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for the South East of England



Sent via email to: info@heathrowconsultation.com
4th March 2019

Re: Heathrow Airspace Consultation: Fundamentally flawed

This letter constitutes my response to the consultation on the Airspace and Future Operations at Heathrow.

General framing, approaches and objectives

There are numerous claims made, or objectives stated in the consultation that must be highlighted and called into question.

The consultation document states that “Expansion will connect the whole of the UK to global growth by opening up new trading routes, so that businesses of all sizes can connect to markets across the world.” But the idea that choosing to expand Heathrow will have positive benefits for the rest of the country is disingenuous.

In terms of connectivity, Airports Commission analysis shows that a third Heathrow runway will reduce the international connectivity of the UK’s regional airports. Expansion at Heathrow simply has the effect of displacing connectivity from other regions. I strongly challenge the claim that a significant net economic benefit will arise from airport expansion in the South East. Creating additional airport capacity within the South East goes directly against the objective of rebalancing development in the UK, especially in terms of infrastructure and investment.

The ‘balanced approach’ outlined in the consultation, which still largely frames environmental and social concerns as secondary considerations to economic growth, demonstrates a shocking disregard for the UK’s legal and moral obligation to tackle urgent and genuine environmental crises like climate change and public health emergencies like air pollution.

These are the fundamental constructs on to which this and all consultations that will follow are built. Without addressing these base issues, plans will be developed which are not in keeping with what scientists are telling us to prepare for. The risks and expenditure that will ensue from such business as usual, growth-minded decision making will greatly outweigh the costs associated with making these decisions ‘balanced’ today.

Furthermore, the air quality and carbon objectives that are set in the consultation document are simply not fit for purpose.

It is stated in terms of air quality that expansion must not affect the UK’s ability to comply with its legal air quality obligations. This statement ignores the fact that the UK is already non-compliant with its legal air quality obligations, giving expansion plans free-rein to pollute since it is not technically affecting compliance. Legal air quality obligations apply to local levels. Therefore the fact that this objective gives no guarantees about the quality of air in the local area is worrying. No consideration of this impact is incredibly dangerous and it must be ensured that full assessments of all expansion impacts on pollutants are delivered before plans progress further.

It is also stated that expansion must not have a material impact on the ability of the UK to meet its carbon reduction targets. In October 2018, climate scientists from across the world came together to highlight the need for urgent and radical action to avoid the very worst effects of a climate breakdown that is already in process. Airport expansion quite literally flies in the face of the government's claim that it is committed to protecting our planet and our environment.

Aviation is a top ten global polluter and emissions from the heavily subsidised industry are set to balloon by 300% if action is not taken sooner rather than later. Not accounting for any airport expansion, emissions from aviation are already expected to use up more than two-thirds of the UK's carbon budget by 2050. At the same time, the Government's 'Clean' Growth Strategy will already see the UK miss its legally-binding climate targets. There is simply no way that expansion will not have a material impact on UK carbon reduction targets. It cannot be allowed to take place.

The consultation states that 'Heathrow must 'strive to meet' its pledge to ensure that airport related traffic is no greater than today – although this is not expressed in the Airports NPS as an absolute limit.' This is yet another example of vague language which could simply be left open for interpretation. What does 'strive to meet' mean? What measures will be taken to ensure that this is the case? What are the implications of not meeting the pledge? These considerations need much clearer explanation and more detail is required about the specifics.

Increasing air transport movements by up to 25,000 a year is an incredibly dangerous proposal and should not be considered. For all of the reasons outlined above, on social and environmental grounds more flights cannot be permitted. Moreover, the idea that 'early growth' can be achieved before the third runway is built calls into question all previous claims made about the airport being at 98% capacity. If it is possible for the cap to be removed on the two existing runways to achieve early growth, why the business case has been so desperate to include additional tarmac?

Noise and Night Flights

Whilst it is important to continue to monitor the noise levels and review them periodically, the consultation states that: 'After expansion, we will update our targets over time through the noise envelope process to ensure the objective remains relevant.' There is a real danger that such open-ended plans could lead to the goal posts being moved significantly, with targets withdrawn or weakened and with residents left significantly worse off than they are pre-expansion. More substance and detail is required here to ensure that these plans do not see 'updated targets' that remove the protections currently afforded.

The notion that non-restrictive measures (such as incentivising the use of quieter aircraft and requiring aircraft to use quieter operating measures) should be applied first, before any restrictive measures such as bans or quotas are used, simply demonstrates that the concerns for the wellbeing of residents affected by the night flights are superficial. The consultation states that 'the overall impact of aircraft noise must be limited and, where possible, lower than 2013 noise levels'. It would be possible to ensure that the lower noise levels were achieved, if a more restrictive approach were applied in the first instance.

The consultation states that 'Where an area is indicated as 'No planes overhead', it may be the case there will still be an awareness of aircraft landing/departing from the adjacent runways.' What does this awareness constitute? Does it in fact mean that respite isn't actually experienced? More information on this is required before informed responses can be given.

Additionally, there is insufficient detail provided about how the unscheduled night flights quota and movement limits currently operate, and how expansion plans would alter these, if at all. This information is also fundamentally important and needs to be clarified.

Whole days without respite are unacceptable. The consultation states that 'Airlines expressed strong concerns about the economic impacts of a scheduled night flight ban and said that its introduction could result in flight cancellations and potentially entire route cancellations'. These fiscal concerns should not be given more consideration than the social impacts of the affected communities.

Moreover, there are airports operating best practice - i.e. no night flights – Heathrow should not be beholden to airline threats but should be transparent about the current impacts, and ensure that changes accord to best-practice which is to have full 8 hours night respite.

Yours sincerely,

A handwritten signature in black ink that reads "Keith Taylor". The signature is written in a cursive style with a long horizontal stroke underneath the name.

Keith Taylor, Green MEP, South East England