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Rt Hon Chris Grayling MP

**Consultation response: draft Airports National Policy Statement: new runway capacity and infrastructure at airports in the south east of England**

I am writing in my capacity as a Green Party Member of the London Assembly.

I reject the proposals by Heathrow Airport Ltd, backed by the Government, to build a third, north-west runway, along with the additional facilities to go with it.

This is a proposal based on economic claims that have been shown to be over-inflated and, since the Davis report, significantly downgraded. If the full impacts of noise, congestion, air pollution and climate change are taken into account, the net economic benefit is negative. A third runway is not essential for London's economy.

The growth in aviation demand is being driven by a huge increase in leisure flights, not business flights as is often suggested. Artificially low air fares have encouraged demand and have been supported by disproportionately low taxes and subsidies. About 15 per cent of the population account for more than 70 per cent of all UK flights.

It is extremely disappointing that the Government continues to ignore the legitimate concerns of successive Mayors, the London Assembly, and millions of Londoners who have consistently opposed expansion at Heathrow.

The proposals for a third runway in the draft *Airports National Policy Statement: new runway capacity and infrastructure at airports in the south east of England*<sup>[1]</sup> will lead to



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more traffic congestion and air pollution in central and west London as well as around Heathrow. Local and strategic roads will not be able to cope with the additional demands arising from increased passenger and freight traffic.

The proposals seriously undermine the Mayor's efforts to tackle air pollution. If implemented, Londoners will have to wait a lot longer to be able to breathe air that is safe and within legal limits. The proposals are incompatible with the High Court judgement requiring the Government to reduce people's exposure to illegal levels of pollution in the shortest time possible.

London is already the most overflowed and densely populated region in Europe. The third runway and additional flights will mean that for the first time an additional 200,000 people will have their lives blighted by aircraft noise. The proposals also reduce the period of respite people have from half a day to one third. This is unacceptable.

The proposal makes a mockery of the Government's ratification of the Paris Agreement and sends a signal that it is business as usual. Significant cuts to carbon emissions are required now and in the near future. Accelerating climate change through massive aviation expansion is reckless, given the increasing risks to London's economy from national and imported climate-related risks, as highlighted by the London Assembly Economy committee<sup>[iii]</sup>.

I urge the Government to redirect its efforts from Heathrow expansion to improving and developing viable and affordable rail links to the short haul flight destinations (national and international) that use Heathrow. For instance, making better use of existing infrastructure and the 10 million Eurostar seats a year of unused capacity<sup>[iiii]</sup>.

I also urge the Government to look at the feasibility of introducing a Frequent Flyer Levy<sup>[iv]</sup>. This would come into effect on the second flight each tax year, and increase proportionally with each flight taken thereafter. This would remove the need for airport expansion at Heathrow.

## **Aircraft Noise**

Noise from Heathrow airport already affects more than 700,000 people. The number would rise to more than a million with a third runway. This has significant health impacts with extensive evidence showing that exposure to aircraft noise has adverse effects on cardiovascular disease, on sleep disturbance, on children's education, annoyance and other psychological effects of those living under flight paths and near airports<sup>[v]</sup>.

The Government claims that fewer people will be affected by noise with a third runway in 2030 than today. This is simply not credible. The number of noise complaints has been increasing, casting doubt on government assurances. Too much weight is given to individual aircraft and not the cumulative number of aircraft and impact on people.



The Government claims that quieter planes and changes to take-off and landing paths involving steeper angles will bring noise reductions. However these are largely untried to assess the extent of any benefits. What is certain, the enormous increase of air traffic movements, from 480,000 to 770,000 a year will nullify these mitigation measures. The Government needs to set binding noise reduction targets that reflect the effects of noise on well-being and perceived nuisance.

Furthermore, the enforceable powers of the widely recommended Independent Aviation Noise regulator remain unclear. There is concern that the Government is watering down the powers it intends to give to a new noise oversight body<sup>[vi]</sup>. This raises even more doubts about whether the Government can deliver on its claims. Londoners affected by aircraft noise need an effective independent regulator that has the power to take action if unacceptable levels of disturbance occur.

