

26th February 2008

Emailed to heathrowconsultation@dft.gsi.gov.uk

Adding Capacity at Heathrow Airport Consultation A Response From Environmental Protection UK

We are writing in response to your consultation 'Adding Capacity at Heathrow Airport'. Environmental Protection UK has considered the consultation documents and welcomes the opportunity to comment on the proposals.

About Environmental Protection UK

Environmental Protection UK brings together organisations from across the public, private and voluntary sectors to promote a balanced and innovative approach to understanding and solving environmental problems, through policy development and education. We are a registered charity with 110 years experience of environmental campaigning, public information provision, producing educational resources and policy formulation.

Environmental Protection UK's noise and air quality policy committees have been involved in the development of this response. These committees bring together policy makers, regulators and practitioners from local authorities, consultants, developers, academics, industry, interested NGOs as well as members from Environmental Protection UK's regional divisions. As such they are able to draw on a wide range of expertise and views from representatives of the entire air quality and noise communities.

Our Conclusions on 'Adding Capacity at Heathrow Airport'

The 2003 White Paper 'The Future of Aviation' made further expansion of Heathrow Airport conditional on two key environmental tests:

- Noise limit – no increase in the size of the 2002 57dBA L_{eq} contour
- Air quality limits – confidence in meeting European air quality limits around the airport, particularly nitrogen dioxide

We do not have confidence in either of these conditions being met under the expansion plans considered in the consultation document.

Noise - for the noise criteria uncertainties in the future aircraft fleet mix means there are no guarantees that the 'test' will be met. We also strongly question the continued validity of the 57dBA L_{eq} contour as a test of annoyance. In particular we believe that the recent ANASE report provides sufficient evidence to indicate that people are more annoyed at lower levels of noise than previously thought, and also that the number of aircraft noise events, as opposed to the overall amount of noise energy,

is more important than has been previously assumed. Further, we believe that management of noise at Heathrow should be brought into line with all other areas of UK noise policy, where 'night time' is 23:00 to 07:00. It is an anomaly that the aviation night is shorter! In order to comply with the Environmental Noise Directive, the default values determining day and night for the purposes of managing noise should be the same for all sources.

Air Quality - the lack of sensitivity testing for the modelling casts serious doubt on the results. Figures from DfT show that the modelling predicts that a significant number of neighbouring properties will only just be under the 40ugm³ limit by 2020, This means that small departures of actual concentrations from the modelling will result in breaches of the air quality limits. We are also concerned that the consultation document appears to assume that a derogation (to 2015) will be obtained for NO₂ limits under the as yet un-finalised new EU Air Quality directive, and that even then breaches will still be occurring after 2015.

Climate Change - the plans seem to be in direct contradiction to Government policy on climate change. With emissions from the rest of the UK economy expected to reduce significantly under Climate Change Bill targets, the planned rises in emissions from international aviation will become more and more anomalous. We have no confidence in the ability of the Government's preferred option (inclusion within the EU Emissions Trading System) for managing aviation emissions. In its current form this scheme has failed to drive emissions reduction and set an effective price for carbon dioxide emissions. In addition, the technical reports have failed to consider the likely impacts of climate change on areas such as air quality.

The consultation process itself has been muddled, with many facts and figures hidden away in technical reports that do not link together well as a cohesive whole. The muddled nature of the documents and the relatively short time given for the consultation process has hampered the ability of many organisations and individuals to make a full and thorough response to this consultation.

We believe that the expansion as proposed will comply neither with EU legislation or aspirations, and is not compatible with Environmental Protection UK's vision of a cleaner, quieter, healthier world.

Section 1 - Background

Environmental Protection UK believes any development of aviation should be in the context of the following:

General

- The Government should not seek to expand the infrastructure supporting the aviation industry purely on a predict and provide basis, where this will result in unacceptable levels of environmental or social harm.
- Where new infrastructure is required, or where existing capacity is expanded, the mitigation of further environmental and social harm must be seen as a key priority.
- Policies on aviation should be developed in a way which is consistent with the approach used for other transport sectors, and aviation should be fully bedded into an integrated transport policy, rather than being treated as a separate case.
- The Government should seek to reduce the environmental and social harm arising from aviation through a balanced programme of progressive introduction of improved technology, better operational practice, and demand management.

