



Report by the Concerned residents Against Staverton Expansion (CASE)

case@case-online.org.uk

Gloucestershire Airport Expansion Project

Authors: Richard Conibere, Neil Marshall
6th February 2008

Introduction

CASE are local residents concerned about plans to expand Gloucestershire (Staverton) Airport.

For several years we have believed that the Airport has had plans to expand its operations. When the Airport's five-year plan was submitted to Tewkesbury Borough Council as part of four planning applications these fears were confirmed. The five-year plan contradicted the Airports public statements, and confirmed that the Airport wishes to significantly increase the number of larger aircraft using their facilities.

The Airport plan proposes that the two owners of the Airport, Cheltenham Borough and Gloucester City Councils will provide the funding for the £3.4M expansion in the form of a loan. In 2007 the two councils set up a sub committee, the Joint Airport Scrutiny Working Group (JASWG), to examine the Airport's plans.

This report has been prepared as a response to the JASWG report evaluating the 'Gloucestershire Airport Runway Safety Project' (RSP). For reasons that will become clear we refer to this plan as the Airport Expansion Project (AEP).

The evaluation of the JASWG was a cross party collaboration. This report is not aimed at a particular political party nor is it intended to question the policies of a particular party. Hopefully this report will be a useful source of information that may help to inform the view of Councillors and other interested parties on this important issue.

Executive Summary

Chapters 1-2: Firstly this report demonstrates that the Airport is set on the path to expansion with an intensification of activity at the site. The degree of the expansion is understated by the JASWG report and it is misleading to represent the development as safety related.

- Our calculations show that, should plans for passenger services be realised, flights involving larger jet aircraft or similar could increase by over 500%
- Both the overall number of runway movements and the average size of planes using the Airport will increase.
- The number of runway movements will decline by less than 2% if the project is refused.

Chapter 3: The investigation conducted by the JASWG had a limited scope and so, consequently, did the terms of reference given to the engineers who reviewed the Airport's proposal. Though the JASWG conclude that the development is feasible the possibility of other approaches that could produce a greater benefit are completely ignored. Were the value of the land and other assets on the site to be considered the poor return on the investment would then be apparent. The faith in the plan succeeding ignores numerous factors that point to a bleak future for domestic aviation.

- Dividends will not increase for several years. In 3 years time the Council can expect a dividend increase of £18,000 amounting to just 0.11% of their current budget.
- New UK and European laws, the coming Climate Change Bill legislation, policies on taxing aviation fuel that are now under discussion and the looming threat of peak oil all point to a tough economic climate for aviation.
- The JASWG report fails to explore other ways of making up the shortfall that could result from the 'do nothing' approach.

Chapter 4: Expansion of the Airport will be detrimental to the environment, especially in terms of carbon emissions, noise nuisance and air quality

- Expanding the Airport is contrary to the Nottingham declaration, national and local strategies for combating climate change. Carbon dioxide emissions will increase by thousands of tons.
- Noise nuisance around the Airport and further afield, in Cheltenham for example, will increase markedly.
- Residents report that fumes from the larger jet and turboprop aircraft are responsible for the localised stench of jet-fuel, that this on occasion leads to nausea, and that an oily film of unburned fuel is left on roads and fishponds in the area. No such problems are reported for lighter aircraft.

Chapter 5: A number of pseudo-green arguments have been advanced to promote the development e.g. by suggesting that Airport related CO₂ emissions are small compared to a section of the M5. Such arguments are ludicrous and easily refuted.

Chapter 6: Councillors have put forward some possible constraints to the Airport's expansion including a 'Green Policy' and measures to impose a cap on the number of flights. Whilst CASE would like to see the project refused, we acknowledge that there could be some merit to the proposed constraints if they were strengthened considerably and properly implemented.

Chapter 7: Whilst the national policies of the various political parties vary, the unfettered expansion being considered for Staverton is advocated by none.

Contents

INTRODUCTION	1
EXECUTIVE SUMMARY	2
1. EXPANSION OR SAFETY?	4
2. EXPANSION SPECIFICS	6
2.1 JASWG ACKNOWLEDGE POTENTIAL FOR OPERATIONS INCREASE.....	6
2.2 MOVEMENT GROWTH OF OVER 500% FOR LARGEST AIRCRAFT	7
2.3 MORE USE OF THE AIRPORT BY LARGER AIRCRAFT	7
3. ECONOMIC ISSUES	8
3.1 AVIATION TRENDS	8
3.2 SCOPING OF THE JASWG COMMITTEE REPORT	8
3.3 SCOPING OF THE MOTT MAC DONALD REPORT	9
3.4 BUSINESS PLAN ANALYSIS.....	10
4. BENEFITS TO THE COMMUNITY	11
4.1 BENEFITS FROM TOURISM	11
4.2 SURVEY OF RESIDENTS	11
4.3 THE AIRPORT AND THE FLOODS	12
5. ENVIRONMENTAL ISSUES	13
5.1 CLIMATE CHANGE	13
5.2 NOISE.....	13
5.3 AIR QUALITY	14
5.4 OPENING HOURS	14
6. GREENWASH	15
6.1 AIRCRAFT EFFICIENCY GAINS.....	15
6.2 REDUCED JOURNEYS.....	16
6.3 EMISSIONS ON THE M5.....	16
6.4 BUSINESS AIRCRAFT	16
7. ADDITIONAL PROPOSALS	17
7.1 THE 'GREEN' POLICY.....	17
7.2 FLIGHT CAPPING	17
7.3 HOUSING ON THE SITE.....	18
8. PARTY POLICIES	19
8.1 LIBERAL DEMOCRATS	19
8.2 CONSERVATIVES	19
8.3 LABOUR	19
8.4 GREEN PARTY	19
9. CONCLUSIONS	20
APPENDIX A	21

