

CIHT response to the 'Draft Airports National Policy Statement'

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Chartered Institution of Highways & Transportation response to the DfT consultation on Draft Airports National Policy Statement – [25 May 2017]

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CIHT is a charity, learned society and membership body with over 14,000 members spread across 12 UK regions and a number of international groups. We represent and qualify professionals who plan, design, build, manage and operate transport and infrastructure networks. Part of our vision is to demonstrate transport infrastructure's contribution to a prosperous economy and a healthy and inclusive society. Our values are to be Professional, Inclusive, Collaborative and Progressive.

CIHT welcomes the opportunity to respond to the consultation the Draft Airports National Policy Statement on new runway capacity and infrastructure at airports in the South East of England. Access to air travel is essential for business, commerce and industry in providing access to markets. It supports economic development, inward investment and regeneration, it is vital to employment in terms of a range of direct and indirect jobs and supports inbound /outbound tourism.

CIHT polled its membership on a number of occasions on the yes, no question - 'Are you in favour of a third runway at Heathrow?' The membership has consistently been divided 50/50 on the issue, serving to highlight the difficulty of the decision.

Airport capacity

CIHT has consistently called for an Integrated Transport Strategy and the need to increase runway capacity in London and the South East¹ should be part of that strategy.

There have been numerous decisions, announcements, reviews and recommendations over many years. The latest review and report from the Airports Commission in 2015 confirmed the need for increased capacity in the South East. CIHT is disappointed that a decision has not been taken previously when there have been many opportunities to do so. As it stands, everyone affected, be it business or the general public, face continued periods of uncertainty.

High quality international connectivity is vital to the UK's economic wellbeing. As identified by the Airports Commission, the national hub airport, Heathrow, operates at almost full capacity. This limits the scope for improving connections to new markets in terms of passengers, freight and for UK regional connecting flights, all more pertinent in light of Brexit.

Cross party agreement on increasing airport capacity needs to be reached, continued delay exacerbates and undermines the resilience of the UK's transport networks.

Delivering on a strategy for the South East will also benefit other UK regions and devolved nations, delivering better and alternative connections to international routes/markets.

In light of the length of time for a decision and the completion of the option taken, CIHT continue to call for a twin track approach to aviation capacity. One which pushes ahead with short term solutions that will maintain the UK's position as a leading aviation market and maintains its long term global economic competitiveness. Airport operators, airlines and the government can make better use of existing capacity at London's airports, through encouraging larger aircraft and higher load factors; incentivising the use of existing 'off-peak'

¹ [A time to choose](#)

runway capacity and increasing hourly runway throughput through more efficient management.

Regional airports

Government should consider the role of regional airports when making their decision. Regional airports with spare capacity can play a role in relieving capacity constraints in the South East and at London airports whilst working to rebalance the UK economy and supporting local regeneration. Regional Airports could meet more local demand, rather than such demand being delivered via London's airports. Luton markets itself as a London airport and Birmingham Airport with High Speed Rail, sees itself, in the longer-term, as an alternative to additional capacity in the South East.

CIHT members demanded more investment in regional airports, setting out the case for expanded and integrated airport capacity in the North with decent surface access links, all of which is necessary if the government are determined in their drive to create a northern powerhouse.

Most regional airports are actively pursuing direct international services, many with significant success. Over time, as markets grow, further direct services from Birmingham, Edinburgh, Glasgow, Manchester, Newcastle etc will be added, further reducing the reliance on connecting capacity at London airports.

Assessment principles

Assessment criteria will need to include; net CO₂ and other emissions, including from surface transport to and from the airport; integration with other modes, including opportunities of exploiting existing infrastructure; noise; protected ecology and impact on patterns of employment, business activity and urbanisation.

The air transport industry faces a very significant challenge in delivering growth while making its contribution to government efforts to reduce CO₂ emissions. Airlines will have to compensate for growth, for example through fleet modernisation and the need to embrace new technologies, especially when considering surface access connectivity between airports is critical.

In addition there are local emissions and air quality impacts associated with individual airports which are clearly of significant concern to local populations. For example air quality in the vicinity of Heathrow airport is already in exceedance of some EU limits. Developers will need to demonstrate how this impact would be mitigated before any runway scheme was able to proceed.

Noise pollution is regularly cited as one of the greatest concerns. As with air quality, proposals for further development will need to demonstrate that these effects can be managed. Consultation with local residents to secure buy-in to the process will ensure that any remedial action or commitments actually addresses local concerns.

