

WANDSWORTH BOROUGH COUNCIL

CORPORATE RESOURCES OVERVIEW AND SCRUTINY COMMITTEE

16TH JANUARY 2008

EXECUTIVE – 21ST JANUARY 2008

Report by the Chief Executive and Director of Administration on 'Adding capacity at Heathrow' - the Government's consultation on the environmental impact of its proposals for expansion at the airport.

SUMMARY

The Government made clear in its 2003 White Paper 'The Future of Air Transport' that it wanted to add a third runway at Heathrow and make greater use of the existing runways. It said expansion would go ahead provided (a) there was no increase in the area around the Airport affected by noise and (b) air pollution was kept within EU limits. The Council strongly opposed the proposals and joined in a legal challenge to the White Paper.

The Government has now published a consultation document 'Adding Capacity at Heathrow' which explains how it considers these environmental tests have been met. It sets out proposals for a new 2,500 metre runway, which is longer than that proposed in the 2003 White Paper, and the introduction of mixed-mode operations on existing runways. The outcome will be an increase in flights from 480,000 a year to 702,000 by 2030.

The consultation period will end on 27th February 2008. The Secretary of State restated her support for expansion six days before the current document was published. If, once the consultation is concluded, she confirms this position, the Airport's owners, BAA, will be able to take the project forward through the planning process.

This report explains the impact of proposed expansion and asks a number of detailed questions about the assumptions that have been made in order to arrive at the conclusion that the environmental tests can be met. It sets out a proposed Council response and explains how the Council is working with its local authority partners in the '2M Group' to inform residents of the proposals and draw attention to the flaws and deficiencies in the Government's argument.

It is recommended that not only are the proposals communicated to local residents via an information leaflet circulated with Brightside, but that once again the Council should join with authorities in the 2M group to obtain its own studies and expert evidence, and, if a reasonable cause for legal challenge emerges, join and assist with that challenge. At this stage a budget variation of £25,000 to cover these costs is requested.

**GLOSSARY**

ANIS	Aircraft Noise Index Study
ANASE	Attitudes to noise from Aviation Sources in England
ATM	Air Traffic Movements
2M Group	Group of local authorities opposed to expansion
BAA	British Airport Authorities
Chapter 4 limits	The most recent ICAO noise standards
dB(A) Leq	Noise averaged over a 16 hour day
NO2	Nitrogen Dioxide – produced by aircraft engines
PSDH	Project for the Sustainable Development of Heathrow
PM10	Particles of pollution measuring 10 micrometres or less
SERAS	South East Regional Air Services Study
FoI	Freedom of Information
DFT	Department for Transport
NATS	National Air Traffic Services
ICAO	International Civil Aviation Organisation
VAT	Value Added Tax
EU	European Union

**RECOMMENDATIONS**

1. The Corporate Resources Overview and Scrutiny Committee are asked to consider the content of this report, which is also being submitted to the Executive for decision, as shown in paragraph 3 below.
2. If the Corporate Resources Overview and Scrutiny Committee approve any views, comments or recommendations on the report, these will be submitted to the Executive for their consideration.
3. The Executive is recommended to:
  - (a) agree the Council's response to the 'Adding Capacity at Heathrow' consultation document, subject to delegating to the Chief Executive and Director of Administration the addition of any further material that may come to light from technical studies and other material in keeping with the Council's overall policies on opposing unjustified aviation growth at Heathrow;
  - (b) agree to the Council taking steps to inform local people of the proposals and in particular the impact on their quality of life;
  - (c) agree to the Council obtaining provisional legal advice and further analysis of the technical data on noise, air quality, road traffic levels and climate change, sharing costs where necessary with other members of the 2M Group;
  - (d) authorise the Chief Executive and Director of Administration to join in discussions on possible legal challenges to the consultation that may be considered by groups opposing expansion and, following receipt of proper advice, to provisionally commit the Council to a proportionate share of the initial costs of any such action and report back on expected full requirements; and
  - (e) note that at the present time the estimated requirements for (c) and (d) are some £15,000 and for publicity (leaflets etc.) for (b) some £10,000, and a one-off revenue budget variation of £25,000 is therefore sought.