1. Expansion or Safety?

A key assumption in the JASWG report is that the Airport plan is a safety project. Whilst the local councils have considered a Business Plan dated 17th April 2007 a far more telling earlier version of the plan exists. This original plan was submitted to Tewkesbury Borough Council along with the planning applications and was subsequently withdrawn. The withdrawal was nominally on grounds of commercial confidentiality. Although the replacement plan excluded some confidential information, many other passages were also removed. The deleted passages included:

- *"Increase the landing distance available (LDA) on runway 27 from 997 metres to around 1160 metres, making it suitable for a wide range of popular business aircraft as well as regional passenger aircraft in the 20-80 seater range." (originally p.9)*
- *"The improved facilities would also make possible the introduction of regular, scheduled flights, servicing a range of destinations" (originally p.10)*
- *"The planned development of passenger carrying commercial traffic would bring about the need to expand the existing passenger terminal facilities." (originally p.27)*

All of these passages point to an effort to increase Airport operations. The original Business Plan makes it clear that these expansionist plans are possible thanks to the proposed development. Whilst the above passages are absent from the latest Business Plan, the proposed development is unchanged meaning that the originally stated plans can be realised. Furthermore the business plan is explicit in its overall aims:

- *Increase the number of aircraft operating when the weather is not suitable for private pilot training and recreational flying.*
- *Increase the number of commercial training flights*
- *Increase the revenue from each movement by attracting larger aircraft. These generate higher landing fees, increased passenger/freight handling charges and purchase more fuel.*

It should be apparent that the stated aims concern growth of the business with no reference made to safety. The first two points will lead to an overall increase in the number of movements; the third will lead to an increase in the average size of the aircraft using the Airport.

The argument for interpreting the development as a 'safety' issue is based on Civil Aviation Authority (CAA) rules. Currently the Airport enjoys a special dispensation from the CAA that permits the use of a greater length of runway than would ordinarily be allowed. The proposed development would further extend the usable length of runway and would do away with the need for the special dispensation. Effectively the Airport would be able to 'safely' use a longer runway and hence the project is characterised as being safety related. However an equally valid and more honest approach to safety would be to reduce the usable runway length so that the special dispensation is no longer required. This would prevent the use of the Airport by a small number of larger planes that currently use the site. However the Airport would remain accessible to its core business of light aircraft and helicopters that account for over 98%¹ of runway movements.

¹ Five-year plan dated 11/12/2006, p18 (and JASWG report 9.4, p.8) predicts loss of 1,350 movements if runway expansion is not implemented. The same version of the plan also quotes 90,000 annual movements, of which 1,350 represents 1.5%.

There is no requirement by the CAA for the Airport to install an Instrument Landing System (ILS). The proposals include plans for an ILS not for safety reasons, but because it will make the Airport more attractive to commercial operators and training schools. In the first instance this will increase the likelihood of additional chartered and scheduled services, and in the second instance it will increase to nuisance from training flights making additional repeated approaches.

Taking into account the exemptions granted to the Airport by the CAA, which currently allow it to use 997m for landing, the 1159m that will be available after the development represents an increase of over 16%. This is not maintaining the status quo, this is a significant extension of the available runway length. The JASWG report and the Airport's five-year plan indicates the CAA safety restrictions should limit the available main runway length that can be used for landing to 870m². Having implemented the development the Airport will be able to use 1,159m, a potential increase of one third. The proposed developments go beyond what is necessary to avoid the CAA reducing the usable runway length, and significantly increase the ability of the Airport to handle larger aircraft with larger payloads.

In conclusion the proposed development is clearly a move to expand and intensify operations of the Airport. Portrayal of the project as safety related is misleading. Hence the use of the term Airport Expansion Plan (AEP).

² JASWG report 3.3 p.3 and 9.3 p. 8 and five-year plan dated 11/12/2006 p.17

2. Expansion Specifics

2.1 JASWG Acknowledge Potential for Operations Increase

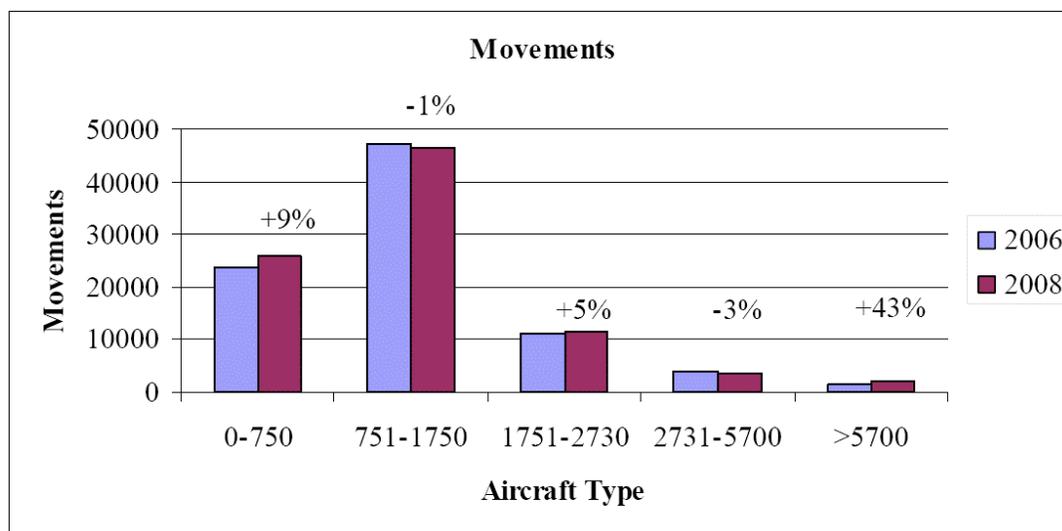
The JASWG report acknowledges that the plan gives the Airport scope to increase its operations. In particular Appendix B page 6 notes that fuel sales are projected to jump from 2.1 to 3.2 million litres, an increase of over 50%. The expected changes in aircraft sizes and movements are quantified and graphed on pages 16-17 of Appendix B in the JASWG report – these are reproduced below:

