



AEF Note to Members Airports Commission Consultation on Shortlisted Options

*This note is intended to give general advice to our members for responding to the Airports Commission's consultation which closes on **Tuesday 3rd February**. The issues we consider here reflect the main environmental impacts we work on – climate change and noise - but we also address wider concerns such as air quality, economics impacts and Public Safety Zones. We are still finalising our full consultation response which will set out our arguments in more detail. We will be sending out our final response to our members but it is likely to be very close to the consultation deadline. So if you have any questions or concerns about issues we don't touch on here, please do get in contact and we would advise you as best we can.*

To respond to the consultation, you can download the response form online¹ and email it to airports.consultation@systra.com or send by post to: Freepost RTKX-USUC-CXAS, Airports Commission Consultation, PO Box 1492, Woking, GU22 2QR, by the 3rd February.

The three questions we comment on are questions 1, 4 and 5. We have not commented on the other questions for the following reasons:

Q2: we are not convinced any of the options can be delivered.

Q3: our comments on Q1 apply

Q6: our comments on Q4 and 5 apply

Q7: the business cases for expansion do not relate directly to environmental impacts

Q8: our comments fit into Qs 1, 4 and 5

Q1: What conclusions, if any, do you draw in respect of the three short-listed options?

All three options carry significant environmental risks and yet a lot of the important evidence in relation to environmental impacts is currently missing. The availability of this evidence would have significant impacts on the estimated benefits and costs of expansion and the political acceptability of any decision to expand airports. Few meaningful conclusions can therefore be drawn from the analysis presented for consultation.

Key evidence missing (covered in more detail below) includes:

- Carbon emissions – see our story online about the gap in the Airports Commission's carbon analysis².
- Noise – the Airports Commission does not present the sensitivity of its findings to assumptions made on 'indicative' flight paths, and on the future fleet mix.
- Air pollution – the Airports Commission has not carried out local dispersal modelling and so has been unable to say whether EU legal limits would be breached following expansion. More information is available in our briefing³.

¹ <https://www.gov.uk/government/consultations/increasing-the-uks-long-term-aviation-capacity>

² <http://www.aef.org.uk/2015/01/20/carbon-gap-airports-commissions-new-runway/>

³ <http://www.aef.org.uk/2014/12/19/briefing-airport-expansion-and-air-pollution/>

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

Climate change

- Our commentary on the **carbon implications** of airport expansion⁴ covered three areas where the analysis falls short. Two of these relate to considerations that the Commission has yet to address at all and so are relevant to this question:
 - The Airports Commission should set out in meaningful detail what policy developments would be required in order to limit emissions to the aviation cap while building new capacity.
 - The Airports Commission should fully include the economy-wide cost of keeping national aviation emissions to within 37.5 Mt in its cost benefit analyses, in line with the recommendations of the Committee on Climate Change. This analysis should be presented prominently in the final report.

Public Safety Zones

- The Airports Commission has not produced any indicative Public Safety Zone (PSZs) maps for a new runway. PSZs exist to limit population growth in areas exposed to a significant risk of aircraft crashes. As the areas included in PSZs have strict planning restrictions, an expanded PSZ around either Heathrow or Gatwick would prevent the development of that area, which would have an impact on the cost-benefit analysis. For local authorities looking for ways to accommodate the predicted population increases in the South East this could be an important consideration in how they analyse expansion proposals.
- The Airports Commission should have produced maps of PSZs for this consultation so that local communities can see what the impact would be on the options for housing and other developments in the area if a new runway was given the go ahead.

Health

- So far the information available on the health impacts of expansion is limited and not collated together – informing only to some extent the costs associated with air pollution and aircraft noise.
- The total health impact in terms of likely population size to have their health negatively impacted by airport expansion should be made clear.
- The Airports Commission has said that a Health Impact Assessment should only be carried out once a planning application is submitted. Yet to fully consider the expansion options being consulted on, information about the total potential health impacts of expansion should be available.

⁴ <http://www.aef.org.uk/2015/01/20/carbon-gap-airports-commissions-new-runway/>

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?

1) Economy impacts

- We conclude from the wide ranging figures the Airports Commission produced in its interim report and appraisals that there is great uncertainty in what the economic impacts of expansion would be. In certain scenarios, particularly the global fragmentation scenario, the net direct impact is *negative* for the two Heathrow options. The Airports Commission should make the potential negative impact clearer.
- For wider economic impacts, the benefits to GDP are highly uncertain, the Commission notes. The business case and sustainability appraisal for each of the expansion options states *"This approach excludes environmental and other social impacts but accounts for how the benefits of airport expansion can transmit through to the wider economy. The approach is far more novel so results should be treated with some caution"*⁵. This 'novel' approach should not be used as the basis for supporting expansion and the Airports Commission should only present wider economic impacts when also considering the wider costs to the economy (in terms of increased carbon costs) of limiting aviation's carbon emissions to 37.5 Mt while adding a new runway.

2) Carbon

- The Airports Commission has undertaken some limited forecasting of CO₂ impacts. We note, however, that the Commission's forecasts are significantly lower than the latest Government figures. The Commission should explain why its CO₂ emissions forecasts are lower than the latest official forecasts, what assumptions have been made and how sensitive the results are to them.

3) Noise

- Assumptions - We are concerned about the lack of clarity in the consultation documents on what assumptions have been made and why, and in particular the sensitivity of the findings to the assumptions made. This is relevant in relation to both flight paths and fleet assumptions. Until the sensitivity of the results is made clear, we are unable to feel confident in the Commission's findings on potential noise impacts around Heathrow or Gatwick. The Airports Commission should clearly present their sensitivity analysis.
- Increased disturbance - Communities are increasingly annoyed by noise even as the average Leq noise contours are shrinking⁶. But the Commission has assumed no new noise measures (for example no increase in stringency of the night noise regime) between now and 2050. The Airports Commission should model the impacts of expansion under an assumption that Government takes effective action to reduce aviation noise.
- Newly overflowed communities - The Airports Commission should clearly identify which communities are likely to be newly overflowed in their modelling and mapping.
- Shortcomings in the choice of alternative metrics - In the modelling by Jacobs for the Airports Commission, the L90 metric is described as being useful to assess background noise but it is not modelled. Modelling this noise metric would enable an assessment to be made of the intrusive

⁵ See for example, Heathrow North West Runway Business Case and Sustainability Assessment, p.59

⁶ <http://www.aef.org.uk/2015/01/26/government-noise-attitudes-survey-people-increasingly-disturbed-by-aircraft-noise/>

impact of aircraft in rural areas. This would better assess the potential noise impact around Gatwick. The Airports Commission should present their proposed flight paths over the L90 noise contours to demonstrate disturbance in rural and tranquil areas.

- Health based modelling - The Airports Commission should model noise down to the levels recommended by WHO and WHO Europe, and assess the population size exposed to aircraft noise at these levels.

4) Air quality

- The local dispersal modelling should have been carried out before the consultation period, even if that meant the consultation was delayed. The modelling would be vital to finding out whether legal limits of air quality will be breached following expansion.
- The local modelling would assess how successful the proposed mitigation strategy would be at the two airports. The costs associated with mitigation should then be factored into the cost-benefit analysis.
- More information on air quality is available in our briefing⁷.

For more information, please get in contact with the AEF office:

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⁷ <http://www.aef.org.uk/uploads/Airport-Expansion-and-Air-Pollution-Briefing.pdf>