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Green Party
for the South East of England

Rt Hon Ruth Kelly MP
Secretary of State for Transport
Department for Transport
Great Minster House
76 Marsham Street
London
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February 25th 2008

Dear Secretary of State,

I would like to take this opportunity to contribute to the Government's consultation regarding the proposed expansion of Heathrow Airport by means of a third runway. I am utterly opposed to the proposals and hope that you will give proper consideration to the views of the many thousands of my constituents whose lives will be further adversely affected should any expansion go ahead.

Under the Department for Transport's proposals, the number of flights using Heathrow will nearly double - from 473,000 last year to nearly 800,000 if both a third runway and the end of runway alternation are agreed. That translates into nearly 500 extra flights a day, and more noise and more emissions. A third runway would require the demolition of over 750 houses - perhaps significantly more - including the entire village of Sipson. More than 3000 people would lose their homes. Schools, pubs and churches would all be demolished.

These proposals are a social and environmental nightmare - and they are economically unviable.

Noise

The government has said that the expansion will only go ahead if the area affected by aircraft noise post-expansion would not be greater than the area affected in 2002. But this base line is deceptive.

First, Concorde was still operating in 2002. Because of the way that the Department for Transport (DfT) measures noise, the retirement of Concorde in 2003 would allow BAA Ferrovial to bring in many more planes without extending the area affected. According to your department, one Concorde every 4 hours followed by 3 hours 58 minutes of silence is equivalent to 120 Boeing 757s coming over every 2 minutes. Yet clearly in reality people don't hear "average noise" - they hear, and become annoyed by, individual noise incidents, which are rising inexorably.

Second, the area which the Aviation White Paper said should not be expanded is the so-called "57 decibel contour" - ie the area where noise levels average out at 57 decibels or higher over the course of a year. But the recent ANASE Study (Attitudes to Noise from Aviation Sources in England), which the Government published last November, found that in reality significant annoyance starts at around 50 decibels - a result that's consistent with the findings of the World Health Organisation. That means that many more people than previously admitted are affected by aircraft noise. At Heathrow, there are 258,000 residents inside the 57 decibel area, but over 2 million inside the 50 decibel contour. Yet the DfT has simply dismissed the findings of the ANASE report - even though it is the first major aircraft noise report in over 2 decades, taking years to complete and at a cost over £1 million. Instead, the Government claims that noise levels will actually be lower in 2020, with over 600,000 planes, than they were in 2002 with less than 470,000 planes a year. This 'saving' will apparently be delivered by means of new technology, yet it is utterly irresponsible to make projections based on a new generation of aircraft that haven't even been designed yet.

Air Pollution

The DfT has commissioned a sequence of models of future air pollution at Heathrow. The models start with information about air pollution and weather patterns at monitoring points near the airport; they make assumptions about emissions from aircraft, airport vehicles, cars on nearby roads and so on; and then predict air pollution levels up to 2030. Yet just about every assumption going into these models is contentious, and adds to the uncertainty of the predictions. For example, aircraft, car and lorry engines trade off NO_x and carbon dioxide emissions: so measures that are good for NO_x are bad for CO₂, and vice versa. Operations to reduce aircraft noise also increase NO_x emissions.

That means that the total uncertainty arising from the model assumptions may well exceed the difference between the modelled levels of air pollution and the EU air quality limits. In those circumstances, it is almost impossible for the government to know whether it can meet air quality standards.

Similarly questionable are DfT claims that only 27 homes will experience air pollution levels above the EU legal limits with mixed mode (in other words, using the same runways for both take off and landing) in place in 2015 (and 540,000 flights using the airport each year) and that, only 5 years later, with a 3rd runway operational and an increase in flight numbers to over 700,000, air pollution standards will still not be exceeded.

I have raised the matter of predicted non-compliance with future air quality standards with the European Commission and will be writing to the Secretary of State about this further in due course.

Public Safety Zones

Take-offs and landings are the most dangerous parts of aircraft operations. The consultation report on whether 130 aircraft movements per hour could be accommodated on 3 runways makes clear that this will be "very challenging".

If planning permission is given, I understand that the DfT will designate a Public Safety Zone at each end of the new runway. These zones are defined by 1 in 100,000 annual individual risk contours. Airport operators must offer to relocate all existing development within the 1 in 10,000 risk contour, a level beyond which individual risk is deemed to be intolerable. In the area between the 1 in 10,000 and 1 in 100,000 annual individual risk contours, PSZ policy is a general presumption against any further development that is not low density or low occupancy. However, there is no policy regarding existing development in that area, although the people there will be at higher risk than before. Interestingly, the consultation documents don't appear to show the 1 in 10,000 or 1 in 100,000 contours, but hundreds if not thousands of properties could well be affected.

There may also be a conflict between the PSZ designation and regional housing targets which, for example, require 5,700 new homes to be in Slough by 2026, and 4,450 in Hounslow by 2017.

