

To: Rt Hon Ruth Kelly MP
Secretary of State for Transport

27 February 2008

Dear Secretary of State

The 2M Group is a cross-party alliance of 12 local authorities concerned at the effects of Heathrow expansion on their communities. Members are not anti-airport but feel that the Government consistently understates its full environmental impact.

This has been an inadequate consultation from the start. Member authorities have incurred considerable expense in commissioning specialist consultants to examine the data and arranging extensive local information exercises to make good the deficiencies of the Department for Transport's (DfT) own programme.

A number of our members have submitted their own responses to the consultation. None of us feels that our submissions are complete. We have all been hampered by the inadequacy of the information and the limited time allowed for analysis.

The central issue here is one of trust. No one believes that this expansion will be the last. Stephen Nelson of BAA even admitted as much at the London Assembly Environment Committee evidentiary sessions. He could not rule out a fourth runway in the future.

Our members are equally opposed to the third runway and the abandonment of runway alternation. No one believes that mixed mode is an interim measure. The history of Heathrow shows that once extra capacity is secured, it is never given up. People's cynicism is fuelled by the long history of broken promises:

- Terminal 4 will be the last expansion (1980)
- Terminal 5 will not need a third runway (1995)
- Terminal 5 will have a cap of 480,000 movements (2001)
- The third runway will be limited to 2000m in length (2003)

The consultation claims that expansion can be achieved within EU air pollution limits taking effect in 2010. Yet the Government is already seeking a derogation until 2015 because it knows this requirement cannot be met. Even at this later date the consultation still shows these limits being breached.

The DfT has refused to make the basic road traffic data available. This means that in the surface access documentation alone, there are more than 40 areas where clarification is required. We have even been denied a meeting between our respective technical experts.

The consultation is simply not credible in its optimistic assumptions on future improvements in pollution concentrations, aircraft fleets and road traffic vehicles. The lack of any sensitivity analysis is a critical weakness. The forecasts of future emissions' levels cannot be considered robust.

Neither is there evidence of any independent scrutiny of the data supplied by BAA and other stakeholders. Given the fundamental importance of the air quality and noise tests to this consultation, these failings are unforgivable.

On noise the consultation fails to take account of up-to-date information from the ANASE study. This showed that people are now more annoyed by aircraft noise than they were in the 1980s. The Government's stated policy is that it will bear down on aircraft noise. Yet this consultation demonstrates a readiness to use any perceived 'headroom' in the noise allowance – not to reduce the numbers of people affected – but to add more aircraft and create more noise.

The consultation set out to restrict direct consultation to people within the 57 dB contour. This means that many people are still unaware that the proposals could affect them. This is particularly true for people affected by the mixed mode proposal. It also applies for people under the southern runway approach to the east of the contour who will have no idea that aircraft will now fly at a lower altitude over their homes as a consequence of mixed mode operations.

Reliance on even this outdated contour is suspect. The results from our members' own noise modelling show that with a margin of error of 1dB (which the CAA admits is inherent in its modelling assumptions) the 57dB cap of 127sq km is breached. The degree of confidence required cannot therefore be satisfied.

The consultation, which is ostensibly about the extent to which expansion can be achieved within a set of environmental constraints, makes much of the economic benefits of further growth. Having introduced this assessment into the consultation material, the DfT must now open these claims to scrutiny.

We would call therefore for the consultation to be extended while the Government commissions an independent study of all the economic costs and impacts. This should be subjected to the same process of peer review applied to the ANASE study. It should also extend beyond the aviation industry to other sectors.

Allowing further expansion is clearly in the interests of the airport operator. It is manifestly not in the interests of the 700 families whose homes will be destroyed – nor of those in communities on either side of the airport who will suffer increased air and noise pollution. It is unlikely to be of benefit to other sectors, for example the rail industry, and it does nothing to persuade the general public that the Government is serious about tackling climate change.

This is a hugely complex consultation which, combined with the inadequacy of the basic information supplied, has left local authorities in a disadvantaged position. For the individual residents the consequences are potentially disastrous. Many people will simply have no idea that their lives are about to be blighted. This cannot be what was intended.

A consultation which was preceded by a period of extended, un-audited information-sharing with the airport owner and has been characterised since by a lack of openness in the responses to requests for information will not have the public's confidence.

The 2M Group believes the air transport White Paper on which today's consultation is based is simply out of date. It has not stood the test of time. It underestimates the rapid growth in concern at the impacts of climate change for climate.

The old 'predict and provide' mantra has long been discredited. The answer to forecast growth in demand for foreign travel does not have to be yet more capacity at Heathrow. It is time to consider more sustainable solutions that look at transport policy in the round and not solely in terms of what is good for one sector of industry.

Yours sincerely

The 2M Group

This is a joint response from the Council Leaders of the 2M Group comprising the London Boroughs of Ealing, Hammersmith & Fulham, Hillingdon, Hounslow, Kensington & Chelsea, Lambeth, Merton, Richmond and Wandsworth and Slough, South Bucks, and Windsor & Maidenhead Councils.