



RTPI

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19 December 2017

To whom it may concern,

Response to the consultation on the revised 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 revised draft Airports National Policy Statement on new runway capacity and infrastructure at airports in the south-east of England.

The RTPI has over 25,000 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.

Please see our submission to the consultation below.

Yours faithfully,

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The RTPI welcomes this opportunity to reiterate and expand upon the points made in our original response to the draft Airports National Policy Statement. The sections below highlight issues which the RTPI believes need further improvement in order to meet the six key NPS requirements, these being:

- How airport policy will contribute to sustainable development
- How airport objectives have been integrated with other Government policies
- How actual and projected capacity and demand have been taken into account
- Relevant issues in relation to safety and technology.
- The adverse impacts of airport development
- Specific locations to provide a clear framework for investment and planning decisions

Setting airport expansion within a wider policy context

The revised NPS continues to focus on airport expansion in the South East of England and the choice between Gatwick and Heathrow. As a *National Policy Statement*, this needs to be set within a context which considers the wider economic, social and environmental impacts on other parts of the country. The revised draft NPS focuses largely on the economic benefits of expansion in the South East, and refers only to the interim Airports Commission report when discussing impacts on the rest of the country. This narrative fails to address the potential for reduced demand at regional airports and the associated displacement of employment and economic activity.

The NPS also operates in the absence of a proper policy framework for long-distance travel. Airport policy can be affected and influenced by the development of rail and road infrastructure and vice versa, such as improved connectivity between existing regional airports, between England and Scotland, and between the UK and Europe. To assist decision-making, the government should indicate desired levels of modal split for long-distance travel (passenger and freight) against which airport expansion and other major transport infrastructure can be assessed.

Integrating airport expansion within a strategic planning context

The revised draft NPS does not consider how surface access improvements could help to solve wider issues than airport capacity. The Appraisal of Sustainability states 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.

As stated in our response to the initial draft NPS, 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, while potentially 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. This includes ensuring that expansion proposals can accommodate the additional trips they generate,

rather than relying on transport infrastructure investment designed to cater for existing growth across the sub-region.

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. Investment in new airport capacity 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 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, with modal split targets for active transport developed in order to drive investment in new walking and cycling infrastructure.

Ensuring that mitigation measures are robust, deliverable and properly enforced

The NPS needs to clearly set out arrangements for monitoring and enforcing the policies and mitigation packages that cover noise, air quality, biodiversity and carbon emissions. This should include mechanisms to monitor changes in impacts over time, and sufficiently high penalties in the event that conditions, agreed actions or financial contributions are not met.

Guarantees are sought on the assumptions being made for control and enforceability, which will depend heavily on staffing and resource availability over a long period, during a time in which the resourcing of local planning authorities is a major concern. Strengthening control and enforcement will increase public confidence that policies are not merely aspirational, and that economic impacts will be given equal priority with social and environmental impacts.

Airport expansion and climate mitigation

In particular, the revised airports NPS still fails to deal properly with the relationship between airport expansion and the UK’s climate change obligations, including the potential for economic impacts on other sectors of the economy.

In June 2017 the Committee on Climate Change (CCC) published its report to government on progress towards meeting the emissions reductions require by the 2008 Climate Change Act. This said that:

“If aviation emissions are anticipated to be higher than 2005 levels – as in the central case in the business case for an additional runway at Heathrow airport – then other sectors would have to plan for correspondingly higher emissions reductions. We would expect to see this reflected in the Government’s plan for meeting the fourth and fifth carbon budgets.”

The government published its Clean Growth Strategy (CGS) in October 2017. While this contained some welcome measures to speed up the pace of decarbonisation, it lacked sufficient policies to enable the UK to meet the 80% emission reduction required by 2050 to meet the fifth carbon budget, as set out under the 2008 Climate Change Act.

The 2050 carbon budget works on the assumption that aviation emissions will be at 2005 levels by 2050, e.g. no higher than 37.5 Mt. The Committee on Climate Change (CCC) say that this can be achieved by limiting demand growth to around 60% by 2050 compared to 2005, coupled with fuel and operational efficiency improvements and the use of sustainable biofuels.

The government's call for evidence on the new UK aviation strategy, published in July 2017, shows that the government expects demand for air services to almost double by 2050¹. The revised draft NPS also works on the assumption that aviation demand will "increase significantly" between now and 2050, with updated passenger forecasts used to justify the costs of not expanding capacity in the South East.

However, the CCC notes that increased aviation demand and the associated rise in emissions would necessitate emission reductions greater than 85% in other sectors of the economy (e.g. power, buildings and transport) by 2050 - cuts which they do not think can be realistically achieved. The CCC instead recommend that:

*"given the need to limit aviation demand growth in a carbon-constrained world... ..it would be appropriate to assess whether investments still make sense if overall demand growth were to be limited to around 60% by 2050 on 2005 levels."*²

There is no evidence that the economic analysis which underpins the revised draft NPS has taken this into account, nor is there evidence the economic benefits of airport expansion have been considered in relation to the costs of achieving deep decarbonisation in other sectors of the economy, or the wider costs of adapting to climate change, should carbon emissions continue to rise.

The impact of Brexit is only briefly considered in the revised draft NPS, which suggests that long-haul connectivity will become increasingly important as the UK looks beyond Europe to the rest of the world. This could also increase the adverse impacts of airports and aviation in terms of carbon emissions and air pollution.

Given the enormity of this issue, and the lack of clarity on aviation emissions in the CGS, an independent assessment is needed to properly consider the consistency between airport expansion and the UK's climate change obligations, which includes analysis on the costs of mitigation in other sectors of the economy should aviation capacity and demand increase as is forecast.

Airport expansion and climate adaptation

Stronger policies are required to ensure that 'new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change'. The revised draft NPS needs to provide reassurance that such actions will be soundly implemented and enforced, largely irrespective of the financial costs.

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/636625/aviation-strategy-call-for-evidence.pdf (page 17).

² <https://www.theccc.org.uk/wp-content/uploads/2015/02/CCC-AC-consultation-response.pdf>

Compensation for local communities

The revised draft NPS should consider whether compensation funding would be more effective if pooled and used implement wider air quality, noise and carbon reducing measures that will benefit whole local communities, rather than given to individual families.