and Sleep Disturbance*
<http://www.aviation.dft.gov.uk/sleepdisturbance/03.htm>).

The Midlands Consultation document states that some 11,000 people in and around 29 villages in the green belt area around the proposed Coventry/Rugby airport would suffer noise levels above 57dB, the official marker for 'community annoyance' (*Jacob's Consultancy Report for WCC October 2002*). The map produced by WCC (*See Appendix 1*) suggests that, in addition to the two villages that would be demolished to make way for the airport, all or part of the villages of Wolston, Stretton-on-Dunsmore, Stretton-under-Fosse and Long Lawford would be within the 69dB level. These homes would have to be compulsorily purchased.

Air quality (air traffic and surface access impacts)

Do large airports have a significant impact on health? In 1999 the Health Council of the Netherlands published a study called *The Public Health Impact of Large Airports*. The study examined a number of issues including air pollution, noise, accidents, oil and water pollution. Their answer to this question was YES.

The committee found that the most important effects were those due to air pollution and noise.

Fuel combustion (both aircraft and road traffic) generates many known pollutants. These include:

- Carbon Monoxide (CO) – worsens existing heart disease and is a risk in pregnancy. Aggravates asthma and other respiratory disorders.
- Nitrogen Oxides – impairs respiratory function and damages blood capillaries and cells of the immune system.
- Volatile organic compounds(VOC) – thousands of different chemicals, many of them carcinogenic. Benzene is the major chemical in this class and is linked to leukaemia.
- Ozone – increases asthma and susceptibility to respiratory infection.
- Sulphur dioxide (SO₂) – irritates the lungs and is associated with chronic bronchitis. Increases asthma.
- Particulate matter (PM) – associated with a wide range of respiratory disorders. Long-term exposure increases risk of death from heart and lung diseases.

Other hazardous materials found in the vicinity of an airport are arsenic, fuel and mineral oils. (*A summary of the Dutch report's assessment of the evidence is given in Appendix 2*)

In the UK it has been estimated (Government figures) that air pollution in general kills up to 24,000 people per annum. No detailed study of pollution in the vicinity of a large airport has been carried out, but West London Friends of the Earth have estimated that the total number of deaths per annum due to Heathrow would be 59, if Terminal 5 were built (or 42 without Terminal 5). A US Environmental Protection Agency study, *Estimation and Evaluation of cancer risks attributable to air pollution in SW Chicago* (1993), concluded that the pollutants in the vicinity of Midway Airport were responsible for 10.5% of the cancer cases caused by toxic air pollution in that area of the city.

There is no doubt then that air pollution is a major problem in the vicinity of large airports. The airport proposed for the Midlands is larger than any other UK airport. The associated increase in air pollution problems would be felt throughout Rugby and Coventry. Several villages, or parts of villages, (Easenhall, Little Lawford, and considerable parts of Long Lawford, Brinklow and Wolston, would need to be evacuated because the level of NO₂ would exceed the WHO limit of 40 µg m⁻³. (*Midlands New Site: Option Appraisal Main Report for the new airport option produced by Arup Transport Planning*)

Climate change

Global warming is an international issue. The Intergovernmental Panel on Climate Change Report on Aviation and the Global Atmosphere (IPCC 1999) concluded that: '...the balance of evidence suggests that there is a discernible human influence on global climate'. This is due to emissions of carbon dioxide, nitrogen oxides, methane and water vapour.

In 1992 aircraft emissions accounted for 2% of all anthropogenic carbon dioxide (CO₂) emissions and 13% of all CO₂ from transportation sources. Depending on the scenario adopted, by 2050, aircraft emission could increase up to tenfold. The figure below (IPCC 1999) shows that only the low-growth scenario, Fc1, leads to a sustainable level of CO₂ emissions. The scenario Edh (which gives the highest curve) allows for 5% annual growth in traffic.

