

CAN A THIRD RUNWAY AT HEATHROW MEET LABOUR'S FOUR TESTS?



**An assessment by Campaign for Better Transport,
Friends of the Earth, Greenpeace and HACAN**

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This report does not reflect the view the four organisations have of the third runway. Nor does it spell out their detailed position on particular issues such as climate change, air pollution, noise and surface transport. Its sole intention is to provide an assessment of whether the proposals for a third runway as set out in the National Policy Statement meet the tests that the Labour Party has set for backing any new runway.

All four organisations are non-party political.

LABOUR'S FOUR TESTS

Test 1: “Is there robust and convincing evidence that the required increased aviation capacity will be delivered with Sir Howard Davies recommendation?”

There is little doubt that Heathrow would deliver a lot of extra capacity and quickly. The DfT’s latest estimate is that by 2050 Gatwick would deliver the same sort of capacity but it would take longer to do so.

There are two areas of doubt, though, surrounding Heathrow.

1. Although Heathrow would deliver the extra capacity, there is uncertainty around how many new international destinations it might serve. Davies estimated that it may be no more than about a dozen. Heathrow argues it is a lot more. It is probably impossible to be sure about the exact number as it is very difficult to predict market demand many years ahead. Equally uncertain is how much of the extra capacity would be used up by more flights to existing international destinations rather than opening up new routes and new markets.

2. The second doubt surrounds the deliverability of a 3rd runway. There are still major unanswered questions around the logistics of building the new runway - for example how to deal with the problem of the M25; the impact it might have on air pollution levels (see test 3) and potential legal challenges against it; around how certain many of the new rail schemes are and who will pay for them – Transport for London has said repeatedly the total cost of the public transport improvements could be as high as £18bn; Heathrow told the Environmental Audit Committee in 2016 it would only contribute £1.1bn. The Government in the National Policy Statement (NPS) has recognized these potential problems but appears to have ducked dealing with them by suggesting Heathrow must come up with the answers when it presents its detailed proposals to a planning inquiry in 2020. That is a risky strategy given the scale of the challenges involved.



With major questions like how to build over the M25 still unanswered there is no guarantee that a third runway is deliverable

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The bottom line is that there is no guarantee that a third runway is deliverable. Therefore any economic benefits it might bring are at risk.

Test 2: “Can the recommended expansion in capacity go hand-in-hand with efforts to reduce CO2 emissions from aviation and allow us to meet our legal climate change obligations?”

If a 3rd runway is built, the only way to meet the CO2 targets would be to restrict growth at other airports

The Airports Commission found that one new runway could be built without breaching the Committee on Climate Change’s target that CO₂ from emissions from aviation should be down to 2005 levels by 2050, i.e. should not exceed 37.5MtCO₂. (That is already a generous cap as it would mean that aviation represented around 25% of all allowable CO₂ by that date, and that other sectors would have to make deeper cuts of around 85% by 2050 from 1990 levels). However, Davies argued that, if the growth at other airports turned out to be higher than expected, the Government would need to introduce demand management fiscal measures to dampen down overall demand. Since then the Government has produced revised passenger forecasts which suggest that growth will exceed what Davies expected. This means that the only way the CO₂ target will be met if a third runway is built would be to restrict growth elsewhere. Moreover, the Government hasn’t updated its climate targets to align them with limiting warming to 1.5°C as per the Paris Agreement (see note 1). So, the evidence strongly suggests if a third runway is built, even aviation’s current climate change target can only be met by restricting growth at other airports. Indeed the former Government chief scientist has said that for UK to be climate compatible Heathrow 3rd runway would become a white elephant. <https://www.theguardian.com/environment/2008/dec/21/heathrow-third-runway1>

Test 3: “Have local noise and environmental impacts been adequately considered and will they be managed and minimised?”

The main local impacts are community destruction, air pollution and noise.

Community Destruction: A third runway would require the demolition of around 800 homes. Heathrow has said it would be prepared to buy up around another 3,000 homes where the noise from a new flight path might be unbearable. Everybody would be offered the pre-blighted cost of their home, plus 25%, plus cost of removal and any stamp duty paid. The offer has divided the community with some people prepared to accept the offer but others don’t want to lose their homes and see their villages destroyed. If a third runway is built, this level of destruction is inevitable. It can’t be minimized and it is difficult to see how it can be fully mitigated.

Air Pollution: The National Policy Statement said: “the Secretary of State will consider air quality impacts over the wider area likely to be affected, as well as in the vicinity of the scheme. In order to grant development consent, the Secretary of State will need to be satisfied that, with mitigation, the scheme would be compliant with legal obligations that provide for the protection of human health and the environment”.

