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Runway Consultation

Department of Transport

Response by London Forum of Amenity and Civic Societies to Draft National Airports National Policy Statement and Associated Documents

1. This is a response by the London Forum of Amenity and Civic Societies to the Department of Transport Consultation on the Draft Airports National Policy Statement, issued in February 2017. It also covers the London Forum response to related documents, especially, in respect of noise, in the Department's consultation on managing UK airspace capacity, also issued in February 2017.
2. The London Forum of Amenity and Civic Societies represents about 130 local amenity and civic societies across London.
3. The comments below take in order the consultation questions listed in the department's consultation.

Question 1: The Government believes there is the need for additional airport capacity in the South East of England by 2030. Please tell us your views.

4. London Forum does not accept the case for expansion at Heathrow. An important reason for this is that it is largely left to the market to determine the pattern of flights and will still be if a new runway is built. Demand can be met, therefore, depending on the price at which flights are offered. We are particularly concerned that neither current nor planned future arrangements allow prices to aviation users to cover fully environmental and other costs. If these costs were fully covered, then demand for flights would be lower.
5. Examples of areas where costs are not fully covered, and, on the Government's plans, would still not be after a new runway were built, are:
 - Noise costs
 - Air pollution costs
 - Surface access costs, many of which should properly be charged to the aviation industry but would not be under the Government's proposals

- The subsidy implicit in low taxation of aviation fuel.
6. Many of the extra flights at Heathrow are likely to be used mainly by leisure travellers, who are less likely than average to fly from Heathrow if they were charged a higher proportion of these costs, and may provide fewer economic benefits to the UK than business travellers.
 7. We believe that it is essential that all external costs should be charged to aviation rather than being borne by the public purse or the wider population. It is a significant deficiency of the Government's proposals that this has not been done and is not proposed.

Question 2: The Government's preferred scheme: Heathrow Northwest Runway. Please give us your views on how best to address the issue of airport capacity in the South East of England by 2030. This could be through the Heathrow Northwest Runway scheme (the Government's preferred scheme), the Gatwick Second Runway scheme, the Heathrow Extended Northern Runway scheme, or any other scheme.

8. As indicated above, the solution must start with ensuring that external costs, including all relevant environmental costs, produced by aviation in the south east are fully paid for by airlines and those who fly, which is not currently happening. Aviation demand in the south east should then be reassessed under these fairer cost principles. If this reassessment is done, aviation forecasts can be expected to be significantly lower than current forecasts.
9. Our view is that if this is done and there is still a need for some additional runway capacity, the worst solution would be to provide this at Heathrow. This is because, as shown by the Airports Commission, both the environmental costs and the delivery costs and risks are very high, much higher at Heathrow than at Gatwick. Depending on the forecast demand shown when this is reassessed as we strongly recommend above, the better solution may be expansion at Gatwick or another airport such as Stansted. We are strongly opposed to either of the two Heathrow schemes considered by the Airports Commission, including the Government's preferred scheme.

Question 3: The Secretary of State will use a range of assessment principles when considering any application for a Northwest Runway at Heathrow Airport. Please tell us your views.

10. The assessment principles in the consultation document include environmental principles. As discussed more fully below, we believe that the environmental criteria proposed by the Government in the assessment principles are insufficiently strong.
11. The consultation document states that one of the assessment principles should be cost, stating (para 4.36), ***"The applicant should demonstrate in its application that its scheme is cost-efficient and sustainable, and seeks to minimise costs to airlines, passengers and freight owners over its lifetime."*** While this is a correct statement in relation to the avoidance of inefficiencies in construction, this principle of cost minimisation to aviation users is quite wrong in relation to external costs especially environmental costs, where, as indicated above, aviation should be paying for the costs it inflicts on others.

12. Additionally, an important omission from the list of assessment principles is the impact on housing from an extended Heathrow runway. This not only requires demolition of around 1,000 houses from construction, but also prevents areas in and around Heathrow being used for new houses which would be possible if other sites were chosen and Heathrow were downgraded in terms of numbers of flights using it.
13. The displacement of so many families and the adverse effect on several villages are serious problems. It is doubtful how far the remaining communities would be sustainable. It is not clear how far those people evicted could find homes that they can afford. Nor is it clear what the impact would be on local businesses if workers have to move out of London to find accommodation.
14. The principle of ensuring that aviation pays its full environmental costs, and the adverse impacts on housing should therefore be added to the assessment principles.

Question 4: The Government has set out its approach to surface access for a Heathrow Northwest Runway scheme. Please tell us your views.

