Neil Spurrier

Jack Goodwin
Deputy Director,
Airports and Infrastructure Directorate
Department for Transport
Great Minster House,
33 Horseferry Rd,
Westminster,
London SW1P 4DR

18th December 2020

Your Ref: HP19/006

Dear Mr Goodwin,

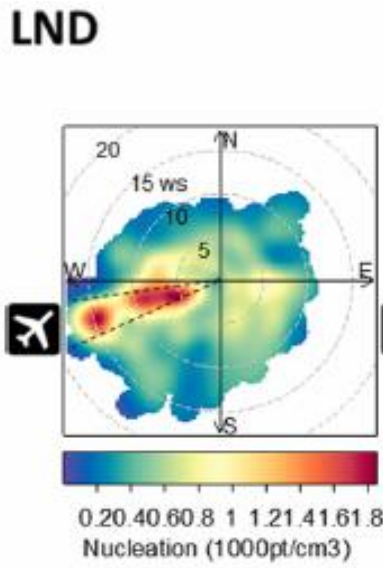
Section 6 Planning Act 2008. Request for Review of Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England

I am writing following the judgment of the Supreme Court restoring the Airports National Policy Statement and your acknowledgment dated the 28th November 2019 to my request dated the 18th October 2019 for a review of this national policy statement.

I would be grateful please if my request for review dated the 18th October 2019 (copy attached) could now be considered and a response given. There are some additions to the request that have arisen over the time of the court cases. The letter of request of the 18th October is still applicable but the additions are:

1. Firstly, we have just had the verdict of the coroner in the case of the young girl, Ella Kissi-Debrah, who died as a result of air pollution. Air quality is below the required quality in London and this is due in part to overflying aircraft. I have given you details of subsequent research showing the extent of air pollution from aircraft flying in and out of Heathrow that affects air quality – quite different to the evidence produced by the DfT and Heathrow previously. There is also the research

work of the Centre for Environment and Health, Environmental Research Group, King's College London, published in February 2020 and available online at https://www.sciencedirect.com/science/article/pii/S016041201931832X, showing the spread of ultra-fine particulates over London from overflying aircraft; again quite different to the evidence given by the DfT in the Appraisal of Sustainability. One of the illustrations of the findings of King's College London in their report with respect to London shows the pollution occasioned by blowing downwind and is replicated below:



2. Secondly, the Committee on Climate Change has advised that the Government should commit to UK international aviation reaching net zero greenhouse gas emissions by 2050 at the latest, and UK domestic and military aviation potentially earlier. The Committee has also advised that we should achieve an emissions reduction towards the Net Zero target of 78% in CO2 emissions over 1990 levels by 2035, and that this should be legislated for by June 2021 (https://www.theccc.org.uk/about/our-expertise/advice-on-reducing-the-uks-emissions/). On the 3rd December 2020 Lord Deben chair of the Committee on Climate Change published his advice to the Secretary of State, Department for Business, Energy & Industrial Strategy that the Committee recommends that that the UK commits to reduce territorial emissions by at least 68% from 1990 to 2030, as part of the UK's nationally determined contribution (NDC) to the UN process, with the addition of the words "We encourage the Prime Minister to make a 2030 commitment that is as bold as possible, to inspire other world leaders to follow suit. As such, the Government may

choose to go beyond a 68% reduction". None of this will be possible with the expansion of Heathrow envisaged by the Airports National Policy Statement

3. Thirdly, the Committee on Climate Change has provided its very extensive report on the 6th Carbon Budget. On aviation the Committee recommend that there should be no net expansion of UK airport capacity unless the sector is on track to sufficiently outperform its net emissions trajectory and can accommodate the additional demand. In producing this recommendation, the Committee has produced a number of scenarios, finding that the "Baseline" of the Government will not yield sufficient savings in CO2 to obtain net zero by 2050. Baseline will use some 205 terawatt hours of energy for aviation, compared with the "Balanced Net Zero Pathway", using under half of this at 94 TWh. The Balanced Net Zero Pathway is the maximum recommended level of emissions and assumes no airport expansion and an energy fuel efficiency improvement of 1.4% per year - pretty ambitious as aircraft are not going to be replaced every year. The previous aviation predictions for Baseline were based upon an improvement of just 0.7%. The Balanced Net Zero Pathway scenario may not be enough, and the Committee produce various other scenarios, some of which require a flight demand reduction of 15%, together with a much higher use of biomass or synthetic fuels. One of these scenarios has been named "Tailwinds" which requires "a reduction in demand, high efficiency, and the maximal resource allocations for the biojet and synthetic jet fuel from the other scenarios". There is no evidence whatsoever that the Balanced Net Zero pathway can or will be improved upon in practice, if Heathrow expansion goes ahead. Baseline is not even being met at present. Therefore, the inevitable question, that should be asked of the government, is that if Heathrow (or any other airport in the south east) were to expand, which regional airport(s) would the Government plan to close (contrary to the Government's declared "levelling up" policy) in order to make up the greenhouse gas reduction required? In addition, what will be the effect on the economy of that region? I would respectfully suggest that such a possibility is not something contemplated by the Airports National Policy Statement.
4. Fourthly, we have demand which I addressed in the original request, the increase of which is now an unknown. Indeed, demand may never recover

to the 2019 levels. One thing that is as certain as can be is that demand is unlikely to increase to 2019 for at least 3 years, if it does so at all.

