

ENVIRONMENTAL CHALLENGES TO AIRPORT EXPANSION IN THE SOUTH EAST

The Airports Commission will soon publish its final recommendations on a new runway in the South East, whether at Heathrow or Gatwick. A new runway at either airport would present significant environmental challenges.

Prior to the election, we - along with leading environmental organisations including WWF, RSPB, Greenpeace and Friends of the Earth - called on political parties to adopt a series of sustainable policy proposals for aviation¹. We continue to call for cross-party support for these proposals, which aim to protect human health and ensure that airport expansion is permitted only once a framework of environmental limits is in place.

There is significant pressure to make a swift decision on airport capacity, but the analysis published so far by the Airports Commission contains evidence gaps. Until these gaps are addressed, it will not be possible to reach a robust view on any recommendations the Commission may make.

There is a high level of public interest in this issue and it will be the first major test of environmental policy in this parliamentary term. Transparent decision-making will be paramount. As an MP you can help to ensure this happens by pressing for a full debate once all evidence has been gathered, and opposing any Government decision on airport expansion until the following challenges have been overcome:

Will the increased aircraft noise be acceptable?

-  All three short-listed schemes would increase noise in the local area and have either an 'adverse' or 'significantly adverse' effect on the Government's objective to minimise and where possible reduce noise impacts, according to the Commission. Thousands of people – potentially hundreds of thousands – would be affected by noise for the first time.
-  The Commission's analysis is based on 'indicative' flight paths and assumptions about the introduction of less noisy aircraft. But it does not make clear whether the noise impact could be even worse if the technology improvements are not delivered. Recent trials of flight path changes were highly controversial around Gatwick and Heathrow.
-  As well as causing significant disturbance, aircraft noise directly impacts people's health which carries significant costs. The Airports Commission's current analysis does not fully account for the costs of addressing the health impacts of aircraft noise.

Could air pollution around airports be brought within legal limits?

-  The Heathrow area has breached the legal limit for NO₂ pollution annually for at least the past 10 years. Modelling by the Government's environment department predicts that the area would still be breaching the legal limits in 2030 with only the current two runways.

- ✈ The Airports Commission's recent consultation on the air quality impacts of expansion revealed that the increased emissions associated with a third runway at Heathrow would mean the area would have the highest level of air pollution in the UK. In terms of mitigation, Heathrow has argued that it would generate no growth in airport-related traffic on the local road network but the Commission concluded that it is not clear whether this is deliverable.
- ✈ Around Gatwick, contrary to claims by the airport, the Airports Commission notes that there was a breach in legal limits for harmful nitrogen dioxide in 2014. One of the Commission's models indicated that there would be worse pollution around Gatwick with two runways than Heathrow with three.

Would aviation play its part in wider efforts to reduce CO2 emissions?

- ✈ The Airports Commission found that all shortlisted expansion options would, when added to the emissions from other UK airports, result in CO2 increases above the maximum level allowed for under the Climate Change Act².
- ✈ The Commission says that it will be for the next Government to work out how to tackle this problem, for example through large tax increases on aviation to limit demand, or through planning limits on regional airports.

Does the economic case for expansion stack up?

- ✈ Advertising by both Heathrow and Gatwick has quoted impressive-sounding figures for the potential wider benefit of airport expansion. However, the Airports Commission notes that these figures should be treated with "some caution".
- ✈ The figures are not supported by the Government's recommended approach for cost-benefit analysis, which generates values that are either much more modest or even negative.
- ✈ According to Transport for London, the costs of surface access may have been underestimated by up to £15 billion at Heathrow while the additional road traffic would put the network around Gatwick under stress, suggesting additional infrastructure may be required.
- ✈ The economic assessment does not include the cost of keeping aviation emissions to a level compatible with the Climate Change Act, despite clear advice to do this from the Government's climate change advisers.

We call on you to ensure that the Government does not make any decision until all the evidence has been gathered, a balanced picture of costs and benefits is provided and all environmental tests have been met.

Notes

- 1) Joint Policy Proposals for a Sustainable Future Aviation Strategy <http://www.aef.org.uk/uploads/Aviation-joint-environmental-policy-proposals.pdf>
- 2) According to advice from the Government's official climate advisers, the Committee on Climate Change (CCC), aviation emissions of 37.5 Mt in 2050 would require other sectors to cut their emissions by an average of 85% between 1990 and 2050 which the CCC considers to be at the limit of what is feasible

About the Aviation Environment Federation:

We are a policy-focused NGO supported by individuals and community groups. We work at national, EU and international levels to secure effective regulation of the industry. We were one of only two environmental NGOs to give spoken evidence to the Airports Commission.

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