

Environmental impacts of Exeter International Airport

Report of the Task Group

1.0 Findings & recommendations

- 1.1 Finding: A year ago, public concern over the proposed sale of the Council's shares in the airport centred on the abortive costs incurred when the preferred bidder withdrew. By August/ September 2006, following a busy summer at the airport, the public's emphasis had moved to issues of noise, air pollution and contributions to global warming.
- 1.2 Finding: In pursuing the sale of the airport apparently without conditions to ameliorate the environmental impact of future operations, the Executive seems to have taken insufficient account of the Council's own policies for sustainability and climate change, and its ambition to become "England's Greenest County."
- 1.3 Recommendation: A lesson of this inquiry is that Executive Members must not consider financial issues in isolation but must be able to demonstrate to the Council and above all to the public that they have taken account of the authority's policy framework as a whole and struck an appropriate balance.
- 1.4 Finding: The public appears to have entertained expectations of the Council which the authority has no powers to meet. Members of the public have expended much energy in protesting to and about the Council when they could more productively have been writing to other agencies.
Many concerns and misconceptions might have been allayed had the Executive made a clear, *early* public statement setting out the County Council's intentions and the extent of its and other agencies' powers with respect to civil aviation. The Leader's responses to questions at the Executive's meeting on 5 September 2006 did spell this out albeit comparatively late in the day.
- Recommendation: In future, the facts should be explained as soon as (and preferably before) the first signs of public concern become apparent and the message continually reinforced thereafter by the Council as a whole and by local members in dialogue with their constituents.
- 1.5 Finding: Notwithstanding the prominence achieved by Airport Concern Exeter's campaigning in recent months, only a few county councillors have received complaints about aircraft noise. Also few complaints have been made to the environmental health authorities or to the Exeter International Airport Consultative Group.
- 1.6 Recommendation: The existence and work of the Airport Consultative Group appear to be too little known at present. Both East Devon District Council and the airport operators should therefore be urged to publicise the group better, with its minutes and other papers readily accessible online.
- 1.7 Finding: Whilst there is clearly concern over possible expansion of the airport, the present night flights (primarily attributable to Royal Mail) appear to be the salient public concern.
- Recommendation: The Council should therefore use such influence as it has to seek the limitation and, if possible, elimination of non-emergency night flights to and from Exeter.

- 1.8 Finding: Traffic through Exeter Airport has seen marked variations over the last 20 years (including rapid growth in the last two years and a sustained downturn between 1990/91 and 1998/99).
The group has seen no sound basis for the apparently confident predictions in some quarters of continual and unchecked growth in air traffic to and from Exeter over the next quarter-century. Rather it seems clear (and it is acknowledged at all levels of government) that a wide variety of inherently unpredictable factors will influence future traffic patterns.
- 1.9 Finding: Sale of the County Council's shares in the airport does not give *carte blanche* for unlimited traffic growth. Any private owner's ambitions to develop the airport's infrastructure (e.g. terminal facilities) remain subject to the planning system—as demonstrated by Uttlesford District Council's rejection of Stansted's expansion plans—while national and international regulatory mechanisms and policies will bear on the number of flights.
- 1.10 Finding: Retention of its shares would not enable the Council to subordinate commercial considerations to environmental concerns since the legislation governing local authority ownership of airports was designed to insulate business from local "political" considerations.
- 1.11 Finding: The airport's new owners will be expected to submit an "Airport Master Plan" to the Department of Transport which should "enable airport operators and others to assess local social and environmental impacts ... and provide an opportunity to develop preliminary proposals on how those impacts could be mitigated."
Recommendation: The County Council must take full advantage of the opportunity of the consultation on the Master Plan (and urge the public to do likewise) to ensure that the Plan takes environmental impacts and concerns fully into account.
- 1.12 Finding: Many contributors questioned whether an expansion of traffic at Exeter would in fact result in a net economic benefit to the County.
Recommendation: As part of its input to the Airport Master Plan consultation, the Council should reassess this issue and seek clarification as to how the airport's expressed wish to be a good neighbour will be taken forward.
- 1.13 Recommendation: In view of public concerns, the relevant environmental health authorities (East Devon Council and Exeter City Councils) should be asked to make available any data from their own monitoring of air quality beneath the main flight paths and in the vicinity of the airport, or recommended to carry out such monitoring if this has not already been done.
- 1.14 Finding: The market for less environmentally damaging forms of transport is distorted by government's continued treatment of civil aviation as a "special case."
Recommendation: The County Council should press government to:
- (a) include aircraft noise within the definition of a statutory nuisance;
 - (b) reverse its decision in 2000 not to impose operational noise limits on arriving aircraft but to rely on a voluntary code of practice;
 - (c) as with road vehicles, impose permitted emission standards as an incentive to phasing out older, more polluting aero engines;
 - (d) end the unwarranted anomaly of aviation fuel's exemption from VAT.

