

## Airports Commission Consultation: Response by Reigate & Banstead Green Party

February 2015

### Introduction

The Airport Commission has been tasked with examining the need for additional UK airport capacity. Its assessments to day have led it to conclude that, “... one new runway, with the capacity to handle around 200,000 aircraft movements a year, will be needed to maintain the UK’s connectivity and hub status, which is what our brief from the Government invites us to secure” and it is now consulting on its assessments and assessment results for three proposed options:

- Gatwick Second Runway
- Heathrow Extended Northern Runway
- Heathrow North West Runway

We commend the amount of work done by the Commission. However we feel the Commission has not adequately examined the evidence and the conclusion that a new runway is needed at Heathrow or Gatwick is flawed, and influenced by a pro-aviation industry bias.

Many residents in South East England suffer the consequences of air and noise pollution from aviation. The Government has a duty to protect citizens, especially the vulnerable, and the environment. Health and environmental impacts, together with the full impact of any new runway on surrounding built environment and infrastructure, should be given adequate scrutiny at this stage, to ensure that the eventual decision does not erode quality of life or damage the environment.

Here we present our responses to the specific questions on the Commission’s consultation web page, and we follow with more detailed observations, recommendations and conclusions.

*Q1: What conclusions, if any, do you draw in respect of the three short-listed options? In answering this question please take into account the Commission’s consultation documents and any other information you consider relevant. The options are described in section three.*

**Our overall conclusion is that the Airport Commission has not provided sufficient evidence, or analysis, to demonstrate that any of the three options can be delivered sustainably. See discussion below.**

Q2: Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in section three.

**See below.**

Q3: Do you have any comments on how the Commission has carried out its appraisal? The appraisal process is summarised in section two.

We feel that some crucial areas have not been adequately assessed, including local air quality impacts, the costs associated with meeting emissions targets, health impacts, noise impacts, and impacts on the wider economy.

The report does not show that potential negative economic impacts have been evaluated.

Q4: In your view, are there any relevant factors that have not been fully addressed by the Commission to date?

See below.

Q5: Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results? We do not believe that many topics, including climate impact, local transport and health, have been considered in sufficient detail – as set out below.

See also other comments below, particularly in sections 1, but also the need for wider inclusion of social and environmental impacts as set out in sections 2-7.

Q6: Do you have any comments on the Commission's sustainability assessments, including methodology and results?

We do not consider that the sustainability assessments, at a systemic level, accord with the UK's Sustainable Development Strategy.

The Commission's Terms of Reference ("to examine the scale and timing of any requirement for additional capacity to maintain the UK's position as Europe's most important aviation hub, and it will identify and evaluate how any need for additional capacity should be met in the short, medium and long term... [and in doing so]...maintain a UK-wide perspective, taking appropriate account of the national, regional and local implications of any proposals") excludes the crucial consideration of sustainability, which should reflect the UK definition of sustainable development, for which the goal is "*quality of life for all within environmental limits*"<sup>1</sup>. The UK Sustainable Development Strategy sets out that sound science, good governance and economics are supporting aims to this objective.

Specific comments are included in the sections below.

Q7: Do you have any comments on the Commission's business cases, including methodology and results?

No comment. Requests for additions in this area set out below.

Q8: Do you have any other comments?

See below.

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<sup>1</sup> *Securing the Future*, UK Government, 2005

## Detailed submission

### 1. Climate change and aviation's role in developing a low carbon UK economy

#### 1.1 Inclusion of international aviation in UK carbon budgets

Airport expansion in the South East would be in direct conflict with the Government's responsibility to reduce UK emissions by 80% by 2050 from 1990 levels.

The UK Climate Change Act requires the government to 'take account' of aviation, but not include it in the current carbon budget. In fact, international aviation (which accounts for more than 95% of UK aviation's carbon emissions) and international shipping have not been included in any of the first four of the UK's carbon budgets.

The decision about new runways will affect all future carbon budgets and how they will be achieved. The government is due to review whether to include international aviation in the fifth carbon budget in 2016.

This means there is a risk that the current inconsistent policy on carbon emissions in UK aviation forms part of the context for the Airports Commission. Currently the aviation sector is allowed to **double** emissions from 1990 to 2050 (and exceed this in the interim).

