

## The Coalition

Set up in March 2017 bringing together a number of community groups who oppose expansion at Heathrow. Our [members](#) include residents, NGOs, environmental campaigners and local authorities.

## Introduction

It is Labour Party policy to support the expansion of airport capacity in the South East of England, subject to being satisfied that any proposal would meet four key tests. The Coalition view is that the proposal to construct a third runway at Heathrow simply cannot pass the tests set by Labour and this briefing sets out the reasons for this view.

### 1. Delivering increased capacity

The third runway has been promoted on the basis that it will improve connectivity to the emerging economies of the world. Yet, according to the Airports Commission, a third runway will provide no more than 7 additional long-haul destinations by 2030, and 12 by 2050. In the meantime, without intervention, domestic airport connections to Heathrow could reduce from 7 to only 4.

Heathrow says a new runway would enable it to serve a total of 14 domestic routes, up 6 from the current position. However, the Airports Commission stated without a regional slot allocation preference or some sort subsidy that these new routes may not be commercially viable. Government has yet to make clear whether it is prepared to financially support these regional connections financially.

Stansted currently operates at 50% capacity and with a change to the planning restrictions could easily handle many more flights. Regional airports like Manchester and Birmingham also have significant spare capacity that could be better utilised today. Interestingly, whilst increases in passenger numbers are regularly cited as the rationale for airport expansion, the number of Air Traffic Movements grew by only 0.6% between 2000 and 2014. Therefore, despite existing capacity at airports around the country the number of planes taking off and landing has stayed roughly the same.

It is in the interest of Heathrow to operate the airport as close to full capacity as possible as this allows them to exploit their monopoly position and extract the largest possible fees from their airline customers. Heathrow has informed its shareholders that the current proposal for a third runway leaves sufficient space for a fourth runway in the future. Any condition imposed on consent for a third runway that rules out a fourth runway would simply not be believed by local communities who were promised no third runway if they supported Terminal 5.

### 2. Climate Change

It may be possible that technically a new runway could be built at Heathrow without breaching the target set by the Climate Change Act. **However this would mean growth would need to be curbed at all the UK's other airports.** The Committee on Climate Change (CCC), estimate that the number of flights in the UK should grow by no more than 55% by 2050 if the Government is to meet its overall targets to reduce CO2 emissions.

If flights numbers grow as predicted across all UK airports, the target could only be met if demand at regional airports outside the South East were deliberately restricted through a draconian 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 limit recommended by the CCC is already generous to aviation. It would mean that by 2050 emissions from aviation would constitute around 25% of the entire UK emissions, meaning that there would need to be serious reductions and restrictions in other sectors of the economy. This would also include the complete decarbonisation of the rest of the transport sector and significant moves to renewable and clean energy production. 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<sup>1</sup>.

A letter (22<sup>nd</sup> November 2016) from the chairman of the CCC to Greg Clark, the CCC questioned whether the target of keeping to the level of emissions in 2005 at 2050 could even be met under the Government's current plans. The June 2017 Report to Parliament of the CCC is even more specific, stating that aviation emissions will not be kept to 2005 levels under the current strategy and says of the Government, *"We would expect to see this reflected in the Government's plan for meeting the fourth and fifth carbon budgets"*. The Government has still not published its 'Clean Growth Plan' which is a serious concern given the current policy vacuum in relation to aviation emissions.

### 3. Minimising local noise and air pollution impacts

#### *Noise*

A 3rd runway would mean **another 250,000 planes a year** using Heathrow. Whilst the noise from individual aircraft is expected to reduce slightly over time, local communities have consistently highlighted that it is the number of aircraft causing noise disturbance that causes the annoyance.

There is increasing evidence that the actual noise experienced on the ground is dependent on how aircraft are flown. 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.

Based on the DfT's proposed new noise metrics and World Health Organisation standards potentially **over two million people will be significantly impacted by aviation noise around Heathrow**, with all of the health, wellbeing and associated quality of life consequences. The projections set out in the Airports Commission report are an enormous underestimate resulting from the use of discredited metrics, which even the DfT accepts are inappropriate.

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. To qualify for a financial contribution towards noise insulation impacted dwellings have to experience extreme noise that is far in excess of WHO guidance. Noise levels have to be even higher for impacted individuals to be offered assistance to relocate which is certainly not an option for most of those in social housing. The impacts on public buildings such as hospitals, places of worship and schools (where children are already expected to play in acoustic igloos) will be severe. The proposed roll

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<sup>1</sup> [https://www.theccc.org.uk/wp-content/uploads/2013/07/CCC\\_letter\\_aviation\\_commission.pdf](https://www.theccc.org.uk/wp-content/uploads/2013/07/CCC_letter_aviation_commission.pdf)

out period over 20 years is dictated by Heathrow's financial capacity and is completely unacceptable. Communities blighted by noise pollution deserve truly world-class mitigation today - not a decade or more after the third runway has opened.