- Action to reduce the environmental and social harm caused by aviation will require international cooperation. The Government should adopt a leading and active role in international debate, particularly within the European Union, and should encourage the development of radical and innovative solutions.

Noise

- Any developments or alterations to the UK aviation infrastructure, air operations or flight scheduling, should not result in an increase to the night time noise exposure of either the general population or of individual communities.
- Any developments or alterations to the UK aviation infrastructure, air operations or flight scheduling, should avoid increasing the day time noise exposure of either the general population or of individual communities. Where an increase in exposure is unavoidable, a full package of mitigation measures should be offered to those affected, and the costs of such measures met by the aviation industry.

Air Quality

- Any developments or alterations to the UK aviation infrastructure, air operations or flight scheduling, should not result in breaches of air quality limits as set out in the current Air Quality Strategy for England, Scotland, Wales and Northern Ireland.
- For 'no safe threshold' pollutants, such as PM_{2.5}, consideration should be given to effects of aviation development on the exposure of nearby populations, and compatibility with the UK's PM_{2.5} exposure reduction target of 15% (urban background) by 2010-2020. Where an increase in exposure is unavoidable, a full package of mitigation measures should be introduced, and the costs of such measures met by the aviation industry.

Relevant EU legislation

The EU 6th Environmental Action Programme aims "to achieve reduction of the number of people regularly affected by long-term high noise levels from an estimated 100 million people in the year 2000, by around 10% in 2010 and by 20% in 2020".

The EU Environmental Noise Directive 2002/49/EC (END) sets out to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise. By July 2008 noise action plans should be in place for managing noise at airports including Heathrow.

The EU Framework Directive on ambient air quality assessment and management (96/62EC) and its four 'daughter' directives sets legally binding limit values for many air pollutants, including nitrogen dioxide and particulate matter (PM₁₀). The Directive and the first 3 'daughters' are expected to be replaced with a new EU Air Quality Directive during 2008.

Section 2 - Answers to Specific Consultation Questions

Question 2

Do you agree or disagree with the Government's view on the continuing validity of the environmental conditions? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

Environmental conditions attached to any expansion of Heathrow Airport are crucial to protect the health of the surrounding population, local ecosystems and the wider environment. We believe that this proposal must be informed by revised guidelines,

in line with recent and required research, to ensure that the stated environmental objectives are met and that decisions are based on 'best evidence' (3.34)

Environmental Protection UK believe that, since the White Paper, new evidence is available on which any decisions must be based:

For air quality the introduction of the exposure reduction regime for fine particles (PM_{2.5}) in the 2007 Air Quality Strategy means further consideration should be given to the effect of airport expansion on PM_{2.5} 'urban background' exposure. We note that the technical documents released for this consultation refer to emissions of fine particles, however there has been no analysis or modelling of the effect of mixed mode operation and the proposed 3rd runway on exposure to PM_{2.5}.

For noise the consultation document agrees with the findings of the ANASE report in stating that "it is probable that annoyance with a particular level of aircraft noise is higher than that found when the last aviation noise study (ANIS) was carried out in the 1980s" and that there is "no threshold noise level at which there is "onset of significant community annoyance""(para 3.32). We believe that these admissions alone are grounds for reviewing the environmental conditions set for noise, namely the 57dB(A)_{Leq} contour. While we recognise the concerns of government advisers and peer reviewers regarding unorthodox research methodologies and flaws in the ANASE report, we believe, and DfT agree here, that it does provide sufficient evidence to indicate that people are more annoyed at lower levels than the Department for Transport has been assuming, based on 1982 ANIS data; also that the number of aircraft noise events, as opposed to the overall amount of noise energy, is more important than the Department has been assuming. Therefore we strongly disagree with para 3.34, which states that the conclusions of ANASE offer no reason to change policy as set out in 2003 and 2006. Further, the publication this month by the EU of 'Noise Operation Restrictions at EU Airports (Report on the application of Directive 2002/30/EC)' is a further indication that environmental conditions must be reviewed.

