

Response to DfT Consultation on Beyond the Horizon: the Future of UK Aviation

October 2017

Introduction

The No Third Runway Coalition was set up in March 2017, bringing together a number of community groups who are opposed to expansion at Heathrow. Our members include residents, NGOs, environmental campaigners, MPs and local authorities.

The Coalition opposes expansion at Heathrow because:

- 3,750 homes will have to be demolished or rendered unlivable;
- A 3rd runway will increase the number of people severely impacted by noise from 725,000 to over 1.1 million;
- London is already in breach of legal air quality limits and a 3rd runway will result in a significant increase in air pollution;
- Cost to the taxpayer remain unknown;
- Growth at other airports would need to be curbed to ensure compliance with climate change targets.

Questions on the Aviation Strategy's aim and objectives

4) In what order of importance should the policy challenges listed below be tackled? Please tell us why you have suggested this order of importance.

Policy challenges

- . **keeping pace with consumer expectations**
- . **maintaining high levels of safety and security**
- . **expanding our access to markets and trade**
- . **encouraging competitiveness**
- . **meeting increasing demand through sustainable growth**
- . **keeping pace with technology and developing skills for the future**

Response:

It is unclear if there is any benefit in prioritising any of these challenges above and beyond all of the others. Government should be seeking to deal with these issues as optimally as possible based on all of the information available.

It is of serious concern that the policy challenge of meeting increasing demand through sustainable growth appears to downplay the impact of

aviation on the environment. Potential solutions to this policy challenge have not been clearly identified, particularly in relation to noise, air pollution and climate change. Indeed such challenges seem almost an afterthought in comparison to the commitment to meeting increasing demand.

It is worth noting that this consultation has been published before the DfT has released its update passenger demand forecasts that may have a significant impact on future aviation capacity needs.

Given the significant local impacts of airport operations, it is also surprising not to see a policy challenge of community engagement identified.

5) The strategy's aim and objectives are:

Aims and Objectives

Aim: To achieve a safe, secure and sustainable aviation sector that meets the needs of consumers and of a global, outward facing Britain.

The strategy will have the following six objectives:

- **help the aviation industry work for its customers**
- **ensure a safe and secure way to travel**
- **build a global and connected Britain**
- **encourage competitive markets**
- **support growth while tackling environmental impacts**
- **develop innovation, technology and skills**

What are your views on the proposed aim and objectives?

Response:

Overall, the proposed policy objectives are not set at a sufficiently strategic level. The aviation strategy should not view aviation as an end in itself. Its objectives are surely about transporting passengers and freight over the coming decades. It needs to be set in the wider context of trends in these areas, including developments in rail transport and shipping, as well as wider policy aims in trade and the environment.

Specifically, the Coalition believes that the aim is too narrow and that the wording should be revised to reflect the needs of wider society, particularly communities that are adversely impacted by airports operations.

The mitigation of the impacts from airport operations should be given a more visible presence in the development of the Strategy. The Coalition would welcome the development of a community impact assessment objective to help achieve this.

It is not clear why tackling environmental impacts has to be linked to supporting growth. There is significant concern that linking the two is confusing and unnecessary, especially when it can be asserted that increased growth results in greater environmental impact.

This objective seeks to be both business and environmentally friendly which may be laudable in many circumstances but on the issue of additional airport capacity may simply not be achievable. A new Heathrow runway would produce around [9 million tonnes](#) of carbon dioxide a year, which is about 8% of all the [emissions](#) the UK can release in 2050 if it is to meet the targets in the Climate Change Act. Further, in order to meet these targets, the expansion of Heathrow would require restrictions on flights at all other airports, thereby undermining any potential growth opportunities.

Indeed, if flights numbers grow as predicted at all UK airports, the targets could only be met if demand were deliberately restricted through a carbon tax or a tough emissions trading scheme with a carbon price of over £600 per tonne. Neither policy initiative is on the horizon.

By 2050 emissions from aviation would constitute around 25% of total UK emissions. This will require significant reductions and restrictions in other sectors of the economy, including the complete decarbonisation of the rest of the transport system.

The CCC has said that allowing aviation emissions to overshoot the limit (as would be inevitable with a new runway) would imply other sectors making cuts beyond the limit of what is feasible.

The Coalition suggests that the reference to growth be removed from the environmental objective to help strengthen the Government's commitment to avoiding "unwelcome environmental impacts".

[Questions on the policy making process](#)

6) The strategy's policy principles are:

- **Consumer focused – it will put passengers and businesses at the centre of everything we do**
- **Market driven – it will emphasise the role of government as an enabler, helping to make the market work effectively**
- **Evidence led – it will target intervention on specific problems which government can address, avoiding activity that does not respond to a clear problem**

What are your views on the proposed principles?

