

A LARGER AIRPORT IN FLORENCE. WHAT IMPACT ON THE LANDSCAPE, THE ENVIRONMENT AND THE UNESCO SITE?

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Abstract

The Airport Development Plan (Piano di Sviluppo Aeroportuale, PSA) to 2035 for Florence Airport was subjected to an integrated Environmental Impact Assessment and Strategic Environmental Assessment (EIA/SEA) procedure, which concluded with a conditional favourable opinion issued by the Ministry of Environment and Energy Security (Ministero dell'Ambiente e della Sicurezza Energetica, MASE) through Ministerial Decree No. 678/2025, as amended by Decree No. 253/2026. This paper analyses the urbanistic and planning criticalities emerging from the technical opinions appended to the decree, highlighting the potential role of a Heritage Impact Assessment (HIA) in safeguarding the Outstanding Universal Value (OUV) of Florence's sites recognised by the United Nations Educational, Scientific and Cultural Organization (UNESCO). The paper emphasises the potential effects of the PSA in terms of overtourism, its contradictions with European and national objectives for the elimination of net land consumption, and its interferences with the Agricultural Park of the Plain (Parco agricolo della Piana) and Natura 2000 sites. It concludes that the documentation underlying the EIA and the knowledge base of the PSA could be substantially enriched to enable a more complete strategic environmental assessment.

Keywords: airport; sustainability; overtourism; Environmental Impact Assessment; Heritage Impact Assessment; Florence; territorial planning, Unesco; land consumption.

1. INTRODUCTION

The proposed expansion of Florence "Amerigo Vespucci" Airport at Peretola represents an emblematic case of the conflict between infrastructure development and the protection of landscape, environment, and cultural heritage. Its significance extends beyond the local dimension to engage structural questions concerning territorial planning, the governance of properties of Outstanding Universal Value, and the consistency of infrastructure decisions with sustainability objectives set by the European Union.

The Airport Development Plan (*Piano di Sviluppo Aeroportuale*, PSA) to 2035 — whose project review was subjected to an integrated Environmental Impact Assessment (EIA) and Strategic Environmental Assessment (SEA) procedure pursuant to Art. 6, para. 3-ter of Legislative Decree 152/2006 — has followed a complex course. An earlier expansion project had already been rejected by the Council of State, which found it incompatible with the principles of the applicable spatial planning framework. The revised project, while having received a conditional favourable opinion through Ministerial Decree No. 678/2025, has prompted legal appeals from municipalities in the surrounding hinterland and from environmental and public health monitoring committees.

The territorial context in which the project is situated is extraordinarily complex. The Florence–Prato–Pistoia plain constitutes one of the most critical examples of metropolitan conurbation in Italy: a continuous urban fabric that crosses the boundaries of several

municipalities and provinces, progressively eroding the residual agricultural and natural open spaces. Within this setting, the proposed airport infrastructure would be located in close proximity to habitats of Community interest that represent a rare exception to the urbanised density of the plain. At the same time, the project's gravitational area includes assets of exceptional value: the historic centre of Florence, inscribed on the UNESCO World Heritage List in 1982, and the Medici Villas and Gardens, inscribed in 2013.

This paper systematically analyses the urbanistic and planning criticalities that emerged during the EIA/SEA procedure, with reference to the technical opinions of the Directorate-General for Archaeology, Fine Arts and Landscape (*Direzione Generale Archeologia Belle Arti e Paesaggio*, DGABAP) of the Ministry of Culture, the Tuscany Region (Regional Government Resolution No. 494/2025 and Regional EIA Committee Opinion No. 202/2025), and the Technical Committee for Environmental Impact Assessment of the Ministry of Environment and Energy Security (*MASE*) (Opinion No. 106/2025). The objective is not to render a judgement on the project itself, but to identify whether methodological and knowledge-base deficiencies undermine its procedural utility and raise questions about its urbanistic, environmental, and cultural sustainability.

