

Department for Transport: Runway consultation

Consultation on Draft Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England

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More information about the consultation can be found at:

<https://www.gov.uk/government/consultations/heathrow-expansion-draft-airports-national-policy-statement>

The need for additional airport capacity

Question 1: The Government believes there is the need for additional airport capacity in the South East of England by 2030. Please tell us your views.

We do not believe the Government has made a convincing case for the need for additional airport capacity in the South East of England and London. (In the context of this submission we are using the term 'South East' to also apply to London.)

The consultation ignores the fact that Airports Commission forecasts show that growth in UK demand would be met by other airports, both elsewhere in the South East, but also outside the South East, where there already exists spare capacity.

In terms of connectivity, Airports Commission analysis shows that a third Heathrow runway will reduce the international connectivity of the UK's regional airports. Rather than being a necessary response to a 'need', a third runway at Heathrow will have the effect of displacing connectivity from other regions.

The Government has elsewhere said it wants to rebalance the UK economy in favour of areas outside the South East. We strongly challenge the claim that a significant net economic benefit will arise from airport expansion in the South East. However, creating additional airport capacity within the South East goes directly against that objective of rebalancing the UK, especially in terms of infrastructure and investment.

We also question the value placed on 'Heathrow's hub status'. A large proportion of international passengers using Heathrow as a hub simply change planes there, and are travelling from one international destination to another without any UK stopover.

No quantification of the economic value of these passengers has been made, yet there is an assumption that these interchange flights are economically beneficial and should be encouraged and provided for. We question that assumption.

We question both the need and the benefit of expanding Heathrow and of airport expansion in the South East more generally, and conclude that the case has not been made. Indeed the benefits have been significantly overstated, and the costs and impacts significantly understated.

In particular, we are concerned about how the economic benefit argument is presented. The Department for Transport is claiming Heathrow expansion will deliver an economic benefit of £61 billion. However, this is a gross figure, which does not take into account the direct and indirect costs, and does not factor in other costs, such as the climate, noise and air pollution impacts, as well as the social costs to affected local communities and the wide range of negative impacts that will arise from those.

On the issue of the required surface access improvements, the cost projections are disputed. Transport for London (TfL) estimates surface access improvements will cost £15 billion, which includes a new southern rail link from Waterloo to Heathrow. The Department for Transport is insisting on a much lower figure. In its 2015 submission, TfL conclude that the Airports Commission proposed £5bn cost underestimates the actual cost by £10-15bn. (See <http://content.tfl.gov.uk/tfl-response-to-airports-commissions-final-recommendation.pdf>, p29.) As London's transport provider, TfL's surface access cost assessments needs to be more fully taken into account.

The 'need' to expand capacity is also based on demand forecasts. However, air travel demand and its growth is highly price-sensitive and will continue to be. Given that aviation is predicted to make up an increasing proportion of the UK's total greenhouse gas emissions, and international aviation is likely to establish carbon pricing regimes for flights, it should not be assumed that the current era of tax-free fuel and low cost flights will continue indefinitely. Mitigating the impacts of carbon intensive activities like flying by applying the 'polluter pays' principle effectively, could therefore impact on future demand levels. This is even more possible given the aforementioned price-sensitivity of air travel demand. These factors have not, we believe, been properly taken into account when formulating the policy.

Furthermore, the likely impact of Brexit on aviation demand needs to be taken into consideration. According to a briefing published by the [International Air Transport Association](http://www.iata.org/publications/economic-briefings/impact-of-brexit.pdf) (IATA) in June 2016 (<http://www.iata.org/publications/economic-briefings/impact-of-brexit.pdf>), "the number of UK air passengers could be 3-5% lower by 2020, driven by the expected downturn in economic activity and the fall in

the sterling exchange rate. The near-term impact on the UK air freight market is less certain, but freight will be affected by lower international trade in the longer term.” The EU is the single biggest destination market from the UK accounting for 49% of passengers and 54% of scheduled commercial flights.

