

## INCREASING THE UK'S LONG-TERM AVIATION CAPACITY

### Response by the Campaign to Protect Rural England (CPRE) to the Airports Commission's (DfT) Consultation

February 2015

#### Introduction

1. The Campaign to Protect Rural England (CPRE) welcomes the opportunity to respond to this consultation on aviation capacity. CPRE fights for a better future for the English countryside. We work locally and nationally to protect, shape and enhance a beautiful, thriving countryside for everyone to value and enjoy.

2. As a charity with about 60,000 members, a branch in every county, over 200 district groups and more than 2,000 parish council members, we have had an interest in many of the recent proposals to develop airports across the country. CPRE has fed in comments to a range of the topic-specific consultations carried out by the Airports Commission ('the Commission'). While we welcome the careful consideration that the Commission has given to the range of views and issues relating to aviation, we have been concerned since the start of the process that it was set up to propose another runway in the South East. Although this consultation is simply about the three options for runways that the Commission is considering, CPRE remains firmly of the view that there should be no runway expansion.

#### Consultation questions

***Q1: What conclusions, if any, do you draw in respect of the three short-listed options? In answering this question please take into account the Commission's consultation documents and any other information you consider relevant. The options are described in section three.***

3. Our conclusions are as follows

- All three short-listed options are unsustainable. They would breach environmental limits, whether in relation to landscape, Green Belt, air pollution or carbon emissions, so it is therefore not possible to seek to argue that environmental costs could be traded off against economic benefits.
- Although there economic benefits from each of the options, they would be in the wrong part of the country and would lead to the economy and regions becoming even less balanced.
- There is a pressing need to look again at aviation afresh without the constraint of

the limited terms of reference that have framed the Commission's considerations so far but also with the support of a framework of a national spatial plan for England.

***Q2: Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in section three.***

4. We do not believe that any of the options proposed are deliverable as well as not being desirable. Nonetheless, as with the case of objectors in planning decisions setting out possible conditions, despite their view a development should not proceed, we make some suggestions how the proposals could be made less unsustainable.

#### National

##### *Greenhouse gas emissions*

5. At a national level, the main challenge would be to ensure that meeting the legal requirement for radical reductions in carbon emissions contained in the Climate Change Act 2008 was not derailed by aviation expansion, regardless of its location. This is particularly difficult as, with the UK already having high rates of flying, there will be limited scope for carbon trading with other countries, whose economies and aviation sectors are relatively undeveloped compared to ours. A further challenge is that accounting for the non-carbon impacts of aviation is likely to mean that the current target for UK aviation emissions not to exceed 2005 levels by 2050 will need to be tightened.

6. There are three options to deal with this. First, introducing consumer measures to dampen demand for aviation, such as a carbon tax or quota. This would offset any benefits to consumers from airport expansion of lower fares and damage the case for airport expansion. Second, to restrict regional airports to enable airports in the South East to take an even more disproportionate share of carbon emissions. This would have wider economic, social and environmental impacts that need to be thoroughly appraised before the Commission's final report

7. Finally, other sectors would need to reduce emissions beyond that currently deemed feasible by the Committee on Climate Change, to allow even greater leniency for the aviation sector. This could lead to further environmental impacts, for example requiring major energy infrastructure to be constructed in and thereby damage nationally designated landscapes or habitats.

##### *Protection of landscapes, historic environment and biodiversity*

8. There are at least three Areas of Outstanding Natural Beauty (AONBs) and one National Park in South East England that are likely to suffer greater overflying and resultant loss of tranquillity if there is a new runway in the South East. Unfortunately, as we set out in our answer to question 5 below, the consideration of tranquillity in the Commission's assessment is inadequate.

9. Paragraph 5.154 of the National Policy Statement on National Networks (NPSNN) states that '[t]he duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them.' Similar considerations apply for airport expansion and planning conditions should be required to minimise any overflying of designated landscapes. Similar considerations apply to historic assets of significance.