Table 1

MTOW Band	Type of flight	Mvmts Current	Mvmts Post-RSP	Revenue Current	Revenue Post RSP	% mvmts	% revenue
0 - 750	Private	23752	25808	59380	64520	+9%	+9%
751 - 1750	Club	47195	46675	117987.5	116687.5	-1%	-1%
1751 - 2730	Comm. Training	11127	11658	222597	244705	+5%	+10%
2731 - 5700	Other	3779	3663	114624.5	118867	-3%	+4%
>5700	Business	1429	2047	143068	194249	+43%	+36%
	TOTAL	87282	89851	657657	739028.5	+3%	+12%

Note that MTOW indicates the loaded weight of the plane, standing for Maximum Take-Off Weight.

Figure 1



The projected figures above are given for 2008 which would be some years prior to the completion of the AEP. It is assumed that this is a mistake and the graph shows projected growth once the AEP works are done.

2.2 Movement growth of over 500% for largest aircraft

At first view the figures seem fairly benign. Overall movements increase from 87282 to 89851, a growth of around 3%. However Mott MacDonald's engineers have subsequently acknowledged that these figures represent a conservative minimum projection for growth.³

Furthermore the figures exclude the potential for the introduction of scheduled passenger services. The recently introduced Manx services account for 28 runway movements per week and hence 1456 movements per year. The JASWG report notes that 3 further scheduled services would be possible giving a total of 5824 additional flights, all concentrated in the highest weight category. Rather than a growth of 43% (Table 1) this represents an increase of well over 500%⁴. All such flights would be reliant on the extended runway running from East to West and, should the passenger service plans to realised, residents could expect 20 flights per day⁵ involving larger jet aircraft or similar. Over the average 10.5 hour/day period in which the Airport is open, this would represent an aircraft in the largest category overhead every half an hour.

Even using the more conservative figures in the JASWG report they project 12 additional flights per day by large passenger aircraft.

2.3 More use of the Airport by larger aircraft

One of the more questionable statements in the JASWG report is that the size and type of planes using the Airport will not change. Page 12 states:

11.2 Aircraft Type

The type of aircraft that can operate at any Airport is determined by the category of Airport license granted (Code 1 for smallest to Code 4 for largest). Gloucestershire Airport is Code 2 and this will not change even when the project is complete. So the types of aircraft allowed to operate will not change. However, the current restrictions on runway use mean some planes operate at less than full payload. So more of the same types could be attracted to the Airport after the improvement work is completed.

This is contrary to the Airport's previous statement that they will attract, "passenger aircraft in the 20-80 seater range". Whereas the Airport website has claimed that "the aircraft able to use Gloucestershire Airport will not be different from the ones we see now" the original Business Plan says the changes will "quickly attract larger business aircraft that cannot currently use, or are severely restricted in their use of, the Airport". The planned changes will not change the current CAA code 2 classification of the runway, but they will make the Airport more financially viable for larger aircraft that currently do not use the Airport. In conclusion the above makes it clear that the projected growth at the Airport is significantly understated by the JASWG report and that such growth can include larger aircraft.

³ Comment at the Economy and Business Improvement Overview and Scrutiny Meeting, 16th Jan 2008

⁴ (2047 post-RSP movements + 5824 passenger plane movements) / 1429 current movements = 551%

⁵ (2047 post-RSP movements + 5824 passenger plane movements) / 365 days in the year = 21.56

3. Economic Issues

Having made the case that the Airport is expanding and that the JASWG report has understated this expansion, this will certainly be a cause for concern to environmentalists worried about climate change and nearby residents who will suffer the blight of increased noise, traffic and so on. However some will be considering the Airport plan purely as a business proposition without regard to the social and environmental consequences. For such persons the over-riding issue will be the economic benefit of the development. Hence we now turn to the question of whether the plan is genuinely feasible and what benefits it offers to Gloucestershire residents.

3.1 Aviation Trends

A number of factors point to an increasingly tough economic climate for the aviation sector. Within the last few months the EU have included aviation with their European carbon Trading Scheme (ETS). The UK government's Climate Change Bill is currently being considered by the House of Lords and is likely to become law in April or May of this year. Both point to a situation where operator costs increase as they are obliged to buy at auction quantities of carbon above their initial allowances in order to carry on flying.

Also Gordon Brown's recent tax changes mean that operators are now charged on a per plane rather than per passenger basis. This will undoubtedly increase costs, especially given that services from the Airport attract few passengers.

Furthermore various political parties are discussing possible additional policies, noting that currently the aviation sector is in effect subsidised by the absence of a fuel tax. Also the future supply of oil is finite. We face the real possibility that oil production is about to peak, suggesting a future in which declining supply coupled with stubbornly high demand will lead to massive price increases. Like domestic gas, petrol and diesel, the cost of aviation fuels are already high and liable to remain so.

Some, though by no means all of above issues, were raised with the Airport by the working group - Their response is disingenuous, saying that they believe, "the impact of eco-taxes would be more on operators and tickets sales rather than on the Airport itself." This ignores the obvious question as to how operators will respond to these increased costs and resulting losses. A rational business would of course act to reduce services and to reconsider whether they will continue to use the Airport.