Response:

The Coalition welcome the evidence led principle but must caution that ALL evidence is taken into account including the negative impacts of airport operations. It is not appropriate to dismiss or not publicise the disbenefits from increased aviation activity. Decision makers must have all the evidence available to them to ensure they are fully informed of the consequences of their policies.

If a market driven principle is to be adopted, the strategy needs to be based on a full analysis of the aviation market in the UK. Such an analysis would seek answers to questions such as:

- How well does the market operate?
- What elements of subsidy does the sector enjoy?
- How competitive is the market between different airports in the UK?
- Are consumers paying the full economic cost of flying i.e. are the externalities such as health and pollution costs reflected in the price?

A key issue with a market driven approach with the Government as enabler is what happens when the market does not deliver as expected? There have been multiple occasions over the decades on large infrastructure projects where the market has not delivered and the Government and ultimately taxpayers end up picking up the bill.

There is again an absence of community representation from the principles, in fact community is only referred to twice in the whole document and one of those is a footnote.

There should a be a community principle developed to ensure that those most impacted by airport operations have clearly defined channels of communication and appropriate mechanisms to be engaged in policy development and implementation. Placing passengers and business at the centre risks undermining local community relations and alienating those who live close to airports.

7) Policy tests

1. What is the rationale for action?

This will remain focused on what the government is trying to achieve, not just in terms of outputs (such as the publication of an Aviation Strategy), but the final outcome for the sector and society.

2. What is government's role?

This will look at the need for government action to fix an identified problem, or whether activity is better carried out by others.

3. What does the evidence say?

This is a test of whether the government is using the best available evidence and whether there is anything that could be done to improve the information and data available to decision makers.

4. Have all of the options been considered?

This will ask whether there are other approaches that may not have previously been considered.

5. What is the effectiveness of any proposed action?

This will ask whether government has considered the practicalities of policy decisions and if these have been properly discussed with those affected or who have an interest.

What are your [views](#) on the proposed policy tests?

Response:

The policy tests seem to be broadly useful for the development of strategy, however as always implementation will be the key to success.

It is vital that Government takes its role and responsibilities seriously and does not simply try to defer difficult to solve problems to the industry or local authorities, particularly on issues such as air quality where national leadership and action is required.

It is reassuring to see a commitment from Government to an assessment of evidence-based policies. A comprehensive analysis of the community and environmental impacts of policies that includes the benefits and disbenefits would be a welcome move towards best practice and help to ensure these impacts are fully understood and mitigated where appropriate.

On option 4, it needs to be clear that the do nothing option will be fully analysed in accordance with Treasury guidance. For example, how much spare capacity now exists or could be created at airports across the UK without any government expenditure? This would be consistent with the market driven approach mentioned earlier i.e. what solutions would be market develop if government spent no money in support of a particular option.

[Specific question on utilising existing runways](#)

8) What are your views on the government's proposal to support airports throughout the UK making the best use of their existing

runways, subject to environmental issues being addressed?

Response:

Such a strategy would make sense in a scenario where Heathrow is not expanded. Many regional airports have significant spare capacity that could be better utilised. Indeed, passengers and businesses want to be able to travel from their local airport to their destination.

Questions on the consultation process

9) This document sets out the questions that the government would like to explore in developing the Aviation Strategy, within each of the six objectives that have been identified. These can be found at the end of chapters 3-8. Are there any other specific questions on the six objectives that you think should be included in the planned consultations?

Response:

No comment.

10) Are there any other sources of information or evidence that the government should bear in mind when developing the strategy?

Response:

There are a number of excellent sources of information for the Government to consider including work undertaken by TfL, local authorities, community groups and NGOs. Materials produced by these organisations should be considered, referenced and responded to as part of the strategy development process.

11) If yes, please give us some details of the sources of information or evidence.

www.aef.org.uk

www.wwf.org.uk

www.greenpeace.com

www.hacan.org

<https://tfl.gov.uk/corporate/publications-and-reports/aviation>

12) Does the proposed timetable (set out in chapter 2), provide enough time to examine the issues in sufficient depth?

Response:

No

13) If no, please provide feedback on the timescale here.

Response:

The timetable appears to be very ambitious. Phase 2 of the Strategy development, where themed consultations on the main issues will be carried out, is the key component of the process. This cannot be rushed and it may be necessary to commission new studies to fully understand the implications of Strategy options.

14) What action could the government take in order to ensure that the maximum number of people, communities and organisations are engaged in the process and are able to have their views heard?