10. We would also expect that any airport expansion would, in line with the Natural Environment White Paper, contribute to a net increase in biodiversity. Conditions requiring this should be attached to any aviation development.

#### Site specific issues

11. In relation to expansion of Gatwick, we are concerned that this could lead to widening of the SW quadrant of the M25 through AONB and Green Belt; indeed in December 2014 the Department for Transport announced a feasibility study looking at this section of motorway. The Gatwick option has further transport challenges, in particular poor connectivity to the west and east, including some of the few parts of the south east where there is significant unemployment, by public transport. While about three-quarters of access to Gatwick is from the north of it, there is still significant access in other directions, particularly if the airport is expanded, which would put further pressure on rural roads. Any expansion would need to include the developers making substantial contributions to east-west rail upgrades, local bus services as well as wider road demand management measures.

12. The Commission has separated the Heathrow Hub proposal for a new off-site station at Heathrow from its analysis. In light of the Government's commitment to construct a new interchange at Old Oak Common, the benefits of this proposal are now at best marginal. The costs, whether the additional time penalty for train stopping services and the fact that it would be situated in Green Belt and on flood plain, now wholly outweigh these.

13. As the Commission's analysis has noted, further demand management measures are likely to be needed around Heathrow, such as road pricing, indeed this may be needed in any event to meet air quality limit values. The additional traffic induced by expansion at Heathrow would be likely to increase peak pricing, which would have further impacts on local people and businesses. Expansion of Heathrow should be predicated on a no net increase in traffic basis, whereby its operator would secure 'trip credits' by investing in alternatives to driving and Influencing Travel Behaviour programmes to reduce existing motor traffic by as much as airport expansion increases it.

#### ***Questions on the Commission's appraisal and overall approach***

***Q3: Do you have any comments on how the Commission has carried out its appraisal?  
The appraisal process is summarised in section two.***

14. Our answer to question 1 applies.

15. In addition we believe that the Commission has paid insufficient consideration to surface transport, whether in terms of 'co-mobility' - considering aviation and high speed rail in an integrated manner - or how much improving rail access to regional airports could assist with moving around shorter-distance flights. In other words with the completion of HS2, or indeed four-tracking to Stansted, public perceptions of what is a 'local airport' are likely to change and facilitate airport rebalancing. Indeed with the Department for Transport forecasting a 121% increase by 2040 in congestion on the Strategic Road Network, particularly in the south east, what is likely to matter is whether an airport is easily accessible rather than simply if it is 'local' or not.

***Q4: In your view, are there any relevant factors that have not been fully addressed by the Commission to date?***

16. The individual issues we set out in our answer to question 5, the further measures that would be required to mitigate the proposals that we set out in our answer to question 2 and the interplay between them should be considered.

17. Since the Commission was set up, the Government has strengthened its commitment and policies regarding the need to maximise the use of brownfield sites for new homes. An assessment should be carried out as to the impacts on this brownfield objective of the three options being considered, as well as alternative means of meeting international connectivity needs through greater use of other airports and through rail.

***Questions inviting comments on specific areas of the Commission's appraisal***

***Q5: Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?***

**Strategic fit**

18. England is unique within Europe, if not developed countries anywhere, in not having any national spatial plan. The lack of such a plan means that there has been no assessment of the suitability of further airport expansion in the south east with the political consensus that the regions in England need to be rebalance. So, for example, the assessment of strategic fit of expanding Heathrow is only able to state that each expansion proposal 'has the potential to align well with local and regional development strategies'.

19. The fact that this would put even more pressure on the Green Belt and ecosystem services such as water, besides depriving the midlands and the north of beneficial economic growth that could be accommodated largely within previously developed sites, is at best ignored. At worst, environmental limits are actively encouraged to be breached. Paragraph 2.84 states, for example that 'the land take associated with additional housing demand resulting from airport expansion could be challenging for individual authorities and potentially require de-designation of areas of Green Belt. Each borough council's plan contains a theme of greenfield land preservation; an intention synonymous with that of the development of town centres for housing purposes. While most local authority plans have shied away from Green Belt development, this strategy may need to be considered given the potential housing pressures and limited alternatives.'