5. Fifthly, to allow the expansion of Heathrow without a clearly stated corresponding reduction in capacity elsewhere in breach of the advice of the Committee on Climate Change in its 6th carbon budget would give a catastrophic bad impression to the World with the UK hosting the COP26 climate change conference in November 2021.

Due to the above and also to the matters raised in my previous letter of the 18th October 2019, I respectfully suggest on behalf of myself and the members of the Teddington Action Group, that there have been significant changes in the circumstances of the policies set out in the Airports National Policy Statement. The Airports National Policy Statement is now completely out of date and should be withdrawn. I request that this is done pursuant to a review under section 6 Planning Act 2008 as well as the statement set out in paragraph 1.21 of the Airports National Policy Statement.

I look forward to hearing from you.

Yours faithfully

Neil Spurrier

Neil Spurrier

Mr. Grant Shapps
Secretary of State for Transport
Great Minster House,
33 Horseferry Rd,
Westminster,
London SW1P 4DR

18th October 2019

Dear Secretary of State

Section 6 Planning Act 2008. Request for Review of Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England

I am writing to request that you review the above Airports National Policy Statement ("ANPS") under your powers under section 6 Planning Act 2008. There are various reasons why this should be done as I set out below. I also ask that the ANPS designation is withdrawn under the provisions of section 6(5)(b).

I am a member of a residents' group called the Teddington Action Group, which was formed in 2014 and whose purpose is set out in their website at http://www.teddingtonactiongroup.com/aboutus/ . I was also one of the litigants in the High Court requesting the Court to judicially review the ANPS.

Since the designation of the ANPS, there have been significant changes in circumstances. These changes either were not anticipated, or they should have been anticipated. In so far as they should have been anticipated, I suggest that the policy set out in the ANPS would have been materially different. Details are as follows:

Cost

The original estimate was some £16.7 billion. Heathrow stated that they could bring the cost down to £14 billion by altering some of the design, in particular how the third runway would cross the M25. These costs now seem wildly optimistic with some (including Heathrow themselves apparently) suggesting that the costs could be over £32 billion. The CAA have divulged that Heathrow expects to spend before even the planning enquiry £2.9 billion. While the total costs to 2026 are stated to still be at £14.6 billion, Heathrow's "current estimates for total expansion capital costs are around £32.5 billion (in 2014 prices) in the period to 2050" (see CAA document CAP1819 entitled "Economic regulation of capacity expansion at Heathrow airport: consultation on early costs and regulatory timetable"). Inevitably a considerable amount of this is going to come from the public purse – not least for transport infrastructure in accordance with the provisions of the "Relationship Framework Document" between your predecessor and Heathrow Airport Limited. The latest CAA document CAP1847 of October 2019 indicates that Heathrow will be able to recover the surface access costs through higher charges, which was not anticipated, and which will drive up landing fees even further.

This puts the project cost on a totally different plain to that envisaged and completely alters the Net Present Value as defined by the Government's Updated Appraisal Report of 2018. You will recall that in that report, the costs over 60 years were estimated at up to £14.9 bn + up to £3.4 bn. That would have given a Net Present Value of between +£2.9 bn and -£2.5 bn (chart below). With a scheme cost increased to £32.5 bn, the figures are completely different.

Table 3.1 Monetised impacts under the DfT17 central, carbon traded forecasts and revised methodologies (present value, £bn, 2014 prices)

	LGW Second Runway	LHR Extended Northern Runway	LHR Northwest Runway
Passenger benefits	69.4	57.2	67.6
Government revenue	4.6	2.9	3.5
Wider economic impacts	0.1 to 1.3	1.6 to 2.7	1.8 to 3.1
Total benefits to passengers and the wider economy	**74.1 to 75.3**	**61.7 to 62.8**	**72.8 to 74.2**
Environmental disbenefits*	-0.9	-1.5	-1.9
Net public value ^	**72.5 to 74.3**	**56.2 to 61.3**	**67.4 to 72.2**
Airline profit loss	-65.1	-46.4	-55.0
Net social benefit	**8.0 to 9.2**	**13.7 to 14.9**	**15.8 to 17.2**
Scheme cost (AC forecasts)	-6.4 to -6.3	-12.0 to -10.7	-14.9 to -12.9
Surface access cost (AC forecasts)	-0.6	-3.9 to -1.9	-3.4 to -1.4
Net Present Value ^	**1.0 to 2.4**	**-2.2 to 2.3**	**-2.5 to 2.9**

* All impacts other than air quality are modelled for the central demand scenario. Air quality is monetised using the high demand scenario. These impacts are relatively very small, so do not impact on the summary metrics.
^ Scheme and surface access costs are based on AC forecasts.

