

## **Response to DfT consultation on revised Draft Airports National Policy Statement**

**11 December 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 unliveable;
- A 3<sup>rd</sup> runway will increase the number of people severely impacted by noise from 725,000 to over 1.1million;
- London is already in breach of legal air quality limits and a 3<sup>rd</sup> 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.

Communities around Heathrow already suffer from excessive illegal levels of air pollution. A three-runway Heathrow, however, would have severe air quality impacts and would increase congestion and emissions on local public transport and road networks.

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.

Our response to this consultation is drafted in reflection of our opposition to expansion at Heathrow.

**Do you have any comments on the revised draft Airports NPS or any of the documents set out in the table on pages 7 and 8?**

**Air Quality**

It is beyond doubt that expansion would worsen pollution compared with a no-expansion future. Indeed, the revised NPS itself states that the proposal for a northwest runway at Heathrow has a ‘high risk’ of exceeding legal limits for air quality.

Further, the revised NPS states that without effective mitigation, the expansion of Heathrow would result in increased congestion and emissions on the local transport networks.

The revised NPS also fails to model the impacts of the construction of a new runway on legal air quality limits.

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. Yet, the revised NPS appears to rely on the full and effective implementation of the Plan in order to address the increase in emissions resulting from expansion at Heathrow. This is a significant cause for concern given that the Government is being taken to court for a third time over the lack of detail provided in the plan.

The new aviation demand forecasts predict that a third runway will fill up more quickly than originally expected. The Updated Appraisal Report in paragraph 2.19 states that an expanded Heathrow opening in 2026 would be operating at full capacity by 2028. This will lead to a greater impact on air quality in the first few years of the runway being in use. The NPS does not include any proposal to mitigate this fact.

The Air Quality Re-Appraisal Report Table 1.1 indicates a risk that the Heathrow third runway could delay compliance with limit values. The commentary box explains:

- The risk is higher the earlier the assumed year of opening;
- The risk of impact on compliance is high up to 2029 and exists even if the Government's 2017 Plan actions are fully implemented.

If air quality limits are to be met then it will rely on measures to be implemented by the Mayor of London. Such measures have been designed to improve the public health of Londoners, not for the benefits to be undermined by increased pollution from an expanded Heathrow.

The updated NPS assumes that air pollution will not increase as a result of expansion at Heathrow as long as both the Air Quality Plan and the Clean Growth Strategy are

implemented fully and effectively. The full and effective implementation of Government plans does not have a robust and successful history on which one can support this assumption with any confidence.

The revised NPS has not accurately reflected the risk posed by expansion to the continued breach of the UK's air quality legislation. The Government's air quality plan is still subject to legal challenge and no effective enforcement has been proposed should air quality improvements not materialise as the Government expects.

## **Noise**

The new evidence indicates that the third runway would fill up within two years of becoming operational. Consequently the noise impact, including on schools and local populations, would be significantly worse in the short term than anticipated by the Airports Commission.

The revised NPS does not fully take into account the impact aircraft will have on people and communities that are newly overflown. The population exposure at high noise levels is 42% higher in 2030 in the new forecasts. This will coincide with the period when a large number of people are exposed to aircraft noise for the first time. The lack of information around detailed flight paths associated with a third runway at Heathrow is a significant flaw that undermines the credibility of the NPS.

There is also apparent indecision about whether or not flight paths should be concentrated, which would result in a significant deterioration of the noise pollution endured by many communities.

There is insufficient information in the revised NPS on the length of the respite period that communities will experience should a third runway become operational. Significant numbers of people will experience a reduction in their respite yet the lack of flight path information means it is not possible to estimate how many will be affected or the size of the reduction.

The revised NPS has failed to use any metric that tests the real level of annoyance of people on the ground. Areas such as Ealing and Teddington fall outside of the annual noise contours despite being overflown about a third of the time in an average year. The final NPS should include a metric that reflects the noise pollution experienced in these communities.

As a result of the new airspace policy the revised NPS now demonstrates that there is a lowering of the threshold at which significant community annoyance begins to occur. Nearly, 400,000 more people will fall within the noise contour considered to mark the onset of significant community annoyance in 2030.

Further, the number of schools to be exposed to high levels of noise (63 Leq) has increased from 14 to 23 in 2030 in the new forecasts. The number exposed to 54 Leq will now reach 416 in 2030 compared to previous forecasts of 292.

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 revised NPS does nothing to address this.

The current 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.

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.

## **Economic**

The Updated Appraisal Analysis significantly undermines the evidence base and rationale for the Government's support for the Northwest Runway at Heathrow. The Government has pursued a policy of support for expansion at Heathrow, primarily based on the economic benefits accrued to the country. However, the revised NPS fundamentally challenges this position.

The revised estimate of total gross economic benefit of the Heathrow northwest runway to £72.8bn - £74.2bn is half of the figure estimated by the Airports Commission. Further, the Net Present Value (which encompasses all costs and benefits, range from just £3.3bn (over 60 years) to a negative figure of minus £2.2bn

Conversely, the revised NPS shows that Gatwick would deliver greater total economic benefit than Heathrow, of up to £75.3bn. There is also an additional £1.5bn of greater passenger benefit from the Gatwick scheme.

The Government's own figures demonstrate that it is not clear that the preferred option of Heathrow expansion presents the most strategic case for expansion that delivers the greatest economic benefits.