In addition to our concerns regarding climate change, noise and air pollution, as outlined above, there is certainly also a good reason to call for the demand for a new runway to be reassessed in view of the UK’s exit from the EU.

In sum, we believe that the need for airport expansion in the South East and London has not been demonstrated. The costs - in terms of financial costs, air pollution, climate, noise and community impacts have not been sufficiently taken into account. The economic benefits arising from increased capacity in the South East have been overstated. Once the negative impacts and true costs are fully taken into account, we believe that no net benefit will arise. In addition, airport expansion in the South East will do nothing to rebalance the UK economy.

The Government’s preferred scheme: Heathrow Northwest Runway

Question 2: Please give us your views on how best to address the issue of airport capacity in the South East of England by 2030. This could be through the Heathrow Northwest Runway scheme (the Government’s preferred scheme), the Gatwick Second Runway scheme, the Heathrow Extended Northern Runway scheme, or any other scheme.

As outlined in the response to Q1, we do not recognise the need to expand airport capacity in the South East, and do not accept that the case for this has been made. Capacity issues at Heathrow do not automatically translate into a genuine need to expand aviation capacity at that airport or in the South East more generally. A broader context is needed, and if that broader context is applied, the case for increasing capacity is not substantiated.

Assessment principles

Question 3: The Secretary of State will use a range of assessment principles when considering any application for a Northwest Runway at Heathrow Airport. Please tell us your views.

Out of the assessment principles chosen by the Secretary of State, air quality and carbon emissions need to be given absolute priority, see our concerns outlined under 5.1 and 5.3.

Furthermore, we are particularly concerned about the wider environmental impacts including biodiversity and ecological conservation as well as noise pollution (see 5.2).

In addition, it is crucial that communities and their views and concerns are properly represented throughout this process.

Impacts and requirements

Question 4: The Government has set out its approach to surface access for a Heathrow Northwest Runway scheme. Please tell us your views.

In the reply to Q1 we have emphasised our concerns about underestimating the true costs of surface access improvements, and the need to fully take account of the cost assessment of around £15bn provided by TfL, and TfL's concern that the AC proposals underestimated the likely actual costs by £5bn-£10bn.

In addition, it is particularly concerning that Heathrow has only offered to pay approximately £1bn. This would therefore require a multi-billion pound taxpayer subsidy. We do not see this as a good use of taxpayer money. At a time when public revenues are being heavily squeezed by central Government, there are numerous other calls on public funding which are more urgent and where the need is more clearly demonstrated.

In terms of the surface impacts, it is clear that the estimated 50% increase in passengers predicted will mean a huge rise in the number of private car journeys. This will be the case even taking into account the predicted increased percentage in trips by public transport. This will have a huge negative impact in terms of air pollution, carbon emissions and congestion.

London currently has the worst air pollution and highest number of premature deaths due to poor air quality anywhere in the UK, and the Government's own figures show it will not have met EU air quality safety limits for nitrogen dioxide even by 2030. Heathrow's London borough, Hillingdon, already has some of the very worse pollution levels anywhere in London.

In this context, any airport expansion plan which does require the most stringent restrictions on private car use and parking will be making an already chronic situation

yet more dangerous still. The Government would also be open to legal challenge as a dereliction of its duty to protect public health.

We are also concerned about the negative impact of the increased road freight which is being promoted as a positive outcome of Heathrow expansion.

Taking into account the increases in both car volumes and road freight, we are particularly concerned about the scale of negative air pollution/health, carbon emissions and congestion impacts of the proposed expansion. **In particular these negative impacts will be felt not just in an immediate area around the airport, but, crucially, across the whole of west London and in the area to the west of London.**

We urge that the full social, health, environmental and transport costs are more comprehensively factored in over this larger geographical area.

Quantification of these impacts will, we believe, place further doubt over the viability of the proposed expansion.

