

New Consultation on National Policy Statement



Possible points to make in your response

This short paper is designed to help people respond to the consultation. We have also produced a one page factual summary of the key points in the consultation – <http://hacan.org.uk/wp-content/uploads/2013/06/DfT-Consultation-Document-October-2017-1-page-summary.pdf> – and a more detailed four page version – <http://hacan.org.uk/wp-content/uploads/2013/06/DfT-Consultation-October-2017-4-page-summary.pdf> – which you might want to read.

The main reason the Department for Transport (DfT) has embarked on this eight week consultation is to invite comments on the revised passenger forecasts and the updated air quality plan as it applies to airport expansion (although it also briefly covers noise, carbon emissions and surface access).

Overview

The Department for Transport's latest figures show that a second runway at Gatwick could have similar economic benefits for the UK economy as a third runway at Heathrow. And the Department in its consultation estimates that there is only a 'low-risk' of a two runway Gatwick not complying with the Government's air pollution targets whereas there is a 'high-risk' that a three runway will fail to comply, particularly in its early years. Passenger demand is forecast to be much higher than previously thought with "London's five major airports now expected to be full by 2034, with four out of five full by 2025". The DfT makes clear that the demand comes from London and the South East. It is much less across the rest of the UK. The DfT continues to favour Heathrow because its new forecasts show "the Heathrow expansion schemes deliver better international connectivity earlier on, with large increases in flights by 2030". Gatwick performs well over a 60 year period but, even in the long-term, the DfT goes for Heathrow as it "continues to deliver substantially more long haul destinations. These long haul flights are particularly important for connecting businesses to emerging markets, and account for the majority of air freight transported – a large proportion of total UK trade". However, a third runway is more expensive to build, will take longer to deliver, risks breaching air pollution limits and affects far more people as far as noise is concerned.

It is a short 8 week consultation with a closing date of 19th December. So, no need to make a long response.

Here's some points to assist you:

Passenger forecasts: There is little doubt the demand is there. But worth making the point that only a minority of passengers are travelling on business (even at Heathrow is only around a third). Most of the growth is in the leisure market. And a startling percentage of flights are taken by frequent flyers (largely for leisure): 75% of all flights are taken by 15% of the population. Fiscal measures, such as VAT on tickets, a frequent flyer's levy or higher rates of Air Passenger Duty could dampen down that demand.

Risk factor 1: There is little doubt that a 3rd runway is the riskier option: the DfT admits in the consultation document there is a "high-risk" of a three runway Heathrow not being compliant with **air quality targets** between the year a new runway is expected to open, 2025, and 2029. There is little Heathrow can do about this, the DfT argues, as the risk arises from the uncertainty in the modelling and from the fear the Government may make sufficient progress in implementing its air quality plan as a whole – for example in tacking emissions from motor vehicles. From 2030 onwards, the risk falls to 'medium'. Gatwick is 'low-risk'.

Risk factor 2: The DfT admits to carrying out no further work on the **costs of surface access**. This means the cost of creating sufficient road and rail schemes to serve either a second runway at Gatwick or a third runway at Heathrow remains uncertain. The cost of the road and rail infrastructure that might be required at Heathrow has ranged from just over £3 billion to £18 billion. Heathrow has said it will only contribute £1.1 billion. Who will pay the rest?

Noise: The DfT acknowledges that all the schemes “have the potential for significant negative noise impacts”. But it believes the impacts will be less than previously thought due to the impact of quieter planes. At Heathrow it says around 92,700 more people will be affected by noise with a third runway in place compared to a two runway Heathrow Airport in 2030: a total of 653,900. HACAN has long challenged that figure because, while planes may be getting a little less noisy and operational practices are improving, we still believe the DfT under-estimates the impact of the increased number of planes, particularly on areas that have not had flights previously. A 3rd runway will mean 700 extra planes a day using Heathrow.

Jobs: The consultation document states that expansion at Heathrow or Gatwick will bring jobs but acknowledges that some of these jobs may be relocated from elsewhere: “the updated figures further support the view that expansion will create tens of thousands of jobs, and that more jobs are likely to be created by expansion at Heathrow [than Gatwick].....These jobs are not additional at the national level, as some jobs may have been displaced from other airports or other sectors. The department has not quantified the impact of the shortlisted schemes on national jobs”.

Climate Emissions: This is a contentious area with some environmental groups arguing a new runway should be ruled out on climate grounds. However the DfT is predicting lower carbon emissions for either Gatwick or Heathrow than the Airports Commission estimated. This is for two reasons. It expects that more passengers will be carried in fewer planes than previously thought because the planes will be bigger and fuller and it expects the planes to be more fuel-efficient than originally estimated. Heathrow would result in an initial increase in emissions but these would be expected to fall by 2050. The DfT concludes that “that any of the schemes could be delivered within the UK’s obligations under the Climate Change Act.”

The full consultation documents are on the DfT website.

The revised economic forecasts are found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/653879/updated-appraisal-report-airport-capacity-in-the-south-east.pdf

The air quality plan can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/653775/2017-plan-update-to-air-quality-re-analysis.pdf

You can respond using an online form but it is probably easier to respond on email

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