Climate Change

Aviation is the fastest-growing source of greenhouse gas emissions, with cumulative growth of 87% between 1990 and 2004, a rate of over 4% a year. At current rates of growth, the increased emissions from this sector will neutralise more than a quarter of the reductions required by the EU's Kyoto target by 2012¹. Analyses like that of the Tyndall Centre for Climate Change Research show that, if unchecked, aviation will account for the EU's entire carbon budget by 2045, if the EU aims to stabilise its emissions at 450ppm.

Evidence from the World Development Movement suggests that the extra annual CO₂ from a 3rd runway would be equivalent to all the CO₂ produced by Kenya in one year, yet international aviation is left out of the government's flagship climate change bill. DEFRA recently reported a reduction of 0.5% in Britain's greenhouse gas emissions over the previous year - but only because it left out international aviation once again. Put aviation back in, and the true figure is a net increase of 1.4% and will continue to rise if the proposed expansion at Heathrow is given the green light.

Aviation activity in the UK is increasing rapidly, nearly doubling in the last 10 years, mainly due to leisure flights taken by UK residents on above-average earnings. This increase is projected to continue beyond 2030. And while the aviation industry will claim that it accounts for only 2% of CO₂ emissions, it's important to note that this figure is a global one, and takes no account of the fact that aviation's non-CO₂ emissions - nitrous oxides and condensation trails - are at least twice as powerful in terms of their climate

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impact as CO₂. As a result, aviation emissions currently form around 13% of total UK climate change impact. Mid-range predictions are that aviation will constitute 50% of the UK's target emissions by 2050.

The European Dimension

The Government claims that the climate change impact of aviation will be dealt with through the European Emissions Trading Scheme, yet the nature of the scheme put before the European Parliament will have next to no impact on aviation growth itself. The latest estimates are that by 2020, instead of growing by 142%, the European aviation industry would "only" grow by around 135%. Some economists say that, as long as emissions are declining somewhere in the economy, it doesn't matter where the cuts are being made. However, the ETS takes no account of the other gases from aviation, which - as I've set out earlier - at altitude, are even more powerful greenhouse gases than CO₂. As you will appreciate, when an air carrier buys up the right to emit a tonne of CO₂ from eg a ground based source like the cement industry which doesn't have other emissions, the net effect on the climate is worse when aviation emits it - because the impact of the condensation trails and nitrous oxides simply aren't accounted for.

Furthermore, since it will have next to no impact on aviation growth, the ETS will do nothing to discourage people from flying, and their habits will get more ingrained. Expanding Heathrow will send out an equally clear message to travellers - keep on flying and never mind the consequences.

The Economic Case

The Heathrow Economics Study - commissioned by the Greater London Authority - concludes that the economic case for a new runway relies on questionable assumptions that overstate both the economic benefits and the predicted demand for expansion. For example, projected figures for passenger demand assume that the economy, and people's disposable income, will continue to grow as it has in previous years, yet this is not a foregone conclusion. Furthermore, the DfT's predictions are significantly higher than those from eg Euromonitor, suggesting they may not be wholly accurate.

Friends of the Earth challenge the Government's claim that the economic benefits of a third runway at Heathrow would be around £6 billion. They argue that this figure fails to take account of the costs associated with climate change, despite Nicholas Stern's work in this area. Stern recommends a cost per tonne of carbon emitted under a business as usual scenario of £53 - the cost of dealing with the climate change outcome. Yet the Heathrow proposals work with a figure of £19 per tonne. I personally feel that even Stern's figure is an underestimate because it is based on outdated science, yet simply replacing the DfT baseline cost per tonne of carbon with his recommendation would take the climate cost of Heathrow's expansion to £14 billion. This is £9 billion more than the climate change costs allowed for currently and would transform the project as a whole into one that has a net cost of £3 billion, rather than a net benefit of £6 billion.

The Nature of the Public Consultation

National data shows that only 18% of people support expansion of UK airports, and over 50% support a standstill on new capacity. Yet the government's public consultation procedure does not engage with the wider population and takes a narrow view about who will be affected by the proposals. This view is so narrow that it only includes residents within the 57 decibel contour area - consultation forms have not been sent to those inside the 50 decibel contour area. Whilst forms are accessible via the internet to anyone with an interest, this assumes a certain degree of internet competency amongst those affected and that residents are able to proactively seek out the necessary information.

Furthermore, the consultation documents are flawed. They contain technical language and jargon that residents should not be expected to understand. The phrasing of some questions is leading and there is often no capacity to clearly express opposition to the proposals.

Back in 2001 Transport Secretary Stephen Byers clearly said that Terminal 5 would be subject to planning permission limiting it to 480,000 flight movements a year. But just one short year later, the new Transport Secretary Alistair Darling suggested that the cap on the number of flights only ever referred to the existing runways. The proposal in 2002 was for a 3rd runway that would result in a total of 655,000 flights using Heathrow - yet the current consultation foresees a total number of flights of 702,000. The government has shown a lack of respect for the public by continuing to move the goal posts in this manner.

I urge you to now start listening to the voices of local people and abide by the government's own stated commitment to reducing CO2 emissions, by withdrawing the third runway expansion proposals for Heathrow immediately.

Yours sincerely,

A handwritten signature in black ink that reads "Caroline Lucas". The signature is written in a cursive, flowing style.

Caroline Lucas - Green Party MEP for South East England.