## **BACKGROUND**

4. The Government's policy on Heathrow was established in the 2003 Future of Air Transport White Paper. This concluded that, in view of predicted rising demand for air transport, the Government should plan to provide the extra capacity. Having looked at all the options for expansion at other sites in the South East, it said expansion should take place first at Stansted, Essex from 2011 and then, from 2015, at Heathrow. Expansion was to be conditional on EU air quality limits not being exceeded and the 57 dB(A) Leq contour around Heathrow not being breached. It also said public transport improvements would have to be in place for expansion to proceed. The Project for the Sustainable Development of Heathrow (PSDH) was launched by the Government in 2004 to progress the Heathrow proposals. Its job was to review the conditions in which the environmental tests might be met. The 'Adding Capacity at Heathrow' consultation published in November 2007 is the result of those deliberations. It argues that adding capacity on the existing runways and building a new runway would bring substantial economic benefits. The additional 222,000 flights would be accommodated without breaching the environmental constraints. While the Government is now pressing ahead with its plans for Heathrow no proposals have been brought forward for a second runway at Stansted, despite this being one of the Government's stated aims in the 2003 White Paper. The consultation document is available from [www.dft.gov.uk](http://www.dft.gov.uk), and a copy has been placed in the Member's Room.
5. Wandsworth and Hillingdon Councils had joined with the main anti-expansion groups in a legal challenge to the 2003 White Paper. The principal argument was that, while the Government had set capacity figures for the other London airports, there were to be no limits on expansion at Heathrow. This would lead to a further round of incremental and uncontrolled growth at Heathrow fed only by commercial demand. The White Paper's unfairness was compounded because it failed expressly to restrict the proposed third runway to the short version consulted upon in the 2002 South East Regional Air Services study (SERAS). It also introduced the new element of a sixth terminal which too had not been in the consultation paper. The White Paper was now also proposing to add further expansion through the introduction of mixed-mode operations on the existing runways. This was never advanced in the consultation as a possible option yet by the time of the White Paper it had become the linchpin of the Secretary of State's strategy for plugging the capacity gap in the run up to the opening of the third runway, initially planned for 2015-20.
6. A judicial review centring on the Government's plans for expansion at Heathrow, Stansted and Luton Airports was conducted by Mr Justice Sullivan, the decisions from which were announced by the High Court on 18th February 2005. This did not find the Secretary of State had acted unlawfully in respect of Heathrow expansion plans, but Mr Justice Sullivan confirmed that only a short-length runway could be built. He also said that the Government's proposals to end runway alternation and build a sixth terminal should be the subject of full public consultation. He also found that the decision to select a specific alignment for a new runway at Stansted was unlawful and that a runway extension at Luton should not have been included in the White Paper because it had not been consulted upon.

7. The Council previously set out in detail its concerns and objections to the proposed expansion of Heathrow as set out in the White Paper in Paper Nos. 03-596, 03-597 and 04-135 to this Committee and the Executive.

In almost all respects that initial analysis still holds true, and should be referred to for a detailed explanation of the major concerns. These have not been significantly removed or lessened since 2003, and in fact the ANASE study on noise (which had been long called for by the Council and others) has fully confirmed the arguments consistently made by the Council and 2M partners that noise disturbance from Heathrow was significantly understated and hence undervalued in Government decision-making. Further, nothing to lessen concerns on the potential increase air pollution (especially by NO<sub>2</sub>), climate change effects or local economic overheating and imbalance due to over-expansion at Heathrow has been forthcoming in the current consultation.

