

Views of London Forum of Amenity and Civic Societies to the House of Commons Environmental Audit Committee on the Airports Commission report

Summary

- i) We strongly recommend that the Government reject the option of expanding Heathrow. The main reasons are:**
- The much higher environmental costs (especially on noise and air quality) of expanding Heathrow compared with other options including that of expanding Gatwick;**
 - The very high delivery costs of expanding Heathrow, including compared with expanding Gatwick;**
 - The unsustainable pressures that Heathrow expansion will put on the transport infrastructure serving an expanding Heathrow;**
 - The fact that the expansion of Heathrow will not be a sustainable or cost-effective solution for the longer term, given that, on the Commission's own assessment, there is no room there for further runway expansion after a third runway.**
- ii) The mitigation measures proposed by the Commission to limit environmental impacts from an expanded Heathrow are very weak, especially as they will not influence significant behavioural change by airline operators towards quieter flying or shifting the mix of long and short haul flights at each airport. Although some strengthening would be possible, it is not possible to strengthen mitigation sufficiently to justify the expansion of Heathrow. The proposal to link release of runway capacity to EU air pollution limits appears impracticable. And once a decision were announced that a new runway would be built at Heathrow, the Government's position to negotiate tougher mitigation measures would be weaker. Its negotiating position is also likely to erode over time assuming demand for air travel continues to increase.**
- iii) The Airports Commission rest their case for Heathrow expansion heavily on that fact that Heathrow is currently the UK's main**

international hub, but fail to address the crucial issue of the scope for market intervention by Government (though regulation or economic instruments) to stimulate more intercontinental flights to use other UK airports, so providing a critical mass of them away from Heathrow.

Introduction

1. The London Forum of Amenity and Civic Societies, which is the coordinating body for approximately 100 local amenity and civic societies across London, which together have around 50,000 people as members. Some individual London amenity societies may submit their own evidence as well.
2. The London Forum strongly opposes the expansion of Heathrow through a third runway. If expansion is unavoidable, then the case for expansion at Gatwick or Stansted is much stronger than Heathrow. It also believes that the mitigation measures proposed by the Airports Commission are weak and that the expansion of Heathrow fails to provide a sustainable long term solution. The comments below expand on these points.

A. Are the indicative policies and proposed mitigations set out in the Airports Commission's recommended option are realistic and achievable?

3. The following paragraphs summarise why the Airports Commission's proposals are either unrealistic or unachievable or both.

Noise Impacts

4. First, the noise impacts from expanding Heathrow are several orders of magnitude greater than for other expansion options including Gatwick expansion, with far more people affected by noise from Heathrow than for any other European airport.

5. A major reason why expansion of Heathrow will add significantly to noise impacts is that the periods of **respite** for most residents will be reduced from

one half to one third of the total time even if the Commission's recommendation for a North West runway is implemented (final report para 14.38) (with the Commission's rejected option for an Eastern runway extension being worse still)

6. It is important to recognise that **aircraft movements, and hence levels of noise, would be likely to grow** over the lifetime of the new runway as passenger demand increases. The Commission recommends mitigations in the form of bans on night flights and a firmly agreed "noise envelope" at Heathrow. It is notable that the owners of Heathrow have not said they will accept the mitigations; only that they will 'work with Government'. But once the Government had taken a decision in principle that there should be a third runway at Heathrow, its negotiating position with the airport's owners and with the airlines would be much weaker. And over time, the Government is likely to come under huge pressure to relax these, as passenger demand grows, consistent with history of relaxations in the past

7. An example of this difficulty is over flight angles for landing aircraft. The Commission notes that steeper angles would reduce noise impacts. But it does not make any recommendations over angles, leaving this for later settlement, with no clarity over the regime at the time a decision in principle over airport expansion was made.

