



RTPI

mediation of space · making of place

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To whom it may concern,

Response to the consultation on the draft Airports National Policy Statement .

The Royal Town Planning Institute (RTPI) welcomes the opportunity to provide evidence to the Department for Transport's consultation on the draft Airports National Policy Statement on new runway capacity and infrastructure at airports in the south-east of England.

The RTPI has over 24,000 members who work in the public, private, voluntary and education sectors. It is a charity whose purpose is to develop the art and science of town planning for the benefit of the public. The RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, practice advice, training and development. This evidence has been prepared with reference to the response from the National Infrastructure Planning Association (NIPA).

Please see our submission to the consultation below.

Yours faithfully,

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The RTPI welcomes this opportunity to respond to the consultation from the Department for Transport. We do not take a view on which option best meets the need for increased airport capacity in the South East, but is rather concerned with addressing matters of consistency in the planning process and providing a spatial planning perspective, regardless of the final decision taken by government.

Question 1: The Government believes there is the need for additional airport capacity in the South East of England by 2030. Please tell us your views.

This NPS reinforces an emphasis on airport expansion in the South East of England, and specifically the preferred option at Heathrow. However, the NPS is not clear about the impacts that this would have on economic growth and airport expansion proposals across the rest of the UK. Paragraphs 6.5.11 and 6.5.12 of the Appraisal of Sustainability (AoS) state that the calculations of employment growth, conducted by the Airports Commission and Department for Transport, did not consider displacement impacts (where the employment generated by airport expansion in the South East is transferred from other areas), nor the potential for an increase in airport activity in the South East to result in reduced activity at other regional airports in the UK. This should be made clear in the narrative around the economic benefits of airport expansion in the South East.

Question 2: Please give us your views on how best to address the issue of airport capacity in the South East of England by 2030. This could be through the Heathrow Northwest Runway scheme (the Government's preferred scheme), the Gatwick Second Runway scheme, the Heathrow Extended Northern Runway scheme, or any other scheme.

Greater clarity is needed regarding the purpose and scope of this NPS. It states that its primary purpose is to facilitate decision-making "*on development consent applications for a North West Runway at Heathrow Airport*" but also that it will "*be an important and relevant consideration in respect of applications for new runway capacity and other airport infrastructure in London and the South East of England.*" If this scope is to be carried forward, then the NPS should be clear which paragraphs relate only to Heathrow, and which are relevant to other applicants.

The NPS needs to be clear whether the preferred scheme is considered by government to meet all identified need for new aviation infrastructure within the South East, and how/whether additional applications for airport extension projects in the South East - or indeed other regional airports in the UK - will be considered in relation to this NPS.

Question 3: The Secretary of State will use a range of assessment principles when considering any application for a Northwest Runway at Heathrow Airport. Please tell us your views.

No comment.

Question 4: The Government has set out its approach to surface access for a Heathrow Northwest Runway scheme. Please tell us your views.

The NPS should contain details on how the mode share targets proposed in the NPS, which are expected to become binding upon the airport, would be enforced along with penalties

and mitigation measures if they are not met. The pledge from Heathrow Airport to ensure that levels of related surface traffic are “no greater than today” should be strengthened in order to avoid a perpetuation of the current serious levels of congestion.

The NPS does note the potential of western and southern rail links to support Heathrow expansion, but does not consider them essential and provides no certainty on financing. There is also only limited consideration of measures to improve accessibility by bus, walking and cycling, particularly for airport staff, and little mention of measures to manage the impacts of freight movement.

There is also little consideration of how surface access improvements could help to solve wider issues than airport capacity – beyond a recognition in the Appraisal of Sustainability that surface access schemes at Heathrow would initially benefit communities by providing more varied travel options and improved access to employment, but that over time these would be negated by airport expansion and associated increase in passenger numbers.

Local authorities around Heathrow and in Greater London are severely limited in terms of developable and accessible housing land, along with rail passenger and freight capacity. The Appraisal of Sustainability notes that airport expansion schemes will reduce the availability of this land. Furthermore, it notes that airport expansion has the potential to generating cumulative negative impacts (such as congestion and pollution) from the developing of new transport infrastructure, set against that which is already planned for Greater London and the South East. In order to manage these impacts, any airport expansion needs to be set within a wider strategic planning framework, so that the plans of neighbouring local authorities and the London Plan can be properly aligned.

A more strategic approach would also enable better links to be made between surface access improvements and wider objectives for sustainable development across the sub-region. The RTPI policy paper ‘Capturing the Wider Benefits of Investment in Infrastructure’ describes how strategically planned transport infrastructure can play a significant role to play in developing sustainable, thriving communities, where individuals have good access to employment, housing and leisure. Investment in new airport capacity, should it take place, should provide an opportunity not only to meet demands for air travel, but to assist local authorities in meeting their objectives for housing, employment, regeneration, decentralised energy and sustainable transport.

The NPS also operates in the absence of any policy framework for long-distance travel within the UK or between the UK and the continent. To assist decision-making it would be helpful for the government to indicate a desired level of modal split for long-distance travel (passenger and freight) against which airport expansion and other major transport infrastructure can be assessed.