### **MAIN PROPOSALS**

8. The main proposals in the current consultation paper are the addition of a third runway and sixth terminal and the introduction of mixed-mode on the existing runways. The third runway would, at 2,500 metres, be longer than the original 2,000 metre proposals although the consultation states only 2,200 metres would be used at any one time. This confirms the fear expressed in the judicial review that the Government was leaving the way open in the future to a longer runway capable of handling bigger aircraft. The extended runway would mean the demolition of 700 homes in the immediate area - instead of the 260 set out in the White Paper. It would mean the complete removal of the community of Sipson Village, near the northern perimeter of the Airport. The Project for the Sustainable Development of Heathrow (PSDH) was set up by the DfT and BAA after the White Paper. Initially it comprised BAA plus some experts with the DfT, but subsequently has been replaced by a private group of BAA, DfT and others working on technical development and modelling, behind closed doors, with no access for the local authorities. The PSDH forecast that anticipated reductions in emissions over the next decade for aircraft and road vehicles would make it possible for the runway to open in 2020. At this point it is claimed it would be possible to stay within EU limits for NO<sub>2</sub> and PM<sub>10</sub> which were identified (particularly NO<sub>2</sub>) in 2003 as the most crucial air pollution limits currently in prospect of violation. In the period up to 2030 progress would be largely dependent on improvements in road vehicle emissions standards. By 2030 the airport would be operating at around 702,000 air transport movements (ATMs) compared to the current 480,000 ceiling. It is claimed that the 57dB(A) Leq noise contour would at this time cover 112.9 sq km against a limit of 127 sq km.

### **MIXED MODE OPERATIONS**

9. Mixed-mode operations would allow each runway to be used to its maximum capacity. Instead of aircraft landing on one runway and taking off from another as now, each runway could be used independently. One consequence would be that the current practice of runway alternation – where aircraft switch runways at 3pm each day – would be discontinued and aircraft would be able to land continuously throughout the day on each runway. This would add another 60,000 flights a year by 2015. Moreover, the 57dB(A) Leq noise contour would stretch to 125.5 sq km against a limit of 127 sq km. It would also be compatible with NO<sub>2</sub> and PM<sub>10</sub> limits although there would be some

NO<sub>2</sub> exceedences north of the M4 motorway. These would have to be addressed by traffic management measures not yet specified.

10. Since 1999 arrivals in the 6am-7am early morning period have alternated between the two runways. This arrangement will now be made permanent although it may be affected by future decisions on mixed-mode operations throughout the day.

### **WESTERLY PREFERENCE**

11. The Government has also considered the effect of the westerly preference arrangements - where aircraft land and take off into the prevailing westerly wind for most of the year - on noise and air quality. It concluded that the issue was not critical to achieving compliance with air quality limits. Enabling more departures to the east would reduce the noise contour area but affect more people as this side of the Airport is more heavily populated. There would therefore be some redistribution of noise around the airport but on balance the Government found there were no strong grounds for change.

### **CRANFORD AGREEMENT**

12. Cranford is sited at the eastern end of the northern runway. Since the 1950s there has been an agreement that aircraft would not regularly take off to the east from this runway. However this agreement was never expressed as a planning or statutory condition or a clear legally-binding form, despite its 50 year implementation. The Government now proposes to remove this long-standing protection. This will enable both runways to be used for landings and take-offs in full mixed-mode operations and is an essential element in the strategy to increase capacity.

### **SURFACE TRANSPORT**

13. The Government is not proposing any specific road traffic and emissions reduction measures in the area around the Airport. No firm promises on public transport improvements including new rail links are made although mention is made of Airtrack. It would be the responsibility of BAA to bring forward new proposals as part of any future planning application.

### **CLAIMED ECONOMIC BENEFITS**

14. The Government places great stress on the economic benefits from expansion. The third runway is estimated to bring claimed net benefits of between £4.4bn and £5.2bn. Squeezing more capacity onto the existing runways through full mixed-mode operations would bring greater benefits – from £5.4bn to £6.2bn. The Council and other partners in the 2M group have consistently challenged the validity of these claimed benefits as not being consistent with Treasury guidance, including counting benefits to foreign nationals, counting full benefits from passengers who are merely transferring flights, and making some double counting. The Council has therefore long called for a demonstrably independent cost benefit analysis of all costs and benefits.