**The Airports Commission must follow the advice of the Committee on Climate Change, and ensure that its decision does not jeopardise the UK's ability to meet its legally binding 2050 carbon target.**

**We recommend that the Commission accept the need for aviation carbon targets to both be within the UK carbon budget (as recommended by the Committee on Climate Change) and significantly reduced. Otherwise it will be rubber stamping the current unsustainable growth of aviation emissions allowed within the overall UK target, which has the effect of increasing the target for ALL other sectors of the UK to an 85% carbon reduction by 2050 - just to meet (let alone stay within) the current carbon target of 80% reduction by 2050.**

**Rather than accept the current omission of international aviation (and shipping) from the UK's carbon budgets, the Airports Commission should set out a plan for aviation capacity that stays within carbon budgets, and should therefore recommend that international aviation and shipping are included in all future carbon budgets.**

#### 1.2 Direct impact of expansion of Heathrow or Gatwick on carbon emissions

The Airports Commission's own figures show that expansion of neither Heathrow nor Gatwick can be achieved within our carbon budget.

That is not surprising. Currently Heathrow produces 9.5 million tonnes of carbon dioxide (CO<sub>2</sub>) per runway: a total of around 18.5 million tonnes CO<sub>2</sub> (equivalent) pollution each year. And a two-runway Gatwick is forecast to handle 96 million passengers a year, bigger than Heathrow's current passenger capacity.

As all three runway options proposed are the same physical capacity, and so would produce the same capacity increase, they are judged to increase emissions by the same amount – 8-9 million tonnes of CO<sub>2</sub> (equivalent) per year.

Recommendation: As all three runway options proposed are the same physical capacity, so would produce the same capacity increase, are judged to have a similar estimate of 8-9 million tonnes of CO<sub>2</sub> (equivalent) per year.

The Airports Commission's own statistics suggest that the only way to stay within the carbon budget is to restrict flights. The simplest way to do this, and the one which will be effective from the moment the decision is taken – is not to expand runway capacity. The Airport Commission suggests that flights are restricted **once airports are expanded**. This is like attempting to restrict car movements **after** widening the M25, or perhaps like attempting to close a stable door after a horse has bolted.

The Commission proposes increasing the price of carbon (in the longer term) but has not done any work on the carbon price and what the economic cost of this would be. An expanding airport would therefore seek to achieve a greater return on investment in its new runway in the short term, before the higher costs kick in<sup>2</sup>.

**The Commission must carry out the analysis called for by the Committee on Climate Change – this needs to be done before the Commission can make its final report.**

**As the aviation market is global (as reflected in competition, to some degree, between hubs in the UK with continental Europe and the Middle East), the Commission should commission research and review any existing analysis into the cumulative impact of overcapacity provision across Europe on the overall sustainability and climate targets, both for the EU and globally.**

**We note that the carbon emissions forecasts produced by the Airports Commission are considerably lower than the DfT's most recent forecast in 2013. The reason for this must be clearly set out and referenced by the Airport Commission.**

### **1.3 Wider economic and carbon impact of aviation capacity expansion in South East England**

The expansion of an airport does not just impact upon the carbon emissions of the aviation sector but impacts upon the structure, scale and inter-relations within the wider economy. For this reason wider analysis is required to ascertain the broad impact that the airport will have on economic development and sustainability – including impacting the non-aviation impacts within the UK carbon budget. This should be reflected in the Strategic Environmental Appraisal for the Airport Commission Terms of Reference (and the three proposed schemes), and be supported by detailed research.

Analysis is therefore required to set out how the proposed intensification of aviation focused in the South East of England leads to indirect emissions, not just associated with the construction of the airport and associated infrastructure in the immediate catchment area, but with the UK economy. This includes the impact of concentrating economic development (as well as major transport links) in one region.

Business interests – particularly the airports themselves (HAL and GAL) want to grow themselves, regardless of local impacts or wider environmental consequences. But the way we change the UK's infrastructure, especially aviation, will to some degree 'lock in' the future pathway for our economy.

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<sup>2</sup> The argument that the airports would prefer to run more runways for less of the time does not stand up to analysis. Optimum runway use appears to be 95-96% capacity (as opposed to the current 98% at Heathrow) as this is the amount that maximises income. If investing in a new runway asset, the airport will naturally want that to be a profitable decision and to make extensive use of a new runway to repay this investment.

To be sustainable these must be more local, with less transportation and associated resource and energy use. Expansion of international aviation and shipping is inconsistent with this. We believe the Airports Commission must not blindly adopt a business view but must face up to the impact that aviation has on the shape and scale of different aspects of the UK economy, and how these in turn generate different social and environmental impacts.