- 1.15 Finding: Lessons from this inquiry for Overview/Scrutiny Committees include the following:
- (a) any investigation relating to the proposed sale of an asset or contracting-out of a service is best undertaken at an early stage and not after the selection of a preferred bidder;
 - (b) there is a limit to what scrutiny can achieve in investigating “community leadership” issues which resonate with the public but relate to matters over which the County Council does not have the most important powers, where it does not have the requisite technical expertise in-house and where scrutiny committees lack the resources to engage such expertise from outside;
 - (c) the group’s inquiries were inhibited by the lack of a timely response from a number of the agencies invited to contribute views and information and which (unlike council members and officers) scrutiny committees cannot require to provide information or appear to answer questions;
 - (d) with hindsight, the Environment, Economy & Culture Overview/Scrutiny Committee might more readily have obtained the information it sought about environmental impacts and safeguards had it used its powers to call-in one or more of the Executive’s decisions on the airport sale process.
- 1.16 Recommendation: that, with a view to its input into the Airport Master Plan, the Environment, Economy & Culture Overview/Scrutiny Committee should follow up the task group’s approaches to the following bodies and individuals whose evidence has yet to be received: Royal Mail; the Civil Aviation Authority; flybe; and the Council’s officers for sustainable prosperity and climate change.
- 1.17 Recommendation: that the task group be represented at the meeting with the airport’s new owners which it is understood will take place in the New Year, after the completion of the sale.

2.0 Terms of reference and background

- 2.1 At the Environment, Economy & Culture Overview/Scrutiny Committee’s meeting on 11 September 2006 it was resolved that that a task group comprising Councillors Giles, Foggin, Hannaford, Hook, B. Hughes, Newcombe, Nicholson and Owen be established:
- “to examine the environmental impact of the potential expansion of Exeter Airport, particularly increases in flight numbers and night flights.”
- 2.2 This group met on 27 October, 27 November and 4, 12, 18 & 19 December 2006 and was chaired by Councillor Jill Owen.
- 2.3 In 2004, the Executive agreed to sell at least 75% of the Council’s 100% share in the airport company but the preferred bidder withdrew in October 2005; in January 2006, the Executive agreed that the airport should be put back on the market.
- 2.4 Meanwhile, in November 2005, the Policy & Resources Overview/Scrutiny Committee had established a task group (also chaired by Councillor Owen) to consider and report on the events and processes leading to the withdrawal of the preferred bidder. Public and media concern at that time appeared to centre on the costs of the abortive sale, not environmental issues. Among that task group’s recommendations were that:
- tenders for the purchase of the airport should be invited afresh, particularly in view of the increased growth in traffic achieved by the airport since the original tenders were

invited;

- prospective purchasers should also be assessed on their proposals for developing and maintaining a dialogue with existing business at the airport, with neighbouring communities and with other interested parties;
- the Director of Finance & IT be requested to raise with the airport management whether major freight operators have been approached with a view to developing freight facilities for the South West at the airport.

2.5 During summer 2006 a pressure group, Airport Concern Exeter (ACE), was formed to campaign against noise and other environmental consequences perceived as arising from current operations and various assumptions about future levels of traffic. To a lesser extent concern was also expressed via the local media about the impact of the proposed Skypark development.