Response:

The Government should assess the consultation process used to publicise and consult on the NPS and Airspace Policy documents published earlier in 2017 to identify lessons learned.

There will be a need to carry out consultation exhibitions and it is vital that communities close to airports and those under existing or potential new flight-paths are directly engaged in the process.

15) Would your organisation be willing to take part or help organise events to help the development of the strategy?

Response:

The Coalition as an organisation does not possess the resource to help organise events but some individual member groups do and have assisted with DfT consultations in the past. We would certainly be willing to help share information about events and details of the consultation, as they are available.

16) Are there any issues which we have not covered in this document which you think should be included in the consultation process? If yes, please describe what you think these issues are.

Response:

No additional issues beyond those identified in previous comments.

Other comments

17) Do you have any other comments on the issues raised by this call

for evidence? If so, you can either give these in your response to this consultation, or in the themed consultations which we have planned for each of the objectives.

RESPONSE:

The approach the Government is adopting in developing aviation policy is confusing and could potentially lead to an inconsistent approach across the policies that overlap.

It is not unreasonable to expect that the national strategy be developed and adopted first so that other related strategies such as the NPS on Airports could be prepared in a way that would be logical.

The national Aviation Strategy that the current consultation relates to will be the main over-arching policy, but it seems likely that this will not be adopted before the NPS and the Airspace Policy or before Heathrow seek to make further changes to operations, possibly prior to the construction of a 3rd Runway.

The Government's Air Quality Plan still does not refer to Heathrow expansion despite a recommendation from the Environmental Audit Select Committee that it be directly addressed.

There Government is also yet to publish its Clean Growth Plan which is a serious concern given the current policy vacuum in relation to aviation emissions.

It is notable that the Government has had to reopen the consultation on the NPS to take into account the updated passenger forecasts and the recently published Air Quality Plan. It would have been logical for these to have been publicly available before consulting on the draft NPS on Airports.

Sequencing the various strands correctly would mean deferring a decision on Heathrow. This would be likely to save government money and allow the market to develop solutions in line with the market driven approach favoured in the document.

Questions on supporting growth while tackling environmental impacts

The government is interested in exploring the following issues as part of the planned consultation on this objective:

- **Whether there should be a new framework to allow airports to grow sustainably, and if so what that framework should be**

RESPONSE

It has been assumed that the new Aviation Strategy will be the document that provides the framework for the development of aviation in the UK for the next 30 years and beyond. This development cannot be anything other than “sustainable” as to do otherwise would not be consistent with Government policy. It is not evident why – as this question appears to suggest – there would be a need for a separate, new framework.

- **Whether the government has the right structures in place to support airspace modernisation**

RESPONSE:

It would be easier to respond to this question if the consultation document had clearly set out the current and proposed structures in place to support airspace modernisation. No detailed comment can be made on this issue until the response to the Airspace Policy Document consultation is published.

- **How government and industry should address resilience issues both at specific airports and within the wider airport system**

RESPONSE:

Resilience issues need to be addressed in the emerging Strategy. As identified in the consultation document, the busiest airports such as Heathrow operate their infrastructure close to capacity limits which means that they often see a reduced ability to recover from disruption caused by, for example adverse weather. This causes impacts for local communities when delayed flights are allowed to continue to land and take off well into the early hours of the morning.

Airports should be directed by Government to ensure that any development or changes to operations be used to support greater resilience. We recommend that specific resilience target levels – e.g. in terms of integrating appropriate spare capacity such as landing/take off slots – are developed by Government and included in the developing Strategy.

- **What the government could do to help co-ordinate the planning and delivery of improved surface access to meet the needs of consumers**

RESPONSE:

It is still unclear what the cost of the road and rail infrastructure needed to serve a third runway will be and who will pay for it. The Airports Commission put the cost at £5-£6bn. The DfT has said that at least £3.5bn will be required, whilst TfL estimates the cost could be as high as £18bn. Heathrow told the Environmental Audit Committee that it would contribute only £1.1bn leading to

questions about the size of the contribution that will be required from taxpayers.

Crucially the arrival of Crossrail and the eventual upgrade of the Piccadilly Line have been designed to support the population growth of London, not the expansion of Heathrow airport.

In addition, two proposed rail improvements; Western Rail Access and Southern Rail Access, assumed to take place have currently no Government commitment or funding to ensure their delivery.

It is worth noting that money has run out for Network Rail, because costs for schemes like Great Western electrification have gone through the roof, and completion has slipped – so the available funding for enhancements in CP6 (2019 – 2024) is being swallowed up by work that should have been completed earlier. This means that there is little chance of funding for either scheme coming from Network Rail before 2025; the date by which expansion is supposed to have been completed.

