

Airports Commission consultation on 3 options for a new runway in the south east of England

Response by West London Friends of the Earth

West London Friends of the Earth is a network of local Friends of the Earth group in the boroughs of Ealing, Hounslow, Hillingdon, Harrow, Brent, Richmond and Hammersmith & Fulham. Richmond & Twickenham Friends of the Earth has submitted a separate response. We agree with their comments and we are not aware of any inconsistencies in our respective responses.

Q1: What conclusions, if any, do you draw in respect of the three short-listed options? In answering this question please take into account the Commission's consultation documents and any other information you consider relevant. The options are described in section three.

In all of them, there is a clear desire to demonstrate economic benefits and to downplay social and environmental and even certain economic costs.

Q2: Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in section three.

No comments.

Q3: Do you have any comments on how the Commission has carried out its appraisal? The appraisal process is summarised in section two.

While the Commission has carried out a huge amount of analysis, what has not been analysed is crucial. The Commission has failed to assess adequately:

- The impact on air pollution levels
- Health impacts from noise and air pollution
- The climate impact
- The effect on the shortlisted proposals if the UK climate targets are to be met
- Economic cost of environmental impacts
- Social impacts
- Economic cost of social impacts
- Pressures on local infrastructure and services
- Impacts on unemployment, as opposed to jobs 'created'.
- Equity effects, eg beneficiaries of flying being mainly higher socio-economic groups.
- Impacts on demand, capacity and economic benefits due to under-taxation of aviation.

More details are in the answer to question 8.

Tellingly, all of these are ones which, if analysed and published, would make all of the runway options either more problematic, or less attractive or lead to lower, even negative, economic benefits.

In contrast, there are no major work areas omitted or incomplete which would be likely to make the runway options less problematic, more attractive or lead to higher economic benefits.

Calculation of wider economic benefits is impenetrable, not subject to full peer review and not provided with 'sanity checks'. More details are in the answer to question 8.

Q4: In your view, are there any relevant factors that have not been fully addressed by the Commission to date?

The ones mentioned in Q3.

Q5: Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?

See answers to Q8.

Q6: Do you have any comments on the Commission's sustainability assessments, including methodology and results?

See answers to Q3 and Q8.

Q7: Do you have any comments on the Commission's business cases, including methodology and results?

See answers to Q3 and Q8.

Q8: Do you have any other comments?

Yes, we set out briefly some major concerns.

Air pollution, including health impacts

The limited work by the Commission indicates that the impact of each runway would be "adverse" or "significantly adverse". Around Heathrow, air pollution breaches legal limits set to protect human health and the EU is commencing legal action (on air pollution breaches in the UK generally). The Commission makes a wild assumption that the problem will be resolved: "by the time of scheme opening, action at both a national and local level will have been considered to ensure these limits or any replacements or enhancements are respected."

In London alone, over 4000 people are estimated to die from air pollution every year. There are also other impacts such as impacts on wildlife and habitats and corrosion of man-made structures, some at levels well below EU legal limits. The Commission should therefore be seeking to minimise air pollution, irrespective of legal limits.

The Commission plans that any further work on air pollution will be secret until the final report is published. In this way, 'the bad news can be buried'. This is unacceptable. When the full air pollution estimates are complete, they should be published and subject to public consultation before the final report.

Climate impact

The Committee on Climate Change (CCC) recommended that there should be a limit on UK aviation emissions by 2050 of 37.5 mt (million tonnes or mega tonnes) pa CO₂. The CCC considered this to be the maximum level of aviation emissions that could be allowable, consistent with the target of cutting UK emissions by 80% by 2050 and given feasible emissions reductions in other sectors. They assume that other sectors could cut emissions by 85% - which they describe as "at the limits of what is feasible".

The Commission's work shows that emissions for each new runway option would exceed the 37.5 mt limit and therefore be inconsistent with the UK's target for CO2 reductions by 2050.

The Commission undertook work to show how a 'cap' of 37.5 mt CO2 could be achieved. This indicated that a reduction of about 19% in traffic would be needed. Such a reduction would have radically changed the 'need' for an additional runway and the economic benefits of it. But the Commission failed to carry out any assessment.

Because the Commission has only shortlisted and then assessed cases where the CO2 target is exceeded, it has, in effect, ignored climate change in its recommendations and subsequent analysis. This is unacceptable.

Public safety (danger)

Heathrow is by far the most dangerous airport in the country for people on the ground. This is due to the large number of large aircraft overlying large number of people. (Societal risk is affected by numbers of people overflown whereas individual risk is not.) The increased societal risk of injury and deaths on the ground ought to be assessed, published, consulted upon and form part of the final report.

There is a Public Safety Zone (PSZ) around airports where the risk of injury or death to those resulting from a crash is greatest. There are also larger areas beyond the PSZ where there are restrictions on development and land use because of the risk to those on the ground. Each runway option involves a large increase in aircraft movements, so an increase in the PSZ and protected areas beyond would be needed.

There will be an economic cost of sterilisation of land for safety reasons. This should form part of the assessment of economic benefits.

Noise

Noise is an important issue and, for many people, is the most obvious impact. The Aviation Environment Federation has made detailed comments which we support. In particular we agree that insufficient information has been provided on flight paths, meaning that local noise impacts are simply not known. We do not consider it acceptable to present to government a recommendation until the requisite data has been published and subject to consultation.