Demand

I deal with this also under "Climate Change" below. The Committee on Climate Change has reported that including speculative reductions in demand required to meet our greenhouse gas reduction targets, demand could be constrained to no more than 2018 levels. In addition, we see a report from the Swiss Bank UBS that Boeing and Airbus are concerned that commercial flying's perceived impact on the environment will act as a brake on passenger growth and reduce jet sales (see e.g. CNBC (Consumer News and Business Channel) at https://www.cnbc.com/2019/09/30/boeing-and-airbus-to-see-reduced-plane-demand-as-climate-awareness-grows.html). The UBS survey of more than 6,000 people revealed that a growing number of travellers in Europe and America have already reduced the number of flights they took over the last 12 months because of heightened environmental awareness. Around one in four flyers in France, Germany and the U.S revealed to UBS that they had reduced flights taken. 16% of British people surveyed admitted that climate change had forced them to forego at least one trip. In all probability the demand forecasts of the Airports Commission upon which the Government relied in designating the ANPS are out of date and considerably over-stated.

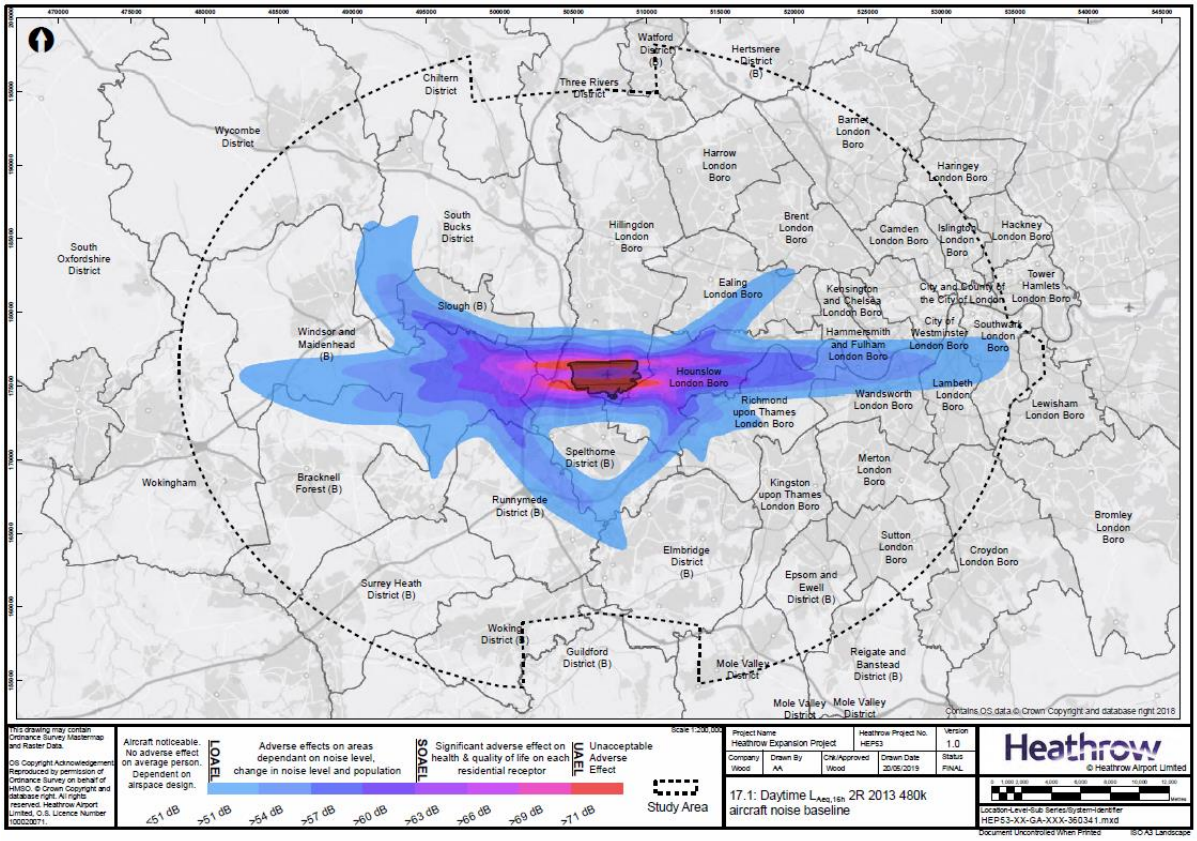
Noise

The ANPS contains various provisions concerning noise. It provides at para 5.58 that