15. Transport for London (TfL) has estimated the surface access costs associated with the Government's preferred scheme at £18 billion. The Government has said it does not recognise these estimates; but has not given any detailed explanation of why it thinks these estimates are wrong. Accordingly we believe TfL's cost estimate, which has been broken down, is likely to be more accurate than the Government's own estimate of surface access costs.
16. But on either basis, we believe it is quite wrong that the Government's proposal is for the airport and airlines to be charged only a very small proportion of the surface access costs associated with transport upgrades. This seems to be on the argument that the airport should be only expected to pay for costs that result directly from the additional runway. We cannot see the logic of this, since the airport as a whole benefits from surface access upgrades. Moreover, the more firmly the Government states that its preferred scheme is at Heathrow, the less likely it is that it will succeed in any negotiations to pass on more of the costs to airports and airlines.
17. Without significant investment, congestion on both public transport and the roads is likely to be a serious obstacle. We were surprised how little emphasis is given in the consultation document to the implications for the London Underground. The Piccadilly Line is already congested; and it is not clear how runway expansion can prevent this from becoming still worse.
18. We believe that the very high surface access costs are a strong reason for not proceeding with Heathrow expansion; but that if the scheme does go ahead the Government should be insisting that the airports and airlines pay for a much higher proportion of the costs than is implied in the consultation document. We also believe that the Government should issue a much fuller explanation of how far it agrees, or disagrees, with TfL's estimates.

Question 5: The draft Airports National Policy Statement sets out a package of supporting measures to mitigate negative impacts of a Heathrow Northwest Runway scheme. Please tell us your views. Are there any other supporting measures that should be set out? In particular, please tell us your views on:

- 5.1. Air quality supporting measures
- 5.2. Noise supporting measures
- 5.3. Carbon emissions supporting measures
- 5.4. Compensation for local communities

Air quality

19. The area around Heathrow suffers from some of the worst air quality in London; and the proposals for Heathrow are likely to make this worse, especially from the additional surface traffic that this would produce. The extra surface transport caused by expanding Heathrow's capacity to transport air freight, as the consultation document proposes, is likely to generate a significant additional future contribution to air pollution. It is disappointing that the Government's draft plan for tackling nitrogen dioxide in cities, published in April 2017, does not make any new proposals which would reduce its level around Heathrow.
20. The consultation document states (para 5.31) : ***"The applicant should [demonstrate] ... to the Secretary of State that the construction and operation of the Northwest Runway will not affect the UK's ability to comply with legal requirements. Failure to demonstrate this will result in refusal of development consent."***
21. However this is an entirely unclear statement, with little apparent force in practice, as it is not clear what legal requirements are being referred to. By the time a third runway was to be built, we could expect tighter air quality legal limits to apply across the EU than apply now affecting both vehicle and other emissions and ambient air quality. Given Brexit, it is not clear how far the UK will adopt these.
22. We believe that the Government needs to make it clear that the legal requirements that are referred to should cover future as well as present EU air quality requirements on both emissions and ambient air quality.
23. In addition, in order to provide greater certainty that such requirements would be met, the Government should agree with the Mayor of London that the Ultra Low Emission Zone (ULEZ) proposed by the Mayor to reach as far as the North and South Circular Roads should be extended to cover the area in London surrounding Heathrow. Otherwise the Heathrow area is likely to have even poorer air quality than now relative to that in the area covered by the ULEZ.

Noise

24. A key reason why we are opposed to the expansion of Heathrow is its noise effects. Heathrow already has a far bigger adverse impact on people from noise than any other European airport; and the Government's proposals will significantly add to this, including, as it admits in the consultation document, by substantially cutting periods of respite for households.
25. However there are several reasons why we think that the Government's proposals on noise are insufficient, and would need to be strengthened if the Heathrow expansion proposal went ahead. We note that the proposals are in several respects weaker than the Airports Commission; but that the consultation document does not give clear reasons for its proposed weakening of the Airports Commission's own proposals..
26. First, we believe that much greater use should be made of taxation and levies on noise to incentivise the use of quieter aircraft at Heathrow. Although the consultation

document proposes the use of financial compensation to communities to cover noise from Heathrow, the Government should go significantly further in this respect, by requiring the use of variable levies so that noisier aircraft would pay significantly higher levies than quieter aircraft. It is particularly disappointing that this is not proposed given that the Airports Commission notes that such variable levies are applied elsewhere in Europe.