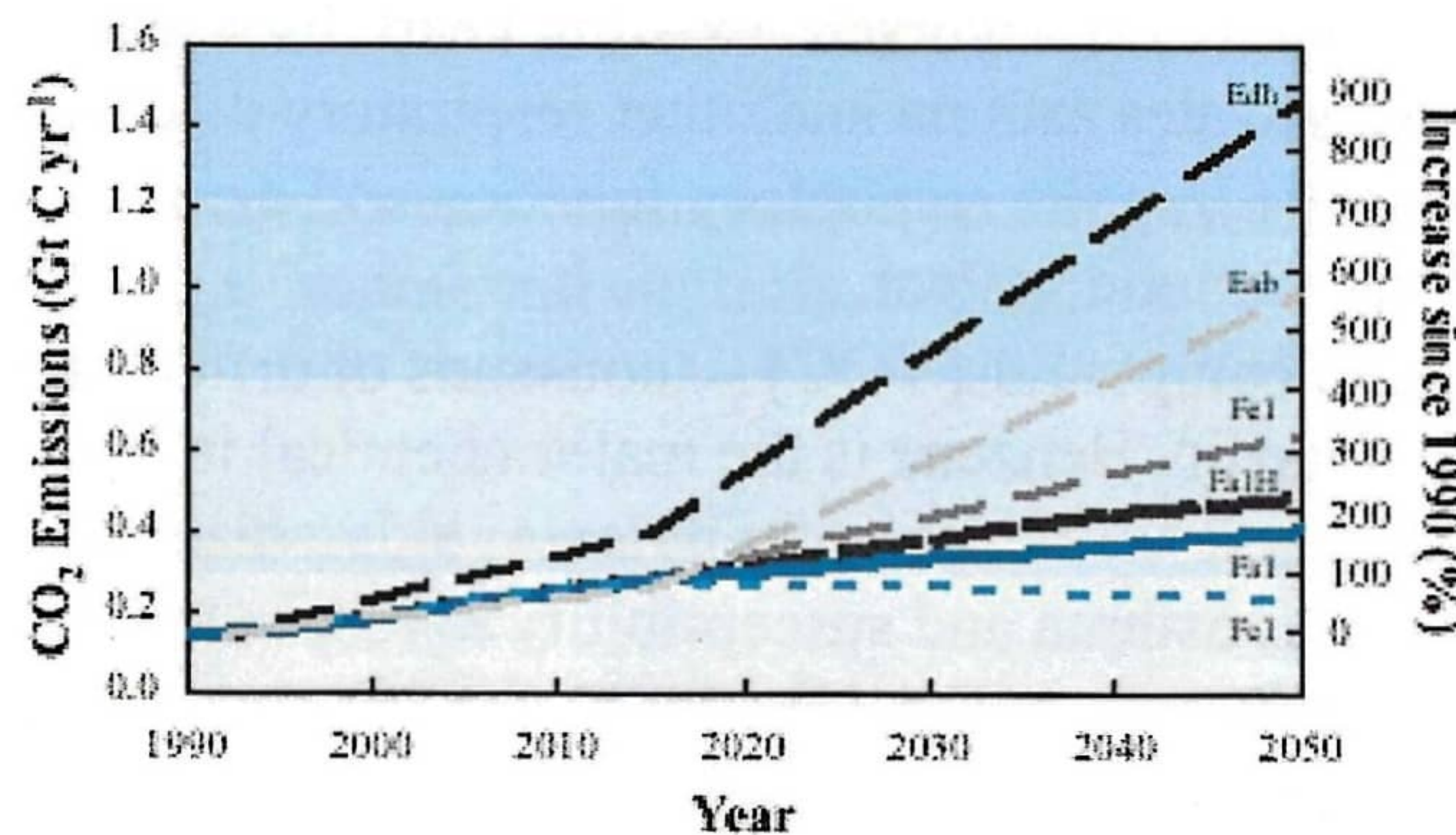


Figure 1: Total aviation carbon dioxide emissions resulting from six different scenarios for aircraft fuel use. Emissions are given in Gt C [or billion (10⁹) tonnes of carbon] per year. To convert Gt C to Gt CO₂ multiply by 3.67. The scale on the righthand axis represents the percentage growth from 1990 to 2050. Aircraft emissions of carbon dioxide represent 2.4% of total fossil fuel emissions of carbon dioxide in 1992 or 2% of total anthropogenic carbon dioxide emissions. (Note: Fa2 has not been drawn because the difference from scenario Fa1 would not be discernible on the figure.)

There is also an increasing body of evidence to suggest that contrails – the vapour trails made by aircraft – have an effect on the climate. The complete grounding of aircraft over the USA for the three days following September 11 2001, for example, gave researchers an opportunity to observe climatic differences. Preliminary conclusions (*Travis DJ, Carleton AM, Lauritsen RG NATURE 418 (6898): 601-601 AUG 8 2002*) suggest that there are climatic effects.

Unrestricted growth of air travel is clearly not in accord with the Government's stated intention to comply with the Kyoto Protocol (*see Question 1, Reason 3, 'National Policy Scenarios'*).

Land and property take

The environmental and social costs of the proposed new Midlands airport are discussed below and in subsequent sections.

Land

Total land-take for the proposed new airport is 1,841 hectares (4,550 acres) taken from the parishes of Church Lawford, King's Newnham, Wolston and Bretford. This is divided up as follows:

Green belt	1,584 hectares
Lakes and reservoirs	6 hectares
Woods	44 hectares
Landfill	145 hectares
Church Lawford	62 hectares

