

Department for Transport

Via email to RunwayConsultation@dft.gsi.gov.uk

I am writing in response to the Government consultation on the draft National Policy Statement (NPS) on airport capacity in the South East to ensure that the concerns of Londoners are fully represented. These are further elaborated in the series of detailed papers by subject area which accompany this submission.

Aviation is vital for our city and for the country as a whole – it provides jobs, supports the economy, allows us to connect with the world and ensures London is open. We can and should make best use of existing capacity through improved surface access links to our airports.

Nonetheless, it is clear that there is a pressing need for additional aviation capacity. But new capacity cannot come at any cost. Government has not been transparent about the range and scale of impacts that will result from a third runway at Heathrow. The NPS singularly fails to demonstrate that Heathrow airport can be expanded without:

- severe air quality impacts and exceeding legal limits;
- dire noise impacts;
- significant investment in surface access improvements, currently unfunded.

In addition, there remain concerns about the impact on efforts to mitigate the effect of climate change, and on the economic case made in favour of the expansion of Heathrow.

Air quality

As Mayor of London, tackling poor air quality is at the heart of my policies and I have a clear mandate from Londoners to tackle our poisonous air. I fear that Heathrow expansion is taking us in the wrong direction exactly when we should be making every effort to improve public health and ensure UK compliance with legal limits as soon as possible.

The Heathrow area is already a major air pollution hotspot, with legal limits being breached for NO₂ on a regular basis. The NPS is taking forward a third runway at

Heathrow, with substantial increases in aircraft movements and road traffic (I will elaborate on the latter in the next section). However, it fails to demonstrate that expansion can be delivered without worsening air quality and delaying compliance with legal limits. Indeed, the NPS acknowledges that if the airport opens in 2025 – as is currently envisaged – there is a high risk that several roads will be in breach of NO₂ limit values.

The NPS appears to claim, as mitigation, measures which are wholly unrelated to expansion – such as those I am already implementing across London to reduce pollution and improve public health. It is unacceptable for the NPS to seek to take advantage of such schemes whose overriding objective is to improve the health of Londoners as quickly as possible, to allow an expanded Heathrow only to worsen air quality again. The NPS relies on the National Air Quality Action Plan to sufficiently improve air quality, yet the recently published draft Action Plan undermines the NPS with no specific reference to Heathrow, little commitment to new initiatives and a lack of clarity in how compliance will be achieved and in what timeframe.

Analysis by TfL to date indicates that Heathrow expansion will result in increased traffic on several key links around the airport and towards central London, leaving many at risk of exceedence. Moreover, a third runway will increase traffic flows in 31 Air Quality Focus Areas, identified by TfL due to their high population and risk of exceeding the limit values.

We have been frustrated in our efforts to further assess the likely impacts because Heathrow Airport Limited (HAL) have so far not provided TfL with detailed breakdowns of existing activity or emissions from the airport, despite several requests. It is clear, however, based on the additional traffic generated, that the air quality impacts of the current proposals would be both widespread and substantial and that, at the very least, significant and definitive further mitigation is required. The NPS cannot be allowed to take forward expansion of Heathrow when it will have such a detrimental impact on air quality – in contravention of the UK's legal obligations and denying health improvements for Londoners.

Noise

Heathrow already exposes more people to significant aircraft noise than its five main European rivals combined. Therefore it is no surprise that noise remains a concern for hundreds of thousands of Londoners, compounded by a system which does little to address the genuine noise issues they raise. The NPS provides little assurance to those already plagued by aviation noise.

Scientific studies have established the impacts of prolonged exposure to aircraft noise on public health. The risk of stroke, coronary heart disease and other cardiovascular disease was found to increase by 10-20 per cent in areas affected by aircraft noise. A study showed that a five decibel increase in noise exposure for school-age children was seen to correspond to a two month delay in reading age among pupils near Heathrow.

Modelling undertaken for TfL shows that a fully utilised third runway will lead to a net additional 200,000 people being exposed to significant aircraft noise (at 55dB_{Lden}), compared to a no expansion scenario. This is regardless of whether one includes the flight routing optimisation and other new technologies that HAL assumed in its

expansion scenario. As the NPS acknowledges, such flight routings are, at this stage, wholly indicative. Furthermore, NATS, the primary manager of UK airspace, found some of the routes modelled by HAL to be unfeasible. Yet these indicative and sometimes unfeasible routings were used as the basis for the interactive noise contour display being promoted at the NPS consultation events.

Moreover HAL has sought to paint a highly misleading picture of the noise impacts of expansion. It assumes flight routing optimisation and other new technologies in its modelling of its expansion but did not include these for its non-expansion baseline. This approach is largely relied on by both the Airports Commission (AC) and the NPS. It is unacceptable for such technology improvements – with the potential to reduce the noise impacts for hundreds of thousands of Londoners – to instead be used to allow expansion, or at least make the impacts of expansion look slightly less dire than they actually are. This does a disservice to the local communities who already endure significant aircraft noise from Heathrow day after day.

