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Aviation 2050 – the future of UK aviation consultation

(via email)

The London Assembly has done extensive work in relation to aviation, on behalf of Londoners. This work informs the London Assembly's Environment and Transport Committees' position on the Department for Transport's proposal for a new aviation strategy to 2050,¹ as outlined in this letter.

The London Assembly has had a long-standing position against the expansion of Heathrow Airport.²³ We passed a motion to this effect in June 2018, stating that: "The Assembly believes that many fundamental issues remain unresolved about the expansion of Heathrow airport. The Assembly therefore wishes to reiterate its long-standing opposition to a third runway at Heathrow airport and the Assembly resolves that, in the light of its fundamental objection to this, we will campaign to prevent its implementation."⁴ The issues that have informed this position are applicable in general and should inform the aviation strategy. We delve into these issues in detail below.

¹ <https://www.gov.uk/government/consultations/aviation-2050-the-future-of-uk-aviation>

² The Assembly has passed 9 motions since 2007 opposing expansion to Heathrow.

³ In relation to the Heathrow expansion, the Assembly's Transport Committee conducted an investigation in 2013, title "Airport capacity in London". In addition to stressing the Committee's position against Heathrow expansion, the report recommends that the Airport Commission investigates whether there is scope to use other airports more effectively to meet capacity demands in London. See report here:

https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Airport%20Capacity%20in%20London%20%28May%202013%29.pdf

⁴ <https://www.london.gov.uk/press-releases/assembly/assembly-opposed-to-heathrow-airport-expansion>

Noise footprint

The Environment Committee has studied the impact of aviation noise on the health and wellbeing of Londoners. Most recently, the Committee produced a report on aircraft noise,⁵ which included the following calls for action:

Air traffic using Heathrow and London City airports should not increase, and the proposed third runway at Heathrow should not go ahead.⁶

Even with the current thresholds, the number of Londoners disturbed by noise, some severely, would increase with any new runways or flight paths, and the level of disturbance would also increase in response to any changes in the frequency of use of existing flight paths.

The Committee reiterates its opposition to any further expansion of air traffic at Heathrow and London City Airports and to the creation of a third runway at Heathrow. Heathrow Airport's new runway proposal would enable it to grow from around 475,000 to around 740,000 flights a year. As well as adding to the overall level of air traffic, this would create new flight paths and affect around 300,000 more households with noise than a two-runway equivalent.⁷ Heathrow has also recently published plans to increase its flights to around 500,000 per year and change flight paths, including overflying new areas, even before any third runway.⁸

The Government and the Civil Aviation Authority (CAA) should regulate noise disturbance more stringently, using lower thresholds for disturbance (taking into account WHO guidelines and the need for residents to keep windows open) and mapping the combined effect of all London's airports, especially Heathrow and London City. The Mayor should support this work.

The World Health Organisation (WHO) has issued guidance showing that aircraft noise above 45 decibels on average is associated with adverse health effects.⁹ Government guidance is much less stringent, using a disturbance threshold of 54 decibels (and it is disappointing that the recent Green Paper on aviation strategy does not remedy this).¹⁰ Compensation

⁵ <https://www.london.gov.uk/sites/default/files/aircraft-noise-report.pdf>

⁶ The Brexit Alliance Group does not consider that this recommendation should apply to City airport, recommending instead that any increase in flights should not adversely affect Londoners.

⁷ <https://www.london.gov.uk/press-releases/assembly/assembly-opposed-to-heathrow-airport-expansion>

⁸ <https://www.theguardian.com/uk-news/2019/jan/08/heathrow-may-add-25000-flights-a-year-before-third-runway>

⁹ Exposure to noise can lead to auditory and non-auditory effects on health. For example: 1) noise can lead to hearing loss and tinnitus, through direct injury to the auditory system, 2) noise is a nonspecific stressor and has been shown to have an adverse psychological and physiological distress, as well as a disturbance of the organism's homeostasis. Please see: *Environmental noise guidelines for the European region*. World Health Organisation 2018. Available online at http://www.euro.who.int/__data/assets/pdf_file/0008/383921/noise-guidelines-eng.pdf?ua=1 accessed 11 June 2019. The measure of average noise used is the Lden measure, which averages noise across the Day, Evening and Night.