## **CLIMATE CHANGE IMPLICATIONS**

15. The aviation industry would not be asked to meet the climate change impact of expansion. The Government's approach is to establish an EU-wide carbon trading scheme that stretches across all sectors. It draws on the 2006 Eddington Transport Study (written by the former CEO of British Airways – who it was claimed by some commentators very largely ignored the case for transfer from short-haul air to fast rail services) to argue that, even when users are paying the full environmental costs of their journeys, there will remain a strong economic case for additional runway capacity. This 'whole economy' approach was endorsed in the 2007 Department for Transport (DfT) document 'Towards a Sustainable Transport System: Supporting Economic Growth in a Low Carbon World.' An additional 222,000 flights would generate an estimated 180bn tonnes of CO2 over 60 years. The social cost is estimated at around £4.8bn (this is not a fully comprehensive estimate of social cost e.g. it excludes cost disbenefits of noise and falls far short of the cost-benefit analysis the Council has requested).

## **BACKGROUND TECHNICAL ANALYSIS FOR THE CONSULTATION PROPOSALS**

16. The consultation includes hundreds of pages of technical information. These contain much of the material used in the detailed assessments of the environmental impacts by the PSDH team. This work was carried out by the DfT civil servants and the Airport's owners, BAA. Local authority members of the 2M Group were repeatedly denied access to the information that was being shared between the two organisations. The MP for Putney (Miss Justine Greening) filed a series of Freedom of Information Act (FoI) questions to establish the true extent of this cooperation. The initial responses confirmed a very detailed degree of working together including collaboration over the drafting of the eventual consultation document, but since April 2007 all further FoI requests from her about this matter have been blocked.
17. The main proposals in the consultation document – mixed-mode on existing runways and a new third runway - are presented as three options:

Option 1 – add a third runway by 2020 used in mixed-mode from the start with the two remaining runways in segregated mode. This would generate 702,000 annual movements by 2030;

Option 2 – introduce mixed-mode on existing runways from 2010 but with no increase in the current planning cap of 480,000 movements until the third runway opens in 2020; and

Option 3 – introduce mixed-mode from 2010 to fill the gap until the third runway opens in 2020. This would add another 60,000 movements in the interim period. It is this option that the Government has modelled assuming full use of mixed-mode throughout the day with eight extra aircraft an hour from 2015.

18. The Government estimates that the number of passengers passing through the Airport will go up from the current total of 67million to 122 million by 2030. Even this, the consultation notes, is only 70 per cent of demand.

### **CHANGES IN FLIGHTPATHS**

19. Although indicative flightpaths are included in the full consultation document these are only presented as a means of demonstrating the viability of the expansion proposals. National Air Traffic Services (NATS) are currently reviewing airspace arrangements. This is likely to lead to changes in departure routes if maximum capacity is to be achieved. NATS will be consulting separately on their proposals in 2008.

### **CONSULTATION: PROPOSED RESPONSES TO DETAILED QUESTIONS**

20. The consultation document invites responses to a series of detailed questions:

**Question 1.** Do you agree or disagree with the proposals that a third runway at Heathrow, if built, should be supported by associated passenger terminal facilities? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

#### **Council response**

**The council disagrees strongly with the proposals to expand Heathrow and in particular to build a new 3<sup>rd</sup> runway with associated passenger terminal facilities. The council is opposed to any further expansion at Heathrow beyond the current town planning limits which specify five terminals only and a ceiling of 480,000 Air Traffic Movements (ATMs) annually.**

**The Council's reasons relate mainly (but not exclusively) to the adverse environmental impact that an expanded Heathrow airport will have on a large number of the Borough's residents through exposure to increased levels of aircraft noise. The consultation document attempts to hide the fact that the planned expansion will lead to a significant rise in the number of night flights arriving over the Borough before 7a.m.**