2. THE PROJECT AND ITS TERRITORIAL CONTEXT

2.1 Urbanistic Setting of the Florentine Plain

The Florence–Prato–Pistoia plain is one of the most densely anthropised territories in central Italy. The process of metropolitan conurbation has progressively reduced the open spaces of agricultural and natural character, generating a continuous settlement fabric that transcends administrative boundaries and makes the maintenance of ecological corridors increasingly difficult. The remaining open spaces consequently acquire extraordinary ecological, landscape, and identity value, recognised at regional level through the establishment of the Agricultural Park of the Plain (*Parco agricolo della Piana*).

The intervention site, located to the west of the existing Peretola runway and adjacent to the A1–A11 motorway interchange, is in close proximity to habitats of European interest. The area is also contiguous with settlements of significant public interest: the University Scientific Campus at Sesto Fiorentino and the Carabinieri Officers' School at Castello, whose functional integrity could be jeopardised by the acoustic, environmental, and logistical disturbances generated by the new infrastructure.

The PSA affects two fundamental ordering elements of regional planning: the Agricultural Park of the Plain — a territorial project of regional significance approved by Regional Government Resolution No. 61/2014 as an integration of the Regional Landscape Plan (*Piano di Indirizzo Territoriale con valenza di Piano Paesaggistico Regionale*, PIT-PPR) — and the principles of Tuscany Regional Law No. 65/2014 on territorial governance, which already in Art. 1 sets as its objective "guaranteeing the sustainable development of activities in relation to the territorial transformations induced by them, including by preventing new land consumption."

The Structural Plan of the Municipality of Florence, approved and published in the Regional Official Bulletin (*BURT*) No. 19 of 7 May 2025, has adopted these principles as its foundational framework, limiting new construction to a minimal allowance. Against this backdrop, a major infrastructure project entailing automatic variation of planning instruments pursuant to Art. 9-bis of Regional Law 65/2014 introduces a structural contradiction with the prevailing planning strategy.

2.2 The Authorisation Process and the Integrated EIA/SEA Procedure

The complexity of the procedural trajectory is itself a subject for reflection. The integrated procedure involved a multiplicity of institutional actors — the Ministry of Environment, the Ministry of Culture, the Tuscany Region, the Provinces, the affected municipalities, and technical agencies (the Regional Environmental Protection Agency ARPAT, the Local Health Authority AUSL, the national rail operator RFI, and the motorway operator Autostrade per l'Italia ASPI) — each with their own conditions and requirements, at times mutually inconsistent. The Civil Aviation Authority (ENAC), which proposed the PSA, was required to undergo multiple cycles of documentary supplementation, ultimately leading it to formally request, in August 2025, that the acquisition of landscape authorisation within the EIA/SEA procedure be waived, deferring this step to subsequent design phases.

This circumstance is indicative of a fundamental methodological deficiency: the EIA operated in the absence of the documentary elements necessary to verify landscape compatibility. It should be noted that the technical and economic feasibility design, pursuant to Art. 41, para. 6, let. f) of Legislative Decree 36/2023, must already contain sufficient elements to obtain landscape assessment. The waiver of landscape authorisation during the EIA procedure therefore raises substantial doubts about the actual level of design development achieved. Ministerial Decree No. 678/2025 concluded the procedure with a conditional favourable opinion, attaching 14 prescriptions set out over approximately 20 pages. It is foreseeable that their implementation will require material modifications to the project as submitted for assessment, rendering the EIA already conducted partially superseded.

3. THE KNOWLEDGE UNDERLYING THE EIA PROCEDURE

3.1 Archaeological Aspects: Deferred Preventive Verification

The technical opinion of the DGABAP Section V notes that the intervention will be required, at the detailed design stage, to undergo the preventive verification procedure for archaeological interest pursuant to Art. 1, paras. 7 et seq. of Annex I.8 of Legislative Decree 36/2023 (the Public Contracts Code).

