

## **Submission to the Transport Select Committee Inquiry into the Airports National Policy Statement.**

**29 November 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 inquiry is drafted in reflection of our opposition to expansion at Heathrow.

The Coalition did not submit a response to the inquiry into the NPS in the previous parliamentary session and thus this submission briefly sets out our position to some of the key questions.

## **1. How well the proposal reflects Government policy on airports and aviation more generally.**

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.

The national Aviation Strategy will be the main over-arching policy, but it is unlikely this be adopted before the final NPS is published. 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.

Sequencing the various strands correctly would likely 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.

## **2. How well the proposal takes account of other aspects of the Government's transport strategy.**

The NPS needs to be set in the wider context of trends in other areas of transport, including developments in rail and shipping, as well as wider policy aims in trade and the environment.

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 overflowed communities.

## **3. The suitability of the Government's evidence and rationale for the need for a Northwest Runway at Heathrow.**

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 NPS fundamentally undermines this position.

The revised the estimate of total gross economic benefit of the Heathrow northwest runway to £72.8bn - £74.2bn, which 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 updated 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.

There 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.

#### **4. How comprehensive the proposal is in terms of the supporting measures for those communities who will be impacted by expansion.**

A comprehensive analysis of the community and environmental impacts of policies that includes the benefits and disbenefits would have been a welcome move towards best practice and help to ensure these impacts are fully understood and mitigated where appropriate. Unfortunately, the NPS has failed to grasp this opportunity.

The NPS does not fully take into account the impact aircraft will have on people and communities that are newly overflowed. 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 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 but the lack of flight path information means it is not possible to estimate how many will be affected.

The 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 overflowed about a third of the time in an average year. The NPS should include a metric that reflects the noise pollution experienced in these communities.

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.

**5. How well the proposal takes account of sustainability and environmental considerations and the adequacy of relevant documentation and information published alongside the draft proposal.**

**Air Quality**

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.

It is beyond doubt that expansion would worsen pollution compared with a no-expansion future. Indeed, the 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 NPS states that without effective mitigation, the expansion of Heathrow would result in increased congestion and emissions on the local transport networks.

The 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 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.

**Noise**

Expansion will result in another 250,000 planes a year using Heathrow, increasing the number of people directly affected by noise from 725,000 to 1.1 million. Local communities have repeatedly 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 NPS does nothing to address this.

The current Government 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.

## **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 draft NPS has failed to give sufficient weight to these very serious impacts.

The draft 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.

## **Climate Change**

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.

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.

## **Surface Access**

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

In addition, 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 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 worthy of note that the NPS 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.

#### **6. The extent to which the NPS provides the Secretary of State with the basis for judging applications for development.**

The NPS is lacking vital information and is therefore not fit for determining applications for development.

#### **7. The effectiveness of the Government's consultation on the proposal**

The consultation process has been seriously flawed with selective information provided and still no details provided to communities about the potential new flight paths and periods of respite.

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.

### **Updated NPS Questions**

#### **8. Whether the revised passenger demand forecasts and air quality assessments have been satisfactorily completed and are represented accurately in the final version of the NPS and Appraisal of Sustainability.**

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 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.

#### **9. Whether any other changes to the NPS based on clarity intention and/or Government policy since February 2017 are suitable.**

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 CO<sub>2</sub> 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 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 detailed, robust analysis and critique.

There is significant concern that the Government may be selecting evidence that supports their policy position rather than objectively analysing the totality of evidence available before making a decision.

There are significant gaps in the policy framework, particularly on addressing air pollution that require comprehensive solutions as soon as possible rather than seeking to push responsibility for resolving the issue into the future.