The statement notes: "Therefore, for the time being, European Union (EU) legislation applies to the development of this policy and to decision making in relation to the preferred scheme." CIHT would like to see assurance that any future framework for evaluation would operate to an appropriate standard.

Impacts and requirements

Whilst access to air travel is critical to the success of the UK, the economic and social value of air travel needs to be balanced with sustainable programmes to mitigate and reduce the environmental impacts of air travel.

There is a strong case for attaching a greater strategic priority to transport investments which improve surface access to our airports. Surface Access (Public Transport) should be improved to all airports regardless of the decision. It is critical that the decision made is not detrimental to air quality agenda – therefore sustainable modes and not the development of road space should be a priority.

The Draft Airports National Policy Statement rightly discussed consultation with Highways England, Network Rail and Highway and Transportation authorities, linking to the National Networks National Policy Statement (NN NPS). A national transport strategy, including airport capacity, would be most effective if developed around an overall spatial strategy that looks at the demand for the country's transport networks (including non-strategic/local interfaces) in an integrated sustainable manner. This would allow future needs of networks to be assessed holistically and in a way that balance investment across all networks, maximising the efficiency of both public and private investment. The Airports National Policy Statement needs to be specific about the implications on local transport networks and these should be articulated in the promotor's proposals.

The NN NPS is very mode discrete and does not join different transport modes into a coherent policy statement. Any future developments in aviation will impact on strategic road, local road and rail networks. HS2 is also being considered separately further emphasising that lack of an overall integrated approach and increasing the danger that promoters will put forward projects that increase capacity within modes rather than considering where best to focus investment and limited resources across networks.

Planning

The Airports National Policy statement is lacking on planning and integration with other strategies.

CIHT has supported the government's commitment to a long-term ambition to improve living standards and drive economic growth across the whole country. Improving productivity and competition across the UK will be vital as we work towards exiting the European Union, however it is imperative that government co-ordinates that drive and the strategy across sectors. Too often in the past, government departments, strategies and industry have worked in silos. The addition of an Industrial Strategy remit to the Business and Energy Department is welcomed and there is an opportunity to ensure that this strategy aligns with the Airports National Policy Statement, Housing White Paper, education, environmental and digital policy to deliver a consistent, complete and sustainable strategy for the whole country.

The establishment of the National Infrastructure Commission to evaluate infrastructure connectivity, investment priorities, city to city corridors and governance in the parts of England is a significant step. However, it is important to note the CIHT believe that a 'National' Transport Strategy should include the local road network and set out how the Strategic Road Network (SRN), aviation, rail and ports networks integrate with one another, taking account of key drivers that transport needs to take into account. Nearly all journeys begin and end on the local highway network and therefore this must be considered in any evaluation of connectivity. The latest AIA Survey² shows that the local road network is continuing to deteriorate and demonstrates the negative impact this potentially could be having on local economic growth.

CIHT supports the need to take a co-ordinated approach to determining investment priorities for infrastructure in all its forms. There also is recognition of the inter-dependency between infrastructure and the extent to which this can result in changes in the demand for and nature of travel demand. A National Transport Strategy must take into account the work undertaken at sub-national and local level, as well as having a strong linkage to spatial planning

² <http://www.asphaltuk.org/alarm-survey-page/>

considerations. It is imperative that the National Planning Policy Framework and Local Plans are considered in the decision.

Conclusions

The aviation debate has become too heavily politicised. Government and opposition parties need to come to a long-term aviation strategy for the UK. Expanding London's airports will never become a reality if investors do not believe the UK has an aviation strategy that can survive a change of government.

All options will involve major engineering, operational and project management challenges with some options likely to require significantly greater time and resources than others to achieve.

The Institution believe that any decision on additional airport capacity must:

- 1) Form part of an integrated national transport strategy and show how capacity is provided in a resilient way that allows issues such as climatic conditions and security to be addressed
- 2) Contain a comprehensive surface access strategy with efficient links to London and the wider south-east.
- 3) The strategy for surface access must be sustainable, deliverable and costed. The impacts on the strategic road network needs clarification before decisions are finalised. All investment in surface access should be prioritised in national investment programmes.
- 4) Mitigate negative air quality and noise impacts.
- 5) Outline how all regions in the UK will have access to modern airport facilities to improve international connectivity.