Deferring this verification to the detailed design stage — that is, to a moment subsequent to project approval — introduces a structural element of uncertainty concerning both actual impacts and the financial sustainability of the project. The purpose of EIA is to provide decision-makers with a complete knowledge base *prior* to approval decisions being taken. In the absence of archaeological investigations, it is impossible to correctly estimate the order of magnitude of costs, or to carry out an informed comparison between the project alternatives assessed in the EIA/SEA. If the cost estimate is incomplete, it cannot be claimed that the choice between alternatives was made in a reasonably informed manner: this constitutes a lacuna that undermines the legitimacy of the environmental assessment.

3.2 The Waiver of Landscape Authorisation and Coherence with the PIT-PPR

ENAC's formal waiver of landscape authorisation within the EIA/SEA procedure allowed the documentary deficiency to be circumvented by deferring the problem to subsequent phases. The conditions formulated by the DGABAP for a future landscape authorisation include the need for a thorough verification of the project's coherence with the Tuscany Regional Landscape Plan (PIT-PPR). This verification was not fully carried out during the EIA. The DGABAP also noted the presence of errors and typographical inconsistencies in the Environmental Impact Statement.

A significant contradiction emerges: while the Tuscany Region asserts the PSA's coherence with the PIT-PPR (notwithstanding the reduction in hectares of the Agricultural Park of the Plain), the DGABAP concludes that it cannot issue the landscape authorisation due to documentary deficiencies and the impossibility of verifying such coherence. By requesting the waiver, the applicant implicitly acknowledged the insufficiency of the documentation submitted.

This contradiction between the institutional actors involved should have prompted a suspension or deepening of the EIA procedure, rather than the formulation of a conditional favourable opinion.

The PIT-PPR is a regional territorial governance instrument that, with regard to landscape assets, has binding force and involves the State in the definition of its contents. Any variation cannot be automatic when it concerns protected landscape assets — in particular when it affects the so-called "obliteration" of the artificial lake of Peretola, which constitutes a landscape asset under Art. 142, let. b) of the Code of Cultural Heritage and Landscape (*Codice dei Beni Culturali e del Paesaggio*). The impossibility of proceeding by automatic variation opens further fronts of uncertainty regarding the feasibility of the project in the configuration submitted for EIA, with potentially significant repercussions for both the location of works and the overall financial framework.

4. UNESCO WORLD HERITAGE AND THE ABSENCE OF A HERITAGE IMPACT ASSESSMENT

4.1 Florence's UNESCO Sites and Impact Risks

The historic centre of Florence has been inscribed on the UNESCO World Heritage List since 1982, recognised as one of the places of greatest concentration of cultural assets in the world - an expression of the Outstanding Universal Value (*OUV*) of Renaissance civilisation. The Medici Villas and Gardens were inscribed in 2013.

The PSA interacts with these sites through two categories of impact. The first, of a direct nature, concerns overflight trajectories: the new airport configuration provides for flight paths that overlie the historic centre and the Medici Villas, at frequencies and intensities which, as noted by the DGABAP, have not been adequately quantified in the EIA documentation. The second, indirect and systemic in nature, concerns the increase in tourist flows induced by the expansion of airport capacity, with amplifying effects on the overtourism phenomenon already underway.

The DGABAP opinion defers a thorough description of overflight trajectories and frequencies to subsequent design phases. However, this information cannot be postponed: it is a necessary and non-deferrable condition for a complete assessment of the impacts of an airport infrastructure situated in the context of UNESCO World Heritage Sites. The absence of these elements renders the EIA substantially incomplete with respect to the cultural heritage component.

