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 2^{nd} 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 $\pounds 10$ 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.

A third runway at Heathrow is by far and away the government's favourite option and by supporting additional capacity in the SE, the Mayor could reasonably be taken to be tacitly supporting Heathrow expansion.

By supporting airport expansion in the SE and opposing it at Heathrow, the Mayor is adopting a classic 'nimby' approach which will allow MPs and government to disregard his opposition to a third runway at Heathrow.

We strongly support the first part of Policy C which addresses environmental impacts. However we are strongly opposed to the clause "any airport expansion scheme must be appropriately assessed and if required demonstrate that there is an overriding public interest or no suitable alternative solution with fewer environmental impacts." This is an open invitation to cite economic benefits and jobs as overriding public interest and thereby ignore the environmental and health impacts.

Policy D is ambiguous and therefore weak. "*No additional .. air quality* [euphemism for air pollution] *harm* .." is being argued by the Heathrow and national government to mean that if legal air pollution limits can be met by reduction in other sectors, increases in emission from Heathrow are all right. We do not consider such an interpretation is acceptable and we hope the Mayor does not either. It should be made clear the emissions/pollution and noise from Heathrow (aircraft plus airport plus traffic) should be lower when a third runway is in full use than they are now. This point is in fact made in 10.8.6 and ought therefore to be reflected in Policy D.

Policy H "*increase the proportion of journeys passengers and staff make by sustainable means*" is extremely weak. A small increase in the proportion of sustainable modes would mean a big increase in the absolute amount of unsustainable modes (because there would be nearly 50% more passengers and freight in total with a third runway). The policy should be to prevent an increase in absolute terms of unsustainable modes.

We support 10.8.8 except insofar as "*major investment by*.. *central government*." We do not see why London and other UK taxpayers should subsidise Heathrow by paying for schemes which are only needed as a result of airport expansion.

We very much support the Mayor's policies on protection of Green Belt and Metropolitan Open Land in Policies G2 and G3. But a third runway and associated infrastructure on Green Belt would be completely contrary to the principle of protection and should therefore be cited in Policy T8 as a reason for opposing Heathrow expansion.

Policy G2 says "*The extension of the Green Belt will be supported, where appropriate. Its dedesignation will not.*" This should be strengthened to: "Its de-designation will be opposed." This is necessary so that the London Plan can be cited when proposals are made by Hounslow council and others build on Green Belt with 'airport related development' and/or de-designate Green Belt. A similar policy should be in place for MOL.