

# Consultation on the London Plan: Spatial Development Strategy for Greater London

Response from the Aviation Environment Federation

12<sup>th</sup> 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 replacement London Plan that relate to our area of expertise. We have also responded to the consultation on the draft Mayor's transport strategy

6.10 bullet 1 says “... **taking a balanced and sustainable approach to additional airport capacity in south-east England ...**” It is not clear what “balanced” or “sustainable” means in this context. Government estimates show that if new runways were provided in the SE, which appears to be supported in the London Plan, this would increase CO2 emissions at a time when the UK is committed to cut its emissions by 80%. This appears unsustainable as it is not clear how this increase in emissions would be balanced out.

Policy 6.6 A says “**Adequate airport capacity serving a wide range of destinations is critical to the competitive position of London in a global economy. Airport capacity serving the capital and wider south east of England must be sufficient to sustain London's competitive position.**” This may be so, but it by no means follows 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. 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’<sup>1</sup>

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

Policy 6.6 C says **“The aviation industry should meet its full environmental and external costs.”** We strongly support this. Aviation should pay the full cost of its noise, air pollution and climate change impacts. Climate costs should cover emissions of all greenhouse gases produced by aircraft, not just CO<sub>2</sub>. (The government sometime applies a factor of 1.9 to CO<sub>2</sub> emissions to reflect the impact of other gases.) The external costs of noise and air pollution are undoubtedly high, but the government does not use realistic estimates for these.

As well as environmental costs, aviation, including airport development, should fully meet its social and economic costs. For example, destruction of communities should be included if a third runway goes ahead. Aviation should also pay its fair share of general taxation – at present it avoids VAT and tax on fuel. These massive tax advantages, estimated by the Treasury at £10 billion pa for the UK<sup>2</sup>, inflate demand for air travel beyond what is necessary or economically desirable.

Policy 6.6 C also says **“Airport operators should increase the share of access journeys by passengers and staff made by sustainable means.”** We support this, but the policy should go further. It is possible for the *share* of sustainable transport, assuming this means largely public transport, to increase while the *amount* of less sustainable transport, such as cars, still increases. The policy should therefore have a requirement to reduce car use for access in absolute terms, not just as a share.

6.24 says **“The Mayor does not wish to prevent people from flying or undermine London’s competitive position, and he does recognise the need for additional runway capacity in the south-east of England.”** This statement would seem to imply support for extra runways at Stansted and/or Gatwick or the building of a new airport in the Thames Estuary. If the policy does in fact support any of these options, it should say so openly. AEF would be opposed to the building of new South East runway. (See our comment overleaf on the conclusion to 6.24.)

This statement also implies 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. 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 be leisure, not business. The impact on London’s competitive 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

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<http://www.dft.gov.uk/pgr/aviation/environmentalissues/aviationemissionscostassess/costassessresponconsul.pdf>

capacity constraints, this too would not undermine London's competitive position.

6.24 also says “.. **considers that the noise problems and poor air quality at Heathrow have reached such levels that further capacity increases there are untenable.**” We fully support this. There can be no doubt that noise is significant for people near and many miles away from Heathrow. It is the main reason why councils of various political persuasions are so strongly opposed to a third runway and to removal of runway alternation.

Air pollution, while less obvious, is perhaps a bigger problem, at least with respect to both health impacts and legal constraints. It is estimated by the GLA that air pollution causes some 3,000 deaths pa. Heathrow, being by far London's largest polluter, must be responsible for a significant proportion of these deaths. Expansion of Heathrow would also increase the chance of legal action by the EU over London's failure to address breaches of air pollution standards.

6.24 concludes “.. **there is a need for a thorough reappraisal of airport policy in the south-east.**” We agree fully. However, we consider that no extra runway capacity should be provided unless and until it can be demonstrated that such expansion would not have unacceptable environmental implications, such as undermining climate targets. We would not agree that a reappraisal should be carried out with the aim of ‘moving’ the environmental impacts from Heathrow to Gatwick and/or Stansted.

7.44 makes reference to Noise Action Plans (NAPs). The reaction of almost everyone who has studied it is that the Heathrow NAP is of virtually no value. It is largely a re-statement of existing issues and plans and does not offer the prospect of reduced noise nuisance. The government has to accept BAA's NAP before it is submitted to the EU and can require it to be improved. The GLA therefore has an important role in lobbying central government to make the NAPs effective. In contrast, liaising with airports over designated ‘quiet areas’ is unlikely to be productive unless NAPs specifically prevent aircraft noise spoiling designated quiet spaces.

In section 23 of ‘opportunity areas’ it says “.. **future growth of City airport ..**” We disagree with the implied acceptance and support of growth there. The noise, pollution and safety impacts are, relative to volumes of air traffic concerned, probably far greater than for Heathrow.

**Aviation Environment Federation**

Broken Wharf House | No. 2 Broken Wharf | London EC4V 3DT

Tel: 0207 248 2223 | Fax: 0207 329 8160

[cait@aef.org.uk](mailto:cait@aef.org.uk)