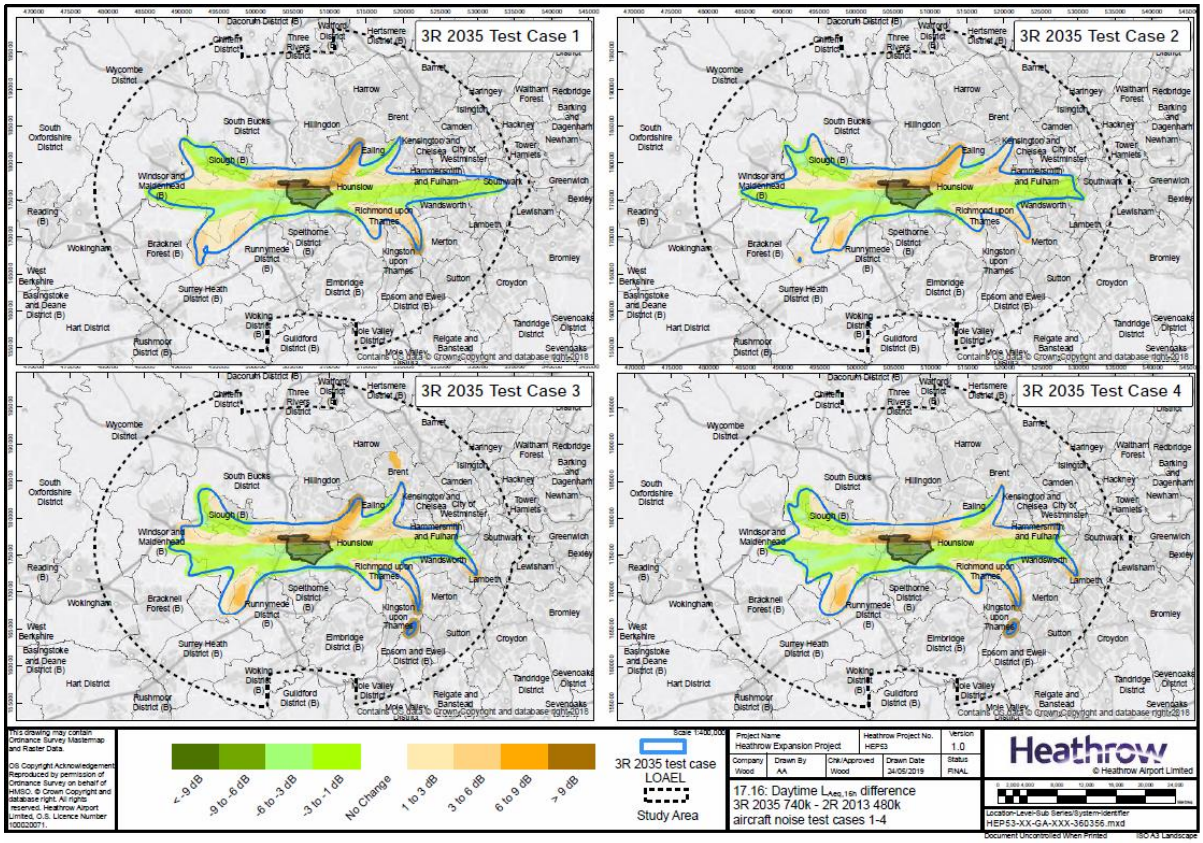
> "The Secretary of State will consider whether the mitigation measures put forward by the applicant following consultation are acceptable. The noise mitigation measures should ensure the impact of aircraft noise is limited and, where possible, reduced compared to the 2013 baseline assessed by the Airports Commission"

The DCO Consultation has now been completed and we see that in Teddington at least, the impact of aircraft noise is forecast to be very far from limited to 2013 levels. Indeed, it is very much higher as shown by the illustrations below in the Heathrow document 27-Vol 2-PEIR-Chapter 17. You will see, in the second illustration, the green sections denoting lower noise and the brown sections showing increased noise. The green sections denote only improvements of between 1dB and 3dB whereas the brown section show greater deterioration