Question 5: The draft Airports National Policy Statement sets out a package of supporting measures to mitigate negative impacts of a Heathrow Northwest Runway scheme. Please tell us your views. Are there any other supporting measures that should be set out? In particular, please tell us your views on:

5.1. Air quality supporting measures

The NPS needs to set out clearly the arrangements for monitoring and enforcing air quality supporting measures, and the penalties envisaged in the event that conditions, agreed actions or financial contributions are not met.

5.2. Noise supporting measures

As with the response to Q5.1., questions remain as to the monitoring and enforcement of noise supporting measures, and the penalties envisaged in the event that conditions, agreed actions or financial contributions are not met.

5.3. Carbon emissions supporting measures

All airport expansion schemes referred to in the draft NPS are predicted to result in absolute increases in carbon emissions. The NPS repeats the position of Government and the Airports Commission that expansion can be made with the UK's climate change obligations, however this depends on a series of assumptions related to international agreements, domestic legislation and market forces. These include:

- A carbon cap scenario, where the gross CO₂ emissions from flights departing UK airports are limited to the CCC's 'planning assumption' of 37.5 MtCO₂ in 2050 (implying around a 60% increase in passenger demand) and in which no trading of aviation emissions occurs
- An alternative carbon trading/offsetting scenario, where any increase in CO₂ emissions from flights departing UK airports results in no increase in CO₂ emissions at the international level.
- Changes in the aviation industry, including a shift to larger and more efficient aircraft
- Changes in the wider economy, including the gradual decarbonisation of electricity supply and distribution, a shift to low-emission road vehicles and the electrification of the rail network, deep decarbonisation of other sectors such as housing, and negative emission schemes such as Carbon Capture and Storage and afforestation

All of these assumptions entail considerable uncertainty. The government has not decided whether to accept the CCC's 'planning assumption' to manage emissions or whether to include carbon trading. Government policy on national aviation emissions is expected to be addressed through an Aviation Strategy White Paper, which is not expected until 2018, while the publication of updated passenger demand forecasts have been delayed due to the General Election. The growth in carbon emissions from airport expansion will have significant implications for the speed and level of decarbonisation required across the wider economy in order to meet the legally binding targets of the 2008 UK Climate Change Act and the deeper cuts which are consistent with the objectives of the Paris Agreement. The UK currently lack the policies necessary to achieve these cuts, with the Clean Growth Plan from BEIS again not expected until after the General Election.

This absence of wider policies and strategies means that the NPS operates in a vacuum, however there is no recognition of the potential for decision-making parameters to change over time. Examples of developments that might precipitate such as change include a continued failure to substantially reduce emissions in the wider economy, a failure of carbon pricing to constrain passenger demand, limited uptake of measures to deliver negative emissions, or a failure of international agreements to limit aviation emissions. The DfT Carbon Policy Sensitivity Test: Supplementary Analysis addressed some of these concerns

by showing how carbon abatement could be technically feasible under higher passenger growth scenarios; but acknowledged that further work is required to identify how to deliver these measures in practice.

The NPS needs to acknowledge this complexity and uncertainty entailed in determining whether the emissions resulting from airport expansion would have a material impact on the ability of government to meet its carbon reduction targets. It should set out clear management, monitoring and review mechanisms which can deliver the necessary flexibility, accounting for new evidence as it emerges throughout the applicant process. As with the response to Q5.1. and Q5.2., questions remain as to the monitoring and enforcement of noise supporting measures, and the penalties envisaged in the event that conditions, agreed actions or financial contributions are not met.

5.4. Compensation for local communities

The NPS should set out how community compensation packages for homeowners should assess the base value of properties, taking into account for any depression in house prices that has already occurred as the result of the properties being purchased by the applicant, and set against inflation elsewhere.

Question 6: The Government has set out a number of planning requirements that a Heathrow Northwest Runway scheme must meet in order to operate. Please tell us your views. Are there any other requirements the Government should set out?

These are addressed in the response to Q5.

Question 7: The Appraisal of Sustainability sets out the Government's assessment of the Heathrow Northwest Runway scheme, and considers alternatives. Please tell us your views.

A final check for consistency should be made to ensure that the NPS is compatible with the provisions of the Planning Act 2008 (sections 5-10) and that mitigation commitments are compatible with one another.

Question 8: Do you have any additional comments on the draft Airports National Policy Statement or other supporting documents?

The draft NPS should be checked for consistency of terminology and the correct use of terms from the Planning Act 2008. For example, the document is inconsistent about the word 'requirements' – sometimes this referred to requirements under s120 of the Planning Act 2008 (e.g. paragraphs 4.9 and 4.18) and sometimes used in a more general sense (e.g. Chapter 5 heading and paragraph 5.1). The NPS should be reworded so that the word 'requirements' refers to the meaning in the Planning Act 2008, in order to avoid confusion and legal arguments at a later date.

Question 9: The Government has a public sector equality duty to ensure protected groups have the opportunity to respond to consultations. Please tell us your views on how this consultation has achieved this.

No comment.