

**Louise Ellman MP**

Chair

Transport Select Committee

House of Commons

London SW1A 0AA

**Date:**

Dear Louise

I welcome this opportunity to contribute evidence to the Transport Committee's inquiry into the draft National Policy Statement (NPS) on airport capacity. My officers are still assessing the consultation material and I will be providing my formal response to the Government's consultation in due course. In the meantime I would offer the following points to assist your consideration of these very important matters.

Aviation is vital to the London and UK economy supporting jobs and communities. It is also important we make best use of existing capacity through improved surface access links to our airports.

I have been clear that our city urgently needs additional aviation capacity but that this must be done without further breaching limits on pollution which are vital for protecting the health of all Londoners. The NPS fails to demonstrate that Heathrow can be expanded without severe noise, air quality and surface access impacts. It is my duty to Londoners to oppose a third runway and to push Government for new airport capacity which can, environmentally and economically, meet the needs of London and the UK.

I have made clear my view that expansion at Heathrow has unacceptable consequences for London and its people. I am deeply concerned that the NPS presented by Government does not provide any resolution to the fundamental environmental and surface access issues which arise from its third runway proposals. For example, it makes a series of assertions about how this could be delivered, many of which are not backed up by any commitment or are completely unproven. The Government's approach also relies on improvements wholly unrelated to expansion to alleviate its impacts, yet the scope and timing of many of these measures remain uncertain. The NPS focuses much of its assessment on a three-runway Heathrow that is not fully utilised, but this is at odds with best practice and plays down the impacts of a third runway.

### **Noise**

Heathrow already exposes more people to significant aircraft noise than its five main European rivals combined. Therefore it is no surprise that noise remains a concern for hundreds of thousands of Londoners, compounded by a system which does little to address the genuine noise issues they raise. The NPS does nothing to offer assurances to those already plagued by aviation noise; instead it follows Heathrow Airport's approach to seek to rely on future technology to optimise flightpaths and reduce noise. Even assuming this can be delivered as planned, this merely moves the noise around, meaning that hundreds of thousands of people will be exposed to significant aircraft noise

for the first time with a third runway. According to analysis undertaken for Transport for London (TfL), whether or not one assumes optimised flightpaths, a new runway at Heathrow means a net increase of 200,000 in those exposed, compared to no expansion. That increase is around four times the number of people that are exposed by all the other London Airports combined.

Meanwhile the scheduled night flights 'ban' by Government could actually lead to an increase in night flights. The different bans proposed by the Airports Commission (11.30pm-6am) and Heathrow Airport (11pm-5.30am) both fall short of the full eight hours (11pm-7am) deemed by Government to be the official night period, reflecting when most people are actually trying to sleep and their health and well-being would be adversely affected. Informal restrictions already apply before 6am, meaning just a handful of existing flights would be removed. Operating a three-runway airport at full capacity after 5.30am or 6am would mean at least a 33% increase in the total number of night flights, even with such a ban.

### **Air Quality**

As Mayor of London, tackling poor air quality is at the heart of my policies and I have a clear mandate from Londoners to tackle our poisonous air. Heathrow is already one of the worst locations for air pollution in the UK, with the roads around Heathrow already exceeding legal limits by some margin. I fear that Heathrow expansion is taking us in the wrong direction exactly when we should be making every effort to ensure UK compliance with legal limits as soon as possible. This is a question both of the emissions from aircraft movements - but also the road traffic associated with the airport.

The bottom line is that it has yet to be demonstrated that a third runway at Heathrow can be delivered without a worsening in air quality compared to a situation without expansion - nor without risking legal limits. The approach for the NPS appears to be that the vitally important measures we are taking across the whole of London to improve air quality - and the steps to be announced in the latest Defra air quality action plan - will reduce emissions by enough to allow Heathrow expansion and keep us within legal limits. This cannot be tested until we see Government's plan.

Particularly worrying, in its appendices, the NPS states that if the third runway opens around 2025 - as is Heathrow's plan - there is a very real risk that the knock-on impacts of expansion on the roads into central London will lead to breaches in the legal air quality limits, with few mitigation options available to the airport to address this.

The NPS seems to expect that many of the air quality gains I will have secured on behalf of the whole city will not be used to bring about improved public health, but instead to enable Heathrow expansion. If we in London are taking the difficult decisions required to tackle air pollution head-on, it is unacceptable for Government to seek to squander those gains on an expanded Heathrow.