3.0 Lines of enquiry

3.1 The task group recognised that the County Council was not an environmental health authority and did not maintain an in-house capability for assessing the environmental impacts of civil aviation. An assessment with a sound scientific basis would therefore only be obtainable if appropriate external expertise could be enlisted but the funds available for commissioning by the four overview/scrutiny committees (£500 in 2006/07) were clearly insufficient for this.

3.2 The group therefore agreed: to invite views from interested parties; question those contributors who appeared in person; come to a view about the airport's present or future impact; and clarify where power and responsibility lay for responding to environmental/nuisance concerns raised by members of the public.

4.0 Legal and regulatory context

4.1 The airport has long been owned by Exeter and Devon Airport Limited, an arm's length company created under the Airports Act 1986 and required by law to operate on a strictly commercial basis. The Council has been the sole shareholder and appointed members of the Board but the directors' first responsibility has been to the interests of the company, not the Council.

4.2 The Civil Aviation Authority regulates all matters relating to air traffic control and flight patterns while the enforcement of environmental health and planning matters is the remit of the Environment Agency and East Devon District Council. Aircraft noise is exempt from nuisance legislation however and so the district environmental health authorities cannot enforce against it. As the local planning authority, East Devon District Council would have to approve any proposals for development of the airport's facilities, for example to cater for increased passenger numbers

4.3 Local noise-related incidents are monitored by the airport's operations unit. The Airport's Consultative Group (for which East Devon's Chief Executive is the Secretary) includes representatives from local parish and district councils and meets regularly to discuss environmental and noise issues, working to the Department for Transport's *Guidelines for Airport Consultative Committees*. There is a Noise Issues Sub-Group which meets regularly and is attended by a representative of Airport Concern Exeter.

5.0 Regional and national policy

5.1 The Department for Transport's December 2003 White Paper, *The Future of Air Transport* set out a framework for the development of airport capacity in the UK. It said that Exeter, "has a distinctive role in serving the local catchment area and there is significant scope for development without major environmental impacts." The White Paper devotes a chapter to environmental impacts and noise, saying that "local controls should operate ... to manage the environmental impact of aviation and airport development so that [inter

alia] noise impacts are limited, and where possible reduced over time.”

- 5.2 The same document states that “ We will expect airport operators to produce master plans ... to take account of the conclusions on future development set out in this White Paper.” A stated purpose of these plans is to:

“enable airport operators and others to assess local social and environmental impacts ... and provide an opportunity to develop preliminary proposals on how those impacts could be mitigated.”

- 5.3 Forecasts of traffic from Exeter in 2015 and 2030 were included in the report *Development of an Air Transport Strategy for the Far South West of England*, commissioned by the Regional Development Agency, Regional Assembly, Government Office South West and DfT and published in June 2003. While the White Paper had this to say on forecasting:

“There are, of course, large uncertainties involved, which increase the further we look ahead ... the market for air travel might mature more rapidly than we expect, causing the rate of growth to slow more quickly than forecast. Or the cost of flying may prove to be higher ... for instance, due to rising oil prices or ... the costs of tackling global warming being higher than expected. The physical constraints on airport capacity will have the effect of limiting actual traffic.”

- 5.4 The task group noted that the uncertainties of forecasting were illustrated by the figures for Exeter (see Appendix A):

- passenger numbers declined after 1989/90 and did regain their former level until 1998/99;
- air transport movements (passengers + freight) had exhibited some marked variations year-on-year;
- the “all movements” figure of 55,000 in 2005/06 was barely 2% higher than the 54,000 recorded in 1990/91 — indeed the lowest “all movements” figure had been recorded as recently as 2002/03.

- 5.5 The group noted news reports highlighting the apparent sensitivity of the “no-frills” airline business model to (for example) more rigorous security precautions and changes in airport fees and taxes.

