

## **Dark day for communities and for the UK's chance of tackling climate change, as May decision on Heathrow shows reckless disregard for environmental targets.**

### **Supporting information to Aviation Environment Federation reaction**

#### Climate

The climate change impacts of expansion presented a significant hurdle the last time there was Government support for a third runway, with a successful judicial review being brought against the Government by environmental NGOs and local groups over its failure to take appropriate account of climate change commitments<sup>1</sup>. In responding to the passage of the Climate Change Act in 2008 Theresa May had said that a third runway would “undermine our national targets”<sup>2</sup>.

The Airports Commission predicted that emissions from aviation in the UK are already set to overshoot the maximum level possible under climate legislation<sup>3</sup> and will be higher still with a new runway<sup>4</sup>. Yet it made no recommendations on appropriate climate change conditions accompanying expansion. The Government has not set out a meaningful policy on aviation emissions despite repeated recommendations to do so from the Committee on Climate Change<sup>5</sup>.

#### Noise

If the Government imposes conditions in relation to noise, this reflects the strength of feeling on this issue among local communities who, for decades, have been exposed to unacceptable levels of aircraft noise, both day and night, and is a testament to their tireless campaigns.

But a new runway will nevertheless lead to hundreds of thousands of people being newly exposed to noise<sup>6</sup>, will continue to disturb people in the late evening and early morning (with Heathrow having promised a night flight ban only between 11pm and 5:30 a.m.<sup>7</sup>), and will mean that the airport will continue to expose more people to noise than its five main European hub rivals combined<sup>8</sup>.

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<sup>1</sup> [http://www.ft.com/cms/s/0/f6867b50-82ea-11de-ab4a-00144feabdc0.html?ft\\_site=falcon&desktop=true#axzz4MOK9SfFz](http://www.ft.com/cms/s/0/f6867b50-82ea-11de-ab4a-00144feabdc0.html?ft_site=falcon&desktop=true#axzz4MOK9SfFz)

<sup>2</sup> <https://www.carbonbrief.org/revealed-when-theresa-may-spoke-out-on-climate-change>

<sup>3</sup> <http://www.aef.org.uk/uploads/Climate-briefing-update.pdf>

<sup>4</sup> [http://www.aef.org.uk/uploads/AEF-Infographic-climate-implications-of-airport-expansion\\_v6.jpg](http://www.aef.org.uk/uploads/AEF-Infographic-climate-implications-of-airport-expansion_v6.jpg)

<sup>5</sup> <https://documents.theccc.org.uk/wp-content/uploads/2016/06/2016-CCC-Progress-Report-Executive-Summary.pdf> (summary of recommendations in Table 1)

<sup>6</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/372488/noise--local-assessment.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/372488/noise--local-assessment.pdf)

<sup>7</sup> <http://mediacentre.heathrow.com/pressrelease/details/81/Expansion-News-23/6296>

<sup>8</sup> <http://content.tfl.gov.uk/landing-the-right-airport.pdf>

## Air quality

The decision to expand Heathrow comes just days before the Government will have to defend itself in the High Court<sup>9</sup> over alleged continued failures to implement air quality legislation, and air quality is likely to form the basis of the judicial review threatened by local authorities<sup>10</sup> if the Government were to proceed with Heathrow expansion.

Heathrow is an air pollution hotspot, with sites near the airport having breached legal air pollution limits every year for at least a decade<sup>11</sup>. The Airports Commission argued that although Heathrow expansion would make the problem worse, it could still be legally permissible as long as this didn't 'delay compliance' with the law, in other words, as long as other locations, such as sites on the Marylebone Road continue to record even worse air quality than those around Heathrow.

Since publication of the Commission's final report, the Government has updated its air quality plan, including a reforecast of nitrogen dioxide emissions such that London would in be compliant by 2025 – just before the anticipated opening of a third runway. The plan has been denounced as 'simply not good enough', however, by campaigning lawyers Client Earth, who will have their case against the Government heard in the High Court on 18<sup>th</sup> and 19<sup>th</sup> October<sup>12</sup>.

## Brexit

The argument made by Heathrow that approving a third runway has become more urgent in light of Brexit as a means of showing that we are open for business smacks of desperation. Even at Heathrow almost 75% of flights are made for leisure, not business<sup>13</sup>, and there is no evidence that we are losing out on trade as a result of constraints on airport capacity. In fact, as a result of Brexit, airlines have forecast a drop in air travel demand of 3-5% by 2020<sup>14</sup>, effectively wiping out anticipated growth, while longer-term forecasts are uncertain. A new analysis of demand post-Brexit should be undertaken by the Government.

## Today's decision is far from final

There is likely to be a vote in Parliament on the decision in the following days or weeks, which would give an indication of the level of cross-party support for the Government's plan.

As a new runway would fall under the definition of Nationally Significant Infrastructure, the Government will then need to finalise a National Policy Statement (NPS) for aviation, which would include its case for supporting expansion and set out any proposed environmental mitigation. This must be laid before parliament and would be subject to committee scrutiny, as well as going out to public consultation. Best estimates suggest this may take up to a year. Only when an NPS is adopted would the airport submit its detailed application and supporting material. Construction of a new runway could begin only at the end of this process. Judicial reviews may be launched at various stages.

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<sup>9</sup> <http://www.dientearth.org/government-disarray-air-quality/>

<sup>10</sup> <http://www.telegraph.co.uk/news/2016/10/08/theresa-may-at-odds-with-her-local-party-chairman-over-heathrow/>

<sup>11</sup> Air Quality at Heathrow Airport 2015 end of year summary  
[http://www.heathrowairwatch.org.uk/documents/AQ\\_briefing\\_2015\\_Q4.pdf](http://www.heathrowairwatch.org.uk/documents/AQ_briefing_2015_Q4.pdf)

<sup>12</sup> <http://www.dientearth.org/uk-ministers-facing-new-legal-action-over-air-pollution/>

<sup>13</sup> Table 2.1

[https://www.caa.co.uk/uploadedFiles/CAA/Content/Standard\\_Content/Data\\_and\\_analysis/Datasets/Passenger\\_survey/CAA%20Passenger%20survey%20report%202015.pdf](https://www.caa.co.uk/uploadedFiles/CAA/Content/Standard_Content/Data_and_analysis/Datasets/Passenger_survey/CAA%20Passenger%20survey%20report%202015.pdf)

<sup>14</sup> [https://www.iata.org/whatwedo/Documents/economics/impact\\_of\\_brexit.pdf](https://www.iata.org/whatwedo/Documents/economics/impact_of_brexit.pdf)