Dear Sir or Madam

Draft Aviation Policy Framework – Response from Environmental Protection UK

We are writing in response to the above consultation. The Air Quality Committee of Environmental Protection UK has considered the consultation document and welcomes the opportunity to comment. These comments represent an overview of the Committee, but do not necessarily reflect the views and opinions of individual Environmental Protection UK members.

About Environmental Protection UK

Environmental Protection UK is a national charity that provides expert policy analysis and advice on air quality, land quality, waste and noise and their effects on people and communities in terms of a wide range of issues including public health, planning, transport, energy and climate.

We offer clear and critical analysis of UK government and European Union policy proposals through a range of high-quality publications and expert-led events, as well as up-to-date regulatory information through our comprehensive guide to UK and EU environment legislation.

Environmental Protection UK works with and for UK national and devolved governments, local authorities, business, academics and the general public, and with relevant EU institutions and NGOs.

Responses to Specific Questions

Our comments are focused on the section dealing with air quality and other local environmental impacts. Two specific questions are posed by DfT, and our brief response is provided below.

Q1: Do you believe that the regime for the regulation of other environmental impacts at airports is effective?

If the statement “other environmental impacts” is meant to include local air quality, then the regime is clearly not effective as there are substantial exceedences of the EU limit values associated with airport operations, including at residential and commercial locations. In particular we would question whether the effect of air transport infrastructure on air quality is adequately taken into account.
Q2: Do you think that noise regulation should be integrated into a broader regulatory framework which tackles the local environmental impacts from airports?

Given the growing evidence linking the adverse health effects of air quality and noise, we believe that this would be beneficial; specific comments on noise would need to be made by EPUK’s Noise Committee. Any regulatory framework for controlling environmental impacts from aviation needs fully to take into account trade-offs between noise, emissions and fuel use, inherent in aircraft engine design.

Additional Comments

Para 4.94: It is noted that the Government is “committed to achieving full compliance with the European air quality standards”, but no confirmation is provided as to the date by which this commitment will be met. The annual mean limit value for nitrogen dioxide (40 µg/m³) was to have been achieved by 1 January 2010, but is still exceeded widely across Greater London, and in the vicinity of Heathrow Airport. Any proposals for airport development must take this into consideration, with the intent to achieve the limit value at the earliest possible opportunity.

Para 4.95: Reference is made to the potential impacts of airport-related emissions on public health and climate change, but no mention is made to the potential impacts on sensitive ecosystems. There are widespread exceedences of the annual mean critical level for NOx (30 µg/m³) at sensitive ecosystems in the vicinity of a number of airports.

Para 4.96: It is stated that the latest standard for aircraft NOx emissions, agreed in 2010 (CAEP/6), represents a reduction of 15 per cent for large engines compared with the previous standard agreed in 2004 (CAEP/4). However, the CAEP standards for NOx emissions are set as a function of engine overall pressure ratio (OPR), such that as OPR increases, so the NOx emission limit also increases (with the allowable ratio of Dp/F∞: OPR increasing for OPR above 30). As there has been a tendency to increase OPR on new engines (as a measure to reduce fuel consumption and CO2 emissions), there is potential that CAEP/6 (and even the forthcoming CAEP/8 standard) may offer little reduction in emissions over and above CAEP/4. To support the statement in this paragraph, evidence should be provided from emissions inventories at major airports on the actual effects of introducing new aircraft. As far as practicable, emission inventory evidence should take into account actual thrust data for specific airframe/ engine combinations in order to provide confidence in the robustness of emissions calculations. Higher pressure ratios may also lead to greater direct emissions of primary-NO2; a similar issue with diesel road vehicles is perhaps the most important factor causing continued exceedences of the NO2 limit value across the UK and EU.

Para 4.103: This notes that any proposals for a new hub airport would consider a variety of environmental impacts, but air quality is not listed amongst them. Given the substantial emissions from aircraft, surface access and airside operations associated with a new hub, any proposals for expansion or development should only be considered after the Government has achieved full compliance the EU limit values.

Yours faithfully

[Signature]

Chair – Air Quality Committee