Question 5: The draft Airports National Policy Statement sets out a package of supporting measures to mitigate negative impacts of a Heathrow Northwest Runway scheme. Please tell us your views. Are there any other supporting measures that should be set out? In particular, please tell us your views on:

5.1. Air quality supporting measures

According to a 2015 report by King's College London, there are nearly 9,500 early deaths each year as a result of air pollution in London and the Government's own figures show London will not have met EU air quality safety limits for nitrogen dioxide even by 2030. Some of the very highest levels of this pollution in Hillingdon are around Heathrow.

The third runway will mean a 50% increase in passengers and flights, which, along with associated road traffic increases, will inevitably mean increases in both nitrogen dioxide and particulate matter (PM) levels.

As a minimum, Heathrow and the area affected by the airport around west London should be included in the Ultra Low Emission Zone. This is not currently the case.

However, whilst a ULEZ would impact positively on air pollution levels, it would certainly not solve the air pollution problem presented by a third runway. We cannot see a viable option for a third runway to be compliant with EU air quality legal limits.

A particular concern is that the projections on air pollution are for 2030 when the runway will only be in partial use. The air pollution impact needs to reflect the levels that will be experienced when the runway is fully in use.

Court cases against the UK Government brought by Client Earth have ruled that the UK government has failed to produce an effective plan to tackle air pollution across the country. The latest revised plan (https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogen-dioxide/supporting_documents/Draft%20Revised%20AQ%20Plan.pdf) has also been heavily criticised, and London is predicted to fail to meet EU air quality safety limits for nitrogen dioxide even by 2030. The UK Government needs to take a step change and provide a more robust and far-reaching set of interventions to tackle air pollution. Unfortunately this remains lacking. Particular measures should include a New Clean Air Act which is fit for purpose in tackling a raft of air pollutants and their sources, expanding Clean Air Zones to ensure that WHO and EU limits are met by 2018 at the latest and much better monitoring of emissions at source.

A related concern is that, given the pathway to Brexit, the Government has not given a cast iron commitment to maintain and keep pace with EU air quality legislation. This is a big concern, and could further threaten progress in reducing chronic air pollution in and around Heathrow and west London. **The Government needs to commit to maintain and keep pace with EU air quality legislation, including an effective legal enforcement mechanism.** This commitment has not been forthcoming, and this places the Heathrow runway expansion as an even greater health threat to those living and working in and around Heathrow and west London.

Given the above concerns and the shortcomings identified, we don't see the measures proposed as being effective.

5.2. Noise supporting measures

It has been estimated that 725,000 people currently live under a Heathrow flight path. This amounts to 28% of all those impacted by aircraft noise across Europe. With a third runway added, it is clear that the overall numbers impacted by Heathrow aircraft noise will grow significantly, bringing huge numbers of new people under a flight path for the first time. However, without sufficient knowledge of those flight paths the people likely to be affected cannot be properly consulted.

The policy includes a commitment to encourage quieter aircraft. However, this needs to be much more stringent. **This needs to be a requirement rather than an encouragement and noise levels of aircraft need to be quantified in such standards.** Without this, there are no sufficient mechanisms for enforcement and redress, should these objectives not be met.

The EU-derived noise impact threshold is 55dB. Yet this policy uses a 57dB threshold. The policy and impact assessments need to be re-assessed using this more stringent 55dB threshold.

Supporting documents use an assumption that a third runway will increase the noise impact by only 9%. We question that figure. With flights and passenger numbers predicted to rise by 50%, it is hard to see how noise impacts could only increase by 9%. This needs explaining clearly, so the methodology for this figure can be scrutinised.

The Government's stated aim is to seek a 6.5 hour night flight ban between 11pm and 7pm (hours to be determined). This doesn't go far enough. The policy should require a night flight ban to be in place before undertaking any expansion plans.

Given the above concerns and shortcomings identified, we don't see the measures proposed as being effective.

