

New Draft London Plan Consultation

Response from West London Friends of the Earth

West London Friends of the Earth is a network of local borough-based groups in west London. We are concerned with a range of issues but concentrate particularly on Heathrow. This response is therefore confined to Heathrow issues (including reference to Green Belt and MOL policies). We rely on submissions from other FOE groups on other matters covered by the London Plan.

We welcome the principle of the Mayor's opposition to a third runway, but there are some critical concerns and caveats.

We consider that Policy A and the first sentence of 10.8.4 should be deleted. The evidential base for expansion (new runways) in the SE is voluminous and very complex with many thousands of pages published by the Airports Commission (AC) and Department for Transport (DfT). TfL or the Mayor's office have not, as far as we are aware, studied the evidence in requisite detail to be able to support the case for additional aviation capacity in the SE on a properly informed basis.

This is not the place to argue in detail the pros and cons of expansion, but we mention just a couple of areas of evidence that argue against expansion:

1. The AC and DfT forecasts of traffic show clearly that if a new runway is not provided in the SE, there is little loss of growth. Traffic that would otherwise go to a third runway at Heathrow (or a 2nd runway at Gatwick) would simply be re-distributed to other airports inside and outside the SE.
2. The forecasts show that a new runway will barely increase 'connectivity' in terms of routes and there would be no extra routes from London to the rest of the UK.
3. The forecasts show that much of the growth generated by an extra runway will be international transfers. These are trips where the passengers fly into Heathrow to change planes. They bring no economic benefit to London because the passengers are not visiting London, but they dump air pollution and noise on Londoners. They do not even pay tax for the privilege (because there is no Air Passenger Duty and they can buy duty-free goods.)
3. DfT analysis shows virtually no benefit of a new runway. The 'Net Present Value' of a third runway at Heathrow is in the range minus £2.2 bn to plus £3.3 bn over years. With the UK's GDP of about £2 trillion, any benefit would be at worst negative and at best negligible and invisible.
4. The 'need' for expansion is predicated on a gigantic tax dodge of tax-free aircraft fuel worth £10 bn pa. If taxes were paid, demand would be lower and there would be even less 'need' for a new runway.
5. Trade and the needs of a globalised economy are always cited as reasons to expand airport capacity. But the reality is that less than 20% of traffic is for business and the proportion is falling. The proportion of traffic that is UK business people flying long distance – argued as being especially important post-Brexit – is under 2%. The majority of flying is leisure trips abroad by affluent Britons.

Given such evidence, we do not see how the Mayor can justify support for a new runway in the SE.