An expanded Heathrow would result in 175,000 additional daily trips on local transport networks. Heathrow's aspiration is that there is no net increase in passenger and staff highway trips. Yet this would require a public transport mode share of 65% - something that no airport in the world has achieved.

The Airports Commission found that to deliver no increase in airport related traffic, a road user-charging scheme (at around £40) would be required around the airport. This would be in addition to existing London congestion charging schemes.

Analysis by TfL shows that a third runway would result in increased delays at junctions and average speeds becoming slower on the local road network.

The Government also needs to be clear that “consumers”, as referred to in this question, are not just those who are using the airport's services, but also those who live close to the airport and use services that serve the airport. Improving surface access solely for the benefit of airport users should not be supported where this is going to have detrimental impacts for other users.

- **How to encourage and improve connectivity across the regions and nations of the UK in a way that benefits the country as a whole**

RESPONSE:

No comment on this issue.

- **How to ensure all regions of the UK have suitable connectivity to major**

Airports

RESPONSE:

No comment on this issue.

- **How to achieve the right balance between growing the sector, and ensuring effective action is taken to tackle carbon emissions, reduce noise and improve air quality**
- **Whether the right incentives and regulations are in place to ensure industry continues to reduce noise, including the feasibility of noise**

targets

RESPONSE:

Communities around Heathrow already suffer from excessive noise and illegal levels of air pollution. A three-runway Heathrow, however, would have severe noise and air quality impacts and put undue strain on the local public transport and road networks.

Noise

Expansion mean another 250,000 planes a year using Heathrow, increasing the number of people directly affected by noise from 725,000 to 1.1 million. This could potentially result in 2 million people being significantly impacted by aviation noise. Local communities have clearly stated that it is the number of aircraft causing noise disturbance that causes the annoyance.

Owing to the cramped airspace, aircraft at Heathrow depart at lower trajectories than any other major international airport in the world. The 'quieter' A380s are increasingly being flown at lower trajectories (at 2,000ft up to 9km from the airport), with National Physical Laboratory (NPL) recordings showing that they are even noisier than the A747s they are replacing. A low flying 'quieter' aircraft can be much noisier on the ground than a higher flying 'noisier' aircraft.

The noise mitigation package offered by Heathrow is lamentably insufficient and is not available for the majority of people who will be significantly impacted by aviation noise. Communities blighted by noise pollution deserve truly world-class mitigation today; not a decade or more after the third runway has opened.

The DfT currently employs metrics based on noise from road traffic when assessing the impact of proposals for airport expansion. This is unacceptable. Noise from aircraft is of a different magnitude and is many times more intrusive than noise from road transport. Consequently, assessment, appraisal

and resultant compensation for local communities should reflect the reality of the noise pollution endured based on accurate information.

The current Government proposals plans for an independent noise authority are woefully behind schedule and serious concerns remain about the genuine independence of such a body that will be predominately staffed by personnel from the aviation industry and the CAA.

Air Quality

Heathrow has long represented an air pollution challenge, with aircraft, passenger and freight traffic all adding to background pollution from traffic on local roads, some of which regularly breach air pollution limits.

It's beyond doubt that expansion would worsen pollution compared with a no-expansion future. Analysis by the Airports Commission (2014) found that by 2030:

- The scheme would increase emissions of nitrogen oxides by 26% above the 'do minimum' two-runway scenario predominantly as a result of increased aircraft emissions;
- Expected exceedences of the National Emissions Ceiling Directive (NECD) limits for both NO_x and particulate matter would be exacerbated by expansion. The UK has so far been compliant with the NECD but current projections suggest future breaches are likely.

A third runway at Heathrow will result in at least 250,000 more planes using the airport. It seems likely that the only way not to exceed legal limits on air pollution will be to limit the number of planes using the third runway.

What the best approach and combination of policy measures are to ensure we effectively address carbon emissions from aviation

RESPONSE:

If expansion at Heathrow takes place, emissions from aviation would constitute around 25% of total UK emissions by 2050. This will require significant reductions and restrictions in other sectors of the economy, including the complete decarbonisation of the transport.

If flights numbers grow as predicted at all UK airports, the targets could only be met if demand were deliberately restricted through a carbon tax or a tough emissions trading scheme with a carbon price of over £600 per tonne. Neither policy initiative is on the horizon.



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The CCC has said that allowing aviation emissions to overshoot the limit (as would be inevitable with a new runway) would imply other sectors making cuts beyond the limit of what is feasible.

Reference is made in the consultation document to ICAO's goal of achieving carbon neutral growth for aviation (internationally) from 2020. This aim should be included as part of the Phase 2 assessment.