¹⁰ *Aviation 2050: the future of UK aviation*, UK Government Green Paper, December 2018. Available online at <https://www.gov.uk/government/consultations/aviation-2050-the-future-of-uk-aviation> accessed 11 June 2019

measures, such as sound insulation, are offered by the airports at higher thresholds again (57dB for City and 63dB for Heathrow).¹¹

Because of the way the airports select flight paths according to weather conditions, parts of London are overflowed by aircraft from at least one of Heathrow and City airports on nearly every day of the year—up to 300 flights per day.¹² Combined with concentrated flight paths, this can leave affected residents without respite and generates some of the worst impacts.¹³

Flight paths should therefore be rotated to give respite for those living under concentrated flight paths. Flight paths should be designed to minimise noise impacts: stacking, low-level overflying, and overlapping flight paths should be minimised.

We have long argued that noise from London's airports must be mapped, monitored, managed and regulated together. A London-wide view of noise impacts should also inform London-wide airspace management and flight routing.

There should be no night flights, and limits on early morning flights should be retained, and preferably strengthened, for example by extending the time of no or very limited flights to 7.00am.

There are currently restrictions on scheduled arrivals during designated night hours, with none at City and a limited number at Heathrow. Flights at night create the greatest health and wellbeing impacts, because they come at a time when other noise is less and disturb sleep. We have long opposed night flights.¹⁴

Air pollution

In the Environment Committee's response to the draft Aviation National Policy Statement,¹⁵ we outlined the serious impact of aviation on air pollution, in particular as related to Heathrow expansion.

The legal limit on nitrogen dioxide (NO₂) is breached in many London locations, including Heathrow airport and roads leading to it (particularly those towards the airport from central London). These breaches are currently projected to continue until 2028, but with a wide

¹¹ Heathrow and City airports at the Environment Committee meeting of 8 November 2018. Transcript (see pages 8-10) available online at

<https://www.london.gov.uk/moderngov/mgChooseMDocPack.aspx?ID=6432&SID=17630> accessed 11 June 2019

¹² *South East London: no respite from aircraft noise*, Tim Walker, 2018. Available online at

<http://hacan.org.uk/wp-content/uploads/2018/08/No-aircraft-noise-respite-for-London-SE23-August-2018.pdf> accessed 10 June 2019

¹³ Impacts in terms of level of noise exposure and associated adverse health effects, as outlined in *Environmental noise guidelines for the European region*. World Health Organisation 2018. Available online at http://www.euro.who.int/__data/assets/pdf_file/0008/383921/noise-guidelines-eng.pdf?ua=1 accessed 11 June 2019.

¹⁴ See 2013 response to Airports Commission consultation, available online at

<https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/london-assembly-night-flights-consultation> accessed 10 June 2019

¹⁵ https://www.london.gov.uk/sites/default/files/london_assembly_revised_nps_response_-_final.pdf

margin of uncertainty arising from factors such as the strength and speed of Mayoral, national and international policy action to reduce air pollution.

Particulate pollution also breaches World Health Organisation guidelines across London. Nitrogen oxides (NOx) and particulate emissions come from aircraft taking off, landing and running engines on the ground, from vehicles and buildings involved in airport operations, and from transport of passengers, freight, materials and staff to and from the airport, particularly by road.

The Government acknowledges that Heathrow expansion would increase air pollution – both in construction and in operation, particularly due to increased surface travel – and that this would harm the health of, and increase mortality among, people exposed to the increased pollution. However, the Government argues, as did its Airports Commission, that this is acceptable as long as it is legal, and that it is legal as long as the increased pollution from expansion does not exceed the worst pollution in the whole of Greater London, thereby delaying compliance of the region as a whole with legal limits on pollutant concentrations.