Expansion of Heathrow or Gatwick Airport risks increasing the propensity for Heathrow and Gatwick to outcompete airports elsewhere in the UK – further centralising the UK economy in London and the South East – at least in the short to medium term. This could further increase surface transport emissions associated with flying (increasing origin/destination journey lengths to these airports within the UK).

Also, the additional runway proposals could change the scale of commuting from London from other parts of the UK and the potential for sustainable low or zero carbon economies across the UK is thereby further constrained.

**The wider economic and transport implications of focusing airport growth capacity in London and the SE should be considered by the Airport Commission.**

**The Commission should assess the wider economic and transport implications of *focusing airport growth capacity in London and the South East*.**

**The Commission should carry out a full Equality Impact Assessment of the decision to focus expansion in the SE of England (including impacts on those not in these areas, and on inequality within these areas) and this should be included in the Airport Commission's analysis.**

**This prioritisation of sustainability should be applied to the Airport Commission's appraisal framework<sup>3</sup> and fully reflected in the Airport Commission's analysis.**

## **1.4 Avoidance of stranded assets**

As a result of UK and international climate commitments, a dramatic increase in carbon prices is anticipated in official forecasts from 2020. If these materialise, a new runway could become a 'stranded asset' and therefore a wasted investment.

There are signs that this is beginning already. Both EasyJet and British Airways are against a runway expansion at Gatwick – because they do not want to use Gatwick with higher landing charges. They represent 37% and 14% of flights from Gatwick: more than half of Gatwick's flights combined. Therefore operators do not support the business case for expansion at Gatwick, in even current conditions.

## **2. Air quality impacts**

Air pollution is a public health crisis. In many areas in the UK air pollution is above the EU safe limits, with London being the worst. Annual UK deaths attributable to NO<sub>2</sub> and PM are estimated at around

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<sup>3</sup> While this is presented as a 'balanced scorecard' type set of indicators, it should be considered with the priority order set out, including full implications of the negative implications on economics, as well as social and environmental aspects.

55,000<sup>4</sup> of which 29,000 are due to PM2.5. In the South East 5.5% of deaths are attributable to air pollution. It is imperative therefore that any airport expansion proposals are assessed in terms of the impacts upon air quality and specifically their impact upon the UK's ability to meet EU air quality standards.

Local dispersal modelling has not been carried out to date by the Airports Commission, which prevents a detailed assessment of whether or not a new runway would breach legal air quality limits. We note that both Heathrow and Gatwick currently regularly breach legal air quality limits (and the whole of Spelthorne Borough is an Air Quality Management Area), and it is hard to see how this could improve with the addition of more flights at either airport. Increasing flights, with the associated surface transport, at either airport will make it impossible for would also have a serious negative impact on health, which has not been assessed<sup>5</sup>.

The Commission must ensure that any development reduces rather than increases air pollution so that it is within EU and national limits. This must be based on measures directly associated with the planned runway expansion proposals. The relative impact of Heathrow and Gatwick expansion on freight traffic, both directly and associated with expected indirect economic and business growth in airport catchment (as reflected in HAL and GAL's direct marketing of their expansion plans to local businesses in a 20 mile radius) should also be clearly analysed.

**Comprehensive computer modelling of the air pollution impact of the different schemes must be carried out, with an opportunity for public consultation, for integration into the final report.**

### **Local transport impacts**

Also, no data or consideration on impact to local transportation is set out. This is an important aspect and should have been commissioned and made available during this public consultation period. It is crucial to consider the volume of additional journeys (passengers and workers) to Heathrow or Gatwick and the knock on impact this will have on communities and other businesses.

The extent to which Heathrow or Gatwick expand their use of existing rail and bus capacity would have a knock on impact on the need to also create a modal shift to sustainable transport options.

The notion that no additional rail infrastructure and capacity is proposed associated with the Gatwick bid is unacceptable. Road and rail routes to Gatwick are already over capacity. Expansion of Gatwick would necessitate electrification and intensification of the Gatwick to Reading 'North Downs Line' and associated station and interchange improvements to be included within the Commission's transport requirements. Many of the transport measures to create a modal shift in association with runway expansion at Heathrow are already required for the existing airport's operation and to help remove the whole of the Spelthorne (and much of London) from Air Quality Management Area status.