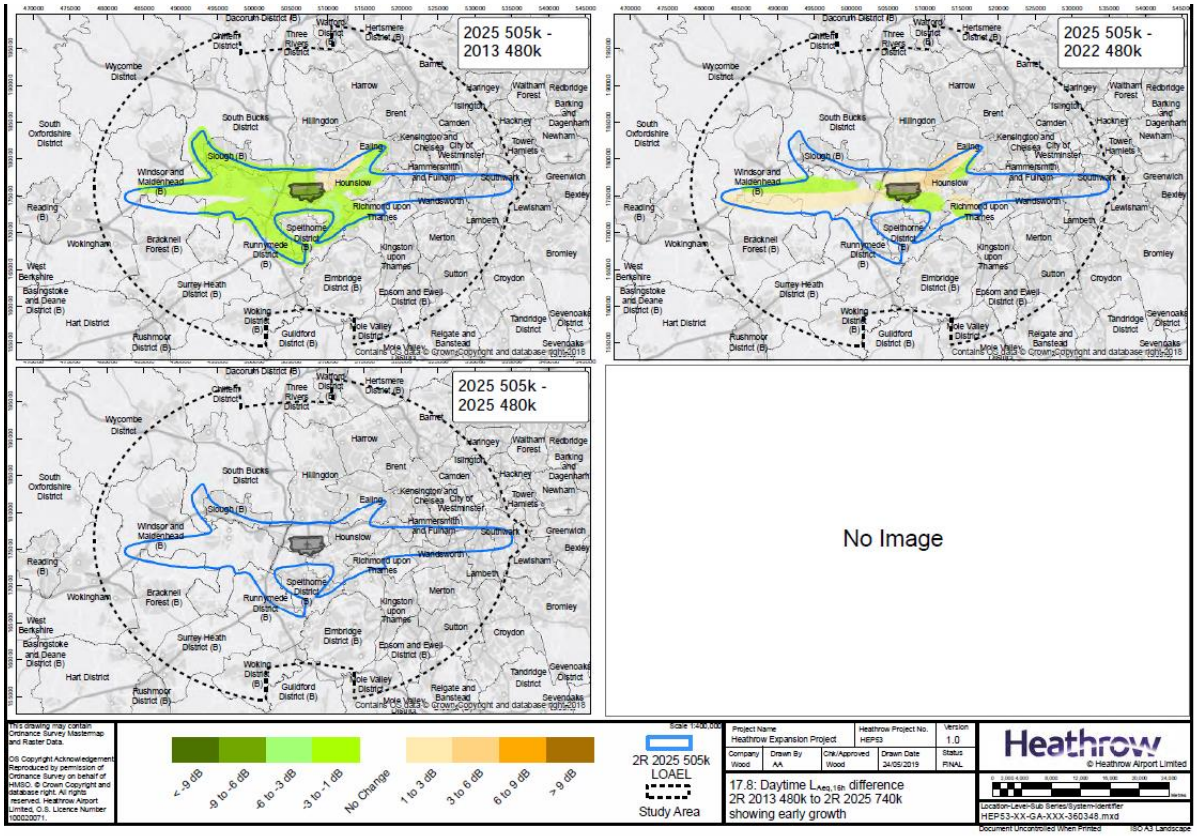
Baseline



Three Runway



There are various "Test cases" but in all we can see that the outer areas will suffer considerably more noise. It could be said that there are "winners and losers", but that was not what the ANPS stated. Most of the "losers" will receive an increase of at least 3 dB and many will receive an increase of 6 dB. All "winners" will be less than 3 dB. Those "winners" only benefit from reduced noise due to anticipated plane design (which may not happen) and not the third runway. That is shown by the Heathrow Consultation noise figures, which show, to a large extent, the same improvement for the existing two runway configuration.



The measurements are "LAeq" which is an "equivalent" or averaging figure. A 3 decibel rise will be equivalent to a doubling of the number of planes, at the same level of noise per plane. It can be seen that some communities will be subjected to a 400% rise in the number of overhead flights. This was never disclosed to Parliament nor was it envisaged when the designation was made.

We have also, since the designation of the ANPS, ascertained that the assessment of the effects of noise upon people has been highly questionable. The Government's guidance is based upon the "SoNA" survey (Survey of Noise Attitudes) carried out by the CAA, finalised in 2014 and published in 2017. The World Health Organisation (WHO) issued revised Environmental Noise Guidance (ENG) in 2018, shortly after the ANPS was designated, recommending major changes in how noise from aviation, of the scale and nature being proposed in the ANPS, should be assessed. Noise levels should be much lower than SoNA and assessment is recommended as follows:

> "…It is therefore not possible to determine the "exact value" of %HA [Human Annoyance] for each exposure level in any generalized situation. Instead, data and exposure–response curves derived in a local context

should be applied whenever possible to assess the specific relationship between noise and annoyance in a given situation. If, however, local data are not available, general exposure–response relationships can be applied, assuming that the local annoyance follows the generalized average annoyance."

The consultation documentation is stated to be based entirely on SoNA as the "local context" referred to.

The CAA has confirmed that SoNA 2014 was intentionally carried out as a static survey and that the effect of airspace change on public sensitivity was not investigated in its survey. However, the CAA subsequently accepted at the Heathrow Community Noise Forum that change is a key factor in establishing aviation's noise impact. It is self-evident that it is not appropriate to use SoNA 2014 – which was designed to cover the whole of the UK – as the primary basis for evaluating Heathrow expansion in a local context, most importantly as the ANPS represents the most significant expansion and radical changes in the use of airspace in aviation history in the UK - and probably worldwide.

