

Response to Mayor's Draft Transport Strategy

29 September 2017

Policy 20

The Mayor will continue to oppose expansion of Heathrow airport unless it can be shown that no new noise or air quality harm would result and the benefits of future regulatory and technology improvements would be fairly shared with affected communities. Any such expansion must also demonstrate how the surface access networks will be invested in to accommodate the resultant additional demand alongside background growth.

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.

What criteria and measuring metrics does the Mayor's Transport Strategy propose to test noise and air quality levels both in the present and in the event that expansion at Heathrow proceeds?

Any such metrics and tests need to be clear and solid, based on the best available evidence to ensure that the Mayor is in a position to challenge both Heathrow and the Government as required.

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.

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.

On current projections, the Mayor's 2025 target to reduce CO₂ emissions will not be met. Further action to help meet the targets and reduce reliance on fossil fuels is therefore a critical issue for the Transport Strategy and will only be undermined by any expansion at Heathrow.

Conclusion

The Coalition is supportive of the Mayor's position to stand on a clear anti expansion platform in the Mayoral Election. Both the Mayoral and General Elections demonstrated that Londoners and London politicians are unequivocally opposed to expansion at Heathrow. However, as presently worded, Policy 20 inadvertently introduces ambiguity into the Mayor's position, which could be exploited to Londoners' disadvantage in the future.

Supporters of Heathrow expansion could use the qualification to the first sentence of Policy 20 ("*...unless it can be shown that no new noise or air quality harm would result and the benefits of future regulatory and technology improvements would be fairly shared with affected communities...*") to argue that the noise pollution and deterioration in air quality resulting from expansion do not amount to "new harm". The Coalition is convinced that laying London open to this possibility is not the intention of the proposed policy and that clearer language would avoid this risk.

The Coalition therefore suggest that:

a) Policy 20 be reworded to state simply:

"The Mayor will continue to oppose expansion of Heathrow Airport."

b) Additional points should be included in a new policy and along the lines of the suggested wording below:

"Should Heathrow be expanded, despite the best interests of the Londoners, acceptable and effective limitations on aircraft noise exposure and air

pollution must be a condition of expansion. Furthermore, the benefits of any future regulatory and technology improvements should be fairly shared with affected communities. Any such expansion must also demonstrate how the surface access networks will be invested in to accommodate the resultant additional demand alongside background growth. Any contribution from taxpayers must be made explicit before any expansion is approved”

Proposal 96

The Mayor will seek a commitment from Government to fund and deliver within an appropriate timescale the extensive transport measures required to support the expansion of Heathrow.

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.

Part 2

For all buses to be zero emission by 2037, for all new road vehicles driven in London to be zero emission by 2040, and for London's entire transport system to be zero emission by 2050.

- **Strongly agree**
- Partially agree
- Neither agree nor disagree
- Partially disagree
- Strongly disagree
- No opinion

Comment?

8). Proposals 18 and 19 set out the Mayor's proposed approach to road user charging (see pages 81 to 83).

Proposal 18

The Mayor, through TfL, will keep existing and planned road user charging schemes, including the Congestion Charge, Low Emission Zone, Ultra Low Emission Zone and the Silvertown Tunnel schemes, under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy.

Proposal 19

The Mayor will give consideration to the development of the next generation of road user charging systems. These could replace schemes such as the Congestion Charge, Low Emission Zone and Ultra Low Emission Zone. More sophisticated road user charging and/or workplace parking levy schemes could be used to contribute to the achievement of the policies and proposals in this strategy, including mode share, road danger reduction and environmental objectives, and to help reduce congestion on the road network and support efficient traffic movement. In doing so, the Mayor will consider the appropriate technology for any future schemes, and the potential for a future scheme that reflects distance, time, emissions, road danger and other factors in an integrated way.

To what extent do you agree or disagree with the proposed approach to road user charging?

- **Strongly agree**
- Partially agree
- Neither agree nor disagree
- Partially disagree
- Strongly disagree
- No opinion

Comment?

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.

10). Policies 5 and 6 and proposals 22-40 set out the Mayor's draft plans to reduce emissions from road and rail transport, and other sources, to help London become a zero carbon city (see pages 86 to 103).

Policy 5

The Mayor, through TfL and working with the boroughs, will take action to reduce emissions – in particular diesel emissions – from vehicles on London's streets, to improve air quality and support London reaching compliance with UK and EU legal limits as soon as possible. Measures will include retrofitting vehicles with equipment to reduce emissions, promoting electrification, road charging, the imposition of parking charges/levies, responsible procurement, the making of traffic restrictions/regulations and local actions.

Policy 6

The Mayor, through TfL and the boroughs, and working with other transport providers, will seek to make London's transport network zero carbon by 2050, which will also deliver further improvements in air quality, by transforming London's streets and transport infrastructure so as to enable zero emission operation, and by supporting and accelerating the uptake of ultra-low and zero emission technologies.

Proposal 25

The Mayor, through TfL and the boroughs, will tackle pollution in local air quality hotspots and at sensitive locations (such as around schools) including through the Mayor's Air Quality Fund and other funding.

To what extent do you agree or disagree that these plans would help London become a zero carbon city?

- Strongly agree
- **Partially agree**
- Neither agree nor disagree
- Partially disagree
- Strongly disagree
- No opinion

Comment?

Any expansion at Heathrow risks seriously undermining the multiple policy initiatives (particularly Policy 5 and Policy 6) proposed in the draft strategy to enable London to become a zero carbon city by 2050.

If expansion 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.

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 areas around Heathrow are indeed a local air quality hotspot and the Coalition welcomes Proposal 25 to provide additional funding for communities and in particular local schools.

11). Policies 7 and 8 and proposals 41-47 set out the Mayor's draft plans to protect the natural and built environment, to ensure transport resilience to climate change, and to minimise transport-related noise and vibration (see pages 104 to 111).

Policy 7

The Mayor, through TfL and working with the boroughs, will:

- a) Ensure that transport schemes in London protect existing and provide new green infrastructure wherever practicable to deliver a net positive impact on biodiversity. This will be achieved through the requirement for specific commitments to be made under the relevant planning or development consent regime, including Habitat Regulation Assessment and other environment protection undertakings. Designated spaces such as Sites of Importance for Nature Conservation shall be protected where practicable.
- b) Maximise opportunities to protect, promote and enhance London's built heritage and sites of cultural importance.

Policy 8

The Mayor, through TfL and the boroughs, and working with other transport and infrastructure providers, will seek to ensure that London's transport is resilient to the impacts of severe weather and climate change, so that services can respond effectively to extreme weather events while continuing to operate safely, reliably and with a good level of passenger comfort.

To what extent do you agree or disagree that these plans would achieve this?

- Strongly agree
- **Partially agree**
- Neither agree nor disagree
- Partially disagree
- Strongly disagree
- No opinion

Comment?

Proposals 46 & 47 deal specifically with noise from road and rail traffic respectively.

The Coalition believes that the Mayor's Transport Strategy should include a policy and/proposal for the robust and independent monitoring of aircraft noise.

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.

This is an initiative that the Mayor could take the lead on to make a tangible improvement to the lives of Londoners.