Jobs and social impacts

The Commission has carried out considerable work on jobs that would be 'created' by a new runway with the implicit assumption that extra jobs would be a good thing. However, we are not aware that creating jobs is of itself a benefit or is government policy. The emphasis is in reducing unemployment. Creating jobs does not reduce unemployment unless there is a pool of unemployed people in the area who are able to take up any new jobs. There has been no evidence presented by the Commission or the proponents of expansion that this is so. Indeed, the Commission believes that the extra jobs will lead to population increase, putting further pressures on housing and infrastructure.

In the case of Heathrow, the Commission considers up to 70,000 new housing units would be required. Councils are already under extreme pressure to meet housing targets and the extra numbers would entail building on allotments, other urban open spaces and on the Green Belt. Green open space has been shown to benefit physical and mental and health. Conversely, destroying green open space would have health disbenefits.

In west London schools are bursting and hospitals are close to breaking point. Tens of thousands more people would increase these pressures even more. This would be a major social disbenefit. Pressures would extend to surface transport and even water and sewerage. At a stakeholder event on 10/1/2/14 Bob Collington, Director at Thames Water, said “Biggest challenge [to Thames Water] is population growth.”

Along with the human impact, there will be economic costs. The cost of trying to meet new demand for public services will not fall on the aviation industry and its users, but on cash-strapped local authorities, central government and on the public paying higher prices for utilities.

Economic benefits

It is no exaggeration to say that the Commission has been desperate to demonstrate economic benefits from airport expansion. For example, the PWC study (published for the interim report) had to search thorough a whole range of travel and economic statistics before they could find a pair which could be interpreted as showing a causal relationship in the direction of more air travel causing economic changes. All the evidence is that economic growth leads to increases in air travel, not the other way round. The Commission’s own passenger forecasts are based on that premise.

The transport benefits are subject to considerable uncertainty. The benefits rely on notional values of time saved by passengers which, it should be noted, do not form part of GDP or economic growth.

The assessment of ‘wider economic benefits’ is extremely dubious. The Commission has used a model which is by their own admission is experimental. It is complex and impenetrable. Airport Watch and others have asked the Commission for explanations of this model and other economic works but all we were granted in a year was one two-hour meeting.

The results of the modelling are very variable. In the interim report a range of £30-45 bn (‘present net value’) was quoted but in the shortlist assessments they are far higher with an even bigger range, eg Heathrow NW runway is £101 to £214 bn.

Given the complexity and obscurity of the economic modelling, we would have hoped that there would be some ‘sanity checks’ on the results. For example:

- what is the evidence that if a particular runway was full, british business people would simply decide not to travel abroad and do business? Despite the fact there was spare capacity at virtually every other UK airport.
- what is the evidence trade and international business would suffer if, due to shortage of capacity at one airport, the business traveller had change planes instead of taking a direct flight or had to change planes at a different hub?

The significance of these tests is that results of wider economic benefits presumably rely on such assumption. (If they didn’t make these assumptions, it is hard to see why there would be an economic impact on trade and business in not building a new runway.)

It is well known that aviation is very under-taxed compared with most of the economy. Aviation is not subject to VAT and there is no tax on aircraft fuel. The latter exemption is worth about £10 bn pa (assuming that aircraft fuel was taxed at the same rate as petrol). This low level of tax means the economy is distorted, with more aviation than is economically optimal. If aviation were taxed at an equitable rate, the demand would be considerably lower and the economic benefits of a new runway would be greatly reduced. (We know the reduction would be great because the 5 different forecast

scenarios illustrate the effect of changing the passenger forecasts.) As far we can tell, allowance has not been made for the under-taxation of aviation.

The estimates of economic benefits do not cover adequately the environmental costs. In the case of noise and air pollution, values for Heathrow NW runway have been calculated only for 'assessment of need', 'carbon capped'. This is the lowest of the possible values and carbon capping is not proposed by the Commission anyway.

The cost of carbon omits by far the biggest source of carbon – aircraft. The justification given is that "assumed that aviation is part of an emissions trading scheme". In our opinion, this is a pure excuse to avoid an embarrassing cost. Given the failure of recent attempts to include aviation in even a European scheme (except in a very minor way), there is no reason to assume a worldwide scheme will come about. Even if an emissions trading system does come about, the emissions will still have an environmental impact. Any cap that is set will obviously allow for aviation as well as all the other regulated emissions so aviation emissions will clearly have an impact.

There are no economic costs estimated for the social costs of expansion, some of which are described in the 'jobs and social impacts' section above.

For 'assessment of need' and 'global fragmentation' scenarios, the economic benefits appear already to be negative (table 2.12 of the Heathrow NW runway assessment). If the full costs of the extra noise, air pollution, the climate costs of aircraft, dislocation and destruction of communities, health impacts and others were included, the economic benefits would very probably be negative for the other scenarios as well. The Commission has admitted that taking into climate costs alone causes the benefits to become negative. (The approach used is to increase carbon prices such that the CCC recommended cap on aviation CO₂ emissions is achieved.)

The Commission has made a valiant attempt to demonstrate economic benefits. But given the impossibility of those outside the Commission to understand the models, the absence of a full peer review, the wide range of results, taxation effects, and the omission of much of the environmental and social costs, very little credence can be given to claims of economic benefits.