Serious flaws contained in SoNA 2014 have been thrown into sharp relief by the latest World Health Organisation Noise Guidelines, WHO ENG 2018, which recommend strongly against exposing populations to greater than 45dB Lden during the day (equivalent to 43dB LAeq) - whereas SoNA assesses significant impacts to occur at a much higher 54dB LAeq. As established during the Parliamentary Transport Select Committee examination through FOI, over 2 million people will experience significant increases in noise above 45dB LAeq, even as late as 2050 when a much quieter fleet is assumed. This impact has been confirmed as correct by the DfT.

The differences in SoNA's findings and WHO advice in relation to noise levels are huge and irreconcilable.

No sustainable or reasonable justification has been produced for basing the DCO's noise assessment on SoNA 2014 while disregarding the WHO ENG 2018 guidelines, although the PEIR Heathrow Expansion Consultation analysis is entirely dependent on it. Whilst the PEIR states that a review of the WHO 2018

advice will be undertaken before the DCO Inquiry, this is far too late. The public will not have been made aware of the impact on their health and wellbeing from the documentation that forms the basis for the Heathrow DCO consultation.

Inexplicably, SoNA was set up to avoid considering impacts on populations at noise levels below 51dB LAeq, despite a wealth of international and local evidence that aviation's noise impacts at lower levels are very material. Notwithstanding this, SoNA has formed part of the evidence base for setting the UK LOAEL (lowest observable adverse effect level) for aviation – a key metric and used extensively in the PEIR analysis - at 51dB LAeq. It is particularly astonishing as the then existing World Health Organisation Night Noise Guidelines of 2009 found significant disturbance at night starting at 40 dB Lden with the risk of heart attacks increasing at 50 dB – less than the lowest noise level that was assessed by SoNA!

By not considering impacts at lower levels of noise, SoNA prejudged what the level of the lowest observed adverse effect level "LOAEL" should be. It is not supportable to use a LOAEL of 51dB LAeq for aviation, certainly not in the local context, and especially in the given situation that Heathrow is proposing of an unprecedented expansion and radical changes in the use of airspace. It should also be noted that the CAA's SoNA survey was of just 1,999 people by IPSOS MORI. The WHO ENG 2018 Noise Guidelines were devised from a survey of 37,000 people in 10 EU countries.

In addition to an inappropriate threshold being used, there is an additional problem of setting a LOAEL based on a LAeq metric. Noise events can massively increase if planes become just a little less noisy. If individual plane events are a (still noisy and disturbing) 65dB then this would be equivalent, at 51dB LAeq, to 224 planes in a 16hr day or 14 planes an hour i.e. one every 4.3 minutes on average before accounting for runway alternation and respite. After allowing for wind direction, runway alternation and current respite levels, it is equivalent to 40 flights an hour for eight hours on average for two days out of every three. Common sense shows that a lowest observable adverse effect level at 51 dB is not credible. Either the LOAEL must be reduced substantially, as indicated by WHO ENG 2018, or an events based metric must also be used to define LOAEL at around 25 N>65dB events or lower a day. The lower of either the events or

LAeq measure should define LOAEL.

It is shown in international research that change increases noise sensitivity by between 6-9 dB LAeq. This is what led to the huge protests when Heathrow's 2014 departure trials were held and had to be abandoned early. Heathrow have acknowledged the need for social research of the impacts of concentrated flight paths, but none has been done. The US Government Audit Office reported in September of this year that Performance Based Navigation, which is integral to Heathrow's expansion proposals, has failed to deliver the intended economic benefits (by 50%) and that out of 12 pilot schemes 5 are running substantially behind time due to community protests and legal challenges. It would be irresponsible to push on with a third runway in these circumstances.

Air Quality

Much has already been said about this, and the Appraisal of Sustainability described the risk of failure to meet the required levels as "High". The Heathrow DCO Consultation stated as a fact that:

> "Aircraft flying into and out of the airport do not have a significant effect on air quality in the local area. This is because aircraft are so high that emissions are dispersed before reaching on the ground"

That is manifestly untrue as shown by a number of research papers (the latest being from Bern University in May 2019). The Teddington Action Group have done an investigation of the various research works and collated them. Our work can be found online at http://www.teddingtonactiongroup.com/2019/06/26/are-emissions-from-aircraft-harmful-or-not/

Since the designation of the ANPS we have ascertained that there are only four pollution monitors around Heathrow, and they are all placed at the side of the airfield. They are not directly under the flight paths. We have also received the figures for 2018. The results for PM2.5s for the Heathrow Air watch supplied by Ricardo Energy & Environment for the year 2018 are:

Show 10 ▾ entries Search:

Table 4: Summary statistics for $PM_{2.5}$

Site	Annual mean	Annual data capture	Hourly maximum	99.8 percentile of hourly mean	98 percentile of hourly mean	Daily maximum	90 percentile of daily mean
Heathrow Green Gates	7.3	99.8%	62.5	43.3	25.9	48.5	14.5
Heathrow LHR2	7.6	99.7%	59.7	43.6	27.5	47.6	14.8
Heathrow Oaks Road	8.1	99.6%	60.8	45.2	29.1	47.2	16.2
London Harlington	9.4	96.7%	76.4	57.7	33.9	60.4	18.7

