

MAYOR OF LONDON

Mary Creagh MP

Environmental Audit Committee

House of Commons

London

SW1A 0AA

Date: 23 November 2016

Dear Mary

Thank you for the opportunity to make a submission to inform your ongoing work in relation to airport expansion. I am responding on behalf of the Mayor.

It is regrettable that Government has decided to take forward Heathrow expansion in spite of the clear evidence of its serious environmental impacts in terms of air quality and noise and, perhaps of greatest concern, what it would mean for public health. The recent court judgment, which the Mayor participated in, quashing the Government's current Air Quality Plan as inadequate and unduly optimistic, simply underscores the need to properly and robustly assess and address the consequences of this lamentable decision.

That is why the Mayor will be seeking to hold Government to account. To that end, he announced last week that he has directed Transport for London to provide advice and assistance to the group of boroughs preparing a legal challenge – and he has not ruled out joining any legal challenge as a full participant.

The Mayor believes these proposals could have a very detrimental impact on the lives of hundreds of thousands of Londoners. His fundamental concerns include:

- It is yet to be demonstrated that an expanded Heathrow could operate without exceeding legal limits for NO₂.
- The requirement for Defra to draft a new Air Quality Action Plan incorporating more realistic emissions factors is likely to further complicate attempts to demonstrate the compliance of an expanded Heathrow.
- Delivering significant mode shift will be critical to limiting highway traffic and helping tackle air pollution; but no new rail infrastructure is deemed by Government or the

Heathrow Airport Limited to be required for expansion, rendering such an aspiration simply not credible.

- Little consideration has been given to the impact expansion will have on the growth in highway trips associated with air freight and induced economic activity (attracted to the area as a result of an expanded airport, albeit not directly related to the airport); both could have a disproportionate impact on local roads.
- A three-runway Heathrow would result in an increase in the number of people exposed to significant aircraft noise (at $55\text{dB}_{\text{Lden}}$) of over 200,000, compared to a two-runway Heathrow (applying similar assumptions); Heathrow Airport Limited claimed a new runway could lead to less noise, but only by not comparing like with like – it assumed measures, notably flight routing optimisation, in its expansion scenarios but excluded them from its non-expansion scenarios.
- Applying DfT WebTAG guidance indicates the monetised impact on public health from the noise of an expanded Heathrow to be £20-25bn over 60 years.
- Even with the partial night flights bans being proposed, the proposals are likely to lead to a net increase in flights across the night period (11pm-7am) of at least 30%.
- For most people living under the flightpaths in the vicinity of the airport, the respite from aircraft movements will be half of what is offered today – i.e. just a quarter of the traffic day.

Taken together, this presents a potentially serious challenge to the health of hundreds of thousands of Londoners. The Mayor believes it would be wholly unacceptable if potential gains in noise and air quality as a result of other measures, such as London's action on vehicle emissions and aircraft operational changes unlocked by new technology – which could substantially benefit local communities – were instead banked by the airport to enable expansion.

The Mayor believes that such is the scale of the environmental impacts that would result from a third runway at Heathrow, it remains highly uncertain that these impacts are capable of being successfully addressed.

Yours sincerely,



Val Shawcross CBE
Deputy Mayor for Transport