

# **ADDING CAPACITY AT HEATHROW AIRPORT**

## **CONSULTATION RESPONSE**

### **OF**

## **SOUTH EAST ENGLAND REGIONAL ASSEMBLY**

**February 2008**

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### **Summary**

Having considered the evidence presented in support of the consultation on adding capacity at Heathrow Airport the Regional Assembly has concluded that the Government has yet to prove that the proposal is consistent with its policies on sustainable economic growth.

The Regional Assembly argues that it is premature for the Government to take a decision 'in principle' to promote further expansion of Heathrow Airport until further consideration has been given to, and a satisfactory solution identified for the following issues:

- i) The extent to which the increase in CO<sub>2</sub> emissions arising from an increase of 50% in permitted air traffic movements at Heathrow Airport can be consistent with the Government's commitment to address issues of climate change;
  - ii) The extent to which the increase in noise disturbance arising from the expansion of permitted air traffic movements will have an adverse impact on the quality of life for residents directly affected by the change;
  - iii) The extent to which the proposal is dependent upon the introduction of as yet unspecified transport measures that will both increase overall level of access and reduce the environmental impact of movements on the transport networks in and around the airport. In the absence of detailed proposals it is impossible to come to a view as to whether such measures are both deliverable and affordable.
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### **I. Context**

- I.1 The 'Future of Air Transport White Paper' (usually referred to as the "Aviation White Paper") was published in November 2003 and sets out the Government's view on the future role of the UK's principal airports over the period to 2030.
- I.2 The Aviation White Paper identified that there were a number of key issues arising from the proposal to expand Heathrow Airport that needed to be satisfactorily addressed if the proposal was to be acceptable. The White Paper identified specific issues in respect of the impact of any future expansion on housing demand, infrastructure and the environment.

## 2. The Assembly's Policy Position

- 2.1 In 2002 and 2004 the Regional Assembly commissioned consultants to review the evidence base used to underpin the Aviation White Paper<sup>1</sup>. These reviews identified that a realistic level of passenger demand on which to base future airport provision was 240 million passengers per annum (mppa). This was in contrast with the Government's assumption that provision was required to accommodate 300 mppa.
- 2.2 At this level of growth there is a need for only one additional runway to be constructed in the wider South East and on the evidence available this should be located at Stansted Airport. In arriving at this position the Assembly reaffirmed its support for the expansion of facilities at both Heathrow and Gatwick Airports up to their current planning limits (i.e. 2-runway/5-terminals at Heathrow Airport; 1-runway/2-terminals at Gatwick Airport).
- 2.3 The key concerns upon which the Assembly's position is based are the adverse impact of further growth on the environment (in the widest possible sense) and the implications arising from further expansion at Heathrow Airport in what is already an extremely tight labour market.
- 2.4 In seeking to move the policy agenda forward the Assembly has consistently advocated that:
  - a) Government policy in respect of aviation must move on from the predict and provide approach;
  - b) There is a need for improvements in the operation of the aviation market so that it can set an economically efficient level of demand for aviation services;
  - c) There is a need to take policy steps to mitigate aviation's impact on climate change and sustainability in the wider sense;
  - d) Stronger emphasis should be given to regional/sub-regional air services as a means of increasing the economic and social benefits;
  - e) Stronger encouragement must be given to the development of alternatives to air services, particularly with regard to short haul air services for which rail services provide a viable alternative.
- 2.5 In responding to the current consultation document the Regional Assembly has focused on the extent to which the new evidence base addresses the issues identified as part of our previous consideration of the Government's proposal to expand capacity at Heathrow Airport. This response is therefore focused on consideration of the following issues:
  - i) Climate Change (CO<sub>2</sub> emissions)
  - ii) Surface Access
  - iii) Air Quality
  - iv) Noise
  - v) Blight

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<sup>1</sup> The Implications of the Aviation White Paper for South East England: Understanding the Evidence Base, May 2005, RTP

- 2.6 This response has been informed by an assessment of the evidence base commissioned by the Regional Assembly and undertaken by consultants. A copy of the consultants' report is included as supporting evidence to this response.

### **3. Climate Change**

- 3.1 While it is clear that the modelling of potential impacts has improved, the fact remains that the proposals set out in the consultation document will have an environmental impact. The evidence published by the Government clearly shows a substantial increase in carbon dioxide levels as a consequence of the proposed 50% increase in permitted air movements.
- 3.2 It is the Assembly's contention that an increase in carbon dioxide levels on the scale set out by the Government is inconsistent with its commitment to reduce the impact of human activity on climate change.

