

## **Guide to responding to the DfT Consultation on the revised NPS**

The consultation only asks one question: ***Do you have any comments on the revised draft Airports NPS or any of the documents set out in the table on pages 7 and 8?***

### **Key Issues to mention in your response**

#### **Air Quality**

- The revised NPS states that the proposal for a northwest runway at Heathrow has a ‘high risk’ of exceeding legal limits for air quality.
- The revised NPS also fails to model the impacts of the construction of a new runway on legal air quality limits.
- The Updated Appraisal Report states that an expanded Heathrow opening in 2026 would be operating at full capacity by 2028. This will lead to a greater impact on air quality in the first few years of the runway being in use. The NPS does not include any proposal to mitigate this fact.
- The revised NPS has not accurately reflected the risk posed by expansion to the continued breach of the UK’s air quality legislation. The Government’s air quality plan is still subject to legal challenge and no effective enforcement has proposed should air quality improvements not materialise as the Government expects.

#### **Noise**

- The revised NPS does not fully take into account the impact aircraft will have on people and communities that are newly overflown. The population exposure at high noise levels is 42% higher in 2030 in the new forecasts.
- The lack of information around detailed flight paths associated with a third runway at Heathrow is a significant flaw that undermines the credibility of the NPS.
- As a result of the new airspace policy the revised NPS now demonstrates that there is a lowering of the threshold at which significant community annoyance begins to occur. Nearly, 400,000 more people will fall within the noise contour considered to mark the onset of significant community annoyance in 2030.
- There is insufficient information in the revised NPS on the length of the respite period that communities will experience should a third runway become operational.

#### **Economics**

- The Updated Appraisal Analysis significantly undermines the evidence base and rationale for the Government’s support for the Northwest Runway at Heathrow.
- The Government has pursued a policy of support for expansion at Heathrow, primarily based on the economic benefits accrued to the country. However, the revised NPS

fundamentally challenges this position as it is not clear that the preferred option of Heathrow expansion presents the most strategic case for expansion that delivers the greatest economic benefits.

### **Surface Access**

- The revised NPS has not included any further analysis of the potential costs involved in providing the surface access improvements required to facilitate the operations of a third runway at Heathrow.
- The revised NPS has not calculated the financial or environmental costs of the proposed construction of the runway over the M25, nor assessed the potential impacts on the local road network.

### **Regional Connectivity**

- The revised NPS shows that airports outside of London will on average handle 8.5% fewer passengers in 2050 with a third runway at Heathrow.
- Table 3.3 demonstrates that the total number of destinations served will actually fall when compared to a no expansion scenario.

### **Health**

- The Airports Commission report assessed the effects of a third runway at Heathrow as moderately adverse for health outcomes (including mental and physical health) and majorly adverse for children's cognitive development. The revised NPS has failed to give sufficient weight to these very serious impacts.
- Government should examine bringing the legal air pollution limits down to be in line with WHO recommendations.

### **Climate Change**

- The revised NPS includes a significant reduction in CO2 emissions per passenger compared to previous Government forecasts in 2013, yet does not provide any evidence to explain why the current predictions are accurate and the previous ones were incorrect.
- The revised NPS and Appraisal of Sustainability make clear that the Government has no intention of pursuing a carbon capped scenario but rather will allow expansion on a carbon traded basis. This will require a significant rise in the price of carbon that is currently not part of Government policy.

### **How to respond**

**Write to:** Freepost RUNWAY CONSULTATION

**Email:** [RunwayConsultation@dft.gsi.gov.uk](mailto:RunwayConsultation@dft.gsi.gov.uk)

**Online:** <https://runwayconsultation.dialoguebydesign.com/>

**Deadline for submissions is 11.45pm on Tuesday 19 December 2017.**