4.2 Comparison with the Venice Case

A significant point of comparison is offered by the case of Venice Marco Polo International Airport and the UNESCO site "Venice and its Lagoon." The joint UNESCO/ICOMOS/RAMSAR report of 2015 had already recommended that any airport expansion be planned outside the boundaries of the World Heritage property and its buffer zone. In June 2025, the Metropolitan City and the Municipality of Venice formally requested, within the EIA procedure for the 2037 Masterplan, that the project be subjected to a Heritage

Impact Assessment (HIA). The parallel with the Florentine situation is evident. The PSA for Florence would similarly appear to require the conduct of an HIA in accordance with ICOMOS methodology.

4.3 The UNESCO Normative Framework and HIA Methodology

The Convention Concerning the Protection of the World Cultural and Natural Heritage, adopted by UNESCO in 1972 and ratified by Italy, establishes in Art. 4 that the obligation to ensure the protection, conservation, and valorisation of heritage rests primarily on each State Party. Art. 5 requires that heritage protection be integrated into general planning programmes. The ICOMOS 2011 Guidelines for Heritage Impact Assessments provide the specific methodology for evaluating impacts on World Heritage Sites. As specified on page 4 of those Guidelines, where a change may affect the Outstanding Universal Value of a Heritage property, consideration of the attributes of the cultural heritage should be central to the planning of any proposal and should be presented at an early stage of any general assessment (such as an EIA).

The same Guidelines clarify that an HIA undertaken as part of an EIA is not additional to normal EIA requirements, but employs a different methodology that clearly focuses on Outstanding Universal Value. Significantly, the Guidelines (p. 5) explicitly indicate that tourism infrastructure and increased visitation could have unintended consequences for UNESCO sites, and that these dynamics too require a specific impact assessment.

The absence of an HIA in the case of the Florence PSA is not a minor procedural lacuna: it may constitute a substantive violation of the obligations arising from the 1972 UNESCO Convention, and an omission that may prevent a complete assessment of the project's effects on the integrity and authenticity of the Florentine OUV.

4.4 Overtourism as a Systemic Impact on UNESCO Heritage

The phenomenon of overtourism has in recent years acquired a relevance that was not adequately appreciated when the Peretola enhancement proposal was originally developed. The excessive pressure of tourist flows on the urban, social, and cultural fabric of heritage cities is now recognised as a threat to cultural heritage comparable to the physical threats traditionally monitored by UNESCO.

The historic centre of Florence is among the most severely affected contexts: progressive loss of original residents, housing crisis, disappearance of neighbourhood shops and traditional crafts — structural components of the Florentine OUV — congestion of public and cultural spaces. It is not coincidental that Florence hosted, in October 2024, the UNESCO World Conference on Overtourism, an initiative to raise awareness of the gravity of the issue.

The PSA envisages an increase in airport capacity to 5.8 million passengers per year (approximately 2.3 million additional passengers relative to current figures). This increase cannot be considered neutral with respect to the overtourism dynamic. The most profound impact is not merely visual-perceptual (overflight noise), but functional and social: the "touristification" of the historic urban fabric — with the replacement of residents and traditional activities by exclusive tourist offerings — constitutes one of the most severe and least reversible cumulative impacts of the project. From an urbanistic perspective, this process corresponds to a structural and permanent transformation of the social and functional fabric of the city, with direct consequences for the authenticity of the OUV recognised by UNESCO.

5. THE AGRICULTURAL PARK OF THE PLAIN AND COHERENCE WITH THE PIT-PPR

5.1 Quantitative and Qualitative Reduction of the Park

The Agricultural Park of the Plain represents a foundational element of Tuscany's regional spatial planning. Approved by Regional Government Resolution No. 61/2014 as an integration of the PIT, it was conceived to halt the process of reduction of the rural areas that constitute the territorial identity of the area. The first masterplan of the Park (Resolution No. 83/2010) already emphasised that "affirming the supra-local importance of a large peri-urban area elevated to the status of 'metropolitan park' means halting the process of reduction of the rural areas" (BURT 6/2010, p. 208).