**The Council is also concerned that the consultation contains significant omissions in relation to the impact on traffic and public transport over south west London and the M25. Apart from reference to the provision of Airtrack there are no firm commitments or proposals relating to how it is proposed to accommodate what would amount to a doubling in the number of passengers travelling by public transport to the Airport in 2030.**

**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?

### **Council response**

**The Council disputes the validity of the environmental conditions for noise. The results of the latest ANASE study confirm that significant community annoyance from aircraft now spreads well beyond just the residents within the 57decibel contour. This finding is supported by the Council's own surveys, revealing widespread disturbance registered from residents beyond the 57dB contour. The study has reported that the touchstone of the Government's air noise assessment methodology – the Leq noise metric - has become uncalibrated. The consultation document admits that the Government has no reliable social survey data regarding the extent to which communities currently under the Heathrow flightpath value the current respite periods which are created by the use of Segregated Mode operations.**

**The Council further disputes that the Government has even demonstrated compliance with its now out of date noise criterion. The reality of the situation is that noise would increase. This is contrary to the Government's declared policy to do everything practical to improve the noise climate around Heathrow and to 'bear down' on aircraft noise. The Government has failed to demonstrate effects of its proposals on noise during the night period. The UK is required under the European Noise Directive to model the effects of Heathrow noise both by day and by night. The Council considers that the consultation document is materially misleading by claiming that the proposals are not concerned with the night flights regime at Heathrow.**

**The Council does not believe that the government has satisfied its own public transport condition test. The consultation document does not address the impact of what amounts to more than a doubling of passengers travelling to and from Heathrow by public transport by 2030. The impact on local roads which will also see a doubling of traffic by 2030 has also not been addressed.**

**Question 3. Do you agree or disagree with the Government's view on adding a third runway and being able to meet air quality limits without further measures? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?**

### **Council response**

**The Council disagrees with the Government's view that it will be able to meet air quality limits without further measures. The consultation document is silent on how it is proposed to ensure that air quality targets are maintained year on year. It is not good enough to claim 'confidence' in meeting annual air quality limits when the public cannot see the effects of possible changes in vehicle fleet growth and replacement.**

**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?**

**Council response**

**The Council strongly disagrees with the Government's view. The information provided to support the Government's assertions that a 50 per cent increase in movements can be achieved for an 8 per cent increase in the size of the 57 decibel contour is not robust. ICAO has not agreed any further reductions in noise standards beyond Chapter 4 limits. The reality is that even the Government's now out-of-date noise target cannot be met without making optimistic assumptions about the noise performance of future aircraft that are not yet even at the design stage. No evidence is yet available to demonstrate that even current prototypes of new generation aircraft (e.g. the A380 and 787) can produce lower noise emissions consistently under fully loaded operational conditions: the Council's own noise measurements on the prototype A380 indicated it did not offer any noise reduction (registering at QC/2 on take off) whereas it was certified as QC/1.**

**Questions 5 and 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?

**Council response**

**The Council does not agree that mixed-mode operations can be introduced within the Government's own noise limits. The White Paper contained a commitment to limit, and where possible reduce, noise impact over time. The proposal to introduce mixed-mode would by necessity result in the abolition of the current half-day's respite that Wandsworth residents currently enjoy. The Government admits that runway alternation was introduced in 1972 as a noise mitigation measure to provide communities under the arrival flightpaths with predictable periods of relief. The consultation document makes no attempt to quantify the benefits of runway alternation either in noise or economic cost terms.**

**Questions 5 and 6 (cont'd)**

To what extent would you support the introduction of mixed-mode operations a) throughout the day b) limited to specific hours (if so would you support mixed mode between 0600 and 1200 hours? Some other period? Please specify)

**Council response**

**The Council is opposed to the introduction of mixed-mode operations for the reasons given above**

If you support additional movements, in what periods of the day do you think they should be provided?

**Council response**

**No additional movements are supported.**

What are your reasons for these answers? Are there any significant considerations you believe need to be taken into account? If so, what are they? Please provide evidence where you can (eg environmental impacts, business benefits)

**Council response**

**As stated above, the reasons are the strongly evidenced fact that any mixed mode operations would expose resident to a much greater, and unacceptable degree of noise disturbance.**

**Question 7.** Do you agree or disagree with the Government's view that full mixed-mode 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?