Even with the technology improvements that HAL modelled, the NPS found that the numbers exposed by an expanded Heathrow are around 40 times greater than for a second runway at Gatwick. Moreover, the nature of the flight routing optimisation that HAL undertook – an iterative process, shifting the flightpaths around until HAL achieved its noise objective – would result in between 100,000 and 300,000 people being exposed to significant aircraft noise for the first time.

There is no escaping the fact that a third runway at Heathrow will have severe noise impacts on communities both inside and outside London. It is a concern that these impacts have been completely glossed over by Government in the NPS consultation process. The NPS does make reference to a set of noise mitigation measures, but these range from the limited to the ineffectual and do little to improve the noise environment for Londoners affected by expansion.

Partial Night Flight Ban

Much has been made of the NPS proposal for a six and a half hour scheduled night flight ban, the exact timing of which has not yet been determined – yet the reality will be an increase in night flights across the whole eight hour night period, 11pm–7am. The ban is limited in its effect because there is already a voluntary agreement whereby no flights are currently scheduled between 11.30pm and 4.30am. If Heathrow can operate all three runways without restriction after the partial night flight ban finishes at 5.30am (the HAL proposal) or 6am (the AC proposal), it will allow a very significant increase in night flights up to 7am. Under the HAL proposal, this could mean over 110 additional flights per night compared to today, an increase of 140 per cent.

Respite

Much emphasis is placed in the NPS on the importance of respite. Most in the vicinity of the airport will have respite from aircraft noise for just a quarter of the traffic day (6am–11.30pm), half of what is offered to local communities today. Moreover, talk of predictable respite is predicated entirely on an airport which is not fully utilised, avoiding the need to suspend runway alternation. Yet, the AC found that an expanded Heathrow would be operating at 80–90 per cent capacity shortly after opening, meaning that suspension of runway alternation – infringing on respite – would likely continue.

HAL has also modelled a 'respite' flightpath scenario, with multiple dispersed flight routings to apply respite over a wider area. But there remain substantial uncertainties about such an approach, not least because it runs contrary to current and draft Government policy and would entail over 120,000 people being exposed to significant aircraft noise for the first time.

Other noise measures

The other noise measures presented in the NPS also raise concerns. Noise envelopes are mentioned but have little value when there is no stipulation as to how stringent they will be or the extent to which HAL will be required to take into account community concerns. While the NPS references noise insulation it does not specify the noise criteria required. The phasing proposed by HAL would see insulation rolled out over 20 years, starting the year before opening – leaving most eligible homes exposed for several years, without any assistance. Moreover, take-up of previous Heathrow schemes has been weak because HAL only part-fund the insulation and typically insist on a single approved supplier which precludes a competitive offering.

Surface access

The NPS references HAL's aspiration for no increase in airport-related highway trips. Should Heathrow expansion go ahead, I agree with this aspiration, fundamental to mitigating the air quality impacts of a three-runway Heathrow. However, I am deeply concerned by the failure of the NPS to specify no increase in airport-related highway trips as a requirement for expansion – and by the complete lack of a credible strategy to achieve this.

An expanded Heathrow is predicted to generate an additional 175,000 extra trips by passengers and staff each day. Without any increase in road traffic this would mean there would have to be an increase of over 200 per cent in public transport trips to and from the airport.

It is worrying that the NPS does not specify any schemes required by expansion and appears to entirely rely on what is already committed such as the upgrade to the Piccadilly Line and the new Elizabeth Line. As London continues to grow, it is my responsibility to ensure that the transport network can accommodate the additional demands on its networks. The Elizabeth line and Piccadilly line Upgrade projects have key roles to play in meeting current growth in demand across the capital. It is not acceptable for Government to only rely on such pre-existing schemes and the extra capacity they provide to support the case for a third runway. To do so would be to undermine the original purpose of these schemes to unlock growth and development and would result in severe crowding for airport and non-airport passengers alike.

The NPS implies that Western and Southern Rail Access would help support expansion, but there is no certainty about the funding or delivery of either and the latter is still some way from a defined scheme. It is simply not credible to claim expansion can be delivered with no increase in highway traffic in the absence of any firm commitments to new rail infrastructure.

The aspiration for no increase in highway trips for passengers and staff would mean an airport public transport mode share of 65 per cent. This is a very significant increase compared to today (39 per cent).

TfL has undertaken initial modelling with the Western and Southern Rail Access schemes, which shows a public transport mode share of 47 per cent would be achieved. Our analysis indicates that these projects alone are not enough to ensure there will be no increase in highway traffic to the airport. The modelling suggests that even with these schemes, there will still be 70,000 additional daily car and taxi journeys compared to current levels.