The Regional EIA Committee Opinion No. 202/2025 quantifies at 22.7 hectares the surface area subtracted from the functional area of the Castello Urban Development Plan (*Piano Unitario di Esecuzione*, PUE) attributable to the Park, partially compensated through the reconversion of 14.4 hectares of the northern portion of the existing airport footprint. The net balance is negative: 8.3 hectares of Park reduction, placing at risk the conservation of continuity between the Agricultural Park of the Plain and the public green areas of the Castello PUE.

The issue is not merely quantitative. The Technical Contribution for Habitats Directive Assessment (*Valutazione di Incidenza*, VINCA) of the Regional VAS-VINCA Sector, annexed to Opinion No. 202/2025, notes that the new areas proposed as compensation could constitute an "ecological trap for avifauna," since bird flight trajectories would intersect with aircraft take-off and landing paths. Furthermore, avifauna in the agricultural park would potentially be exposed to acoustic differentials exceeding 6 dB between the noise expected in the future state and current measured levels. The compensatory areas are not functionally equivalent to those subtracted: nominal compensation does not prevent an effective qualitative reduction of the ecological system.

6. ACOUSTIC IMPACT AND THE HABITATS DIRECTIVE ASSESSMENT

6.1 Deficiencies in Acoustic Documentation

The issue of acoustic impact emerges clearly from the technical opinions appended to the Decree. ARPAT noted that the PSA documentation takes into consideration only residential receivers, omitting productive, commercial, and tertiary-sector receptors. ARPAT, AUSL, and the Tuscany Region's Ecological Transition Sector have consistently identified significant knowledge gaps in the acoustic documentation.

From a spatial planning perspective, the prescriptions concerning acoustic compatibility directed at municipalities run counter to the planning autonomy of local authorities and lack a basis in applicable superior legislation. In a correct EIA/SEA procedure, mitigation measures must be directed at the applicant, not at local authorities.

Mitigation measures requiring interventions on building envelopes - reinforcing window frames - do not address acoustic impacts in open spaces or when buildings are used with windows open. Should the applicant opt for source mitigation measures rather than receiver insulation, the technical choices and costs could differ substantially from those considered in the current financial framework.

6.2 Habitats Directive Assessment and the Natura 2000 Network

The intervention site is situated in close proximity to Natura 2000 network areas, protected by the Habitats Directive (92/43/EC) and the Birds Directive. The VINCA conducted within the procedure concluded that the planned mitigation measures do not eliminate the direct, permanent loss of habitats. Ministerial Decree No. 253 of 30 April 2026, a corrigendum to the Decree of November 2025, excludes the involvement of the European Commission for a formal opinion, on the grounds that no interference with priority habitat types or species was identified.

7. LAND CONSUMPTION AND THE EUROPEAN AND NATIONAL REGULATORY FRAMEWORK

Opinion No. 106/2025 of the MASE Technical Committee notes that the applicant has not assessed the coherence of the PSA with the National Climate Change Adaptation Plan (*Piano Nazionale di Adattamento ai Cambiamenti Climatici*, PNACC), approved in 2023. The PNACC identifies land consumption as a particularly significant phenomenon in the Italian context, causing soil quality degradation and habitat loss.

The construction of a major airport infrastructure in an area of residual high naturalness is in tension with the land consumption neutrality objectives defined at European and national levels. The EU Soil Strategy for 2030 (COM/2021/699) sets a 2050 target of no net land take. Italy's Ecological Transition Plan anticipates this objective to 2030, establishing that net land consumption must be zeroed by that date. The Nature Restoration Law — EU Regulation 2024/1991 — which entered into force on 18 August 2024, requires Member States to develop National Restoration Plans with the objective of restoring at least 20% of degraded ecosystems by 2030.

Against this regulatory backdrop, the construction of a new airport infrastructure in one of the few remaining naturalistic areas of the Florentine plain may be structurally inconsistent with European and national objectives.