It is widely assumed that the domestic aviation market to which the Airport aspires is growing and will continue to do so. Recent figures show that this was not the case in 2007 with domestic aviation declining by 0.8%⁶. This may be indicative of a longer term trend.

There is no suggestion in the JASWG report that any of the numerous factors mentioned here were considered when Mott Mac Donald looked at the economic feasibility of the AEP.

3.2 Scoping of the JASWG committee report

The objective of the JASWG report is to advise on "whether or not Cheltenham Borough Council and Gloucester City Council should agree to support the business case" for implementing the Gloucestershire

⁶ www.dft.gov.uk/pgr/statistics

Airport Runway Safety Project (RSP). We believe that this scope is too narrow, and will not have allowed several other options to be considered, some of which could produce greater benefits for the two Councils.

The JASWG report does not propose, or examine, alternative ways of developing the business on the Airport site (as noted on section 5.2). These could include, but are not limited to, developing GA activities without implementing the RSP, developing the commercial letting business on the site or examining alternative uses for the land. Instead the report considers just the business expansion proposed by the Airport management and what it calls the 'do nothing' option. Without considering all of the possible options it is not clear to us how the report can recommend the Airport's own business plan.

It is particularly concerning that the report does not consider the 'bigger picture' and factor in the value of the land assets that the Airport occupies.

We understand from informal discussions with the JASWG that alternative uses of the land have been discounted due to 'compensation' becoming payable to existing tenants in the event of the Airport ceasing to operate. It is surprising that this potentially huge liability (which could far exceed the loan required to implement the RSP) was not investigated and quantified by the JASWG.

3.3 Scoping of the Mott Mac Donald Report

The terms of reference of the Mott Mac Donald evaluation report are limited in many respects. As would be expected the Mott Mac Donald evaluation stays within this brief. A more complete and credible evaluation of the AEP would be possible by expanding the scope of the report to consider other factors and sources. Thus the following important questions were not considered:

- *Bearing mind the current asset value of the buildings and the Councils' ownership of the site could a better use be made of these assets in the wider interests of their owners, the people of Gloucestershire?*
- *Is the spend a good use of taxpayers' money bearing in mind the stated serious money shortage for other Gloucestershire needs and the risks involved?*
- *Will the completed project bring real value to a significant percentage of the people of Gloucestershire and as thus be commensurate with the spend of their tax money?*

Given the limited scope of uses for the site that could yield a greater income to the Council were not considered. A popular suggestion, also raised by a Councillor at the scrutiny meeting, is that the Council could raise more money from the site by renting the land for grazing cattle!

Though Mott Mac Donald calculate that the investment will provide a positive return the benefit to the shareholder councils is limited. Considering the profit projections in Appendix D this shows no increased revenue until 2010/2011. In this year then, in comparison to the 'do nothing' option, the council's dividend increases from £30,000 to £48,000. This additional income of £18,000 is achieved by sacrificing current capital held by the Airport (£1.566 million) and by Council borrowing (£1.8 million).

This odd state of affairs led to one campaigner to say "if someone gives the council 18 grand might they forget the whole thing?" To put the £18,000 gain in perspective, Cheltenham Borough Council's total

budget for the year ending 31st March 2009 is £16,138,733⁷. The AEP means that in 3 years time the Council can expect an extra contribution amounting to just 0.11% of their current budget.

Even this meagre benefit to the Council is questionable considering that the Airport has previously failed to meet its financial projections e.g. In 2005/06 the Airport forecast net profits to be £104,501 (as quoted in the business plan details to Cabinet 29/11/05); however net profits for the year were actually £28,827 (Council budget papers 2005/06)

The AEP is to be financed with a loan from the Public Works Loan Board (PWLB), a national government body responsible for loaning money to local authorities. Having passed the money to Gloucestershire Airport, the business will then make regular repayments to the Council who will then meet the payments for the loan. An aspect of this arrangement neglected by the JASWG report is that, should the Airport default on the loan, our district council and hence council tax payers will be liable.

3.4 Business Plan Analysis

In section 10.4 of the JASWG the Airport company proposes to finance the revised cost of the business plan (£3,366,000) partly through the use of accumulated reserves (£1.566m) and partly through borrowing (£1.8m). The value available to its owners should therefore embrace the opportunity value in the £1.566 million already available as well as the cost of borrowing the £1.8m. Mott MacDonald were not asked to do this.

The councils have investigated the options available for financing the investment proposed in the Airport. The Airport assumed initially that it would look to a bank to finance the project, but they have discovered that the bank would want to use the company (read taxpayers) assets as security against the bank loan. The councils concluded thankfully that this is an unacceptable risk to both councils (read 'taxpayers') as the Banks commercial interests are primarily about security of the loan and its accumulated interest and charges.

The abbreviated balance sheet of the Airport accounts dated 31st March 2007 show a restated shareholders funds of £2.52m only of which some £616,970 is recorded as outstanding debts. Is it reasonable for an organisation, with a total asset value of £2.53M is taking on additional liabilities of over £1.6M? These figures show an unacceptable loan/asset relationship – but of course, these figures take no account of the value of the land the Airport occupies. However, if the value of the land were included in the asset register the loan/asset ration improves, but it then becomes apparent what a poor return on investment the Airport generates for its stakeholders. We don't believe they should have it both ways, the value of the land should be considered.

The loan/asset ration would become even worse if the Airport spent the £1.566M in its reserves on the AEP. Once it is spent, of course the asset strength of the company is being dramatically and further reduced.