Question 3

Do you agree or disagree with the Government's view that a third runway could be added whilst meeting air quality limits, without the need for further measures? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

We are not convinced by the evidence put forward in the consultation and accompanying technical documentation. Although the modelling and assessment work has been carried out to a high standard we firmly believe that insufficient attention has been paid to variables and ranges of future scenarios, primarily regarding:

- road traffic forecasts
- meteorological variability
- background air quality
- climate change effects (both on meteorological conditions and background air quality)
- atmospheric chemistry (particularly background O₃)

Furthermore we understand that the air quality case relies very heavily upon technological improvements in road vehicle NO₂ emissions making 'headroom' for aircraft emissions to increase. Previous tightening of the Euro emission standards have failed to deliver the scale of NO₂ reductions envisaged at the time of the legislation, and expectations for further Euro standard improvements need to be subject to a range of scenarios.

Question 4

Do you agree or disagree with the Government's view that adding a third runway is achievable within the noise contour limit of 127 sq km, at the indicated levels of air traffic? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

Please see our answer to Question 2. We believe Government should urgently commission a review of research, together with a technical assessment of ANASE. We believe that it is unsafe to continue to rely on 1982 data in assessing proposals with potential for such massive long term impact as Heathrow. We do not believe that reliable decisions can be taken on these proposals without such a review. Further, even on information provided we remain unconvinced that adding a third runway is achievable within the 127 km² contour limit, as the future fleet mix is uncertain.

We believe (see Question 2) recent reports indicate that the 57 dB(A) contour is no longer an appropriate parameter for population impact. The World Health Organisation onset of annoyance level for noise is 55dB(A). Research also shows that aviation noise is more annoying than other noise sources. The chart below shows relative onset of annoyance for percentage of population for transport modes (*Annoyance from Transportation Noise: Relationships with Exposure Metrics – Miedema/Oudshoorn, TNO-PG Leiden, The Netherlands*)

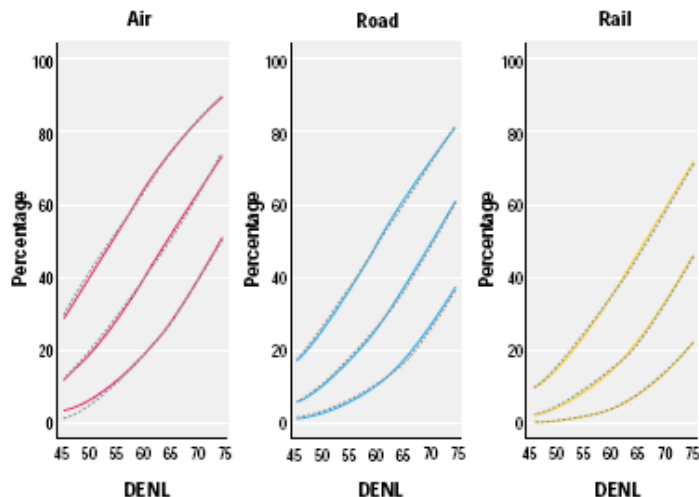


Figure 4. The estimated curves (solid lines) and their polynomial approximations (dashed lines) for DENL.

It is therefore essential that work is undertaken to determine true impacts on current and future populations and appropriate parameters, so that standards are set which ensure compliance with EU legislation and aspirations.