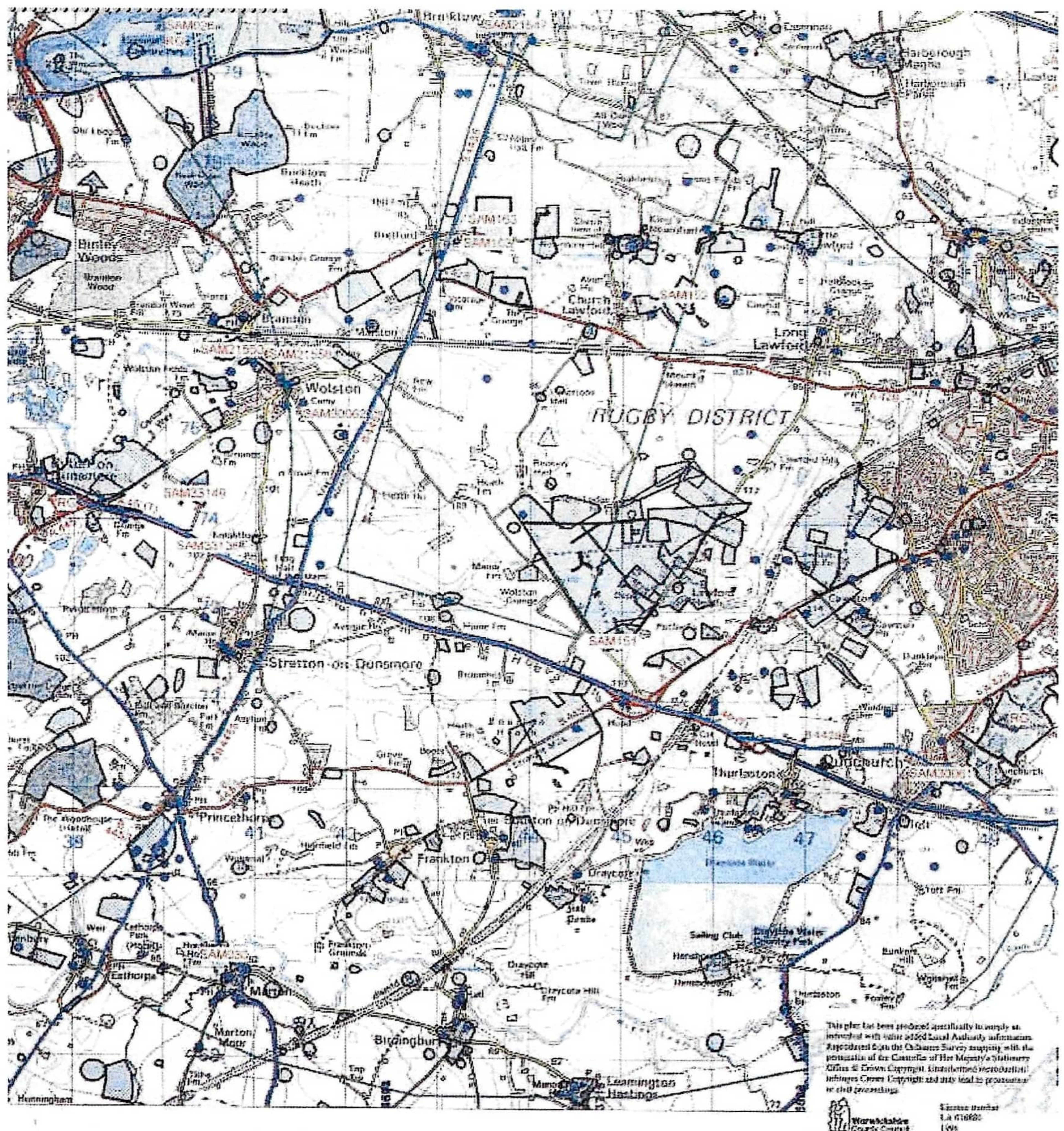
The number of properties to be taken is 136 in Church Lawford and 42 in King's Newnham, Bretford and Wolston. Of these, 13 are listed buildings (*grade II – see Appendix 3*). There are two rest homes that will be affected by the airport: one (Wolston Grange) will be demolished; the other (Town Thorns) would be a few hundred yards beyond the northern end of the runway.

The present church in Church Lawford, which serves the parish of Church Lawford and King's Newnham (Coventry diocese), is not old, having been built in Victorian times (grade II listed). However there has been a church in Church Lawford since Saxon times. The graveyard contains two listed tombs and the remains of the relatives of many current residents. The ancestors of the USA's President Garfield came from Church Lawford and are believed to be buried in the churchyard.

The number of farms to be taken is not 7 (as stated in the consultation document) but over 20 (*further details are given in Appendix 4*). These are mixed farm types: dairy, beef and sheep, pigs and arable, all on land which is considered to be very productive.

Archaeological and historical remains

A notable feature of the area is the wide range of archaeological and historical remains. There are 80 listed finds within the area of the proposed Midlands



Map showing archaeological finds in the area of the proposed airport (WCC Archaeology Office)

airport itself, and over 1,000 within the wider area that would be urbanised by subsequent building (see map). There is archaeological evidence of continuous human occupation in the Church Lawford and King's Newnham area since Neolithic times, and many of the remains are still part of the present day landscape. The remains include:

- An early Neolithic to late Bronze Age earthwork in King's Newnham, identified by aerial photographs and not excavated. This is a Scheduled Ancient Monument (no 152) (OS map reference SP45667655)
- Several ring ditches of early Neolithic to late Bronze Age origin, situated between Bretford and Kings Newnham. (OS Map reference 43567733, Scheduled Ancient Monument no 163)
- The tower of St Lawrence's church, and three associated medieval fishponds. These date back to the 13th century when there was a

settlement granted to Kenilworth Priory. The tower and fishpond are an essential part of the heritage of the area and are much treasured by the local inhabitants. In the same area there are a variety of Neolithic, Roman and medieval remains.

- Brinklow Castle, a motte and bailey that was probably a Norman castle of strategic importance (Scheduled Ancient Monument No 21547). It is described (Victorian County History Vol 6) as 'as fine an example...as can be seen anywhere within the kingdom'. This castle was itself believed to have been built on the site of a prehistoric barrow, and there are also Roman remains in the area.
- The Manor House, Church Lawford, a timber framed Elizabethan manor house, with a pargetted frontage.
- Several lime kilns and the remains of a tramway to a 19th-century lime works east of King's Newnham.