6.0 Complaints

- 6.1 District Councils and the Airport Consultative Group were asked how many complaints they had received about nuisance from airport operations and responded as follows:

Exeter City Council	1 in 2004
	6 in 2005
	2 in 2006
East Devon District Council	16 from 2003–2006
Mid Devon District Council	nil
Consultative Group	2 in the last 12–18 months

7.0 Information from contributors

- 7.1 There was general concern about noise nuisance from increased traffic to and from the airport during 2006, the great majority of contributors citing night flying as by far the most objectionable.

- 7.2 Many respondents expressed great concern over the contribution of aviation to global warming through the greenhouse gasses it generated.

- 7.3 Mr and Mrs Christian submitted a map showing the main flight path over Exeter and the area 500m to each side of the flight path they believed to be adversely affected by aircraft noise, estimating that this included 7,750 households (or 17–20% of the total) in Exeter itself and around 2,250 to the east of the city. Exeter Friends of the Earth estimated that figure at 15,000 households however.
- 7.4 It was argued that disturbance to sleep was deleterious to health and, in consequence, to the local economy. It was also contended that noise nuisance was detrimental to children's learning rates and one respondent queried whether whether there was any economic or other justification for flying at night.
- 7.5 It was suggested that while there might be economic benefits in having a larger airport, there was a negative effect on some people and property. One contributor added that aircraft flying overhead would affect property prices.
- 7.6 It was advocated that an airport so close to the city should not be developed and that large airports should have their final descent and takeoff over areas where fewer people live. It was suggested that in a sparsely populated county, aircraft had no need to fly over the city and once contribution called for the opening of another runway so there were fewer flights over the city.
- 7.7 Airport Concern Exeter contended that there was a need for more counter-arguments to the claims of economic growth deriving from the expansion of civil aviation. They suggested that jobs had remained static within the industry and those created had tended to be low skilled/lower paid and often occupied by migrant workers, offering no boost to the local economy.
- 7.8 Both ACE and Friends of the Earth argued that airport expansion would take more tourism revenue out of the area than it brought in because local people in increasing numbers would take their holidays outside the South West.
- 7.9 Other concerns expressed and arguments advances included:
- that the "tipping point" for the perception of aircraft noise as a nuisance had occurred in August 2006;
 - the effects of increased air traffic on Ottery St Mary and the surrounding area.
 - that there had been no sign yet of the "much vaunted 'quiet aircraft'" announced by flybe;
 - that there were night flying restrictions at Heathrow, but not at Exeter;
 - that priority was given to the convenience of passengers and the profits of airlines and airports, but no thought was given to the "millions of people on the ground" who had to put up with noise and pollution from aircraft;
 - that the civil aviation industry posed as a benefactor when in reality it was interested only in profiting from the public "by seducing them into frivolous travel";
 - that the County Council should protect people from climate change and from big business and "take a lead by limiting the expansion of Exeter Airport";
 - that the terms of the sale should have included covenants to restrict or prevent flying operations at night.
- 7.10 It was noted that in June 2003 the then Executive Member for the Environment had objected when Royal Mail announced that it was switching from rail to air transport.
- 7.11 Among the points emerging in discussion with the County Solicitor were:
- that it was expected that conditional contracts would be exchanged before Christmas;

- that clearance in respect of competition issues was also required and with this achieved the final sale was expected to be completed by the end of January 2007;
- a member's suggestion that any night flying limit for Exeter should be in line with standard practices in other Airports where such restrictions operated (e.g. between 23.30 and 06.00 hours);
- the advice that technically it was possible to place such a restriction as contracts had not yet been drawn up, but practically it could be difficult. The process was far advanced and to seek restrictions now could well result in a lower sale price;
- a member's suggestion that a wish list was shared with the purchaser, asking that they might operate under a curfew as with London City Airport;
- that task group was advised that whilst this was possible there would be no guarantees that the request would be honoured.