**Council response**

**The Government has not demonstrated that it would be able to meet air quality limits with full mixed-mode operations by 2015. The consultation document fails to demonstrate what would happen if assumptions about future road vehicle fleet replacement and mix are not forthcoming within the predicted time frame. Additionally no details are provided to indicate how the Government would intend to ensure that the rolling annual average level for Nitrogen Dioxide does not exceed the EU Directive limits.**

**Question 8.** 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?

**Council response**

**On the basis of the information given in the consultation document, the Council agrees that little would be gained overall by changing the current arrangements. In any event it considers higher volume of flights should not be accommodated by merely spreading them over new areas above London, but instead reducing aircraft noise over all urban areas.**

**Question 9.** 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?

**Council response**

**The Council disagrees with the Government's proposal. Abolition of the Cranford agreement would facilitate the introduction of true mixed mode operations at Heathrow**

which the Council objects to for the reasons stated at questions 5 and 6 above. Also again, it would expose a large number of London residents to a much higher level of noise disturbance, reducing their quality of life.

**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 are they?

**Council response**

**The Council disagrees with Government's views on night flying at Heathrow, including continuing the theoretical arrangements for night-time rotation which have brought little comfort or respite to Wandsworth residents. As part of any further expansion plan for Heathrow there should be a firm commitment to phasing out night movements. The Council strongly believes there is no economic justification for night flights that counterbalances the very high degree of distress and disturbance they cause to Londoners.**

**Question 11.** Do you agree or disagree with the Government's view on continuing runway alternation in the 0600 to 0700 period? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

**Council response**

**The Council does not agree with the Government's view on continuing runway alternation in the 06:00 to 07:00 hrs period. By formalising the current 'trial' arrangement the Government has signalled that it has no intention of introducing any meaningful controls on future numbers of arrivals in this last hour of the night period. The Council strongly believes it is important to seek to reduce arrivals and departures in this period in order to restore the situation at least to that existing prior to the rapid increase in flights over the 1980's and 1990's in this key hour interval.**

**COMPLEXITY OF CONSULTATION OF QUESTIONS**

21. The Council is concerned at the complexity of the questions posed in the consultation paper. The DfT has refused to hold any exhibitions in Wandsworth explaining the proposals. While some local residents have received a summary version of the full 235-page document in the post, this only contains a limited amount of information. Since the consultation was launched, further documents have been published online. In many cases the DfT has not had printed versions readily available to supply to interested persons. The mass of information will be daunting for all but the most technically competent respondent and it still does not contain all the information needed to form a proper appraisal of the economic and environmental impacts of expansion.

**LOCAL COUNCILS EXCLUDED FROM INFORMATION SHARED BETWEEN INTERESTED PARTIES**

22. The Council is further concerned that, while the Airport's owners have been able to spend many months working with the DfT on the proposals, the local authorities must now complete their own analysis of the data within the three month period allowed for

the public consultation. This will force the Councils to engage specialist consultants at their own expense in order to meet the Government's timetable. The Leader of the Council in conjunction with his 2M Group colleagues has raised these concerns directly with the Transport Minister. His requests for a longer consultation period and at least one local exhibition of the proposals have been denied. Further concern was also expressed at the extent of the cooperation between civil servants and the Spanish-owned company (BAA) which stands to gain most from expansion and in particular the refusal to release documents to the local authorities that had been freely shared with BAA.