8. The Commission also proposes a statutory **Noise Authority**. However its outline remit, as proposed by the Commission, appears to be about giving advice and recommendations rather than enforcement. Moreover it seems virtually certain that such an authority would only be able to work within a broad noise regime agreed with Government, and this is likely to be eroded as noted above. In any event, none of these proposed mitigations can address the issue of respite. If Heathrow expansion were agreed now, London residents would in effect be hostage to a noise regime where not only important details, such as the role of the proposed Noise Authority and the shape of any noise envelope would be agreed only later, but such a regime would be likely to be eroded further over time.

9. The Commission's assumptions about noise impacts depend on assumptions about the speed of introduction of **quieter aircraft**. However take-up of these depends considerably on what standards are agreed in the UN International Civil Aviation Authority. Recent history suggests that, while the UK and EU are likely to argue for tighter standards, these will be strongly resisted by both the US and newly industrialised countries, such as China and India. So there is a

considerable risk that aircraft will not be as quiet as assumed by the Commission.

10. The Commission proposes a **charging regime** aimed at providing funding for measures to reduce the effect of noise in the home. However the Commission has not proposed a stronger regime which would also aim to incentivise airlines to use quieter aircraft at Heathrow. This would require strongly differentiated charges between different aircraft types. This should have been proposed, even though it will certainly not deal with all the noise issues. Moreover given the widespread adverse noise impacts from a Heathrow expansion, there is a strong case for a noise tax, in addition to the charges levied by the airport, with the tax revenues accruing to the Exchequer. Such a charge should also be strongly differentiated by aircraft type related to noise levels. This will need a tough negotiating position by the UK Government, especially given the likely reluctance of airlines to be charged in this way for the environmental damage they cause.

Air quality

11. Second, on air quality, the Commission notes that Heathrow expansion, in contrast to Gatwick expansion, will damage air quality in the area. The Commission's argument that, with mitigation such as greater use of public transport, the expansion of Heathrow in itself may well not lead to London breaching EU air quality limits (because the largest breaches may be in central London) appears beside the point for three reasons.

12. First, the impact on human health would exist regardless of how air quality at Heathrow compares with central London. Second, the Commission does not spell out what mitigation measures should be put in place; so, as with noise, a decision in principle to expand Heathrow could be put in place before there is any clarity about them.

13. The third reason is related to the way in which EU breaches are assessed. It does not follow that the EU Commission, or the European Court of Justice will regard the UK as complying with air quality limits at Heathrow, just because there are higher breaches elsewhere in London. It would be a matter of judgement both for the EU Commission in deciding whether to bring an infraction case, and for the European Court of Justice (ECJ) in ruling on whether the UK should be regarded as being in breach of a directive, taking account of a range of factors. These factors are likely to include the purpose of the directive (consistent with the wider approach of European law in this

respect), and also that it would have been a voluntary decision by the UK Government to expand Heathrow, in contrast to other major reasons for the UK's failure to comply with EU air quality directives, much of which are related to the failure of EU vehicle emission standards, for which the UK Government cannot be held responsible in the same way.

14. For this reason too, the Airports Commission's proposal that runway capacity should be released "only... when it is clear that air quality at sites around the airport will not delay compliance with EU limits" (final report: para 14.105) appears unenforceable. It would never be known in advance with sufficient certainty how any approach to infraction, or ECJ judgment, might go. Hence this proposed mitigation does not provide anything like sufficient reassurance.

Delivery costs

15. Third **delivery costs** are far higher for the Heathrow options than for Gatwick, estimated by the Commission at about £22 ½ billion for the Northwest runway option and £20bn for the Eastern runway extension option; this compares with only about £8bn for Gatwick (scheme costs plus surface access costs in each case). The Commission imply that all these costs could be financed by the private sector, though others (e.g. the Chief Executive of IAG group, owners of BA in comments on 31 July 2015) have suggested otherwise. Again this is likely to be the subject of intense negotiations and Exchequer contributions or guarantees cannot be ruled out. Moreover even if all costs were to be met by the private sector, there would be a very large economic resource cost to the country, reducing scope for attractive financing of more deserving infrastructure projects and being likely to raise construction costs for these other projects.