⁷ Figure provided by CBC Democratic Services in phone conversation,

4. Benefits to the Community

4.1 Jobs provided by the Airport

Many of the claims made by the Airport are muddled and confused. For example the number of people employed at the Airport is quoted as being 1900⁸. We feel that this is potentially misleading as the latest figures we have show that Gloucestershire Airport itself employs 28 people.

The number of jobs in the vicinity of the Airport which are not directly linked to the operation of the Airport greatly exceeds those which are directly associated with the Airport. Many companies for whom the presence of the Airport was once a crucial location criterion now make no use of the Airport. For example, two large local aerospace companies Messier (Dowty) and GE Aviation (Smiths Aerospace) now have no operational linkage with the Airport. We also understand that neither of these companies, or GCHQ, uses the Airport to bring in investors, customers or suppliers. Most of these companies would not lose any business if the Airport were not to implement its expansion plans, and very few would gain if it did. The JASWG report does not attempt to quantify the benefits to the community.

Unsubstantiated claims are made by the Airport relating to their influence on the take over by GE of Smiths Aerospace, and the future of RAF Innsworth.

We would suggest that for the average member of the community, who is not one of the few people directly associated with the Airport operations, there are no benefits from the Airport. In fact, once the noise, pollution and environmental damage are taken into account any benefit is negative.

4.2 Benefits from Tourism

We would suggest that the benefits of the Airport to the local tourist trade are overstated. As with most regional Airports, the bulk of passengers are travelling out of the region to spend their money. The detrimental effects of local Airports on the regional economy are well documented in the Friends of the Earth briefing, "Why Airport expansion is bad for regional economies."

4.3 Survey of Residents

An ad-hoc survey of local residents was carried out by Lib-Dems on St. Johns ward, Churchdown in September of 2006. This is the only time that local opinions have been canvassed, and the timing meant that it was carried out before the scale or extent of the Airport's plans had been revealed by their planning application. We also believe that this survey was compromised by biased questions; The first of four options mentioned new safety measures and a possible increase in the number of business flights, the other three of options mentioned Airport closure and dwelt upon the possibility if the site being used for housing. Not surprisingly the results of the survey showed that a majority of residents were against closing the Airport and using the site for housing. We believe that if the survey were repeated now, the results would be rather different.

⁸ JASWG report, Appendix B, p.11

4.4 The Airport and the floods

It is clear that the airport benefited the community during the floods of summer 2007. As well as providing a convenient base for the RAF and Coastguard helicopters, the airport Café remained open to provide refreshments for their crews.

However these benefits may have been overstated - helicopters are able to operate from any convenient surface, the airport was merely the most convenient place to refuel. Furthermore, none of the developments planned by the Airport are necessary for the operation of helicopters from the site. In fact, in the aftermath of the flooding parts of the main runway were under water, presumably effectively closing that runway to fixed wing traffic.

- Not implementing the Airport's plans would have no affect on its ability to operate rescue helicopters.
- Rescue helicopters could operate effectively from alternative sites, particularly if plans are made in advance to provide fuel.

Maybe the question is whether the 2007 floods were a 1-in-100 year event that will not happen again in our lifetimes or (due to climate change) such flooding will become a common occurrence. We would suggest that if the first case is correct, having an airport nearby will not be a benefit for another one hundred years. If the second case is correct, expanding the airport is the worst action that should be taken as it will exacerbate the cause of the problem.

5. Environmental Issues

5.1 Climate Change

The JASWG report acknowledges that increases in CO2 emissions from the Airport as a result of the AEP would be “contrary to the Government’s 60% reduction target by 2050 and Cheltenham Borough Council’s carbon neutral aspirations”. Furthermore Cheltenham Borough is a signatory to the Nottingham Declaration which commits the Council to reducing emissions. However with the JASWG supporting the Airport’s plan it is clear that prior Council commitments to address global warming are simply being ignored. In the report they come a poor second against unsustainable Airport expansion. The Council should be taking action to demonstrate that emissions reductions are a real rather than a paper based fantasy.

Currently government campaigns exhort the public to ‘Save their 20%’, asking people to reduce emissions in line with the country’s Kyoto commitment. On the question of the likely increase in emissions the Airport professes some difficulty in quantifying this. Nevertheless using increased fuel sales as a guide then, even when making conservative assumptions in the Airport’s favour, the AEP will likely negate the emissions reduction efforts of over 2000 Cheltenham residents.⁹ In all probability the figure would increase by several thousand more persons if passenger services were also considered in the calculation.

It is of course contradictory to sanction increased emissions at the Staverton site when the onus on everyone else is to reduce.

5.2 Noise

The claims made by the Airport on noise are misleading. They tell us that some of the larger aircraft that they hope to attract are quieter than some light aircraft. There are clever ways of comparing the two, and showing that because the jet goes so much faster it creates a nuisance for a much shorter time, and so its average noise is quieter. These techniques may work on paper, but in practice the perceived nuisance is not reduced.

As an example, consider the way that shoppers in Cheltenham react when the Manx2 service passes over the town. Conversations stop and eyes turn skyward to see what is creating the racket. Aircraft passing overhead interrupted speakers at some of last year’s Literature Festival events. Is this really the way to enhance the image of the town to visitors?

Noise pollution at the Airport comes from a variety of sources. Depending on where people live they may have problems with helicopters, light aircraft or the new services to which the Airport aspires. Previous Airport statements have suggested that nuisance from light aircraft would be reduced as the focus of the business moves to private jets and larger planes. However Figure 1 shows that the promised reductions are actually minimal so the problems will persist. A number of helicopter businesses associated with the site have announced increased investment pointing to increased nuisance from this source.