Many of these sites have never been excavated. Where excavation has taken place, for example at Ling Hall prior to extraction of gravel, further previously unknown finds have been made. It is very likely that excavation of many sites in the area would reveal far more items of archaeological interest.

Within the wider area that would be required for access roads, car parks, hotels etc. there are over 1,000 archaeological records. Within 8 km of the proposed airport site there are seven Grade I listed buildings (*see Appendix 5 for details*).

The historical environment of the two villages and their surroundings gives the residents a sense of continuity with the past that cannot be quantified but is highly valued.

Biodiversity

The Avon Corridor is designated as a Site of Interest for Nature Conservation (SINC). At least two miles of this corridor would be destroyed by the building of the proposed new airport, and much more would be damaged. A report published by the West Midlands Wildlife Trusts in October 2001 recommends [in relation to river basins, river catchments and groundwater protection areas] that '...this spatial information is used to ensure that the planning process protects and restores biodiversity (species and habitats) in the region, and that this information comes together to create sensitive and sustainable spatial planning policies'.

There are two ancient woodlands on the site of the proposed airport: Fulham Wood and Chapel Wood. A third, All Oaks Wood, is immediately outside the proposed boundary of the new airport but would be significantly affected by noise and air pollution. Another nine areas of woodland would be destroyed. Over 80 miles of hedgerow would be destroyed.

The site of the proposed airport is home to an enormous range of species. (*Some of the trees, flowers, mammals, birds and butterflies are listed in Appendix 6.*) There are many protected species, including pipistrelle bats, otters, kingfishers, tawny owls, barn owls, little owls, and swans. The stretch of the River Avon that passes through Church Lawford provides nesting sites for kingfisher and grey wagtail.

These would be lost if the river is covered. Lawford Heath holds breeding barn owls and populations of the endangered yellow wagtail, tree sparrow and corn bunting. Up to a fifth of Warwickshire's sand martins (50 pairs in 2002) breed in Ling Hall Quarry. Eighteen species of birds from the 'red list' of endangered species breed on the site (*see Appendix 6*), including the yellowhammer, for which this is a noted site.

Other environmental impacts

The River Avon

The area outlined for the airport includes approximately two miles of the River Avon, which would need to be culverted or diverted. Culverting would clearly be unacceptable from the environmental viewpoint because of the large numbers of riverside species; diverting would be difficult and expensive, and would mean that the river – which is home to many swans – would have to pass to the north of the runway. This is likely to lead to collisions with birds, unacceptable to both aeroplanes and birds.

Flooding

An even greater problem is that the River Avon floods several times every winter (and sometimes also in the summer if there is a heavy rainfall). On these occasions the river level can rise sufficiently to make it impossible to drive in a conventional car from King's Newnham to Church Lawford for several days. Recent flooding has been more severe than any within living memory and has meant that it has also been difficult to drive from King's Newnham to Little Lawford, or to pass through Newbold when the river is in flood.



Flooding of the River Avon January 1998

The Avon Valley in this area is a flood warning area, as defined by the Environment Agency's website (<http://www.environment-agency.gov.uk/regions/midlands/Corporatedocuments>).

The problem would be exacerbated by the run-off from the area of the airport and approach roads. A rainfall of 5cm on an area of 2000 hectares gives rise to 1 million tonnes of water. At present most of this falls on agricultural land and is slowly released into the river via drains, giving the river time to dispose of the water. However, if the airport were to be built, this area would be converted to hard surfaces and run-off would be immediate. If released into the river, this could give rise to serious flooding downstream of the airport. In addition, this water will be contaminated by a wide range of chemicals including de-icing fluids, kerosene, petroleum and hydraulic fluids, and consequently will need to be prevented from running into the river immediately as it will need to be treated before release. These chemicals are known to cause kidney damage, blood disorders and cancers.

Draycote Water

Draycote Water supplies drinking water for Rugby and surroundings. There is an obvious issue here about the supply of water to the airport – a far larger consumer than Rugby town. However another potential problem is the contamination of the water in Draycote by fall-out of oil and chemicals from planes taking off and landing or, in cases of emergency, dumping fuel before landing.

Draycote is also a roosting area for up to 40,000 gulls and there is a major morning and evening flight line for these gulls between Draycote and the Tame valley. This could pose a serious hazard to aircraft as Draycote water is only two miles from the south east end of the runway and therefore in the direction of flight of most aircraft taking off from the airport.

Gas pipeline

The consultation document makes no mention of the fact that there are two or three large gas pipelines running through the proposed site and an important gas distribution station just on the edge of the site.

Rural community

The demolition of the villages will mean the displacement of some 400 adults and 70 children. Of the adults 57% have lived in the community for more than 20 years and 25% for more than 40 years. In many cases their families have lived in the village for several generations.

The two villages have a strong and thriving sense of community. Many social activities are initiated by the church community, others by the Reading Room committee. There is also a Youth Club, a Women's Institute and a luncheon club for the elderly. The annual village fete is a notable event in the area, and events such as the Queen's Jubilee are occasions for barbecues, barn dances,

and sports days which are enjoyed by all the residents. The quality of life enjoyed by villagers is high, and typical of the rural lifestyle that will disappear if not supported.