### ***Air Pollution***

Air Pollution is already a massive problem in the UK as evidenced by the recent Supreme Court ruling that there is no credible plan to meet air pollution limits. Around Heathrow air pollution levels are in breach of the EU legal limits set out in the 2010 Air Pollution Directive. Whilst much of the air pollution is from the traffic on the nearby roads, it is an unjustified and totally unrealistic leap of faith for Heathrow to claim that, because of cleaner planes and cars, air pollution levels will fall by the time any third runway is built – flight numbers will have increased from nearly 480,000 a year to possibly as much as 760,000.

The use of cleaner vehicles on the roads surrounding Heathrow also require significant roll out of new infrastructure and a step change in attitudes to motor vehicles by the majority of motorists. There is currently minimal commitment from Government about the investment required to achieve this.

There are also significant commitments in the Heathrow proposal about increasing use of public transport yet 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 scaled that down to around £3.5bn. TfL puts it as high as £15-£18bn. Heathrow told the Environmental Audit Committee that it would contribute only £1.1bn. Without this investment it will not be possible for Heathrow to meet its air quality commitments.

Labour should outflank the Government by committing to meeting the limits set in the EU Air Quality Directive, ensuring that these are enshrined in UK law after Brexit and pledging to progress towards meeting WHO guidelines.

## **4. What is best for the entire UK economy?**

The Airport Commission (AC) report estimated that £147bn of total economic benefit could be delivered by a third runway at Heathrow. The Government based its support for expansion on this report. In October 2016 the DfT have revised down the estimate of total economic benefit to £61bn. It can be shown that even this revised figure is misleading because it is a measurement of 'gross' economic benefit that does not include the actual economic and financial costs of the proposal.

The DfT's Further Review and Sensitivities Report concludes that the Net Present Value of the Heathrow proposal to be just £0.2bn to £6.1bn over a 60-year period.<sup>2</sup> This calculation does not take into account the full cost of meeting climate targets<sup>3</sup>. The report also revised down the wider economic impacts to just £2.0 to £3.9bn. This is because many of the benefits have already been claimed as passenger benefits and therefore cannot be counted again. The report indicates that an overrun in Heathrow's costs of just one per cent could be enough to negate the overall benefits of the scheme.

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<sup>2</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/562160/further-review-and-sensitivities-report-airport-capacity-in-the-south-east.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/562160/further-review-and-sensitivities-report-airport-capacity-in-the-south-east.pdf), p.9

<sup>3</sup> <https://www.theccc.org.uk/wp-content/uploads/2016/11/CCC-letter-to-Rt-Hon-Greg-Clark-on-UK-airport-expansion-November-2016.pdf>

It is not clear that Heathrow's promises to local communities in terms of mitigation, the regions in terms of connectivity and to the country in terms of jobs remain the same given the reduction in total economic benefit.

It is vital that the UK makes full use of the capacity of all its airports. As part of a National Integrated and Sustainable Transport Plan the Government should publish a national airports strategy that enables regional airports to develop their own unique identity and competitive advantage in addition to fulfilling a wider strategic role for UK plc. Such a strategy should include clear improvements in surface access to airports and form part of an integrated transport strategy for the country.

If the Government is serious about rebalancing the economy then direct flights to regional airports are vital to support economic growth. Indeed, in the CBI's 2016 *Unlocking Regional Growth* report, businesses recognised the need to better link regions to international markets to increase and encourage export capabilities.<sup>4</sup> It is clear that businesses want to fly directly to centres of trade and commerce without the need to transfer before reaching their destination.

The current consultation on the draft National Policy Statement has been written with such a focus on Heathrow that it could not be applied to other airports in the South East let alone anywhere else in the UK. Whilst the Airports Commission process examined a range of options for expansion of runway capacity, at no stage has Government undertaken a comprehensive and strategic assessment of the totality of UK airport capacity. There is a significant need for a genuinely national integrated transport strategy to help address investment requirements and prioritise key schemes that deliver the greatest benefits, environmentally, socially and economically to the entire UK.

## **Conclusion**

**There are very many unanswered questions and flawed assumptions concerning the economic, social and environmental impacts of a third runway.**

MPs could be asked to vote on the Airports NPS without knowing what the cost of the new runway will be to the taxpayer, without an environmental evidence base that can be relied upon, without a full health impact assessment and without a proper understanding of what the economic impacts will be for the whole UK economy.

There must be a full, open and transparent debate on where investment in infrastructure should be made to benefit the whole of the UK and whether governmental support should be given to projects elsewhere in the country.

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<sup>4</sup> <http://www.cbi.org.uk/insight-and-analysis/unlocking-regional-growth/>