7.12 Among the points emerging in discussion with the Executive Director of the Airport and the Leader of the Council were:

- Exeter could never grow to the same extent as East Midlands Airport by virtue of its geographical position in relation to major industries;
- that Royal Mail's move from overnight trains to aircraft was a direct response to government targets for 95% next-day delivery;
- that there were now three Royal Mail planes taking off and landing per night (= six movements) where previously there had been five:

Type	Depart	Return
Boeing 737-300	23.05	01.15
BAe 146	23.30	01.20
Short 360	23.05	02.00

- Skynet (the inland night airmail network) controlled the timings of these flights and there were no contractual arrangements between Royal Mail and the airport;
- additional night flights might arise from the movement of donor organs, emergency evacuations for the armed forces and occasional diversions (around 50–60 per annum) from other airports, chiefly Plymouth and Newquay;
- that the Airport Master Plan presented a good opportunity to look at the future of the airport, balancing economic benefits against environmental concerns;
- that London City Airport was considered a good neighbour and had invested much time in community engagement. Mr Richard Gooding of LCA had offered to meet members of the public when he was next in the area;
- Exeter Airport also prided itself on being a good neighbour and had always made effort in this area (e.g. with respect to nocturnal engine testing). Complaints were taken seriously and were always responded to;
- the airport was also seeking an extension to its controlled airspace, allowing it more control over aircraft movements (outside its designated zone, the airport's control became advisory rather than mandatory) but securing an extension could take up to three years;
- planning permission would be needed for any expansion of the airport and the economic and environmental issues would be considered as part of the process;
- there were some dispensations under general permitted development rights — i.e. there were not restrictions on passenger numbers per se, only on developments to accommodate them;
- Councillor Greenslade's view that he had a duty to secure best value for the County and that to place conditions on the sale would run counter to this;

- Councillor Greenslade had received 150 pieces of correspondence in relation to the sale, 80 of them on printed cards produced by Airport Concern Exeter. These last had not included addresses and therefore he had been unable to respond to them. He considered this number of complaints to be small in view of the area said to be adversely affected by flights to and from Exeter.

8.0 Documents

8.1 The following documents and publications were considered by the task group:

- White Paper, *The Future of Air Transport* (Department for Transport: December 2003);
- *The Future of Air Transport*, progress report (DfT: December 2006);
- *Noise from Arriving Aircraft, an industry code of practice* (Department for Transport: November 2006);
- *Development of an Air Transport Strategy for the Far South West of England* (South West Regional Development Agency, SW Regional Assembly, Government Office South West and DfT: June 2003);
- *Draft Regional Spatial Strategy* (South West RDA);
- *Devon Strategic Plan 2006–11*;
- *Devon Structure Plan 2001–2016*;
- *Devon Local Transport Plan 2006–11*;

This plan states that the County Council:

“supports the thrust of the Government's Air Transport White Paper, which sees a significant growth in travel from regional airports ... has enthusiastically supported the growth in regional air services from Exeter International Airport since 2003 ... is keen to see continued expansion in the number of routes operated from Exeter International Airport, and in order to facilitate this continued growth ... is looking to move the airport from Council ownership into the private sector [which] will enable the significant capital investment needed to achieve a major expansion in terminal facilities ...”

It also makes a number of references to reducing or minimising the environmental impacts of transport, speaking of “high quality transport networks which ... do not dominate or degrade the environment.”

- *A Warm Response — Our Climate Change Strategy* (Devon County Council: November 2005);
- Questions from Members of the Council (Executive minute *354 of 5 September 2006);
- *The case against the expansion of Exeter Airport* (Exeter Friends of the Earth: December 2006);
- *Environmental Impact of Air Traffic: Questions and Answers* (Exeter & Devon Airport Ltd.);
- *How to influence airport expansion* (BBC Action Network team);
- policy statements on transport operations, carbon management and corporate social responsibility (Royal Mail Group plc);
- complaint log sheets (East Devon District Council: 2003–2006);
- outline planning consent for a new airport terminal (East Devon District Council: May 2004);

- report to committee on an application to expand facilities at Stansted Airport (Uttlesford District Council: November 2006);
- report of a meeting with the Leader of Devon County Council (Airport Concern Exeter: October 2006);
- written statement by Mrs P.A. Mathewson and supporting material including: articles and letters from local newspapers; information from airport campaign groups elsewhere in the country;
- a map submitted by Mr & Mrs Christian showing the main flight path over Exeter and the area they believed to be adversely affected by aircraft noise; national newspaper articles;
- figures for movements, passenger numbers; and “air transport movements” = passengers + freight (Exeter International Airport: 1984/85–2005/06).