Church Lawford Fete 2002

QUESTION 3

Would you support the scenarios to keep pace with consumer demand if they carried with them enforceable targets for environmental improvement (e.g. air quality, noise, public transport mode split, energy savings, and waste reduction)?

ANSWER

As stated in the answers to 'National Policy Scenarios', we do not agree with the 'predict and provide' policy that is implied here. Such a policy has been proven to be unsatisfactory for road transport, and air transport is unlikely to be any different. The approach should instead be one that is led by environmental considerations. Scenarios that keep pace with consumer demand are only acceptable if they can be rigorously shown to be environmentally sustainable.

QUESTION 4

Is there a case for reviewing green belt boundaries as they affect airports in the light of any of the scenarios. What would be the advantages and disadvantages? Should airports be removed from the green belt altogether?

ANSWER

There is no case for reviewing green belt boundaries as they affect airports. The provision of new airports, or extensions to existing ones, should be subject to the same planning requirements as any other development that destroys the green belt.

Each case for the destruction of green belt should be carefully considered and permission given in only exceptional circumstances. In the case of an application for a new airport, consideration must also be given to the possibility of subsequent development of peripheral land that would lead to the destruction of even larger areas of green belt.

There is no justification for removing airports from the green belt altogether.

SURFACE ACCESS

QUESTION 1

Should the focus of any public expenditure which may be available to help improve surface access to the Midlands airports be on improving local or inter-regional access or both, and why?

ANSWER

As both local and remote airport users will use inter-regional access roads for part of their journey, it seems logical that both should benefit from any investment. However it is essential that, since the sustainability philosophy encourages the use of nearest-to-home airports, local access roads are brought up to the required standard before there is investment in any inter-regional access.

QUESTION 2

Under many of our national policy scenarios, there will be a large increase in the number of passengers using the Midlands airports over the forecasting period. Our analysis indicates this will place considerable strain on surface access provision, particularly key road links in a number of places.

- *Should these surface access constraints be addressed?*
- *Which schemes outlined in the document do you consider are the key ones for improving access to the region's airports and what priority should they be given relative to other projects? Which do you think should not be taken forward?*
- *Are there any surface access schemes identified in the analysis that you support or oppose? Please give your reasons.*
- *Are there any surface access improvements, which should be regarded as preconditions before any new capacity can take place at airports within the study area?*
- *How should these surface access improvements be funded?*

ANSWER

Clearly there will be some increase in air travel over the next 20 years, whichever Policy Scenario is adopted. Within the UK-Wide Constrained Scenario, as previously argued, these increases are manageable. However, in order to make this successful, it is important to complete any surface access improvements necessary to accommodate the maximum use operations for existing airports.

In particular, the rail networks should be developed so as to provide more capacity and operate at a higher level of reliability than they do at present, thereby encouraging greater use of public transport. The rail network and local access to airport developments should be completed *before* there is any major road infrastructure work. Only when the use of the rail network, operating at the required capacity and

reliability levels, has been evaluated should any major development of other surface access facilities be addressed.

This process will give public transport a fair and objective opportunity to establish itself as a viable means of airport access, and consequently will limit further development of the road network with its disastrous pollution effects.

QUESTION 3

How might the share of public transport access to airports be increased?

ANSWER

There are three key areas that need to be improved if public transport access to airports is to be increased:

- Availability - there need to be significantly more bus and train routes, in particular to/from the more remote rural locations, and more regular services.
- Reliability - both the rail network and buses need to improve reliability significantly so people can trust the services to get them to the airport on time. This is not currently the case.
- Cost - the exorbitant cost of rail travel, in particular, including station parking, is currently a significant inhibitor in its use for access to airports. Costs must be reduced if rail transport is to become a major consideration.

QUESTION 4

Were a new runway/runways or new airport site to be developed in the region, we forecast that a significant number of passengers originating in the Midlands will still use airports outside the region – predominantly in the South East. Significant numbers of passengers from the South East would also be likely to use airports in the Midlands, particularly if capacity in the South East were constrained.

- *Should surface access schemes to facilitate journeys from the Midlands to airports in the South East be considered?*
- *Should surface access schemes to facilitate journeys from the South East to airports in the Midlands be considered?*
- *Should the focus of any public expenditure which may be available to help improve surface access to the region's airports be on an improving local or inter-regional access, or both, and why?*

ANSWER

The UK-Wide Constrained Scenario does not require any new runway or new airport development. The implications for the surface access infrastructure of adopting any other Policy Scenario is one significant reason for selecting for the UK-Wide Constrained Scenario in the first place.

PART 3 OPTIONS (CHAPTER 7)

QUESTION 1

Do you think that Government should, as part of its policies for airports in the period up to 2030, support in principle the construction of a new runway/runways/airport for the Midlands?

ANSWER

No.

QUESTION 2

If you consider that a new runway for the Midlands should not be supported, on what grounds is this based? What, if any, option would you support for increasing capacity in the region? For example, the development of secondary airports, notably Coventry, Wolverhampton Business Airport and potentially RAF Cosford, in order to serve commercial flights?