Analogous considerations apply to access infrastructure. Opinion No. 202/2025 indicates that subsequent phases will need to involve RFI SpA for coordination with the new Osmannoro–Campi Bisenzio rail line, already provided for in the Territorial Coordination Plan of the Province of Florence and transposed into the Structural Plan of Campi Bisenzio. Such coordination may generate additional costs and significant project redesign, rendering the current knowledge base insufficient to support a ministerial EIA decree of this scope.

8. CONCLUDING OBSERVATIONS

The analysis conducted on the EIA/SEA procedure for the PSA to 2035 identifies a constellation of criticalities that raise serious questions.

The first criticality concerns the structural deficiency of the knowledge base. The multiplicity of aspects deferred to subsequent design phases - preventive archaeological verification, overflight trajectories, landscape documentation, coherence with the PIT-PPR - raises questions about whether the level of design definition is adequate for a complete and effective EIA. As established by Art. 5, para. 1, let. g) of Legislative Decree 152/2006, EIA requires a project defined to a level that permits the comprehensive assessment of the contents of the Environmental Impact Statement.

The second criticality concerns the absence of a Heritage Impact Assessment. The question arises whether the omission of an HIA in accordance with the ICOMOS 2011 Guidelines constitutes a substantive violation of obligations arising from the 1972 UNESCO

Convention and an omission that prevents complete assessment of effects on the OUV of Florence's World Heritage Sites. The standard EIA disaggregates individual cultural attributes without applying the OUV lens to the whole, and is therefore methodologically insufficient in the presence of UNESCO World Heritage Sites.

The third criticality concerns environmental sustainability objectives. The question arises whether the construction of a major infrastructure in a high-value naturalistic area is structurally inconsistent with the full set of European and national objectives for net zero land consumption by 2030, ecosystem restoration under the Nature Restoration Law, and climate change adaptation as defined by the PNACC.

The fourth criticality concerns interferences with the territorial planning system. The question arises whether the PSA is coherent with the foundational principles of Tuscany's regional planning — protection of the Agricultural Park of the Plain, containment of land consumption, priority of brownfield reuse — as enshrined in Regional Law 65/2014 and the PIT-PPR.

The fifth criticality concerns the systemic consequences of overtourism. The increase in airport capacity would induce a further growth in tourist flows to Florence, a city already at the limits of its tourism carrying capacity. The impact on the Florentine OUV is functional and social, beyond the merely visual-perceptual: the "touristification" of the historic urban fabric — replacement of residents and traditional activities with tourist-oriented supply — constitutes one of the most severe and least reversible cumulative impacts of the project. The question arises whether this dimension has been adequately assessed in the EIA documentation.

In summary, the numerous prescriptions appended to Decree No. 678/2025 are a measure of the distance between the level of design definition submitted for assessment and that required for an adequate EIA. It cannot be excluded that the implementation of those prescriptions will in all probability require material modifications to the project, with cascading effects on the configuration of works, costs, environmental impacts, and the need to update the assessment itself.

From the perspective of the supra-regional dimension of the mobility system, it is relevant to note that the structure of the Tuscan airport system and the high-speed rail network have undergone, and continue to undergo, significant transformations that alter the reference framework relative to that in which the Peretola enhancement project was originally conceived. Pisa Airport, connected to the rail network, and Bologna Airport, which will be reachable more rapidly via the high-speed rail line, constitute accessible alternatives for the Florentine catchment area. The assessment of locational and infrastructure alternatives — a fundamental requirement of the EIA procedure pursuant to Annex IV of Directive 2011/92/EU — should have examined this dimension with greater depth, comparing the Peretola enhancement scenario with alternative scenarios based on reinforcing intermodality with existing airports.

The Florence PSA case offers the methodological debate on EIA a contribution of considerable relevance: it demonstrates the necessity of integrating into EIA procedures specialised instruments such as the HIA for UNESCO sites, and of ensuring an adequately defined design level before initiating the final phase of an assessment that produces permanent territorial effects.

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