27. Second, the Airports Commission proposed a statutory system of levies, as also applies elsewhere in Europe. However the consultation document appears to envisage that any levies are run by the airports themselves with no statutory underpinning. This seems much too weak; and we believe that a system of levies should be put on a statutory basis and run by the Government, and so classified as a tax.
28. This is particularly important, since, although the consultation document notes that aircraft are becoming quieter, future progress is likely to be limited, given that the current US administration appears very much opposed to this kind of environmental measure, and standards for aircraft design for noise need to be agreed internationally.
29. Third, night flights are a particular concern to residents. We are disappointed that the consultation document proposes a shorter period of night time limitation on aircraft movements than did the Airports Commission, and believe that the period should end no earlier than 6am as proposed by the Commission rather than at 5.30am as the consultation suggests. The period of restriction should be made clear now and not left to later negotiation as the document implies. The system of levies as proposed above should be used to provide additional incentives for quieter aircraft at night.
30. Fourth, we believe that more emphasis should be put on encouraging steeper landing angles for aircraft so as to reduce noise impacts. The consultation document does not set out any clear proposals here; and we believe that regulations should be established to encourage such steeper angles; the evidence suggests that this can be done without compromising safety.
31. Finally, we noted that while the Airports Commission proposed an independent and statutory noise authority, the Government's parallel consultation document on managing airspace proposes only an independent (though part of the Civil Aviation Authority) noise commission, and that this would not appear to have specific enforcement powers in relation to noise. We believe that this is wrong; and that there should be an independent, and statutory noise authority with its own enforcement powers. This appears essential to prevent contravention of noise requirements and show that the Government is serious about the importance of reducing aircraft noise. We do not regard as valid a possible objection that this would compromise safety, as there are plenty of other examples of separate environmental enforcement bodies from safety bodies.

Carbon emissions

32. The additional flights generated by Heathrow expansion, together with associated increased road traffic, will be bound to increase climate change emissions. We believe that this means that it is even more important that the Government puts much more emphasis in international negotiations on the need to change the current lenient tax treatment on aviation fuel, so that aviation pays the costs it is inflicting on the climate.

Compensation for local communities

33. Given the huge cost of sound proofing for communities, both residents and businesses, that would be affected, over a wide area, by additional aircraft noise from runway expansion at Heathrow, there seems no way in which the sort of levels of compensation indicated in the consultation document would cover the adverse welfare costs they would suffer, especially from noise.
34. Moreover we do not consider the proposal for compensation for local communities for additional noise goes nearly far enough, since it does not propose variable levies on aircraft according to noise levels, as we have suggested above are essential. Some of the additional revenue from this should be used for additional compensation to communities with the rest returned to Government.

Question 6: The Government has set out a number of planning requirements that a Heathrow Northwest Runway scheme must meet in order to operate. Please tell us your views. Are there any other requirements the Government should set out?

35. The views we have set out above – in particular on surface access payment (question 4) , and on air quality and noise (question 5) , should in our view all be translated into additional, and more specific planning requirements compared with those proposed in the consultation document.

Question 7: The Appraisal of Sustainability sets out the Government's assessment of the Heathrow Northwest Runway scheme, and considers alternatives. Please tell us your views.

36. The views we have set out in answer to earlier questions cover the majority of our concerns relating to the appraisal of sustainability. However there is one additional issue which we believe goes to the heart of a sustainability assessment but which is not covered in this appraisal.
37. This is about the Government's intention, as suggested in the consultation document, and drawing on a similar recommendation in the Airports Commission report, that a fourth runway at Heathrow should be firmly ruled out. While we agree with that, we consider that the logic of ruling out a fourth runway has not been properly applied to the Government's proposal for a third runway. This is because ruling out a fourth runway means that expansion of Heathrow through a third runway is not sustainable given that the Government believes that further runway capacity beyond a third runway will be needed in coming decades. Instead, the proposal for runway expansion now should have taken much more clearly into consideration what this means for further expansion later This makes the Heathrow proposal even more objectionable as it appears a purely short-term, and therefore not sustainable, in its true sense of 'lasting', solution.

Question 8: Do you have any additional comments on the draft Airports National Policy Statement or other supporting documents?

38. Our comments are covered in answers to other questions.

Question 9: The Government has a public sector equality duty to ensure protected groups have the opportunity to respond to consultations. Please tell us your views on how this consultation has achieved this.

39. While we welcome the fact that a number of consultation events took place in in area affected by Heathrow airport expansion, we are concerned that no events took place in several parts of London which would be directly affected by increased aircraft movements resulting from an expanded Heathrow. This particularly applies in relation to residents in parts of central, south and west London (e.g. Westminster, Lambeth, Southwark, Chiswick) where no events took place. This means that residents in these areas who might have responded to the consultation may well not do so through lack of awareness.

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