

London Forum of Amenity and Civic Societies

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Response by the London Forum of Civic and Amenity Societies to the Government's October 2017 consultation on Increasing airport capacity in the south-east of England.

1. The London Forum of Amenity and Civic Societies represents about 130 local amenity and civic societies across London. This is our response to the Government's consultation dated 25 October 2017 about a revised national policy statement on increasing airport capacity in the south-east of England.
2. We have already set out in our response to the Government's previous consultation (issued on February 2017) the reasons why we are strongly opposed to building a third runway at Heathrow. The revised appraisals that accompany the current consultation only reinforce our opposition to expansion at Heathrow, as they show that the case for Heathrow expansion has become even worse.
3. The main reasons why we are now even more strongly opposed to Heathrow expansion based on the latest appraisals are as follows.
4. First, the new air traffic forecasts accompanying the consultation predict that Heathrow will be full by about 2028 even with a new North West runway scheme, considerably earlier than the Airports Commission assumed.
5. If this is the case, then unless action is taken to reduce demand (which the consultation is not assuming), then yet further runway capacity will be needed in the South East over and above a third runway at Heathrow. Yet the consultation says nothing about how this issue will be addressed, either through managing demand or through increasing runway supply still further.

6. We note that the Airports Commission recommended against a fourth runway at Heathrow; and the Government has not contradicted this.
7. Hence the proposal for a third runway at Heathrow is entirely unsustainable, since it will only provide a very short term solution to the problem. We consider it would be entirely irresponsible to proceed with such an unsustainable solution especially without any indication of what measures would be assumed to address increases in demand after 2028.
8. Second, the revised appraisals show that there is little difference, as they measure it, between the net benefits of either the recommended (North West runway) scheme or the alternative of a second runway at Gatwick. But the cost estimates have not been altered in this new consultation; and the Heathrow North West Runway scheme remains, therefore, much more expensive to construct than the Gatwick scheme and also more risky in terms especially of cost overrun. So on the combined assessment of net benefits and construction costs the Heathrow expansion scheme is much inferior to construction of a new runway at Gatwick instead.
9. Third, the adverse environmental impacts of Heathrow expansion, especially on air quality and noise, remain severe, and much greater than expansion at Gatwick.
10. On air quality there remain significant risks of air quality limits not being met at Heathrow with expansion, as we previously set out.
11. On noise, on the Government's predictions there will be over 600,000 people affected by noise at Heathrow from this proposal. And the forecasts continue to assume that there will be a substantial reduction of respite for people living on flight paths, due to the construction of a third runway at Heathrow, including with the proposed North West runway scheme. So those who are affected will be worse affected than now. These are more severe impacts than expected at any other European airport and much greater than from expansion at Gatwick.
12. For all these reasons, we continue strongly to oppose a third runway at Heathrow; and the Government's new forecasts have made the case for expansion there even worse.

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