Though the Airport offers assurances that planes follow proscribed routes to minimise disturbance residents report that such paths are often ignored.

⁹ See Appendix A for detail on the calculation of this statistic.

A much neglected issue is the fact that the runway is aligned east to west, directing air traffic over Cheltenham. This needs to be a consideration, especially for Councillors representing Wards towards the western edge of the town. Even more so because of the earlier calculations showing the potential for regular passenger services passing over Cheltenham.

5.3 Air Quality

The jet and turboprop aircraft that the Airport hopes to attract in larger numbers are responsible for the stench of jet fuel around the Airport. Residents report that fumes from these aircraft are not only nauseous at times, but that an oily film of unburned fuel is left on roads and fishponds in the area. This contrasts with the light aircraft that currently predominate at the site for which no such problems are reported. The smell and pollution from jet fuel can only become worse as the number of jets and turboprops increases.

The JASWG report acknowledges the Gloucestershire Air Quality Report of 2004 that stated, “any growth at the Airport has the potential to impact upon efforts to improve upon, or maintain, good air quality.” Whilst the JASWG envisage the vague possibility of some future monitoring of this problem by the Airport, surely such monitoring should be conducted by an independent body and the Council would do better to outline now how they will respond to future air quality failings.

5.4 Opening Hours

The report states that the Airport has no plans to increase operating hours¹⁰ (11.1.3) because it is not economically viable. The JASWG report does not state how many additional movements would be required to make longer hours viable. Currently the Airport operates out of hours on average almost twice each day¹¹. If these daily out of hours operations are viable, how close are we to seeing longer hours? This question is not answered by the report, and increased opening hours are in no way ruled out. Saying there are currently ‘no plans to increase opening hours’ is not the same as a concrete commitment. That opening hours have not changed for some years is irrelevant given the Airport’s ambition for expansion.

¹⁰ JASWG main report 11.1.3, p.12

¹¹ JASWG main report 11.1.4, p.12 “In the year to 29th September 2007, there were 683 ‘out-of-hours’ flights.”

6. Greenwash

The JASWG report in Appendix B provides a great deal of correspondence from their discussions with the Airport. In a number of instances nonsensical arguments are offered describing environmental gains or benefits linked to the Airport. It is not clear in the report which of these comments were accepted, rejected or where further clarification was sought. There are reasonable grounds for concern about the reliability of the Airport as a source of information, suggesting that the JASWG may have been overly lenient in accepting some of their comments. The following are a collection of myths frequently raised in favour of the development.

6.1 Aircraft Efficiency Gains

The Airport has suggested that carbon emissions will be reduced by the availability of increasingly efficient engines (Appendix B, page 6):

“The statistics below show, fuel sales at Gloucestershire Airport have reduced sequentially year on year, indicating that the more efficient engines and techniques used by today’s modern aircraft have helped reduce the impact of climate change.

2004/05 – 2,287,569

2005/06 – 2,145,868

2006/07 – 2,061,893

Whilst the figures certainly show a decline in fuel sales, assuming that this due to increased efficiency is an assumption too far. The figures could show that the number of customers is declining, that planes are acquiring fuel off site from a cheaper source or any number of other trends. Or a combination thereof.

Fuel efficiency for planes is increasing slowly, at around 1% per year. Most improvement comes on the introduction of a radically new design. For example the new super-jumbo, the A380 is 12% more efficient than the 747-400 - a 12% improvement in 18 years. Many of these newer designs are irrelevant as, clearly, they are too big to use the Airport. As the design life for new planes is over 30 years technical improvements will not be deployed even at a 1% rate. Jet aircraft are only now reaching the level of efficiencies that propeller aircraft had in the early 1960’s.¹²

In any case the obvious consequence of increasing efficiency is to reduce fuel costs thereby making flying cheaper. This in turn leads to more flying and hence greater emissions, more than cancelling out the efficiency gain.

Perversely, instead of encouraging newer more efficient aircraft, the Airport has a policy of trying to attract older less efficient aeroplanes. Their web-site¹³ carries a front page advertisement for “REDUCED LANDING FEES - Half price landing fee and 25% reduction in hangarage for historic aircraft built before 1950.”

¹² Source : Fuel efficiency of commercial aircraft - An overview of historical and future trends, National Aerospace Laboratory 2005, http://www.transportenvironment.org/docs/Publications/2005pubs/2005-12_nlr_aviation_fuel_efficiency.pdf

¹³ <http://www.gloucestershireairport.co.uk/>

6.2 Reduced Journeys

A number of contrived examples demonstrate how having an Airport available locally will reduce emissions. For example, with the runway as it is now, an adverse wind can mean that Staverton is off limits, forcing a plane to lengthen its journey, transferring to another nearby Airport. Emissions could have been lower for that one flight if the runway were longer.

The trouble with examples of this ilk is the underlying assumption that the number of flights is static so having more Airports and longer runways would simply make journeys more precise. Of course, in the real world, expanding Airports stimulates the growth of aviation, leading to new journeys that would not have otherwise taken place and so increasing emissions.

6.3 Emissions on the M5

Comparisons to the M5 have been used to suggest that CO2 emissions from the Airport are relatively small and hence inconsequential. Of course the emissions from the M5 are not trivial. However this is an argument for the government acting to reduce transport emissions, not an excuse for increasing those from aviation.

On the global scale my emissions are small, as are those of my friends, neighbours and yours too. However collectively they are massive and contribute to climate change. In the grand scheme of things perhaps the Airport's emissions can be considered small but this is irrelevant, the need is for reductions not increases. The fact remains that large aircraft are a particularly cheap and easy way of creating large volumes of CO2 in a short space of time.