### **CLIMATE CHANGE**

23. On climate change in particular the Government is sending mixed messages to the public. It is difficult to see how its stated objectives for achieving emissions reductions can be reconciled with its policy of further expansion at Heathrow. There is no assessment of the climate change impact of the extra 3 million tonnes of CO<sub>2</sub> emissions produced by the third runway. The quite practical options of substituting much of the short-haul flights with investment in an improved high speed rail network to augment the new Channel tunnel/St. Pancras capacity have not been included and evaluated. The aviation industry, which is exempted from VAT on fuel, is also allowed to pass its emissions on to other sectors which will have to make their own reductions to pay for aviation expansion. Therefore the 'polluter pays' principle is not applied evenly and fairly to aviation. It is also difficult to see how effective emissions trading can be when it is restricted to commercial flights within the EU.

### **NOISE**

24. The consultation document fails to take into account the results of the latest noise attitudes survey contained in Attitudes to Noise from Aviation Sources report (ANASE). This research was commissioned in 2001 by the then Transport Minister, Mr Bob Ainsworth MP, following the Terminal Five decision. The Minister said it would 'underpin' future Government policy on aircraft noise. Six years later the study's findings were finally published – but only after pressure from the 2M Group which had insisted on the report being released prior to the current consultation. It showed that the same proportion of people who were previously annoyed at 57 decibels were now annoyed at a much lower level of around 50 decibels. The 57 decibel figure dates from the only previous social study (ANIS) which reported in 1985. If the Government were applying the results of ANASE it would draw a new 16-hour average noise contour based on the new 50 decibel threshold. This would include an area of some 2 million people around the Airport – compared to the 250,000 people within the current boundaries. By refusing to adopt ANASE, the Government can claim that the noise area affected by expansion will not increase. The Government's response is that ANASE contained a number of flaws particularly on the monetary cost of noise nuisance. For these reasons it has not assessed the aviation noise impact in the current consultation and will continue to rely on equivalent calculations used for other forms of transport noise. The Council's view is that it is simply not credible to claim that a study which took a team of international experts six years to complete at a cost of £1.5 million does not provide more robust and up-to-date information than the previous Government-funded study which is now 22 years old. Furthermore, as stated above the Council's own studies on annoyance, and its experience of registered aircraft noise complaints in Wandsworth entirely supports the ANASE findings.

### **CLAIMED ECONOMIC BENEFITS**

25. The claimed economic benefits of expansion are at the heart of the Government's case. But most of the figures relied on in the consultation document are those obtained from previous studies paid for by the aviation industry. The Council believes that, while the economic benefits to BAA may be substantial, more work needs to be done to establish the impact on the wider economy. It has therefore consistently pressed for an objective and independent cost benefit analysis. The Government should now commission a fully independent study which takes into account the £9bn subsidy the aviation industry receives from its VAT exempt status and the £18bn tourism deficit which results from higher spending by UK visitors abroad. The new study should also assess the impact of not providing the extra 222,000 flights from Heathrow and instead cost the benefits to the economy of those passengers either making their journeys from other airports, travelling abroad by rail or staying in the UK. As part of this process it would look beyond Heathrow to the capacity provided by all five London airports. It would also look closely at the economic benefits generated by the estimated 35 per cent of travellers who are simply changing flights at Heathrow and not leaving the Airport. The claims for extra jobs created by expansion would also be tested. This currently estimates an extra 8,000 on-site and 2,000 off-site. But with the west London economy already buoyant there is no assessment of who might take up these jobs. This is particularly relevant at a time when the Statistics Commission (December 2007) has confirmed that 80 per cent of new jobs in the last 10 years have been filled by migrants. The whole issue of secondary costs and investment necessary to sustain an expansion of Heathrow requires investigation and financial evaluation e.g. the costs of extra housing, schools and other infrastructure to support the claimed extra jobs.

### **AIRCRAFT**

26. The assumptions made in the consultation document on the noise and air quality characteristics of the aircraft that will be flying in the future also need to be tested more rigorously. At the moment they rely not just on the known new aircraft like the Airbus A380 and the new Boeing 787 but also on unknown aircraft types which are not even on the drawing board currently. Even if the technological advances can be achieved which will, on paper, keep the extra flights within the noise and air quality constraints, this still needs to be matched with assumptions on airlines' fleet-buying intentions. At the very least all the data and modelling assumptions worked up by DfT with considerable help from the airport owners should be independently validated.