We continue to reject this ‘zonal compliance’ argument. As well as being a disputed interpretation of the law,¹⁶ it ignores pollution’s health impacts, which affect local residents and people travelling through, regardless of pollution levels in other areas. **It is arguably illegal and in any case unacceptable to worsen and prolong local breaches of health-based air pollutant concentration limits in places where people are exposed. It is also unacceptable to worsen and prolong breaches of health-based guidelines. It is acknowledged that expanding Heathrow would do this.**

Surface access

We are seriously concerned about the lack of planning for improving surface access to Heathrow Airport. The expansion of Heathrow will require significant capacity upgrades on routes to the airport. However, the Government has given little if any commitment that the necessary transport schemes will go ahead. While adopting the Airport Commission’s recommendation to expand Heathrow Airport, the Government appears to have ignored its recommendations on surface transport.

This Government’s approach risks creating severe overcrowding on London’s transport network, and undermining efforts to encourage modal shift to sustainable transport modes. It is imperative that decisions are made on precisely what surface access is required, how much it would cost and who would be expected to pay for it. In light of this, we have recommended that **a costed plan to deliver the required capacity upgrades needed to be produced before Parliament could properly consider the National Policy Statement. We also stressed that it is**

¹⁶ For example, see the legal advice of Robert McCracken QC to Clean Air in London, that planning authorities must refuse permission for developments that would create or worsen breaches of air pollution limits, and stating that the Airports Commission had misdirected itself in the law on air pollution. http://cleanair.london/legal/clean-air-in-london-obtains-qc-opinion-on-air-quality-law-including-at-heathrow/attachment/cal-322-robert-mccracken-qc-opinion-for-cal_air-quality-directive-and-planning_signed-061015/

imperative that decisions are made on precisely what surface access is required, how much it would cost and who would be expected to pay for it.

As well as additional passengers, the expansion of Heathrow would also be likely to significantly increase freight traffic. The Transport Committee heard from Heathrow Airport that, without mitigation, the number of freight trips to the airport is projected to grow by 80 per cent from its current level of 10,000-15,000 per day.¹⁷ The additional business activity around the airport will also create more freight traffic, as the Airports Commission accepted.¹⁸ This increase will have a significant impact on air quality in an area already experiencing high levels of pollution. It also risks negatively affecting local communities as freight traffic increases on the road network. **We have recommended that the Government takes a lead in the area of freight, working with TfL, boroughs, industry and the airports.**

Additionally, the National Air Quality Plan and the case for Heathrow expansion rely on Heathrow-specific measures to reduce air pollution, such as improved public transport links and an ultra-low-emission zone. Without these measures, expansion is projected to worsen pollution by a greater extent, increasing still further the air pollution impact and the likelihood of delaying zonal compliance.

In our response to the draft Aviation National Policy Statement¹⁹ **we recommended, as did the House of Commons Environmental Audit Committee, that, if expansion were approved, the cap on airport-related road traffic should be made legally enforceable, with a clear and transparent monitoring process.**

Carbon emissions

The Climate Change Act requires that carbon budgets – five-year caps on the UK’s green house gas (GHG) emissions are set on the path to the long-term target to reduce emissions of GHGs by at least 80 per cent by 2050 relative to 1990 levels.²⁰ In June 2019, the Government announced plans to amend the Climate Change Act 2008 to abide by the new, much tougher “net zero” GHG target by 2050.²¹ Currently, aviation is not included in the carbon budgets and the Committee on Climate Change (CCC) recommended that the UK should not only set a net-zero target to cover all GHGs but also include “all sectors, including aviation.”²²

We strongly support the CCC recommendation for the newly announced 2050 net-zero UK target to cover all GHGs and all sectors, including aviation. This requirement should be reflected in the revised Climate Change Act and carbon budgets.²³

¹⁷ <https://www.london.gov.uk/moderngov/documents/b14970/Minutes%20-%20Appendix%20%20-%20Transcript%20Heathrow%20Thursday%2008-Dec-2016%2010.00%20Transport%20Committee.pdf?T=9>

¹⁸ <https://www.london.gov.uk/moderngov/documents/b14970/Minutes%20-%20Appendix%20%20-%20Transcript%20Heathrow%20Thursday%2008-Dec-2016%2010.00%20Transport%20Committee.pdf?T=9>

¹⁹ See May response and updated response from June here: <https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/response-draft-aviation-national-policy>

²⁰ <http://www.legislation.gov.uk/ukpga/2008/27/contents>

²¹ <https://www.bbc.co.uk/news/science-environment-48596775>

²² https://www.london.gov.uk/sites/default/files/london_assembly_revised_nps_response_-_final.pdf

²³ The Brexit Alliance Group does not accept the premises of the Climate Change Act. The Group supports energy efficiency but does not support artificial carbon budgets.