Variations on the M5 argument cite the emissions that would arise if the site were used for housing. As with the M5 this just underlines the need for policies to reduce emissions from homes.

6.4 Business Aircraft

Business aircraft are more commonly known as private jets. It is a market that the Airport hopes to accommodate following the AEP. The prevailing myth about business aircraft is that they are essential for business. Considering that the most popular destinations for private jets include Majorca and Cannes, their uses may actually be fairly frivolous. Consider these anecdotes supplied by a former air-traffic controller:

“... they [business jets] come out in their droves for major, and not-so-major sporting events. Over the years that the FA Cup final and other big games were staged at Cardiff, upwards of 20 aircraft commonly took fans from various London airports to Cardiff. For big Manchester United games, 5 or 6 executive jets come in from Dublin (including Chris de Burgh's own aircraft).”

Surely Cheltenham could aspire to something better than being a stop-off point for wealthy Manchester United fans that got lost on the way to Old Trafford!

7. Additional Proposals

The position of CASE has always been to oppose the AEP and this is still so. However the JASWG report and the debate surrounding it have led to some initiatives that would monitor or constrain the Airport's expansion. These are considered here.

7.1 The 'Green' Policy

Opinions on the policy vary. Some would give it a tentative welcome with some caveats whilst others are absolutely unconvinced. The latter view is that, essentially, the policy is just window dressing tacked on to the expansion plan.

The policy would meet the letter but not the spirit of the Climate Change Strategy commitment to "ensure climate change issues are recognised and monitored in future plans for Gloucestershire Airport". In other words emissions and other environmental issues would be recognised and monitored thoroughly whilst getting worse without constraint.

Among those more receptive to the plan issues raised included:

- Last summer the Airport published a document titled "Gloucestershire Airport Common Misconceptions", which was circulated to a number of local MPs and a select group of Cheltenham and Gloucester Councillors. It contained claims that Climate Change is a natural phenomenon, made a clumsy effort at discrediting climate science and announced the existence of young scientists who know the truth but are keeping quiet for now. In light of this people are understandably cynical about the Airport's commitment to tackling climate change. Thus the policy should be developed by an independent party in preference to the Airport. Similarly monitoring should also be carried out by an independent third party.
- Though the answers in Appendix B show that the Airport's grasp of climate science has improved the suggestion that grass growing next to the runway offsets emissions are ridiculous. Another absurdity was the 'local emissions' concept that suggests emissions are not attributable to the Airport once a plane leaves the county. The policy should use a convincing and well-researched methodology for counting emissions. Questionable accounting involving 'local emissions' and carbon offsetting should be avoided.
- The impact of a green policy on the Airport's business plan is not considered by the JASWG report. It may be that implementing a green policy enhances the business case for the Airport, conversely the green policy could be detrimental to the proposed business plan. Until the green policy has been devised and its implications understood, it is surely reckless to press ahead with the original business plan.

7.2 Flight Capping

There has been a proposal to cap flights from the Airport at figures approximating those given in Table 1.

Concerns about later additional growth are genuine. The statement from the original Business Plan saying, "the planned development of passenger carrying commercial traffic would bring about the need to expand

the existing passenger terminal facilities”¹⁴ clearly shows that further expansion is sought. Other future plans are acknowledged in the JASWG report in section 12.3. This demonstrates how the current plan could be a stepping stone to yet more expansion. Though the ideal would be to refuse the AEP the capping idea would at least prevent expansion beyond that put forward in the Business Plan.

The CAA figures¹⁵ show that the number of movements at Gloucestershire Airport during 2006 were 83,453. This is equivalent to the number of movements at Bristol (84,583) during the same period. Of course the two airports are handling very different types of aircraft but the fact remains that it is not widely appreciated how active our local ‘small’ airport is. Again this points to the need for a cap on the flight totals.

Reaching such special arrangements with an airport is not without precedent. For example, over the course of the day, Heathrow would switch the direction of planes taking off on their runways, ensuring that residents at either end at least enjoyed some guaranteed hours of peace. However Heathrow has since abandoned this arrangement, underlining the need for a robust mechanism to implement and maintain the cap.

We fear that any cap would not be properly enforced or it would be gradually increased, year on year, to meet the changing requirements of the Airport.

7.3 Housing on the Site

Some residents have supported the AEP as the lesser of two evils, fearing Airport closure and subsequent massive housing development on the site. To some extent the Airport may have sought to draw attention to this possibility e.g. the ‘Common Misconceptions’ document states that 11,250 dwellings could be built.

However, the Airport would not be forced to close if the planning applications are not permitted, and could carry on much as it has done for some time to come. Furthermore, even if the Airport did close, the land would still be designated as green belt. This would be a significant barrier to developing the land. Also if there are moves to close the Airport substantial compensation has to be paid to the Airport’s existing tenants.

The path to housing would be for the Cheltenham and Gloucester councils to consider selling the site. Having said alternative uses of the land should be considered we therefore hope the possibilities would exclude the outright sale of the property. In this way the site could continue to be an asset for the Councils and hence the taxpayers.

¹⁴ Airport’s five-year plan dated 11/12/2006, p27

¹⁵ http://www.caa.co.uk/docs/80/airport_data/2006Annual/Table_03_1_Aircraft_Movements_2006.pdf

8. Party Policies

8.1 Liberal Democrats

Nationally the Liberal Democrat policy is to oppose the expansion of airports. Some Liberal Democrat councillors in Cheltenham have expressed the view that the plans for Gloucestershire Airport can not be considered expansion because the development does not involve a new runway, an expanded boundary or associated infrastructure development. However the JASWG report does acknowledge an increase in the number of flights (runway movements) and planes will carry greater fuel loads and potentially greater numbers of passengers. These latter points are consistent with most peoples' understanding of expansion, suggesting that the AEP goes against the grain of Liberal Democrat policy.