ANSWER

The answer to this question has been discussed at length throughout the rest of this response document. However, in summary, the building of new runway(s) or a new airport is not supported for the following reasons:

- The forecast demand figures for the Midlands area are, in our opinion, inaccurate (*see 'National Policy Scenarios'*).
 - The current capacity of existing airports is not being fully utilised. If it were to be used to its maximum capacity it would be sufficient to meet demand. This option is available within the UK-Wide Constrained Scenario, which we support (*see 'National Policy Scenarios'*).
 - The environmental costs would be too great, particularly for people living in the Midlands (*see 'Environmental Impacts'*).
 - This consultation should have been on transport issues generally, rather than on one specific sector of the industry. This point is particularly relevant in relation to UK and European destinations, which should be the subject of discussion on alternative forms of transport. An increase in air traffic is not the only way to cope with the demand for travel.
-

QUESTION 3

On the basis of our appraisal of options for new runway capacity at Birmingham and East Midlands airports as well as a new airport for the Midlands, which, if any, of these do you believe best serves the interests of the region in terms of the following:

- *providing accessibility to a wide range and frequency of air services for air passengers originating in the Midlands*
- *maximising economic benefits for the Midlands (in terms of the impacts of both passengers and freight)*
- *providing additional capacity in the most sustainable manner*

Which of these options do you support overall?

ANSWER

The question assumes that there is agreement that additional Midlands runway capacity is required. However, as reiterated frequently throughout this response document, we strongly believe the forecast figures to be unsound and that a more conservative estimate of demand numbers – that takes account of demand management (both Government-initiated and created by the limitations of oil supplies) – can be catered for through effective implementation of the maximum use options. The question is thus rendered redundant.

Only when the maximum use option has been fully exploited should there be any debate about the development of runway capacity.

It should also be recognised that the maximisation of economic benefits should be looked at in a broader context – best use of land take, elimination of the tourism net loss to the region, and so on. None of the options above would bring sufficient economic benefits to the region to warrant the drop in quality of life that would ensue, and we believe there are other options – not transport related – that would bring far greater economic benefits.

None of these options can therefore be supported.

QUESTION 4

Should the development of a new runway or new airport site for the Midlands be made dependant upon the imposition of planning conditions, for example measures to regulate and govern local air quality emissions, aircraft noise exposure, public transport mode split etc?

ANSWER

Answers to previous questions make our position clear – there should be no runway development, and therefore this question is irrelevant. However, the question does raise the issue of whether or not these restrictions apply to existing airports.

Clearly, planning and operational restrictions should apply to all existing facilities, in that local air quality emissions should be regulated, as should aircraft noise exposure, public transport mode split etc. These regulations should be strengthened and strictly applied to all air travel facilities, whether old, new or proposed, in order to reduce the impact on the environment and on the lives of the people living around airports.

QUESTION 5

Do you agree that land required for an additional runway or new airport site should be safeguarded in the forthcoming Air Transport White Paper?

ANSWER

In the event that a new runway or airport is to be built, the land should be safeguarded. However, as stated earlier we do not recognise the need for any Midlands runway or new airport development.

QUESTION 6

Our appraisal of the financial viability of new runways at existing airports and the new site for the Midlands, indicates that some form of public funding might be required to fund their development. Would you support the use of public money for airport infrastructure development?

ANSWER

Emphatically not.

AVIATION STRATEGY FOR THE MIDLANDS

QUESTION 1

Do you think there would be any value in the region developing and regularly updating a region-specific aviation strategy? If so what would be its objectives:

- *to interpret the provisions of the air transport white paper in a regional context?*
- *to provide a short-term plan for delivering improved air services and new airport development in the region?*
- *to ensure the needs and impacts of the aviation industry are properly integrated with other regional strategies on economics, land use, the environment and transport?*