Congestion and overcrowding on both road and rail links to the airport

16. Fourth, it appears highly likely that expansion of Heathrow will lead to unacceptable levels of **congestion and overcrowding on both road and rail links to the airport** (especially on the M4, M25 and Piccadilly line), with knock-on effects on those making journeys on the same links for other reasons than going to or from Heathrow. This is suggested by the current high use of both road and rail links. The report assumes relatively limited expansion of key links specifically related to the new runway (as opposed to those planned in any event), given the scale of airport investment implied and the expected growth in demand both before and after the new runway would be completed; and

the Commission's final report fails to show at all convincingly that congestion and overcrowding can be avoided.

B. What are the implications of adopting or not adopting those policies and mitigations are for wider Government policy?

17. The comments above have pointed to substantial adverse effects on Government policy on noise and air pollution from Heathrow expansion. These impacts have significant impacts on both **human health and wellbeing** and so will seriously damage these policies, as adding to financial costs to the public sector in addressing them. As the Commission's report notes, there would also be increased adverse **climate change** impacts.

18. In addition, as noted above, there would be significant adverse effects on **transport policy** (in relation to congestion), on the **ability to finance other infrastructure projects**, on the Government's public sector **deficit reduction** objectives (given the strong risks of Exchequer contributions being needed to support the investment) and on **housing policy**. The housing impacts arise particularly since Heathrow expansion would substantially reduce the scope for housing on brownfield sites for some distance around Heathrow and consequently be likely to raise property prices still further and make London's current housing crisis still worse. In no case would the mitigations proposed substantially reduce these impacts for the reasons already given.

C. What steps should the Government take in these areas to reach its decision in a way that is consistent with its commitments on sustainable development?

19. The Commission's report, in justifying Heathrow expansion, lays particular stress on the fact that Heathrow is currently the main international hub airport in the South East, with a high proportion of the UK's intercontinental flights. However it appears to take this as an immutable premise, and does not consider what the Government could do to incentivise (e.g. via economic instruments) or regulate to achieve a higher proportion of intercontinental national flights departing from or landing at another airport, most obviously Gatwick, so as to provide a critical mass of intercontinental flights from there. If that were to happen, either quickly or gradually over several years, then the Commission's case for Heathrow expansion would be much weaker. The options here should be considered much more fully in advance of any decision being taken to expand Heathrow.

20. Finally, and as a really important point, the Commission state that in their view there is no room, and hence no case for a fourth runway at Heathrow, even though they think that a further new runway serving the South East is likely to be needed by around 2050. But in that case, the issue of moving the main hub out of Heathrow, or of splitting hub activity between two or more airports will have to be faced in perhaps 15 years' time, in time for implementation then. But the Commission never address this issue or draw out its implications, even though it hugely weakens the case for a third runway at Heathrow. The argument is that if that decision will have to be faced in about 15 years' time, it needs to be considered now, since it may well be more difficult and costly to change hub arrangements then than now. If the Commission thought this issue was outside their terms of reference, then those were too narrow to serve as a basis for decision-making now.

21. Taking such a longer term view would make the case for additional runway capacity at this stage at an airport other than at Heathrow much stronger, given that it is likely to be needed later in any event. Apart from expansion at Gatwick, one such option is which would come more strongly into the fray, with that approach, would be Stansted. Although expansion at Stansted would be a relatively cheap option, the Commission rejected this in their interim report mainly on the argument that there would be insufficient demand, shown by the current overcapacity already at Stansted. But this ignores the scope for active incentive or regulation to stimulate demand away from Heathrow (see para 19 above). And tellingly, the Airports Commission's interim report (para 6.59) suggests that the option of expansion of Stansted is likely to need to be considered as an option for a second additional runway later on. If so, then the option would be better faced now.

Conclusions

22. For all these reasons, the London Forum believes that the Commission's case for Heathrow expansion is seriously lacking in justification even taking account of their proposals for mitigation or of plausible modifications of them.

7 August 2015