### **Climate Change**

On carbon, it is disappointing that the NPS appears to ignore the recommendations of the Committee on Climate Change. That has sought to ensure UK aviation targets are met without resorting to use of carbon credits, which seek to take advantage of improvements in other sectors. The Government's approach will mean even more stringent efforts are required to decarbonise the rest of the UK emissions to compensate for a third runway, as well as substantial restrictions on growth at other UK airports. If we are to take our commitments on climate change seriously, then we can only proceed on the basis of full disclosure and understanding of such implications and not seek to brush the issue under the carpet.

## **Surface Access**

The Government seeks to mitigate the air quality impacts with an aspiration for no increase in passenger and staff highway trips, but it presents no credible plan for how this will be achieved or paid for. This remains no more than an aspiration in the absence of a commitment to provide the new rail infrastructure required to support what would have to be an increase of 250% in public transport trips to and from the airport. I want to make clear upfront that TfL – and in turn London's farepayers and taxpayers – must not be saddled with a multi-billion pound bill for upgrading surface transport access.

Instead the NPS relies on schemes we have already secured for the benefit of Londoners and those who work in the capital, such as the Piccadilly line upgrade and the Elizabeth line (Crossrail), which were designed to accommodate London's very considerable population and economic growth, not a third runway. The Government cannot now rely on these schemes to enable airport expansion as it will fundamentally undermine the development these schemes were intended to unlock.

While the NPS notes the value of potential western and southern rail links to support Heathrow expansion, it gives no certainty to either and takes the view that these are desirable but not essential. A clear commitment is required for both and in the case of a southern rail link, any scheme taken forward must not seek to rely on lines which are already heavily crowded.

Moreover, the Government must consider the full picture of the airport's surface access. The NPS largely neglects the road trips associated with freight and economic activity around the airport induced by expansion, yet increases in these movements could negate any reductions in passenger and staff trips. The NPS also fails to explore the potential for developing bus, cycling and walking access to the airport, particularly for staff.

The Government must take forward a package of workable proposals to increase public transport capacity and ensure the funding is identified so that Londoners are not left picking up the environmental and the financial costs of any expansion. TfL as the transport authority responsible for Heathrow should have a place on the Surface Access Steering Group, unfortunately this is currently not the case and representations to rectify this have been made to Lord Ahmad by my Deputy Mayor for Transport.

## **Economic Impacts**

I welcome the fact that the NPS has moved away from the inflated figures for economic benefit that the Airports Commission put forward, which were severely criticised by its own peer review group. However, issues remain with the methodology used, and this is a concern because the NPS focuses almost entirely on the economic benefits to seek to demonstrate why Heathrow expansion is better than the alternatives. Notably, the NPS assumes expansion can lead to more competition and lower fares (though this is not demonstrated) and counts the economic benefit to consumers, without including the corresponding consequences to the airline industry.

Increasing domestic connectivity is a key part of the Government's pitch for Heathrow expansion, yet it has no ability to make any commitments to enable this. Airlines decide routes, not Governments or, indeed, airports. The tools that Heathrow has to influence the choices of airlines are limited and the Government would be in breach of EU law if it tried at this stage to make any guarantees of new destinations. In the absence of any meaningful commitments, the most likely scenario is that predicted by the Airports Commission: an expanded Heathrow will be at 80-90% capacity shortly after opening, and would offer just four domestic routes, fewer than half of today. Those around the UK pinning their hopes for better connectivity on a third runway will most likely be sorely disappointed.

The overall conclusion of the NPS appears to be to hope for the best. The Government seeks to rely on innovations unrelated to expansion, clawing back public health and environmental benefits and utilising existing public transport improvements designed to cope with economic and population growth, not airport expansion. Taking forward one of the country's largest infrastructure projects on this basis is simply not good enough.

For the hundreds of thousands that would be affected by a third runway, this NPS process cannot be a mere formality. The NPS begs more questions than it answers and leaves me even more concerned about the severe environmental and surface access impacts of Heathrow expansion. As a result, I remain deeply sceptical as to whether Heathrow expansion can ever be the right answer for London and the UK.

Yours sincerely,

**Sadiq Khan**  
Mayor of London