ANSWER

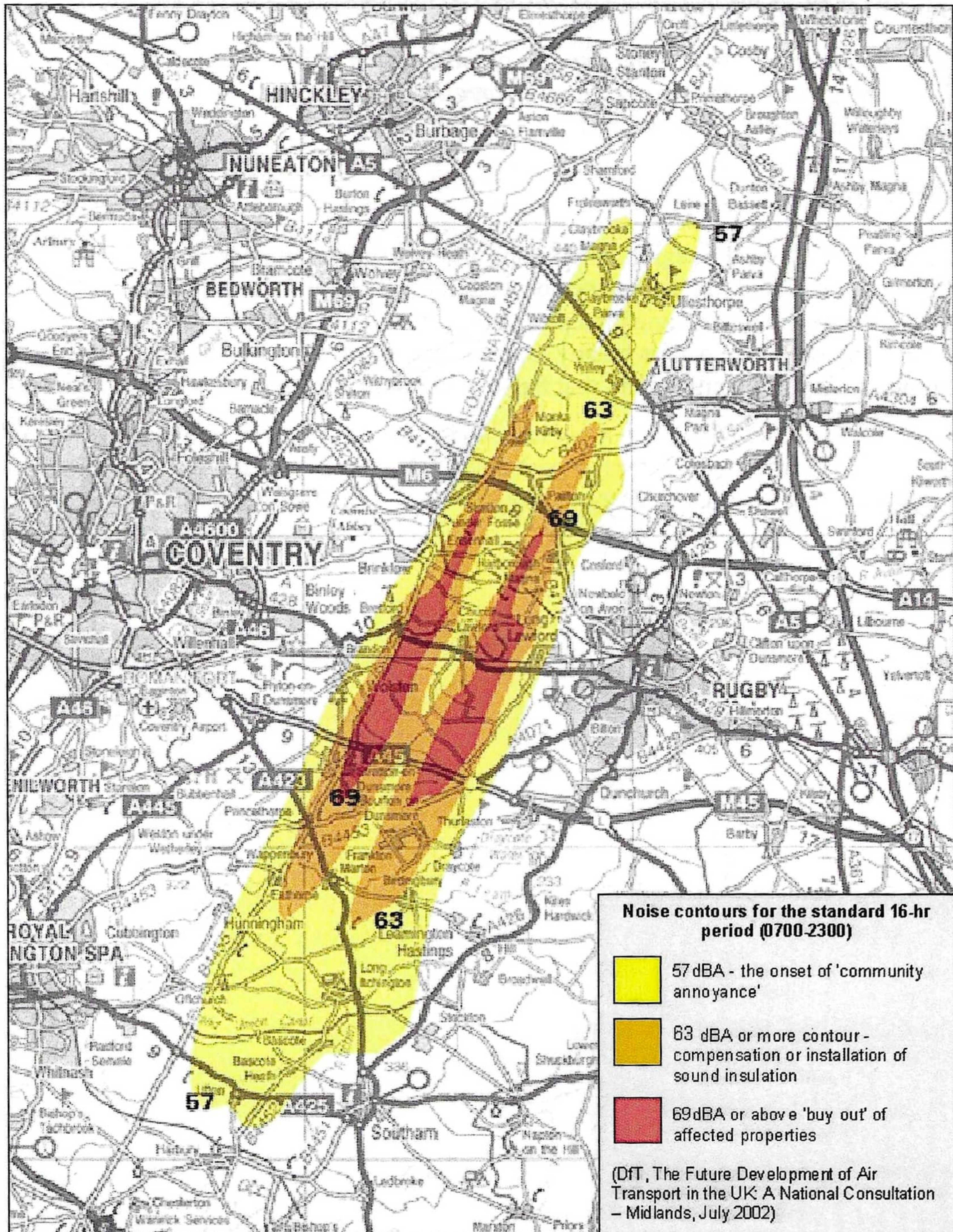
It is not feasible for the region to have specific transport strategies, since the business of integration would in that instance become more difficult than at present. The key is to have one regional strategic planning transport body, responsible for ensuring that all Government white papers on any aspect of transport were incorporated into any regional transport planning, and that those plans were adopted by the wider regional strategic planning organs.

APPENDICES

APPENDIX 1

This map is Warwickshire County Council's interpretation of the areas affected by the 57dBA, 63dBA & 69dBA noise contours depicted in the Midlands New Site: Option Appraisal Main Report for the new airport option (produced by Arup Transport Planning) included on the Government's website.

Rugby / Coventry Airport Proposal - 16 hr Noise Contours



APPENDIX 2

Summary of results from 1999 report by Health Council of the Netherlands, *The Public Health Impact of Large Airports*

The Dutch report analysed the effects of air pollution on health. The evidence already available on the effects of air pollution on health was divided up into effects due to (a) acute, and (b) chronic diseases. The tables below summarise the findings:

(a) Acute

EFFECT	EVIDENCE	SEVERITY
Premature death	Good	Severe
Aggravation of respiratory and cardiovascular disorders	Good	Severe
Decreased lung function	Good	Slight
Increase in chronic respiratory conditions	Limited	Moderate
Aggravation of asthma	Limited	Severe

(b) Chronic

EFFECT	EVIDENCE	SEVERITY
Premature death including lung cancer and cardiopulmonary mortality	Good	Severe
Reduced lung function	Good	Moderate
Respiratory symptoms in children	Limited	Severe
Increase in chronic respiratory conditions in adults	Good	Moderate
Prevalence of asthma and allergic symptoms	Limited	Severe
Odour annoyance	Good	Slight
Odour-related symptoms	Limited	Moderate

APPENDIX 3

Listed buildings in Church Lawford

• Lawford Lodge farmhouse and barn	From 17 th century
• 17 & 19 Church Road	2 cottages. Early/mid 18 th century
• Church of St Peter	13 th and 14 th century origins. Rebuilt 1872
• Chest Tomb	Dated 1799 and 1805. John and Elizabeth Brierly
• Chest Tomb	1795. Rev John Kaye and his wife
• No 9 Green Lane and adjoining	Semi-detached cottages 17 th /early 18 th century
• Limestone Hall	Early 19 th century farmhouse
• The Manor House	Early-mid 16 th century. Timber framed with pargetting

Listed Buildings in King's Newnham

• Remains of the church of St Lawrence	Late 12 th century origins
• The Laurels	Mid-late 18 th century farmhouse
• The Dovecote, Newnham Hall	16 th century dovecote
• Newnham Hall	1791 farmhouse
• Manor Farmhouse	Early/mid 18 th century
• Highfield House	House c 1830

Listed buildings in Wolston Parish

• Manor Farmhouse	Late 18 th century farmhouse
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APPENDIX 4