### **PUBLIC TRANSPORT**

27. The public transport assumptions are scarcely credible. While the consultation document says the share of passengers using public transport would go up from 36.2 per cent to 41.2 per cent by 2030, this would be equivalent to 38.2 million bus, tube and rail passengers by 2030 – double the current number. The numbers of road users would also double to 53.4 million.

### **FURTHER EXPANSION**

28. The Council will want to seek a number of assurances from the Minister about the prospects for further expansion beyond that now proposed. The Council is opposed to any expansion while the economic and environmental impacts are unproven. If expansion does

go ahead the Minister should guarantee that the 702,000 capacity now proposed will be an absolute ceiling and that, once the third runway opens, the existing runways will return to segregated mode. The Government should also set in place measures to ensure that if, subsequently it is shown that air quality and noise limits are being breached, immediate action will be taken to reduce capacity. The Minister should also confirm that the third runway, which would already be 500 metres longer than that proposed in the White Paper, will not be extended again in the future to accommodate larger aircraft.

### **COMMENTS OF THE LEADER OF THE COUNCIL**

29. The Leader has been consulted and believes the Council has an overriding duty to protect the quality of life of local communities – both now and in the future. He considers the economic case for expansion to have been framed solely in terms of what works best for BAA. He considers that the Council should urge the Government to launch a properly independent study of the full economic impacts of expansion and to bring forward without delay proposals for the break-up of the inefficient and anti-competitive BAA monopoly. He also considers that the Council should call on the Government to support the Private Members Bill put forward by the MP for Putney – the Environmental Protection (Airports) Bill - which outlines plans for an independent regulator of the aviation sector that would break once and for all the cosy relationship that has persisted for years between the DfT and the industry.
30. The Leader further considers that, in the context of growing concern about climate change, and indeed the Government's own emerging policies in this area, the current consultation process is an anachronism. Instead of relying on major industry figures to stress the totally unproven business benefits of expansion there should be a transparent and inclusive approach that is more questioning of the claims made by the industry and more open to new ways of managing demand. In particular he considers that the 2003 White Paper is now out of date and should be reviewed as an urgent priority with considerations given to climate change objectives, new high-speed rail alternatives including the recently opened line from St. Pancras and the use of economic instruments to ensure a more level playing field between aviation and other forms of transport.
31. Finally he considers that the most pressing impact for Borough residents will be the loss of runway alternation that will lead to an extra 60,000 flights a year on the existing runways. He urges the Council to support a continuing programme of publicity and information including public meetings and newsletters to make residents aware of how they can respond to the threats posed by the Government's expansion plans. He also recommends continued joint working through the '2M Group' of local authorities with support for appropriate action through the courts if, following joint studies and legal advice, it emerges that the councils and other campaign groups have reasonable grounds for judicial review of any aspect of the consultation document.

### **COMMENTS OF THE DIRECTOR OF FINANCE**

32. The estimated proportionate share of costs of any possible legal challenges to the consultation that may be considered by groups opposing expansion together with local publicity costs are expected to be in the region of £25,000. Consequently, a budget variation for £25,000 is required in 2008/09, equivalent to £0.21 at Band D council tax.

**CONCLUSIONS**

33. In the time available since launch of the consultation it has not been possible to complete a full analyses of all the issues raised. However beyond the new ANASE noise study (rejected by the DfT) it contains little new evidence. There is certainly nothing to change the Council's previous views on Heathrow Expansion, except the longer third runway now proposed confirms earlier fears and is even more unacceptable. Further studies by the Council and partners are proposed or are in hand and results will be reported to Committee later if appropriate. The consultation question responses proposed at this stage are recommended for approval, subject to any additional evidence available being added by the consultation closure date of 27th February.

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The Town Hall  
Wandsworth  
SW18 2PU

GERALD JONES  
Chief Executive and  
Director of Administration

14th January 2008

**Background Papers**

No background papers were used in the preparation of this report.

