

Response to Inquiry into Air Quality

7 November 2017

1. 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 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.

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.

2. Government Policies

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.

The Air Quality Plan has also been widely criticised for seeking to pass responsibility onto local authorities without providing any finances or mechanisms for them to address the issue, which seems unfair and naïve at best.

The Air Quality Plan sets out some laudable ambitions but has failed to set out concrete actions that can be taken to improve air quality in cities now. The communities around Heathrow already suffer the consequences of congested roads coupled with polluting aircraft overhead and this situation will only get worse with expansion.

The plan lacks specific actions that would enable legal limits to be met and cleaner air established sooner rather than later. For example, the ban on petrol and diesel vehicles does not come into practice until 2040, some 15 years after a third runway at Heathrow is predicted to open.

The Government's Clean Growth Strategy gives rise to serious concerns given that aviation emissions are barely mentioned. All reputable evidence to date indicates that keeping aviation emissions to 2005 levels will be challenging even without runway expansion. In its progress [report](#) to Government in June 2017, the CCC had the following to say on aviation:

“If aviation emissions are anticipated to be higher than 2005 levels – as in the central case in the business case for an additional runway at Heathrow airport – then other sectors would have to plan for correspondingly higher emissions reductions. We would expect to see this reflected in the Government's plan for meeting the fourth and fifth carbon budgets.”

Rather than providing any detail, the strategy simply seems to imply that the emissions levels can be met as long as action is taken in other sectors. It appears that the Government has now calculated that anticipated emissions cuts from other sectors will not only be met but also exceeded. It should make publicly available any work undertaken that supports such a conclusion.

It is crucial that those sectors of the economy that will be required to pick up the shortfall caused by growth in aviation emission. In particular, Parliament should be made aware of what the likely impact will be on consumers' bills.

Heathrow airport, already responsible for half the total emissions from UK aviation, must not be allowed to expand until the Government has an answer on how to tackle the sector's CO₂. The strategy effectively admits that it's not possible to meet the CCC's recommendation for keeping aircraft emissions within the limits of the Climate Change Act while building a third runway, but seems to have no answer on how it will account for this.

To date the NPS process has only undertaken a Health Impact Analysis of the impact of expansion at Heathrow on the health of local communities. A full Health Impact Assessment must be undertaken before a parliamentary vote is taken on the NPS.

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.

The updated National Policy Statement on Airports 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.

3. Heathrow and Air Pollution

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.

The Airports Commission Report (2015) showed that, without mitigation, Heathrow expansion would lead to the Bath Road having the worst NO₂ concentrations in Greater London. Government has since failed to demonstrate that a three-runway Heathrow won't have the worst NO₂ concentrations in Greater London - risking the compliance of the zone and EU fines on the UK.

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. This would inevitably result in an increase in emissions too.

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.

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 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.

The updated NPS on Airports accepts that without effective mitigation that expansion will result in both an increase in congestion and emissions.

Neither the Airports Commission nor the updated NPS on Airports investigates in any detail what the more ambitious strategies for mitigation would involve nor the cost these might entail.

The Government has failed to demonstrate that Heathrow expansion can be consistent with legal obligations on air quality In particular, it is unclear why any airport expansion should start before air quality has been consistently met at all nearby sites.