### **4. Surface Transport**

- 4.1 It is clear that the work undertaken to support the consultation document has focused primarily on consideration of the broad issue of air quality aspects of surface transport. However there is no specific package of transport proposals put forward in support of the options set out in the consultation document. The lack of such detail casts doubt as to the extent to which the assessment of the impact on air quality can be meaningful.
- 4.2 Of equal concern is the fact that the absence of a clear set of proposals makes it impossible to gauge whether the access requirements are deliverable within the timescale associated with the proposal to expand capacity at the airport. Nor is it possible to take a view as to whether such a package is affordable within the likely level of funding available. No assessment is possible as to whether the access measures to be put in place will reduce the overall level of dependency on the car as the means of access.
- 4.3 It is not credible for a decision to be taken 'in-principle' to promote further expansion at Heathrow Airport without having given proper consideration to the issue of surface access.
- 4.4 The lack of detailed proposals for surface access means that it is impossible to assess their implication as part of a meaningful sustainability appraisal. It is therefore the Assembly's contention that there is insufficient evidence to demonstrate that the proposal will not result in an adverse impact on air quality.

### **5. Air Quality**

- 5.1 It is acknowledged that this is an aspect of the current consultation where a significant amount of work has been done in an attempt to improve the evidence base.
- 5.2 On first reading it appears that this additional work shows that air quality levels would be within the prescribed limits. However this appears to be

largely as a result of a reduction in road vehicle emissions. In light of the lack of clarity and certainty regarding the improvements to surface access required to achieve the reduction in road vehicle emissions there has to be a fundamental doubt as to whether the improvement in air quality will in fact be realised. At the very least the robustness of the evidence base presented should be the subject of sensitivity testing.

## **6. Noise**

- 6.1 The 'Attitudes to Noise from Aviation Sources in England' (ANASE) study that was commissioned in support of the work the expansion proposals is extremely important; the previous study into noise being over 20 years old.
- 6.2 One of the key reasons for commissioning ANASE was because the Inspector for the Terminal 5 Public Inquiry recommended a fresh look at the  $L_{Aeq}$  index. In addition it was considered that there was a need to put a more appropriate value on the impact of aircraft noise.
- 6.3 The outcome of the ANASE study is used as a key input into the Government's assessment of the nature, quality and appropriateness of the evidence base relating to the impact of the proposals on noise levels. Regrettably, serious questions have been raised about the robustness of the study's outcome. Indeed the study has been severely criticised by one of the peer group review bodies, who stated that '...issues have caused the reviewers to lose confidence in the work of the researchers.'
- 6.4 The lack of conclusive ANASE model results has led to a reliance on the use of the established and flawed leq noise methodology and this arguably renders the new analysis at best flawed.

## **7. Blight**

- 7.1 While the direct physical impacts of the proposals are set out within the consultation documentation, the impacts of the land take and operation of the third runway on adjoining settlements is underplayed, as is the considerable adverse impact of the construction. There is no doubt that as of the time of publication many thousands of people and their communities are blighted - to varying degrees - by the proposals for a third runway. This is not explicitly acknowledged in the paper.

## **8. Conclusion**

- 8.1 It is clear that the evidence base continues to have several large gaps in it and as a consequence there is no over riding case presented to demonstrate that proposals are consistent with the Government's own policies on sustainable economic development.
- 8.2 The key role that aviation plays in supporting both the regional and national economy is not in question. However in considering the proposal to actively promote further expansion at Heathrow Airport it is important to bear in mind the warning set out in the Stern Review; the investment that takes place in the next 10-20 years will have a profound effect on the climate in the

second half of this century and in the next. Make the wrong policy decision now and it will be difficult or impossible to reverse these changes.

- 8.3 While the Eddington review emphasises the importance of aviation in support of the national economy it goes on to note that transport is amongst the fastest growing carbon-emitting sectors and also has among the highest abatement costs.
- 8.4 Stern identifies the transport sector as potentially being amongst the last sectors to experience absolute cuts in emissions. He notes that this is likely because it would be more efficient to focus first on those sectors which can abate most cheaply. Eddington concludes that transport policy has no choice but to respond to the challenge of climate change, for both environmental and economic reasons.
- 8.5 A truly integrated approach to transport provision should seek to improve the use of the capacity available at Heathrow Airport once Terminal 5 is opened. In particular there are undoubtedly opportunities to promote substitution of short haul aviation by rail services, thereby offering the opportunity to reallocate valuable landing slots in favour of long-haul air services that form part of the network of global connections.
- 8.6 To describe the proposals set out in the consultation document as “sustainable” is therefore not supported by the supporting evidence and is arguably misleading.

**South East England Regional Assembly  
February 2008**