The Government has committed to a ban on night flights. The Airports Commission recommends it should be from 11.30pm to 6.00am and at Heathrow a ban from 11pm to 5.30am. Both are inadequate and only offer 6.5 hours of relief from noise rather than the eight-hour period recommended by the World Health Organisation<sup>[vii]</sup>. The Airport Commission's own evidence (Final Report, Table 14.1, p280) shows that there are vastly improved health benefits by extending the curfew hours to cover the full eight-hour night time period.

### **Air pollution and traffic congestion**

The Government has underestimated the impacts on road and public transport of a fully operating third runway. The public transport to Heathrow is already very congested and the planned improvements were designed for the existing two runway airport and the demand in background growth. Local and strategic roads will not be able to cope with the additional demands arising from increased passenger and freight traffic<sup>[viii]</sup>.

Heathrow's commitment to 'strive to meet its public pledge that aims to have landside airport-related traffic no greater than today'<sup>[ix]</sup>, is not credible, nor is this a condition of consent and thus, carries no weight.

The Government acknowledges that Heathrow expansion would increase air pollution, particularly due to surface transport. It argues, as did the Airports Commission, that this is acceptable as long as the increased pollution 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.

This 'zonal compliance' argument is unacceptable. In effect, people's exposure to illegal levels of harmful air pollution will continue and possibly increase, prolonging local breaches. This is in contravention to the High Court ruling ordering the Government to



draw up and implement plans that ensure that Nitrogen Dioxide (NO<sub>2</sub>) limits values are met and people's exposure reduced in the shortest time possible<sup>[x]</sup>.

The Mayor stated that he was *'not persuaded further expansion of airports within London would be compatible with my aim of achieving legal limits for air quality as soon as possible.'*<sup>[xi]</sup>

Furthermore the strengthening of the Mayor's proposed Ultra Low Emission Zone, which is likely to bring forward compliance in inner London, makes it more likely that pollution levels near Heathrow could become the factor delaying zonal compliance<sup>[xii]</sup>.

The environmental, economic and health case against the third runway at Heathrow is overwhelming. I hope that you will not continue to waste even more Government resources on this undeliverable scheme.

Yours sincerely



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**Green Party Member of the London Assembly**

[i] [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/588764/draft-airports-nps-web-version.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/588764/draft-airports-nps-web-version.pdf)

[ii] <https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/weathering-storm-impact-climate-change-londons>

[iii] [http://www.eurotunnelgroup.com/uploadedFiles/assets-uk/TheGroup/Operations/Railways/DRR\\_NS\\_2016\\_EN\\_Final1.pdf](http://www.eurotunnelgroup.com/uploadedFiles/assets-uk/TheGroup/Operations/Railways/DRR_NS_2016_EN_Final1.pdf)

[iv] <http://afreeride.org/>

[v] <https://publicapps.caa.co.uk/docs/33/CAP%201278%20MAR16.pdf>

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

[vii] [http://www.euro.who.int/\\_\\_data/assets/pdf\\_file/0017/43316/E92845.pdf](http://www.euro.who.int/__data/assets/pdf_file/0017/43316/E92845.pdf)

[viii] Assessing the work of the Airports Commission, A report by Hillingdon, Richmond, Wandsworth and Windsor and Maidenhead councils, members of the 2M Group. October 2015

[ix] <https://www.gov.uk/government/speeches/additional-airport-capacity-and-airspace-policy-reform>

[x] <https://www.judiciary.gov.uk/wp-content/uploads/2016/11/clientearth-v-ssenviron-food-rural-affairs-judgment-021116.pdf>

[xi] [http://questions.london.gov.uk/QuestionSearch/searchclient/questions/question\\_289362](http://questions.london.gov.uk/QuestionSearch/searchclient/questions/question_289362)

[xii] <https://www.clientearth.org/uk-government-fails-reassure-heathrow-air-quality/>