## **Passenger Demand Forecasts**

It is important to note that significant uncertainty remains about future demand for air travel. The revised NPS forecasts of demand should consider of the levels of market maturity in air travel already found in some market segments. Indeed, the possibility of earlier emergence of market maturity than assumed in official forecasts needs to be taken into account. The revised NPS does not consider this.

It would seem sensible for the forecasts to include a 'lower case' projection, to allow for the possibility of faster market maturity than currently assumed. This would be particularly relevant to the private sector financing of a new Heathrow runway in that it would reflect an additional risk.

Passenger demand at all UK airports can only increase by 60% between 2005 and 2050 in order to comply with the UK aviation emissions target yet by 2015 demand had already increased by 11% without a third runway at Heathrow. Expansion at Heathrow will mean that regional airports will be forced to reduce services.

There is no analysis of the impact of Brexit on passenger demand forecasts, which is surprising, given that around 40% of Heathrow's 75 million passengers are from the European market and the European Court of Justice governs the EU Open Skies arrangement.

### **Regional Connectivity**

The revised NPS shows that airports outside of London will on average handle 8.5% fewer passengers in 2050 with a third runway at Heathrow.

The revised figures mean that airports such as Liverpool and Newcastle, that had been predicted to benefit from Heathrow expansion by the Airports Commission, are now to see a loss of passengers compared to a no expansion scenario.

The revised NPS has not undertaken an updated forecast of the number of domestic connections served by an expanded Heathrow. Perhaps this is because Table 3.3 demonstrates that the total number of destinations served will actually fall when compared to a no expansion scenario.

### **Surface Access**

The revised NPS has not included any further analysis of the potential costs involved in providing the surface access improvements required to facilitate the operations of a third runway at Heathrow.

It is also explicitly states that it has not calculated the financial or environmental costs of the proposed construction of the runway over the M25, nor assessed the potential impacts on the local road network.

Consequently, it remains unclear what the cost of the road and rail infrastructure needed to serve a third runway will be and who will pay for it.

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

The risk remains high that taxpayers will be asked to make a significant financial contribution.

## **Health**

The Airports Commission report assessed the effects of a third runway at Heathrow as moderately adverse for health outcomes (including mental and physical health) and majorly adverse for children's cognitive development. The revised NPS has failed to give sufficient weight to these very serious impacts.

The revised NPS should have made it a condition of any scheme that specific and proven mitigations are introduced that ensures that there is no increase in adverse health and educational impacts. The failure to do so is a serious abdication of Government responsibility.

The revised NPS assumes that possible future compliance with existing legal air quality standards is sufficient reason to support expansion at Heathrow. However, it can be asserted that current legal limit values are not sufficiently robust to protect the public from dangerous air pollution and that Government should examine bringing the legal limits down to be in line with WHO recommendations.

## **Climate Change**

The revised NPS states that any one of the three shortlisted schemes could be delivered within the UK's climate change obligations. It is simply not credible to suggest that the Government has presented evidence to support such a statement.

The revised NPS includes a significant reduction in CO<sub>2</sub> emissions per passenger compared to previous Government forecasts in 2013, yet it does not provide any evidence to explain why the current predictions are accurate and the previous ones were incorrect.

There has also been an assumption made in the modelling about an increase in larger aircraft carrying more passengers and thus a consequent decline in air traffic movements. However, once again there has been no evidence or commentary to support the assumption that larger aircraft will be operational nor a strategy created to mitigate the impacts that failure to deliver larger aircraft would have on carbon emissions.

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.

The Committee on Climate Change 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 revised NPS appears to rely on the effective implementation of the Government's Clean Growth strategy to address this situation, despite the fact that the strategy said that the Government "*has not reached a final view on the appropriate level of aviation emissions in 2050.*" At time of writing, the Government still has no climate change policy for aviation.

Even if the emission forecasts in the revised NPS are accurate, there will still be an exceedence of the 37.5Mt limit by at least 2.4Mt. The revised NPS and associated documentation do not proposed any measures to tackle this exceedence.

The revised NPS and Appraisal of Sustainability make clear that the Government has no intention of pursuing a carbon capped scenario but rather will allow expansion on a carbon traded basis. This will require a significant rise in the price of carbon that is currently not part of Government policy.

### **Additional Changes to the NPS**

The consultation on the updated NPS presents significant new evidence encompassed in some forty documents. These cover a wide range of key impacts including new demand forecasts, new estimates of noise impacts, new estimates of CO2 emissions and other air pollutants as well as changes to the potential impacts of Heathrow expansion on other UK airports. Such a major revision at this late stage reinforces that the view that the NPS as drafted is not fit for purpose.

Moreover, the short 8-week period of consultation barely provides sufficient time for potential respondents to read all of the new evidence let alone undertake the detailed analysis required for a robust response.

The Government has now published its new Airspace Policy that includes a number of sensible initiatives that need to be incorporated into the NPS, particularly the independent noise authority and use of multiple flight paths to provide respite to overflown communities.

### **Consultation Process**

The first consultation process on the draft NPS was seriously flawed with selective information provided and still no details provided to communities about the potential new flight paths and periods of respite.

Indeed, in September 2017, Sir Jeremy Sullivan accused the DfT of having fallen “short of best practice”, for the publication of “pro-Heathrow propaganda” in the leaflet sent to over a million residents, in place of vital information such as the full address of consultation venues.

The current consultation on the revised NPS was announced as being relatively minor. However, the sheer volume of new evidence and its implications for the proposal to expand Heathrow has been extremely challenging in such a short consultation period, especially for those communities who will be directly impacted by expansion.