Likewise if the focus on local transport strategy in the area surrounding an expanding airport prioritises capital investment bids (led by Local Economic Partnerships with matched funding from Local Authorities) over improving public transport operations, then in seeking to secure its own 'sustainable transport options' airport-focused transport policy could preclude the possibility of local

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<sup>4</sup> Clean Air in London, November 2014

<sup>5</sup> See <http://www.airportwatch.org.uk/2014/11/airports-commission-consultation-shows-air-quality-problems-with-new-runways-but-no-adequate-data-yet/>.

sustainable transport. This applies both in the immediate vicinity of expanding airports and strategically for the UK as the overall development pathway is reflected in national transport priorities and budgets.

We do not agree with the argument that the cost of new transport infrastructure should be balanced between beneficiaries, including for the reasons set out above. Instead, it should be attributed totally to the airport on the basis that it is the airport expansion that will cause the congestion and air pollution impacts to further deteriorate.

**The full economic cost of additional surface access, which we believe should focus wholly on how this can be delivered through expansion of sustainable transport modes, must be fully financially met by the airport which undergoes expansion.**

### **3. Flood risk**

There have been significant flooding incidents in the vicinity of Heathrow (upstream) and Gatwick (downstream), notably in January and February 2014. Heathrow certainly has a big impact on flooding and drainage in its surrounding area and its expansion would increase this pressure. Similarly, Gatwick may have increased flooding downstream in 2014, although the exact cause and effect is not proven. Either way, expansion would require significant associated drainage infrastructure, which would increase the land required for an airport expansion. For example, balancing ponds will be needed, and systems to ensure the increased scale of ethylene glycol run-off (in particular) does not pollute local water courses.

**The wider, direct and indirect, impact and risk of flooding must be fully considered in the Airport Commission's analysis, in line with the above.**

### **4. Noise**

Noise pollution can cause cognitive problems, particularly for young children, high blood pressure, hypertension and related cardiovascular problems. It can cause sleep disturbance, which can lead to insomnia and reduced productivity.

We understand that the flights paths, and the total noise impact will not be determined fully until much later. We note that all of the options would change current flight paths and add more flight movements – which will have the effect of increasing noise pollution. The impact upon tranquillity, i.e. consideration of the change from base noise levels as well as absolute noise contours, should also be considered.

**The full, qualitative as well as quantitative, impact of noise pollution needs to be fully reflected in the Airport Commission's analysis.**

### **5. Health**

The collective health impacts from poor air quality and noise are not presented and neither has a health impact assessment been carried out. While we understand that more work is expected before the Commission publishes its final report in the summer we do not consider this acceptable. Analysis of health impacts should have been presented to the public as part of this consultation.

We note the detailed response submitted by the London Borough of Hillingdon<sup>6</sup> highlighting the limited amount of work undertaken to date on the impacts of aviation on health. We are equally concerned that the health impact assessments regard a huge number of aspects as not serious and disagree that it is appropriate to leave consideration of these aspects until a planning application is submitted. This is **much** too late. In particular we are concerned about the impact of airport expansion on disabled children and those with mental health problems. The lack of detailed analysis in this area, in our view, constitutes a serious omission.

**The Commission must fully assess health impacts at this stage.**

## **6. Wider social issues**

We are also concerned about social issues. We do not consider that reducing the issue of blight to an economic impact is sufficient, as it is people's lives and communities that are blighted, not just property. The human and social impact of the breaking up of communities should be investigated in more detail. This should include the levels of distress, considering blight in terms of the social cost of moving communities, and how the human cost of more plane noise afflicts individual lives.

The Commission has not yet commissioned sufficient research and subsequent analysis on the impact of losing homes at Gatwick or Heathrow, replacement of tranquillity with blight (in wider non-economic terms) and the destruction of the communities in the Heathrow villages.

**The Commission can not just rely on numerical analysis of blight but must commission detailed qualitative research into the human and social impacts of the changes proposed.**

## **7. Housing and associated infrastructure**

The Airports Commission appears unconcerned that a new runway at either airport will likely increase population growth in the surrounding areas – displacing it from elsewhere across the UK as a result of the concentration of new jobs associated with expansion. This will mean an increase in pressure on infrastructure and countryside (including Green Belt) and communities.

The estimate of additional housing associated with airport expansion over 14-15 boroughs as opposed to closer to the airports should be supported by quantitative analysis and UK-based comparative case study data. The local transport impact of this scenario should be fully analysed. The estimation of increase in housing should be reflected in terms of a) absolute additionality over the next 15 years and b) up to 2050 which is the period of consideration for the runway expansion plans.