5.3. Carbon emissions supporting measures

We question the accuracy of the consultation's description of the Airports Commissions assessment on climate change: 'The Airports Commission concluded that any one of these schemes could be delivered with the UK's climate obligations.'

The Airports Commission acknowledged the Committee on Climate Change (CCC)'s assessment that carbon emissions of up to 37.5 MtCO₂e by 2050 would be compatible with the carbon targets in the Climate Act. **This is affirmed in the draft policy statement, although the statement and Government policy in general has not made clear whether it accepts this limit.** However, even if emissions were kept within this limit, this places huge additional and unnecessary pressures on all other sectors to make deeper and faster emissions savings in order to make up for these increases in aviation emissions.

But based on Airports Commission's preferred 'Assessment of Need' scenario, this target is significantly overshot. **If one discounts the perverse scenario of building the runway but not using it, it is clear that running an operational third runway at Heathrow is not compatible with the UK's climate targets and objectives.**

In addition, the policy does not take account of the fact that aircraft emit significant amounts of greenhouse gases (not only carbon dioxide) at high altitudes (Tyndall Centre, 2006). As part of its EU and international commitments (via the Paris Agreement) the UK is committed to reducing emissions from the whole basket of greenhouse gases, not just carbon. The emissions impacts of these flights therefore need to be fully taken into account.

Given the above concerns and shortcomings identified, we don't see the measures proposed as being effective.

5.4. Compensation for local communities

A clear distinction needs to be made between compensation and mitigation. Mitigation involves actions taken to reduce impacts, whereas compensation involves payments where mitigation cannot be undertaken. Mitigation should always be the first priority and compensation should arise where mitigation isn't possible.

Compensation should be proportionate to harm caused and based on the polluter pays principle.

We note that the Government agrees with the Airports Commission figure of £50 million per annum, which was proposed by AC as a noise levy, and is being proposed by the Government as an appropriate figure for a Community Compensation Fund. **We question this £50 million per annum figure, which is clearly insufficient, given the health and economic impacts.**

There needs to be compensation for the impacts of air pollution.

Compensation should be without prejudice and this should be made clear in the policy. It is important that planning consent should not be decided on the basis of compensation levels, rather than the merits and impacts of the proposal. Given the above concerns and shortcomings identified, we don't see the measures proposed as being effective.

Question 6: The Government has set out a number of planning requirements that a Heathrow Northwest Runway scheme must meet in order to operate. Please tell us your views. Are there any other requirements the Government should set out?

Comments on a fourth runway are insufficient to give any certainty about such a possibility. **We strongly urge that a clear guarantee is included which categorically rules out a fourth runway.**

Draft Airports NPS Appraisal of Sustainability

Question 7: The Appraisal of Sustainability sets out the Government's assessment of the Heathrow Northwest Runway scheme, and considers alternatives. Please tell us your views.

The Appraisal of Sustainability outlines 12 topics and 18 issues which need to be considered. In detailing the supporting measures, however, there is an unacceptable lack of information about how impacts will be addressed. In the economy section, there is no mention of the cost of all of the other impacts put together, this is solely framed around economic benefits, which is short sighted and does not take into consideration any of the financial implications of the other measures. Yet on the flip side, many of the supporting measures detailed (with perhaps the exception of landscape, noise, soils and water, where remedial measures are suggested to minimise impacts) treat the impacts as simple externalities that can be paid for - new habitat creation, relocating residents and entire communities to make way for the proposed runway. At no point are the impacts themselves sought to be redressed in any other way than paying to make them go away. The lack of detail in the air pollution and carbon sections is particularly concerning - no information whatsoever is given about what "series of measures" the promoter has put forward and without details about the ability of any measure to reduce pollutants and GHG (greenhouse gases) alike, it is impossible to truly appraise the sustainability of the runway proposal. Order of preference given to address the impacts puts prevent or avoid negative effects first. Reconsidering the 'no new runways' approach would enable this option to be applied to all objectives.

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