8.2 Conservatives

The national Conservative view is less clear cut. Party leader David Cameron appeared at last year's Cheltenham Science Festival (June 2007) and a number of questions put to him that day by the public concerned aviation. In his answers David expressed the desire to constrain the growth of aviation. To be clear this would mean the growth of aviation would continue but the politicians would act to reduce the rate of such growth. The JASWG report approves the Airport plans as a whole with no clauses to constrain the Airport's ambitions. So, whilst the national policy is uncertain, acceptance of the AEP by Conservatives would certainly seem to be contrary to their leader's thinking.

8.3 Labour

Shortly before Christmas Gordon Brown made statements to the effect that climate change would be put at the centre of all policy making. However this was followed in the New Year by a statement calling for the decision on the 3rd Runway proposed for Heathrow. Clearly the national Labour government approach has been rather schizophrenic of late. By contrast David Drew, Labour MP for Stroud, has been strong and consistent in his opposition to the Staverton development.

8.4 Green Party

The Green Party advocates a drastic reduction in the number of journeys made by air for whatever purpose. The first priority must be to discourage the growth of air transport. Greens are opposed to all airport expansions - the four Gloucestershire Green parties have all opposed expansion at Staverton Airport. The Green Party seeks substitution of air travel wherever possible with less damaging modes of transport, such as ferries, trains and buses. This does not apply to the emergency air services such as mountain rescue or specialist medical services, nor necessarily to air links to remote islands.

9. Conclusions

- The JASWG report has been written to show that implementing the Airport's business plan will generate a greater return than making no changes to the way the Airport operates. What the report does not show is whether the Airport's business plan makes the best return for the owners, as no other options are considered. The report also fails to explore other ways of making up the small shortfall that would result from the 'do nothing' approach.
- The proposed development is a move to expand and intensify operations of the Airport. Portrayal of the project as safety related is misleading. The RSP is a necessary part of implementing the business plan, which itself has been devised as a way of sustaining and increasing business, and movements, at the Airport.
- The projected growth at the Airport is significantly understated by the JASWG report. Of particular importance is the increased number of larger aircraft using the site.
- The Airport has supplied much of the source information contained in the report. This has been taken on trust by the JASWG and included verbatim. We would suggest that that Airport may not be the most reliable source of information, and advice should be taken from an independent environmental consultant.
- The JASWG report goes to great length to highlight the questionable economic benefits that the RSP will provide to the community. However it does not investigate the costs; stress caused by relentless noise, environmental damage from pollution, reduced property values, and probably greatest the loss of all, damage to the image and prestige of the local towns from increasing aircraft activity.
- A 'Green Policy' cannot be devised and implemented by an Airport management that has already shown its contempt for environmental issues. An independent consultant with relevant experience should develop any such policy. The impact of any policy on the viability of the business plan must be considered before investing money in the Airport business.
- As shown by the abandonment of the movement limits at Heathrow, a cap is not a robust way of preventing Airport growth.

Appendix A

The JASWG report, Appendix B, page 6 quantifies likely increases in CO₂ emissions arising from fuel sales. They calculate current emissions of 3.8 million kg from Jet Fuel and 1.3 million kg from AVGAS giving a total of 5.1 million kg. Following the AEP works the Airport projects an increase to 8 million kg of CO₂, an increase of 2.9 million kg i.e. 2900 tons of CO₂

Figures for per capita CO₂ emissions vary. The following figures were minuted at a recent meeting of the Gloucestershire Environmental Strategy Group:

	Total CO ₂ emissions per capita (tonnes)	Domestic CO ₂ emissions per capita (tonnes)
Cheltenham	6.2	2.4
Cotswold	11.3	3.2
Forest of Dean	8.7	2.6
Gloucester	6.5	2.3
Stroud	10.4	2.7
Tewkesbury	13.5	2.7

However these figures seem to be unusually low. Typical estimates for individual emissions are normally in the range of 10.0 to 12.5 tons. Let us make an assumption in the Airport's favour and take the higher figure of 12.5 tons. Thus someone seeking to 'save their 20%' would look to decrease their personal emissions by 2.5 tons (12.5 x 0.2 = **2.5**)

There is some question as to how to allocate emissions between a plane's origin and destination. It seems intuitive that if a plane is travelling from A to B then emissions need to be shared between the two sites i.e. for a plane buying fuel and then leaving Gloucestershire Airport for some other destination, not all of the emissions associated with the fuel can be attributed to the local Airport. However a number of planes will arrive at the Airport having purchased their fuel elsewhere so their emissions will not be reflected in the fuel sales. Let us assume that these two opposing trends cancel each other out so the figure of an increase of 2900 tons stands.

A particular problem with aviation emissions is the effect of radiative forcing. That is that plane contrails and the process of injecting CO₂ directly into the atmosphere means that planes have an effect on the climate greater than implied simply by the quantity of CO₂. The Airport is right to point out that this issue needs further scientific clarification with estimates of the radiative forcing multiplier varying between 2 and 6. Let us again make an assumption in the Airport's favour and use the lower figure. Thus the additional 2900 tons will increase overall emissions by 5800 tons CO₂E i.e. carbon dioxide equivalent (2900 x 2 = **5800**).

5800 / 2.5 = 2320 = the number of people whose efforts to 'save their 20%' would be negated by the AEP.