The impact of this on current local authority housing targets should be clearly presented. For example, there is **no** additional capacity in Reigate and Banstead without encroaching on the Green Belt. Similarly Croydon revised down its housing target to ensure its Green Belt, which is also part of London's Metropolitan Green Belt, would be protected in its new Local Plan.

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<sup>6</sup> <http://modgov.hillingdon.gov.uk/documents/s24915/Appendix%201%20-%20Hillingdons%20response%20to%20the%20Airports%20Commission%20Consultation.pdf%C2%A0>



The impact of expansion at either airport on London's Green Belt and other greenfield strategic or local gaps between defined communities should be clearly set out. The scale of greenfield (including Green Belt) and brownfield housing and other development for each site should be clearly expressed in hectares. This is in addition to that directly associated with the proposed expansion (drainage and associated infrastructure and buildings/terminal as well as runway itself).

**The likely implications in terms of not just housing, but associated employment and infrastructure – not just the runway itself – should be set out clearly in an overall physical plan indicating the total impact, including total land-take, both directly and indirectly associated with a decision to add an additional runway to either of these two airports.**

## **8. No need for a new runway**

The Commission has not given sufficient consideration to the arguments presented in support of the view that there is no need for a new runway in the South East.

The UK is already one of the most connected countries in the world. London's five airports serve more routes than any other European city already. Furthermore, all other airports in the country excluding Heathrow are underused. Stansted, Luton and Birmingham are not forecast to be full until the late 2040s. Other airports north of London are only half full<sup>7</sup>.

If the trend for more passengers per plane continues, there will be no need for a new runway. Other changes in the wider world are likely to reduce demand for aviation. These include higher costs due to carbon pricing and changes in the tax regime: the aviation industry is currently exempt from VAT and fuel tax. Aviation's public subsidies combined with exemptions from excise duty and VAT amounts to €40 billion a year across the EU. If this subsidy regime is dismantled, the demand for flights will fall. And nine of the ten most popular destinations from Heathrow are short haul flights. These could be replaced by rail, including European continental services.

**Effective use of existing infrastructure, including regional airports, should be given preference over building new capacity.**

**The Airports Commission should analyse the potential impacts of removing aviation's subsidies, taxing the industry fairly and reducing short-haul flights as a workable alternative to expanding airports.**

## **Conclusion**

We conclude that The Airports Commission has not satisfactorily demonstrated that a new runway is needed at all.

We further contend that expansion at either Heathrow or Gatwick would have unacceptable impacts in terms of climate, noise, local air quality, health and quality of life for residents. An outcome that

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<sup>7</sup> The Airports Commission Interim Report indicated that Stansted will be full by 2041 (figure 2 page 13) but that related to the current planning limit of 35 million passengers a year. The Technical Appendix Table 6.5 shows that Stansted will not reach maximum capacity of 45 million until nearly 2050. That is on the 'carbon capped' forecast which assumes aviation will be kept within the Government's climate change limits.

*the UK has the most effective and extensive aviation system, even if not necessarily the biggest hub*<sup>8</sup> is not consistent with the UK's wider sustainability and climate change commitments.

Further work is needed to evaluate the health, air quality and climate impacts, before any decisions are taken. The Airport Commission must clearly set out the way in which changes to the scale and location of the UK's aviation businesses affect the social and environmental sustainability of the UK economy.

Any changes to aviation must lead to an improvement, not a reduction, in the quality of life of local communities and must contribute towards developing our economy towards one that operates within environmental limits.

This means that the Commission's Terms of Reference should be interpreted so that the impact of airport expansion on noise, air pollution, local transport, health and wider social issues, housing demand and countryside in terms of land-use changes, and the wider sustainability of local economies across the UK within carbon budgets are not just analysed in terms of 'how much impact' they receive but judged in terms of the extent to which they are improved. The Commission must follow the advice of the Committee on Climate Change, and ensure that its decision does not jeopardise the UK's ability to meet its legally binding 2050 carbon target.

Our communities, our future sustainability and global leadership and shared commitments on climate change should not be sacrificed, or considered subservient to expanding our economy. So, a much higher bar is required in terms of how the Commission assesses whether individual business interests and the aspirations of those who fly most are able to trump established frameworks that seek to ensure the economic development pathways we take benefit us all, and our common future.

Reigate and Banstead Green Party  
February 2015

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<sup>8</sup> Airport Commission, verbally stated aim, briefing to Surrey County Council, January 2015.