Question 5, Question 6

Do you agree or disagree with the Government's view that mixed mode operations could be introduced within the noise limits set out in the White Paper? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

We believe runway alteration provides crucial noise free periods to communities and in particular to sensitive locations, such as schools in the area. While it is predicted that mixed mode may meet the noise limits in the White Paper, in the light of 'best evidence' currently available, we do not believe that these 20 year old limits now reflect the true impact on households and communities, or would enable EU legislation and aspirations to be met.

Please also see our answer to Question 4.

Question 7

Do you agree or disagree with the Government's view that full mixed mode operations could be introduced by 2015 and be compatible with compliance with the air quality limits in the vicinity of the airport? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

We disagree with this view – indeed the consultation document estimates that exceedences of the NO₂ objective will still occur in 2015 (para 2.120) making the inclusion of this question in the consultation rather puzzling. Although we note that the predominant source of the exceedences will be traffic on the M4 a significant proportion of this traffic will consist of vehicles accessing the airport, meaning that it should not be divorced from the effects of airport expansion. We also have concerns regarding the evidence presented in the air quality modelling process, as outlined in our answer to question 3.

Whilst paragraph 2.120 makes reference to measures that could eliminate these exceedences, no analysis of these is referenced in the text, and we feel that mitigation options should be analysed and timed before mixed mode operation is taken forward.

We also have concerns regarding the date chosen (2015) for this question, which seems to imply that the Government will seek a derogation for NO₂ under the new EU Air Quality Directive. We do not support the seeking of any such derogation, and would like to highlight that any such derogation would be conditional upon submission of mitigation plans and programmes, which, as we stated above, are not in evidence in this consultation.

Question 8 and Question 9

Do you agree or disagree with the Government's views on retaining westerly preference? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so what are they?

Do you agree or disagree with the Government's proposal to end the Cranford agreement? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

We believe mixed mode and suspension of Cranford would increase noise exposure. Any increase in noise exposure and impact is in contravention of EU legislation and aspirations and therefore unacceptable.

Question 10

Do you agree or disagree with the Government's views on continuing night time rotation? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what?

We agree. However we reiterate a previously stated view that night time movements are an area where aviation is treated as a special case. In all other areas of UK noise policy 'night time' is 23:00 to 07:00 and it is an anomaly that the aviation night is shorter! In order to comply with the Environmental Noise Directive, the default values determining day and night should be the same for all sources.

Question 11

Do you agree or disagree with the Government's views on continuing runway alteration in the 0600 – 0700 period? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

We accept this, for as long as activity continues during this period. Government should aspire to treating the 0600 – 0700 period as night, as it is in all other areas of UK noise legislation.

Section 3 - Questions from Environmental Protection UK to the Department for Transport

In addition to our answers to the consultation questions above, we have a number of questions for the Department for Transport that we feel have not been adequately addressed in the consultation process.

Air Quality Questions

1. Why has only limited sensitivity testing been carried out on the air quality modelling results?

Whilst we note that the modelling work carried out for this consultation has been carried out to a high standard, we also note that only limited sensitivity testing has been undertaken on the variables involved, for example:

- road traffic forecasts
- meteorological variability
- background air quality
- climate change effects (both on meteorological conditions and background air quality)
- atmospheric chemistry (particularly background O₃)

Proper sensitivity testing of the modelling is essential, as we understand that the modelling estimated that there will be a significant number of properties in 2015 and 2030 where annual mean NO₂ is only slightly under the 40ug m³ limit (i.e. in the 38-39.9 ug m³ contour band). This means that only small departures from the modelled concentration will mean a failing of one of the Government's two environmental tests.

This lack of sensitivity testing is particularly concerning in light of previous departures from predicted NO₂ concentrations. At the London Heathrow 2 monitoring site there has been little change in measured NO₂ for the past 11 years, not what would be expected in a period of tightening Euro emission standards. This casts doubt on the ability of further improvements to the Euro standards to meet the required emission reductions, particularly Euro VI for heavy duty engines which hasn't even been finalised yet.

