

MAYOR OF LONDON

Rt Hon Chris Grayling MP

Secretary of State for Transport
Department for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR

Date: 19 DEC 2017

Dear Chris,

Please find enclosed my response to the supplementary consultation on the National Policy Statement (NPS) on airport capacity in the South East.

Aviation is vital for our city and for the country as a whole. It provides jobs, supports the economy, allows us to connect with the world and ensures London is open.

It is also clear that there is a need for additional aviation capacity, but new capacity cannot come at any cost. As stated in my response to the previous consultation, I remain concerned that the Government has not assessed the full range and scale of impacts that will result from a third runway at Heathrow, particularly the severe air quality and noise impacts; and the significant investment required in surface access, which is currently uncommitted and unfunded. In addition, there remain concerns about the impact on efforts to minimise aviation's contribution to climate change and on the basis of the economic case.

Air Quality

Our updated air quality analysis shows that the only way a three-runway Heathrow can avoid a breach of legal air pollution limits is by relying on the measures I am introducing to improve London's air quality, such as the Ultra Low Emissions Zone. Given the public health crisis we face as a result of poor air quality, it would be both morally and legally unacceptable to take advantage of such measures to allow a third runway to meet legal limits, acting against their purpose of bringing about cleaner air for Londoners.

This is particularly important given the Government's stated position that London will not be able to access implementation or mitigation funding on the same basis as being made available to the rest of the country. On top of this, Transport for London's Comprehensive Spending Review settlement in 2016 did not include any new air quality funding. My efforts to improve air quality are being banked by the Government, and being used to enable a third runway which will undermine those very improvements.

Even with my extra measures to improve air quality, the revised NPS finds that the risk of a three-runway Heathrow breaching legal limits remains high up to 2029. This renders Heathrow expansion wholly incompatible with the Government's obligation to reduce national air pollution in the shortest possible time.

Surface Access

There is still no commitment to any significant new public transport infrastructure, which could help achieve a substantial shift away from cars, taxis and private hire vehicles. Our analysis shows that both a Southern and Western Rail Access scheme are required yet neither is considered essential in the NPS.

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The revised NPS now distances itself from Heathrow's aspiration for no increase in passenger, staff and freight traffic. The NPS conditions for 2030 of 50 per cent public transport passenger mode share and a 25 per cent reduction in staff highway trips are woefully unambitious targets, which we estimate would lead to at least around 30,000 additional vehicle trips on the roads every day.

Noise

The noise impacts of Heathrow remain a serious concern, particularly the halving of respite for many and the major increase in night flights entailed in all the night options being considered. I am concerned that the revised NPS explicitly backs the use of Heathrow's indicative flightpaths to assess noise despite some of these previously being found not to be feasible. This means there is no certainty that the modelled routes will have any resemblance to what is actually implemented.

Climate change

The NPS still neglects to set out how carbon emissions from an expanded Heathrow can be accommodated within the national cap without restricting growth at other airports and in other industry sectors.

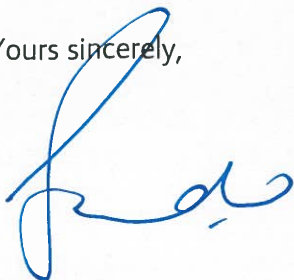
Funding

Finally, the question looming over all of this is who pays. The Government has made wide-ranging commitments in its desire to deliver a three-runway Heathrow and there is a real risk that sooner or later the taxpayer is forced into underwriting, if not subsidising, the whole project.

Never has the case for a third runway at Heathrow looked so precarious. London and the UK have a pressing need for new airport capacity and now is the time to take forward expansion at Gatwick Airport. This was the other feasible location option shortlisted by the Airports Commission and the NPS confirms it could be delivered more quickly (in 2025), have a fraction of the noise impacts, avoid breaching legal limits for air pollution and have a considerably lower wider environmental impact than a third runway at Heathrow. Expansion at Gatwick would also deliver greater benefits to passengers and to the wider economy. The revised NPS forecasts that a third runway, opening in 2026, would be full in 2028. This means that an expanded Heathrow would once more suffer from worsening delays and be unable to accommodate new routes and frequencies without sacrificing existing flights and with the NPS forecasting just five domestic routes, down from eight today.

It is not too late for Government to change course and recognise the inherent and insurmountable flaws in proposals for a third runway at Heathrow that the revised NPS lays this bare for all to see.

Yours sincerely,



Sadiq Khan
Mayor of London

Enc.

Cc: Rt Hon Greg Hands MP, Minister for London
Rt Hon Gavin Barwell, Chief of Staff, 10 Downing Street