The Environmental Audit Committee (EAC) points out that shifting emissions reductions from aviation to other sectors risks an increase in costs to the economy as a whole.²⁴ In the EAC's assessment of Heathrow expansion, it recommended that the business case for expansion must be assessed against a cost/benefit analysis that uses realistic carbon policy assumptions, accounting for the resulting impacts on other airports and sectors of the economy.²⁵ **This recommendation should be incorporated into the aviation strategy, ensuring that future aviation projects, and any proposed associated increase in flights and passengers, are appropriately assessed in terms of their impact on other sectors.**^{26,27}

Further, meeting a net zero GHG target by 2050 means that every tonne that is left from aviation will have to be offset somewhere else. To the extent that emissions remain, those have to be offset by emission removals (carbon capture). According to the CCC we do not know the extent at the moment to which we can use emissions removals, the extent to which they are technically feasible, and the costs of those options.²⁸ We heard from Plan B in October 2018:²⁹

“Then there is one other high-level point coming out of the IPCC report, which says that for something like a 50% chance of avoiding 1.5 degrees, the whole world must be carbon neutral, net zero, by 2050. If we think about that and think about 37 million tonnes of carbon just coming from UK aviation by 2050, which is the planning assumption, we quickly see the tension between the proposal and where the world has to get to in order to avoid disaster.” – Tim Crosland, Plan B

Additionally, we heard that short-haul flights make a significant contribution to carbon emissions from aviation:³⁰

“It is really a perverse situation at the moment when people look at how they are going to get to Glasgow or Liverpool or Paris and might want to get the train because they prefer the train and know the train is better for everybody else, but they find it is cheaper to get on a plane. That is a reflection of perverse Government policy and failing to set the incentives in the right place.” – Tim Crosland, Plan B

²⁴ https://www.london.gov.uk/sites/default/files/london_assembly_revised_nps_response_-_final.pdf

²⁵ <https://www.parliament.uk/business/committees/committees-a-z/commons-select/environmental-audit-committee/news-parliament-2015/heathrow-expansion-report-published-16-17/>

²⁶ In the DfT's response to this EAC's recommendation, it asserted that none of the carbon emission scenarios place additional pressure to reduce emissions on other sectors of the UK economy, except as a consequence of carbon price. However, this assessment looks only at the Heathrow expansion project only. An assessment of an expansion of the aviation sector as a whole will very likely have more significant impacts on other sectors.

²⁷ The Brexit Alliance Group does not agree with the 2008 Climate Change Act, and thus does not support this recommendation.

²⁸ <https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf>

²⁹ Environment Committee meeting, 11 October 2018

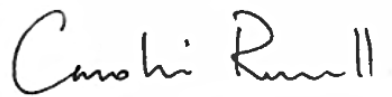
³⁰ Environment Committee meeting, 11 October 2018

In response to the IPCC Special report, the London Assembly called on the Mayor to declare a climate emergency and make London carbon neutral by 2030.³¹ The Mayor made this declaration in December 2018, but stated that in order to bring forward his zero carbon 2050 target, he would require greater powers and resources.

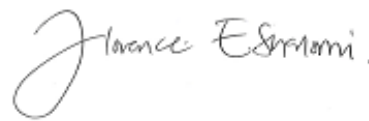
The Mayor of London and the UK Parliament have declared a climate emergency.^{32,33} In this context, **we recommend that the evidence above is used to inform the aviation strategy.**³⁴

We hope that this response, and the many others you will receive from Londoners, will inform the aviation strategy.

Yours sincerely



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³¹ <https://www.london.gov.uk/press-releases/assembly/call-on-mayor-to-declare-climate-emergency>

³² <https://www.theguardian.com/uk-news/2018/dec/11/london-mayor-sadiq-khan-city-climate-emergency>

³³ <https://www.bbc.co.uk/news/uk-politics-48126677>

³⁴ The Brexit Alliance Group states that there is no climate emergency. The Group supports steps to improve energy efficiency but rejects carbon capping.