Recent trends were explored in the 2007 AQEG report 'Trends in Primary Nitrogen Dioxide in the UK', which reported that concentrations of NO₂ were not falling as fast as concentrations of NO_x. The likely reasons identified for this were:

- i) Increased market penetration of diesel cars and retrofitting of pollution control devices;
- ii) Increased background level of O₃, providing a means of oxidising NO to NO₂.

AQEG's modelling work predicts almost constant, or even slightly increasing, values for urban NO₂ emissions over the period 2002-2005 and slight falls over the period

2005-2010. Beyond 2010 the report noted 'currently available predictions of future primary NO₂ emissions percentages are subject to considerable uncertainty'.¹

In addition to the trends highlighted above, there is significant evidence that climate policy, particularly taxation, is driving significant changes in the fuel mix of the light duty vehicle fleet. SMMT figures for 2007 show diesel cars making up 40.2% of new car sales in 2007, with the very latest figures for January 2007 showing diesel registrations up 10% on the previous year to take a 44.9% share of the market.

Forthcoming EU regulation on new car CO₂ emissions is very likely to drive a further increase in diesel sales, and, with the proposed 2012 introduction, affect this before the current Euro standards diesel/ petrol NO_x 'gap' has been addressed by the introduction of Euro 6.

Fleet inventories, and how they may change in the future, are notably missing in the technical documents issued alongside the consultation. We would expect to see alternative traffic scenarios analysed in order to ensure confidence in the conclusions for air quality.

To summarise then, we feel that the modelling work does not take sufficient account of several key variables, and needs to undergo further sensitivity testing to avoid simply presenting a 'best estimate' approach to the NO₂ issue.

2. Why have climate sensitivities not been explored?

Climate change is likely to have a major impact on air quality in the UK over the period of projected expansion at Heathrow. Climate change will impact on the air quality around Heathrow through changes in the metrology around the airport, and raised levels of O₃ providing a means of oxidising NO to NO₂.

The 2007 AQEG report 'Air Quality and Climate Change: A UK Perspective' demonstrated that climate change will make the task of meeting our air quality objectives much more difficult – with major smog episodes such as seen in 2003 becoming far more common unless significant action is taken to cut emissions of local pollutants. The conclusions that many drew from the report included that climate scenarios should be considered in air quality assessments of major long-term infrastructure projects.

There is no evidence that climate scenarios have been factored into the modelling used for Heathrow, with the base year of 2002 being used for metrological input. This potentially provides a major source of uncertainty in the modelling, and we believe that a range of base years should have been explored – in particular 2003 which climate models suggest may be a better fit with the 'average' summer around 2030.

3. What control mechanisms will be put in place to ensure that environmental quality objectives are met?

We feel that the uncertainties we have raised mean that a further review of air quality and noise considerations would be needed before construction of a 3rd runway began, to ensure that progress towards air quality and noise standards was suitably 'on track'. Considering that EU NO₂ objectives are now likely to apply from 2015 (if a derogation is obtained, which the consultation document seems to, rather arrogantly,

¹ Page 98, paragraph 214

suggest will happen) this would seem to be a suitable date for such a review to be undertaken.

With this in mind we ask that the Government give a commitment to a further review of air quality and noise considerations before final planning permission is given for a 3rd runway, and that, if a review showed that air quality and noise objectives would not be met, either planning permission would be refused or made conditional on suitable mitigation measures being introduced.

4. Why have air pollution costs not been included in the net economic benefit calculations?

We note that air pollution costs have not been included in the calculation of net economic benefit, the approach taken assuming that, under limit values, there is no cost imposed by air pollution. This approach stands in direct contrast to the science, particularly for fine particles which have no 'safe' threshold for health and whose economic costs can be calculated.

In terms of NO₂, the modelling for Project Heathrow expects road vehicles to significantly lower their emissions, which will create greater headroom to allow aviation emissions to significantly increase. This in effect allows Heathrow owners and airlines to externalise their abatement costs to the road transport sector at no financial cost to themselves, standing in direct contrast to the 'Polluter Pays' principle.