Farms to be taken

Church Lawford and King's Newnham	Wolston and Bretford
● Grange Farm (incl Newnham Grounds)	● Heath House
● King's Newnham Hall	● *Vicarage Farm
● *Abbey Hall Farm	● Manor Farm
● Manor Farm (KN, incl Highfields)	● Heath Farm
● Fennis Fields Farm	● Lords Hill Farm
● Limestone Hall Farm	● Ferry Farm
● Rookery Hall Farm	● Lawford Lodge Farm
● Burnhams Farm	● New Farm
● *Goodes Farm	● Reg Crowe (smallholding)
● *Mount Pleasant	● North Lodge Farm
● Manor Farm (CL)	● Willow Farm Riding Stables
● Kinver Farm (smallholding)	
● Lineside Nursery	
● Mr and Mrs. Barnwell	

* Indicates that the farmhouse is outside the airport boundary as currently drawn but that there is a significant proportion of the land within the boundary.

APPENDIX 5

List of grade I buildings within 8 km of the site

- St Botolph's Church, Newbold
- Coombe Abbey
- St Edith's Church, Monk's Kirby
- St Margaret's Church, Wolston
- Bilton Hall, Bilton
- Rugby School (Victorian) Chapel
- Newnham Paddock gates (less than 8 km from perimeter)

There are 15 grade II* listed buildings and 440 grade II listed buildings within 8 km of the site.

APPENDIX 6

List of species

(Grasses and invertebrates are not included)

BIRDS

Red list breeding species

Grey Partridge
Quail (not every year)
Turtle Dove
Lesser Spotted Woodpecker
Skylark
Song thrush
Grasshopper Warbler (not every year)
Spotted Flycatcher
Marsh Tit
Willow Tit
Starling
House Sparrow
Tree Sparrow
Linnet
Bullfinch
Yellow Hammer
Reed Bunting
Corn Bunting

Amber list

Mute Swan
Kestrel
Lapwing
Stock Dove
Barn Owl
Cuckoo
Kingfisher
Green Woodpecker
Sand Martin
Swallow
House Martin
Meadow Pipit
Yellow Wagtail
Grey Wagtail
Dunnock
Mistle Thrush
Willow Warbler
Goldcrest

TREES

Oak	Sessile Pedunculated Turkey Variegated Holm x 2 types Macrolepsis Scarlet Red Black Hungarian	Willow Weeping Curly Crack Goat x 4 types Common	Hollies x 4 types Conifers x 8 types Cornus x 4 types Larch Hornbeam Snowdrop tree Handkerchief tree Metasequoia Golden rain Indian bean Parrotia Forest pansy Paulownia Katsura tree Lilac x 2 types Acacia Alder Buckthorn x 2 types Northofagus Antarctica
Acer	Phoenix Liquid Amber Saccharineum Brilliantissima Platinoides Crimson King x 2 Drummondii October Glory Snake Bark Sycamore Field	Lime Small leaved Winter Orange	Birch Silver Black
Beech	Copper Dawick Common Rohanni	Sorbus Whitebeam Pink Pagoda Cashmirriana Aucupania John Mitchell Rowans x 3 types Service	Poplar Native Black Lombardy Aspen
Cherry	Bird Wild Winter flower Edible x 2	Chestnut Horse Sweet x 2 types	Ash Common Spanish Golden
Thorn	Black Haw Midland Haw Common Buckthorn Persimmon x Gallii	Privet Common Wild	
Amelanchia x 2		Laburnum	SHRUBS
Spindle x 2		Hazel x 3 types	Laurel Buddleia x 4 types Hop – golden Viburnum x 4 types Rose x 3 types Cotoneaster x 2 types Berberis x 3 types
Prunus x 2		Gingko	
Cotinus x 3		Tulip	
Elder x 2		Elm	
		Robinii	
		Eucalyptus x 5 types	
		Wayfarer	
		Damson	
		Walnut Common Black	
		Apple Crab x 5 types Eaters x 7 types	
		Pear Wild Eaters x 2 types	
		Alder Italian Common	

MAMMALS

Fox
Rabbit
Hare
Badger
Water Vole
Brown Rat
Stoat
Roe Deer
Fieldmouse
Field vole
Shrew
Grey Squirrel
Muntjac Deer
Weasel
Bat – pipistrelle
Mole
Otter
Hedgehog

REPTILES and AMPHIBIANS

Common Toad
Common Frog
Smooth Newt
Grass Snake

INSECTS

Damselfly
Dragonfly
Chasers
Grasshoppers
Earwigs
Shieldbugs
Crickets
Pondskaters
Backswimmers
Lacewings
Scorpion fly
Caddis fly
Crane fly
Midges
Hoverflies - various
Gnats
Fruit flies
Dung flies
Sawflies
Gall Wasp
Ants
Wasps – various
Bees - various
Bumble Bees x 5 types
Beetles – various including
Bloody-nosed beetle
Stag Beetles
Cockchafer
Ladybirds
Weevils
Moths - various

BUTTERFLIES

Orange tip
Large White
Small White
Green Veined White
Brimstone
Small Tortoiseshell
Peacock
Red Admiral
Painted Lady
Comma
Common Blue
Ringlet
Meadow Brown
Gatekeeper
Speckled Wood
Large Skipper
Small Skipper
Small Copper
Holly Blue
Clouded yellow
Small Heath