“There would be an unacceptable ‘high’ risk of failing the government’s legal obligations, when it has to be likely not just possible to meet limits”

On closer examination this statement is not as strong as it might appear. It gives no indication as to how the air pollution can be managed. Nor is there any recognition that it is largely out of Heathrow's control. Future pollution levels are dependent on Government efforts to introduce cleaner cars - the main source of pollution around Heathrow - and on Government permission to build new rail schemes, such as a new southern access scheme, to take cars off the road (some of these rail schemes are still in the conceptual stage and their call on the public purse remains uncertain). There are no guarantees that all these measures will be in place by the time a third runway would open in 2025. Indeed, the DfT has estimated that air pollution could remain a problem for several years after any runway opened

A third runway would create an unacceptable 'high' risk of failing the government's tests on complying with legal obligations (and harming people's health and shortening their lives) - and that risk is at odds with a High Court ruling that meeting legal obligations must be likely not just possible. There are further risks with the delivery of expected action - see note 2. The only conclusion must be that we cannot take these risks with our children's health.

Noise: The latest Government figures indicate that 92,000 more people would be affected by noise in 2030 than if the runway wasn't built. The number will fall by 2050 as quieter planes are introduced. But quieter planes will not have the impact on the ground the Government is claiming as it is the sheer volume of aircraft that causes the real annoyance problems. A third runway would mean 700 extra planes a day using Heathrow. Some of the noise problems could be mitigated through more respite (using and rotating multiple flight paths) and a tougher regime on night flights but noise is likely to remain an intractable problem that cannot be adequately minimized or mitigated. The Transport Select Committee in its recent report argued for clear noise targets. The Government is not proposing any.



Test 4: "Will the benefits of expansion be felt in every corner of the country, not just the South East of England, and will regional airports be supported too?"

The National Policy Statement has estimated that the national economic benefit to the UK would £74bn over a 60 year period. (This figure excludes some of the trade benefits but it also excludes some of the costs of expansion e.g. see test 1 on public transport infrastructure, and also, e.g. the health impacts of noise, pollution etc). Heathrow's estimate of the number of regional jobs a third runway would create were based on much higher economic benefits and have not been scaled back to reflect the Government's new figures. Nor has the benefit estimate attempted to include the mitigation costs of meeting climate change targets (see test 2) were the runway to go ahead - and there's the impact on growth in the rest of the UK from meeting climate limits.

The NPS says that, if the third runway is built, 15% of all new routes will need to be reserved for the domestic market. The Airports Commission estimated that some new connectivity could be provided but it was likely it would require reserved slots at Heathrow and public subsidy of some of the routes to ensure that they could go-ahead in the face of the competing demand for more profitable international routes. There is nothing about this in the NPS. Overall, hard data on what the exact benefits to regions outside London and the South East will be is missing. Moreover, if the road and rail schemes required for a third runway require significant public resources, this is likely to be at the expense of rail schemes across the rest of the country. Indeed the Labour Mayor of Greater Manchester has made exactly that link – that transport in the North is being neglected because of DfT focus on Heathrow expansion:<https://www.theguardian.com/commentisfree/2018/jun/08/heathrow-expansion-northern-trains-chris-grayling-third-runway-andy-burnham>

Conclusions

We conclude that the third runway does not pass the four tests.

- There is no certainty that the third runway is deliverable. Therefore any economic benefits it might bring are at risk.
- If a third runway is built, even aviation's current climate change target can only be met by restricting growth at other airports.
- There would be an unacceptable 'high' risk of failing the government's legal obligations on air pollution, when it has to be likely not just possible to meet limits
- Independent well-grounded evidence on benefits to regions outside London and the South East is absent

Notes

Note 1

The Committee on Climate Change's (CCC's) climate cap for aviation was based on the Climate Change Act's assumption of needing to keep global average warming to 2°C above pre-industrial levels, but the Paris Agreement said countries should pursue efforts to limit the temperature increase to 1.5°C. <https://www.theccc.org.uk/2018/04/18/lord-deben-welcomes-news-that-government-will-seek-ccc-advice-on-uks-long-term-emissions-targets/>. In April 2018 the Climate Change Minister Claire Perry said she would instruct the CCC to investigate the implications for the UK of moving to adopt a net-zero emissions target, in order to bring the UK's domestic climate change framework into line with our new commitments under the Paris Agreement.

Note 2

The issue is what tests would be used to assess whether the scheme would be compliant with legal obligations referred to in the NPS. Not only did the latest Air Quality assessment, done to reflect the government's 2017 Nitrogen Dioxide Plan, not re-do local air quality modelling, but it still relied on weak criteria, which can be considered at odds with wider air quality legal requirements. However even for the government's test the AQ assessment admits that the scheme is still at high risk of failing to meet legal obligations: "Given the inherent uncertainties in air quality modelling, there remains, however, a risk that the option could delay compliance with limit values" and goes on to say "The risk of impact on compliance is high up to 2029 since the option potentially impacts on compliance in central London and exists whether or not the Government's 2017 Plan actions are fully implemented. From 2030 onwards, the risk falls to medium." This is not compatible with the conclusion of the High Court in November 2016 that the government must "take steps which mean meeting the value limits is not just possible, but likely" Air Quality Assessment (see eg 6.4.1) <https://www.gov.uk/government/publications/airport-expansion-further-updated-air-quality-re-analysis> Client Earth 2 November 2016 High Court judgement (see conclusions, paragraph 95, i) <https://www.documents.clientearth.org/library/download-info/high-court-ruling-on-clientearth-no-2-vs-ssefra-uk-air-pollution-plans/>