Showing 1 to 4 of 4 entries Previous 1 Next

The current WHO Guidelines set in 2005 for maximum exposure to PM 2.5s are 10 µg/m3 as an annual mean and 25 µg/m3 as a maximum 24-hour mean. It can be seen from the chart above that for 2018 the annual means are all below 10 micrograms per cubic metre. This may not be that surprising as all the monitors are away from the flight paths. The daily and hourly maxima though are very considerably above the 25 microgram per cubic metre maximum. No explanation has been given for this in any of the documentation. A possible reason is because the prevailing wind is from the west for most of the time. When it comes from the north west/east or the south west/east, the particulates are blown onto the receptors for a comparatively short time to give the very high short-term readings. If the receptors were put underneath the flight paths, the annual readings might go up to way above the annual mean limit. It is little short of ridiculous to spend £17.6 billion on expansion without a proper investigation of the effects of pollution from aircraft.

Since the designation of the ANPS, there has been published the research work of Prof Tim Nawrot at Hasselt University in Belgium, who led the study of the effects of pollution upon unborn babies. He is reported to have said: "This is the most vulnerable period of life. All the organ systems are in development. For the protection of future generations, we have to reduce exposure."

In September 2018, shortly after the designation of the ANPS, Queen Mary

University published research on evidence of tiny particles of carbon, typically created by burning fossil fuels, being found in the placentas of expectant mothers. The university publicity statement of this research is online at https://www.qmul.ac.uk/media/news/2018/smd/first-evidence-that-soot-from-polluted-air-may-be-reaching-placenta.html .

The research studies referred to above show the extent of particulates emitted from aircraft being blown downwind – in some cases by up to 40 kilometres from the airport – that can have lasting effects and be transmitted onto the next generation.

Climate Change

Several things have happened since the designation of the ANPS:

1. The target in the Climate Change Act 2008 has been amended by The Climate Change Act 2008 (2050 Target Amendment) Order 2019 to a 100% reduction.
2. In July 2019, the Committee on Climate Change reported to Parliament
3. The Committee on Climate Change has given its advice on the future of aviation as contained in the letter from Lord Deben dated the 24th September 2019.

It astonished me that in the High Court the Government defended the claims that global warming should be contained to 1.5º above pre-industrial levels on the ground that the Paris Treaty had not been ratified into UK law, and therefore those provisions did not apply – notwithstanding that the Government had signed the treaty and the Committee on Climate Change had advised that extra measures would be required to achieve the temperature constraint. The High Court found upon the Government's submission that the law was still as contained in the Climate Change Act 2008 with an 80% target reduction although that decision is under appeal at the time of writing. That law has now changed though. The Court did not consider whether expansion was possible within the Paris Treaty and certainly not with a 100% reduction by 2050 – it only considered that *potentially* the target could be met with an 80% reduction. From the advice of the Committee on Climate change, it is certain that the 2050

net zero target cannot be met with the expansion of Heathrow – indeed London airports may have to contract. If there were to be only one reason why the ANPS should be reviewed, this is it.

In June 2019, the UK Government accepted the Committee on Climate Change's advice and amended the 2050 target under the Climate Change Act to require net-zero greenhouse gas emissions by that date. The Government stated that emissions should reach net-zero across the whole economy (i.e. including international aviation and shipping) and that the aim would be to reach net-zero emissions without recourse to international credits (or 'offsets'), consistent with the Committee's advice. The Committee also advised that international aviation and shipping should be formally included within the Climate Change Act targets. The Government has rejected that advice (very unwisely I suggest) but has said in its response that "we will continue to account for international aviation and shipping emissions via "headroom" within our existing carbon budgets. However, we recognise the importance of a good international inventory and we are also minded to include these emissions in domestic legislation at a later date".

The letter of advice from Lord Deben should be followed unless there is a very clear reason why it should not be followed. This is simply because the law contained within the Climate Change Act 2008 as amended will not be met without a review. Under section 10 Planning Act 2008, in considering a review of the ANPS, you are duty bound to have regard to the mitigation of climate change and you now have had very specific advice from the Committee on Climate Change and also from Lord Deben in his letter of advice.