20. The scale of what is proposed is such that this is a matter of utmost importance and concern. As the consultation document notes, an expanded Heathrow would be the 'biggest in the world alongside new Istanbul airport', while an expanded Gatwick would be as big as Heathrow is currently. As its site is bounded on three sides by nationally designated landscape, this would be entirely unsuitable.

21. A further indication as to why this is wrong is provided by the lack of balance of regional aviation traffic. 2010 figures from the Centre for Aviation (<http://centreforaviation.com/analysis/beijing-to-overtake-london-as-worlds-largest-aviation-hub-massive-new-airport-planned-58776>) show that London has 50% more passenger movements than its nearest competitors of New York and Tokyo (both of which have significantly larger catchment populations), though these ignore Luton airport, the inclusion of which would increase the gap further still. This shows why increasing the gap

further between London and the regions would lead to the UK having even more unequal growth.

#### Place

22. While we very much welcome the use of our tranquillity mapping to establish the baseline, unfortunately the reliance on N70 contours in the landscape assessment is fundamentally flawed. In rural areas, background noise levels can be as low as 30dB(A), so setting a threshold of 70dB(A) for the assessment of the impact of flight paths is entirely inappropriate in rural areas. CPRE has been working with the Civil Aviation Authority to consider new ways to assess the impact of flights in areas of tranquillity. It is likely to be difficult to model in detail the impact of flights below about 48dB(A). Nonetheless mapping N48 contours would still provide an adequate assessment of potential impacts on tranquillity.

23. Any such assessment should also consider relative areas of tranquillity: there are few areas of absolute tranquillity in the south east; nonetheless the importance of protecting what tranquillity there is should be recognised. Such an approach has been adopted in the Environmental Statement for High Speed 2.

24. The landscape assessment of the three runway options is inconsistent with the National Policy Statement on National Networks ('NPSNN'). The assessment produced for the Commission only considers the visual impact on nationally designated landscapes of larger airports rather than the visual or acoustic impacts of the aircraft using this additional capacity. At paragraph 5.146, the NPSNN states that: "The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include any noise and light pollution effects, including on local amenity, tranquillity and nature conservation."

25. Furthermore paragraph 5.154 of the NPSNN highlights the importance of considering the impacts of major developments that are outside nationally designated landscapes but which may still lead to impacts within them: '[t]he duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them.'

26. Finally we are very concerned that the indirect impact on the Green Belt has not been adequately considered. Although the direct impact has been assessed (e.g, for the North Western Runway at Heathrow this would be as much as 431ha), the indirect affects have not been. These include pressure for additional housing and employment development required due to local economic activity catalysed by airport expansion and similarly to provide for additional transport infrastructure. In any event the impacts on the Green Belt, if not designated landscapes, of widening of existing transport infrastructure such as the M25, do not appear to have been assessed in any detail.

#### Air pollution

27. We welcome the Commission's statement that it will be carrying out further work on air pollution. The Supreme Court is due to rule this year following the recent decision by the European Court of Justice (ECJ) in the case C-404/13 regarding the UK's lack of compliance with the EU Air Quality Directive. In the circumstances, fairness requires a further opportunity for public comment on this issue before the Commission makes any final recommendation.

***Q6: Do you have any comments on the Commission's sustainability assessments, including methodology and results?***

28. Our answers to questions 4 and 5 apply.

***Q7: Do you have any comments on the Commission's business cases, including methodology and results?***

29. The business cases for expansion do not relate directly to the environmental impacts.

***Other comments***

***Q8: Do you have any other comments?***

30. No but in the event that it is felt any of our comments above do not fall within the scope of the earlier questions, they should be considered in response to this answer.

CPRE

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