Improved exhaust abatement will impose costs to vehicle owners and operators through higher vehicle costs and increased fuel consumption (over business as usual). The argument that vehicles would have to improve their performance anyway is confused – Euro emission standards could be set much lower and limit values achieved if other sources of air pollution, such as aircraft, reduced theirs.

We also note that the costs of carbon dioxide emissions from extra vehicle journeys to the airport have not been included in the economic analysis, which appears to be a major omission in the process.

Noise Questions

1. What work will be undertaken to ensure that appropriate noise contours are used, that reflect latest and pending thinking on the annoyance and health impacts of environmental noise?

Both ANASE and recent work commissioned to establish the basis for increasing membership of the Heathrow Campaign Against Noise (HACAN)², find increasingly that people are annoyed beyond the 57 dB(A) contours, currently used to monitor impact around airports. The recent EU funded HYENA³ research also reinforces health concerns about the cardiovascular impact of noise around airports. Also, new Night Noise Guidelines for Europe are expected from the World Health Organisation and a report on noise and health impacts from Defra. We believe it would be premature to base such a long term infrastructure proposal on the information in the 2003 White Paper, as it is now over 20 years old.

² Aircraft Noise and London Heathrow Flightpaths at <http://www.hacan.org.uk/resources/reports/st06145.text.final.pdf>

³ HYENA (Hypertension and Exposure to Noise Near Airports) Report at <http://www.hyena.eu.com/>

2. What mechanisms will be in place to ensure that adding capacity at Heathrow meets the requirement of the EU 6th Environmental Action Programme “to achieve reduction of the number of people regularly affected by long-term high noise levels by 20% in 2020”.

Heathrow is due to have a noise action plan in place by July 2008. We seek assurance from DfT that this, and subsequent plans will avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise, for populations in, around, and under flight paths to and from Heathrow, and from associated ground traffic movements.

3. “Good economic practice would be to give all levels of noise a monetary value” (3.36, p.47). But noise is not currently included as an economic factor in analysis of aviation projects. What plans do DfT have for a valuation for aviation noise (rather than applying those from rail and road?)

In view of the clear impact of aviation noise on health (see a above) and on children’s learning ability⁴, we believe noise both from the aircraft themselves and from associated ground movements must be included as an economic factor in the analysis of this, and any future plans to develop aviation infrastructure. A recent study⁵ estimates that the full costs to EU society, including costs to health services, of traffic noise pollution are at least EUR 40 billion per year – we believe this must be addressed.

General Questions

1. Is Heathrow expansion compatible with the Government’s aims on climate change, and in particular, the Climate Change Bill?

The Government’s primary means of control of aviation CO₂ emissions is stated to be the European Emissions Trading System. The first phase of ETS was widely seen to be a failure, with over allocation of permits making them essentially worthless and proving little incentive for the industries involved to cut their emissions. It remains to be seen if the second phase will prove to be more successful; however if this too is a failure there is no back up plan provided in this consultation to control aviation CO₂ emissions.

International aviation lies outside the targets in the Climate Change Bill, meaning that increases in emissions in this sector will not have to be offset by cuts in emission elsewhere in the UK. Indeed, inclusion of aviation in the ETS could see emissions reductions elsewhere in the economy being traded with the aviation sector, providing a contribution towards the Climate Change Bill targets but a net cut in greenhouse emissions of zero. As the UK cuts its emissions towards the 2050 target, and aviation emissions grow, this anomaly will become more and more apparent.

We suggest that the UK’s share of emissions from international aviation is included within the Climate Change Bill targets at the earliest opportunity, and that Government policy towards aviation is reviewed in line with this change.

⁴ http://www.wolfson.qmul.ac.uk/RANCH_Project/

http://www.pinche.hvdgm.nl/resource/pdf/brussels/24th/13-30_s_stansfeld.pdf

⁵ “Traffic noise reduction in Europe: health effects, social costs and technical and policy options to reduce road and rail traffic noise” CE Delft for T&E, February 2008

2. Do the assumptions on future passenger demand provide an accurate picture of the market for travel and business services?