We have a whole number of airports seeking to expand – all with a resultant increase in greenhouse gases. The Committee on Climate Change has made clear that only limited carbon offsetting should be permissible. This will necessitate a 50% reduction in anticipated growth of aviation from 49% over 2018 figures by 2050 to 25% over 2018 figures by 2050. Only that amount can be offset in some way and then not traded by buying credits from other nations. In addition, aviation must come within the national targets. The Committee has suggested a further speculative demand reduction of 25% by 2050 so that demand in 2050 equals that of 2018. It clearly is not even sensible to build airport capacity upon the forecasted demand of either the Airports Commission

or the ANPS. The Transport Committee clearly did not have a "Net Zero" target in mind when it stated in its report to Parliament that "The Committee on Climate Change (CCC) in legislating for the Fifth Carbon Budget have set a limit that UK gross aviation emissions will be no more than 2005 levels—37.5 MtCO2—in 2050". The Committee on Climate Change has now made it very clear in its latest advice that the limit is coming down to below 30 MtCO2. It has also stated that "Current planned additional airport capacity in London, including the third runway at Heathrow, is likely to leave at most very limited room for growth at non-London airports". There is still no apportionment plan of greenhouse gases between the airports around the Country.

The 2019 report to Parliament of the Committee on Climate Change makes grim reading and underlines the need for constraint. Around 296 MtCO2e (equivalent to three-quarters) of the outperformance over the second carbon budget period is explained by accounting changes in the EU Emissions Trading System. Other than the accounting changes, consistently lower economic growth than expected was the main factor which led emissions to meet the budget. The report states that "The combined impact of accounting changes in the EU ETS and lower economic growth more than offsets the surplus from the second carbon budget, by around 65 MtCO2e. This implies the budget has not been met due to policy measures but rather due to external circumstances".

Since the designation of the ANPS, Heathrow has produced its own climate change strategy paper and "carbon neutral growth map" as part of its "Heathrow 2.0" plan for growth. These are now discredited, since they propose the very things that the Committee on Climate Change say either should not happen or should be restricted. Thus, Heathrow place reliance upon "sustainable fuels", whereas the Committee on Climate Change state that only limited reliance can be placed upon these together with a reduction in demand. Heathrow rely upon purchasing carbon at an appropriate price within an emissions trading scheme, whereas the Committee on Climate Change state that any trading must be used for Government procured removal of carbon (the Committee on Climate Change had previously commented in its Net Zero report of May 2019, that it is unlikely that carbon prices under the EU emissions trading system, or a UK equivalent, will rise high enough with sufficient lead-time to incentivise the range of changes required). Heathrow relies extensively on CORSIA offsetting, whereas

the Committee on Climate Change says that CORSIA has limited application and must demonstrate genuinely additional removals within a robust governance framework (much of the offsetting benefit will only apply in the future, when trees or peatlands are mature and even then are vulnerable to emit carbon due to future damage, failure or destruction). Heathrow says that peatland restoration has the potential to be amongst the highest-quality, most cost-effective carbon offsetting methods. The Committee on Climate Change says that the net-zero target should be met by reducing UK emissions as far as possible (i.e. not by offshoring them), and by using greenhouse gas removal only to offset the emissions that remain. Heathrow states that it "will expand in a carbon-neutral way", whereas the Committee on Climate Change is clear that expanding a London airport will not be possible if other non-London airports are to expand at all. This is only a sample of the substantial differences between Heathrow's proposals and what the statutory formed Committee on Climate Change state is required.

Since the designation of the ANPS, we have seen substantial civil unrest in the World about the risks associated with climate change and the perceived lack of action of governments, including the British government. Organisations such as Extinction Rebellion have gained huge support. The economic consequences of climate change, including, flooding, displacement of populations (including from low lying areas of England) have the potential to cause devastating economic and social consequences, which have even been highlighted by the governor of the Bank of England – none of which have been assessed or quantified.

The Government's own *UK Aviation Forecasts 2017* show in Table 63 of that document the various forecasts of constrained growth. At the lowest rate of growth, it is predicted that non-London airports will have grown from 104 mppa in 2016 to 192 mppa in 2050. The baseline 2016 figure for London airports is 162 mppa. On the forecasted lowest rate of growth for non-London airports, and if London airports did not grow at all to 2050, the national rate of mppa growth would be 33%. That still exceeds the Committee on Climate Change's absolute limit of 25% demand growth (never mind the speculated further 25% reduction in growth). So, either regional airports will have to reduce their rate of growth even further, or London Airports will have to contract. Either way, expansion is not possible within the stated constraints of climate change and another runway

at any of the London airports is not required.

What I am asking you to do

I ask that in accordance with your duty to review each national policy statement whenever you think it appropriate to do so, you do the following:

1. You review the ANPS
2. You consider and state whether what I have said in this letter constitutes a significant change of circumstances. I say that it does for the reasons given above and for these reasons ask I that you to review the ANPS.
3. You consider and state whether these changes were or were not anticipated at the time of designation and if they were, whether the ANPS would have been materially different. I suggest that the changes and known facts now do cast serious doubt upon the contents of the ANPS. I suggest that the ANPS would have been materially different if these matters were known of or discussed at the time and in particular Parliament would have made a different decision and the Transport Committee would have made different or additional recommendations to Parliament.
4. You withdraw the designation of the ANPS as a national policy statement under your powers in section 6(5)(b) of the Planning Act 2008

I look forward to your response.

Yours faithfully

Neil Spurrier