9.0 Contributions to the investigation

9.1 As well as approaching a number of organisations direct, the task group issued an invitation to potential contributors through the media and received the following substantive responses:

In person:

Cllr Brian Greenslade	Leader of the County Council
Phil Norrey	Chief Executive
Roger Gash	County Solicitor
Geoff Myers	Executive Director, Exeter & Devon Airport Ltd
Mr & Mrs Christian	
Mr & Mrs Mathewson	
Andy Oliver & James Wroe	Airport Concern Exeter

In writing:

East Devon District Council	David Cookman (Exeter)
Exeter City Council	Ian Diffey (Exeter)
Mid Devon District Council	C. A. and Mrs. L. M. Hope (Exeter)
Exeter Friends of the Earth	Andy Hopgood (Silver Lane)
Mr & Mrs Martin (Exeter)	Susan Melzer (Exeter)
Michael Ashby (Ottery St. Mary)	Louise Phillips (Exeter)
Janet Barber (Exeter)	Trish Phillips (Exeter)
Patrick & Anita Beasley (Exeter)	Rodney Powell (Ottery St. Mary)
Tim Burridge (Exeter)	Margaret Read (Exeter)
Brian Chadwick (Ottery St Mary)	Mark Robins (Exeter)
Court Retirement Residence (Rockbeare)	
Exeter International Airport Consultative Group	

9.2 Contributions were sought from the Civil Aviation Authority; flybe; and the Council's officers for sustainable prosperity and climate change but their responses had not been received at the time of writing.

9.3 Royal Mail Group plc was approached with regard to its policy on corporate social responsibility which states that:

“Royal Mail operates one of the largest fleets in Europe and is a major contributor to air and noise pollution as well as traffic congestion. As such it should be operating far more responsibly.”

A representative of Royal Mail's Sustainability & CSR Development Team has offered to meet the task group and answer questions but was unable to do so until after the Christmas period.

Jill Owen (chair)
Roger Giles

Olwen Foggin
Rob Hannaford

Gordon Hook
Bernard Hughes

Vanessa Newcombe
Barry Nicholson

Executive members: Policy & Resources; Environment

Electoral Divisions: all in Exeter and East Devon

Local Government Act 1972 List of Background Papers		
Officer contact:	Nick Beale	
Room:	G.36	
Tel:	01392 382296	
Background Paper	Dates	File References
see 7.0 & 8.0 above	as cited	n/a

APPENDIX A

Exeter International Airport Movements & Passenger Numbers

Fiscal year (1 April–31 March)	1984/85	1985/86	1986/87	1987/88	1988/89	1989/90
Passengers	105,541	95,665	129,124	167,679	170,169	228,071

Fiscal year (1 April–31 March)	1990/91	1991/92	1992/93	1993/94	1994/95	1995/96	1996/97	1997/98	1998/99	1999/00
ATM*	9,522	6,514	6,817	7,839	10,921	8,393	8,171	8,140	9,130	9,691
All movements	54,086	44,394	43,512	42,710	51,800	44,547	40,869	42,231	46,188	47,741
Passengers	208,893	168,631	167,308	189,621	195,590	186,077	213,721	213,280	248,910	286,973

Fiscal year (1 April–31 March)	2000/01	2001/02	2002/03	2003/04	2004/05	2005/06
ATM*	9,649	8,562	7,352	7,863	10,532	14,481
All movements	45,702	49,010	41,297	45,980	51,659	55,053
Passengers	321,182	336,520	345,346	392,445	670,690	873,869

*ATM = Air Transport Movements (i.e. passengers + freight)