We note that the projections of passenger numbers used to justify the expansion plans have been provided by BAA and DfT, with good agreement between the two. The BAA figures being used for modelling purposes due to their greater detail.

BAA as a private operator wishes to advance air travel over other modes of transport, and fight competition from alternative business services such as teleconferencing. This should not be the aim of UK transport and environmental policy, and we find it more than a little worrying that BAA's figures for passenger growth are taken at face value.

High speed rail as a competitor to short haul air seems to have been largely ignored by DfT, despite the evidence that where such competition exists both business and leisure passengers prefer and value the rail service; for example in 2005 Eurostar highspeed train services held market shares of 71% of the London-Paris and 64% of the London-Brussels air/rail routes⁶. Heathrow itself links poorly with the national rail network making onwards journeys by public transport difficult, as can be seen in the consultation's projections for journeys by public transport to and from the airport.

We further note that business travel is expected to increase from Heathrow, accounting for 47% of total passengers by 2030. Whilst businesses greatly value transport links and access to their customers, they also incur significant costs in both fares and staff time and are therefore keen to reduce these where they can. Recent years have also seen huge improvements in communication technologies, including those that allow individuals to meet and collaborate remotely. These technologies are highly likely to improve further in the immediate future and provide an increasingly strong competitor to air travel.

We see no evidence that 'alternatives to travel' have been considered at all in the figures used in this consultation. Have the views of the telecommunication industry and prominent academics in the sector been accessed? Again we see no evidence for this.

In all we feel that the passenger projections used for this consultation are based on relatively simple criteria, and greater 'horizon scanning' should be used to produce a wider set of scenarios.

3. Are BERR's projections of oil prices realistic?

We note that DfT's passenger projection state that 'Oil prices are assumed to move in line with the DTI's central oil price projection, which falls from about \$65 per barrel in 2006 to \$53 per barrel in 2030, with most of the decline occurring by 2012'⁷.

At the time of writing oil prices continue at record highs, and with demand from developing countries increasing dramatically whilst supply is constrained, prices look set to remain high for the foreseeable future. In addition to this even the most optimistic analysis of future oil production see an oil production peak around 2030⁸, making the idea that oil prices will remain low with minimal impact on aviation seem at best over optimistic and at worst completely ludicrous.

⁶ Eurostar press release 16/1/06

⁷ UK Air Passenger Demand and CO2 Forecasts, DfT 2007

⁸ 'Why the Peak Oil Theory Falls Down: Myths, Legends, and the Future of Oil Resources', Cambridge Energy Research Associates (CERA) 2006

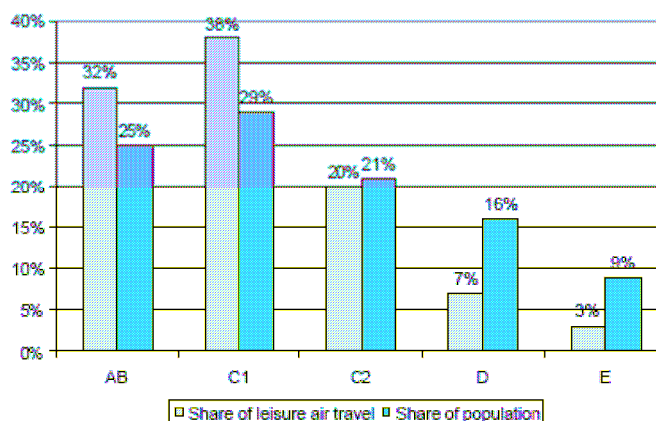
Fuel costs are one of the main overheads for airlines and have a large impact on ticket costs. We remind DfT that aviation is perhaps the transport sector most heavily wedded to fossil fuels, and with the long service life of aircraft and no real alternatives on the horizon the vast majority of the aircraft fleet in 2030 will still be made up of kerosene fuelled jet aircraft with only incremental improvements in fuel efficiency.

