

Consultation on the Mayor's Transport Strategy

Response from the Aviation Environment Federation

12th January 2010



The Aviation Environment Federation (AEF) is the principal UK non-profit making environmental association concerned with the environmental effects of aviation and supported by individuals and community groups affected by the UK's airfields and airports. We promote a sustainable future for aviation which fully recognises, and takes account of, all its environmental and amenity effects. These range from aircraft noise issues associated with small airstrips or helipads to the contribution of airline emissions to global climate change.

AEF takes a keen interest in policy relating to the London airports and we are pleased to have the opportunity to comment on those aspects of the draft Mayor's transport strategy that relate to our area of expertise. We have also responded to the consultation on the draft replacement London Plan.

E14 says “.. **Adequate airport capacity is needed but the Mayor is opposed to further expansion of Heathrow airport.**” and para 37 says “.. **seeking better use to be made of existing capacity at Heathrow (and other airports) while resisting further expansion of the airport, due to the resulting significant environmental and traffic congestion impacts.**” We agree that Heathrow expansion should be resisted because of the significant environmental and traffic congestion impacts. The main environmental impacts would be noise, air pollution and climate change - there is evidence for all of these on the scale of impacts from the aircraft. Additional impacts from the extra road traffic have been less well assessed, but as noted in para 75, Heathrow is the destination for more than 45,000 trips daily by London residents, of which over half are made by car.

It would be helpful if the concept of “adequate” capacity were to be defined, however. AEF considers it to be quite different from the capacity provision that would be implied by unconstrained demand, but the Mayor's views on this are not made clear.

Para 5.11.1 says “**Demand for air travel, will continue to pose a major challenge for London. The number of passengers travelling through London area airports amounted to almost 140 million in 2006, making the London area the busiest in the world. Unconstrained, demand is expected to rise to 290 million passengers each year by 2031. Current airport capacity will, however, limit trips to 180 million passengers a year. This could have the effect of limiting London's economic growth and putting its competitive position at risk. Although the**

Mayor opposes any further capacity increases at Heathrow due to the adverse noise and air quality impacts already experienced by residents and others in the vicinity, he recognises that adequate airport capacity is critical to the continued competitiveness of London's economy. For this reason, the Mayor is interested in looking at whether optimum use is being made of London's existing airport capacity (though mixed mode operation is not favoured at Heathrow), and the potential benefits of additional capacity elsewhere in the South East."

Proposal 47 reiterates this, saying **"The Mayor recognises that adequate airport runway capacity is critical to the competitive position of London in a global economy, but opposes any further increases in capacity at Heathrow."**

Again, it is stated that "adequate" capacity is needed; but it by no means follows from this truism that aviation needs to keep expanding at a very rapid rate or that more runways are needed in the SE. Few would doubt that some air travel is necessary for business, but we do not see evidence that more and more air travel is necessary.

The statements imply that not providing additional runway capacity in the south east of England would undermine London's competitive position. There should be an evidence base for any such assertion; we are not aware of such evidence. In May 2009, for example, 13 business leaders wrote to the Times in connection with debate over Heathrow expansion expressing their view that, as the headline states 'Business can do without a third runway'¹

It is worth noting that the majority of travel from Heathrow is leisure, not business, and that government work indicates that in the case of capacity constraints, the great majority of traffic suppressed would in any case be leisure, not business. Any impact on London's competitive business position would therefore seem to be small.

In addition, a good deal of traffic is interchanging. Because the passengers are not travelling to or from London, they do not contribute to its economy. Therefore, if squeezed out by capacity constraints, this too would not undermine London's competitive position.

Para 5.11.2 addresses surface access to airports. We support schemes to increase the proportion of public transport trips. However, it is not sufficient to simply increase the supply of public transport, mainly rail. To ensure that the increase in rail capacity is fully effective, there needs to be a co-ordinated approach whereby road and parking capacity is constrained as new public transport capacity is increased.

¹ <http://www.timesonline.co.uk/tol/comment/letters/article6215896.ece>

We support the statement in proposal 48 **“The Mayor supports the position of the Government’s White Paper ‘The Future of Air Transport’, which states that airport operators should be responsible for paying the costs of upgrading or enhancing road, rail or other transport networks or services where these are needed to accommodate additional passengers travelling to, and from, expanded or growing airports.”**

However, there is an important caveat. We would not generally support extensions to the road network or enhancing capacity, as such schemes have a history of generating additional road traffic, running counter to environmental objectives of reducing noise, pollution and climate change impacts. These are just the impacts that are germane to resisting expansion of Heathrow. Also, as noted above, supporting and encouraging car trips to airports will reduce the effectiveness of public transport schemes.

Para 5.20.5 says **“Reducing CO2 emissions from aviation: More than 60 per cent growth in passenger numbers is anticipated at London’s airports in the period to 2031. Therefore, efforts must be redoubled to tackle the environmental impacts of aviation if demand growth is to be met in a sustainable manner. The Government has a target to reduce aviation CO2 emissions to below 2005 levels by 2050. The international connectivity that aviation provides is crucial to the competitiveness of London’s economy in the era of globalisation. Therefore, strict limits on aviation growth are not tenable.”**

As we noted in our response to para 5.11.1 and Proposal 48, however, the assumption that any constraint on air travel will damage London’s competitiveness has not been substantiated. We also note that the London Plan says (Policy 6.6c) **“The aviation industry should meet its full environmental and external costs.”** One reason why demand for air travel is so high is that aviation does not pay its full environmental and external costs.

Para 5.20.5 continues: **“Meeting both the Government target for aviation CO2 emissions and the Mayor’s target for London CO2 emissions will require either a breakthrough in aviation efficiency or significantly lower than forecast growth.”** This is true. But to reach useful conclusions from such a statement, the Mayor should point out that there is no expectation whatever of a breakthrough in aviation efficiency. Scientists, the government and AEF all consider that an improvement of only about 1% pa in fuel efficiency (and thus in greenhouse gas emissions) is likely to be achieved. The recent report from the Government’s Committee on Climate Change concluded that an efficiency improvement of only 0.8% pa between now and 2050 should be anticipated². Technological ‘forcing’ and strong economic instruments may increase

² <http://www.theccc.org.uk/reports/aviation-report>

the rate to 2%. But such improvements in efficiency will be insufficient to stabilise, let alone reduce, the environmental impacts because of the high rate of forecast growth. Some form of constraint will therefore be necessary to achieve environmental objectives.

5.20.2 concludes “**The Mayor also supports the expansion of competitive rail-based alternatives, such as high-speed rail ..**” We would strongly support research into the relative environmental impacts of alternative transport modes, as rail travel typically generates far fewer emissions than air travel.

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