If no increase in passenger and staff highway trips is to be secured, there must be a commitment to a more substantial package of surface access infrastructure – a meaningful package of rail schemes and bus and cycle measures – combined with a significant road access charge by HAL to encourage people out of their cars. The rail schemes include Western Rail Access and an effective version of the Southern Rail Access, one which is likely to need to connect directly to the South West Main Line and which can provide both new connectivity and new capacity.

Early indications from the analysis by TfL suggest the investment in surface access infrastructure required would be of the order of £10-15bn. It is essential that the DfT commissions further work to understand the detail of the schemes required. This scale of investment is essential if Londoners are to have any confidence that the building of a third runway won't cripple the transport network of west London.

Moreover, I want to make clear that TfL – and in turn London's farepayers and taxpayers – must not be saddled with the multi-billion pound bill for upgrading surface transport access to enable expansion.

Nor is inaction in the face of expansion an option. It would be economically and environmentally damaging if Government imposed a three-runway Heathrow on Londoners without the public transport investment to alleviate its impacts. To do so would be to condemn the thousands travelling on the road and rail corridors which serve Heathrow to worsening congestion, crowding and delays.

Fundamental questions remain about the surface access impacts of an expanded Heathrow and how the network can cope with the additional demand alongside background growth. Yet, despite repeated requests, the Government continues to exclude TfL, the strategic transport authority for the capital, from the Heathrow Surface Access Steering Group set up for this purpose. TfL has a critical role to play in addressing this challenge and its exclusion adds weight to my concerns about Government's genuine commitment to address the surface access issues satisfactorily.

Climate Change

Aviation contributes around 2.5 per cent of London's greenhouse gas emissions. If this sector fails to decarbonise then, by 2050, emissions of this amount would comprise over 20 per cent of a net zero carbon London.

It is concerning that the NPS appears to ignore the recommendations of the Committee on Climate Change to ensure aviation targets are met without the use of carbon credits.

If this is not followed, the NPS must be clear about the implications, including restrictions on growth at other UK airports, and potentially even more stringent efforts to decarbonise the rest of UK industry. If our commitments on climate change are to mean anything, then we cannot ignore them when it is deemed expedient.

Economic Case

There remain concerns about the methodology used in the NPS, particular in its deviation from standard best practice. This is a concern because the NPS focuses almost entirely on the economic benefits to seek to demonstrate why Heathrow expansion is better than the alternatives.

The NPS presents the economic benefits in isolation, without taking into account either the disbenefits or costs. The Government's own analysis demonstrates that when both benefits and disbenefits are considered, the total net benefit of a third runway is £20.4bn over 60 years – not the headline £61bn figure quoted in the NPS. Including the airport infrastructure and (underestimated) surface access costs, the adjusted benefit cost ratio (BCR) of the scheme is £1.0-1.5bn, which based on DfT guidance represents 'low value for money'. This is notably lower than the BCR of £1.7-2.0bn for Gatwick expansion, which represents 'medium value for money' and includes a significantly lower environmental cost.

Domestic Connectivity

The NPS places great stock on the new domestic routes that an expanded Heathrow could deliver – yet the evidence suggests the number of routes will halve, from eight to four.

A domestic route will always struggle to match the profitability of an established longhaul route, which is why so many domestic routes have been squeezed out of Heathrow already. With the AC predicting that Heathrow will be 80-90 per cent full shortly after opening of the third runway, there is every reason to expect an expanded Heathrow to suffer a similar squeeze. The NPS makes no commitment to new domestic routes, and with good reason. Airlines decide the routes they fly and both Government and airport operator are legally very limited in their ability to influence the routes that might be served.

Financeability

The Government continues to claim that an expanded Heathrow can be delivered without Government support, but this is not credible. Notwithstanding the significant surface access investment required – most of which HAL has made clear that it does not believe is essential and is not responsible for funding – the scale of the investment in the airport infrastructure alone is considerable; according to figures published by the AC, it will require its owners to triple their equity and debt levels. It is not rational to proceed with this NPS so long as there remains considerable uncertainty as to whether an expanded Heathrow can be delivered by the private sector alone. If this is not addressed, there is a substantial risk that costs will fall to the taxpayer.

In conclusion

The overall conclusion of the NPS appears to be to hope for the best. The Government seeks to rely on innovations unrelated to expansion, clawing back public health and environmental benefits being delivered elsewhere and utilising existing public transport improvements designed to cope with economic and population growth, not airport expansion. Taking forward one of the country's largest infrastructure projects on this basis is simply not good enough.

The NPS presents various measures and conditions but many of them are inadequate and few have been made a formal requirement. They provide little certainty of addressing the serious problems identified. For the hundreds of thousands that would be affected by a third runway, this NPS process cannot be a mere formality. The NPS begs more questions than it answers and leaves me even more concerned about the severe environmental and surface access impacts of Heathrow expansion. As a result, I remain deeply sceptical as to whether Heathrow expansion can ever be the right answer for London and the UK.

Yours sincerely,

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