4. Have concepts of demand management been adequately explored?

The consultation document includes mention of Air Passenger Duty to moderate growth, and more specifically changes to the system to levy the duty per aircraft rather than per passenger. However, projections of these changes and the cost impacts of including aviation in the ETS appear to show a minimal effect. We therefore feel that the concept of demand management to moderate growth has been inadequately explored. The consultation makes no reference to any passenger growth scenarios under different levels of APD, and it would be interesting to know if DfT has undertaken any studies on the effect of current and possible future levels of APD on passenger demand.

The argument that increasing the cost of air travel creates inequalities in society is frequently put forward, however we feel this is flawed. Research has shown that the wealthier sections of society have benefited most from cheaper air travel, flying more often and for further distances, as shown in the graph below⁹. Those from lower income groups tend not to fly – essentially if you have a very limited income then you cannot afford a holiday, however little the flight costs.

Figure 2 Leisure air trips abroad by socio-economic status (adult population)



5. Why have the wider effects of expansion on road traffic not been examined, and costed into the net economic benefit calculation?

Heathrow expansion will have major knock on effects on traffic on surrounding roads, particularly the M4 and the nearby sections of the M25. We note that this area is already one of the busiest and most congested parts of the UK's motorway system, and without any envisaged step change in public transport provision Heathrow expansion will only make this situation worse. This will have major knock on effects in terms of congestion and CO₂ emissions which can and should be monetised. We

⁹ Source – Civil Aviation Authority 2005

would also like to point out that addition road congestion will have an impact on air quality exceedences away from the immediate area around the airport.

We note that the concept of road charging is explored in the Surface Access Report – whilst Environmental Protection UK supports nationwide environmentally optimised road charging, a Heathrow only congestion charge is in direct opposition to the ‘Polluter Pays’ principle, and instead ideas of how the airport operator can, for example, fund exhaust treatment retrofit programmes should be explored.

6. How robust is the research base used to calculate the economic benefits of expansion? Why do businesses actually locate near Heathrow?

We note that the recent CE Delft¹⁰ report commissioned by HACAN has cast serious doubt on the economic benefit figures used to justify Heathrow expansion, stating that ‘The suppressed business demand that would be released by expansion at Heathrow is significantly over-estimated’ and that, ‘to give a truer account of the impact of aviation on the national budget, the figures for taxes and charges paid by the aviation sector could have been set against the subsidies and other forms of government support that are paid to the sector, something that the OEF report does not attempt.’

The following facts are frequently quoted in the consultation document, ‘*Fifty two per cent of companies consider transport links are vital in deciding where to locate their business and 70 per cent of foreign companies’ first location in Britain is within one hour of Heathrow*’. We feel this is a major misrepresentation of the facts in the consultation document, as they give the impression that Heathrow is the main or only consideration. A more accurate statement of the facts is that general transport links are vital in businesses deciding their locations, and that foreign companies generally locate in London and South East England for a wide variety of reasons other than simple proximity to Heathrow, factors again referenced by the aforementioned CE Delft report.

We would welcome further research from the Department for Transport on the factors behind business decisions on location (both internationally and within the UK), and further detail on the economic impacts of Heathrow under a range of expansion scenarios.

7. Can the economic benefits of hub airport operations be better distributed to negatively affected communities?

Hosting a major hub airport means that many passengers are transiting through with no direct contribution to the UK economy except to the airport operator and airlines. Whilst we understand the connectivity benefits of hosting a hub airport the fact remains that the negative impacts in terms of noise and air pollution of hub business are felt locally. We believe that further thought is needed as to whether this type of business is desirable, and how local communities can be better compensated for the quality of life impacts this type of ‘through traffic’ causes.

Section 4 – Contact Us

If you require any further information on the views expressed in this response please contact:

¹⁰ The Economics of Heathrow Expansion, CE Delft Feb 2008

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