

2M SUBMISSION TO AIRPORTS COMMISSION MAY 2013

The 2M Group is an all-party alliance of local authorities concerned about the environmental impact of Heathrow operations on their communities. Our members are not anti-Heathrow but work together to improve the environment and protect the quality of life for local people.

The group, which took its name from the 2 million residents of the original 12 authorities, now represents a combined population of 5 million people and was successful in 2010 in overturning plans for a third runway at the airport.

This submission is not a proposal for short, medium or long-term options for increasing capacity. The group's priority at this stage is to make the Commission fully aware of the environmental impacts that flow from any set of proposals submitted by others for Heathrow.

We are particularly concerned that short to medium term measures for making better use of existing capacity including operational freedoms, increased use of runways in mixed mode, continuation of early morning flights before 6am and relaxation of the 480,000 annual movements cap should not be appraised simply on the basis of existing and inadequate assessment criteria.

We seek assurances that the assessment methodology for all proposals will be rigorous and transparent – so that the full costs of expansion, including proposals to make better use of existing capacity in whatever form, can be measured and accounted for in a robust business case.

We would therefore expect any assessment of proposals for Heathrow to challenge the need for night flights, preserve the relief provided to residents by runway alternation and strengthen noise and air quality controls in the areas around the airport.

Rigour and transparency

The Commission has been charged with undertaking a '*vigorous, independent review of all the options.*' While the first stage of the Commission's work on the long term options will be a high-level review, it is not clear what approach the second, more detailed phase will take towards the submissions from those promoting expansion.

For the communities whose lives risk being blighted once more by the consequences of airport expansion there can be only one answer: the Commission's approach to the different options must be rigorous and transparent. We urge the Commission to confirm its commitment to a detailed level of scrutiny and to publish how it intends to verify the assessments accompanying any proposals.

The local authorities in west London with professional expertise in the key environmental impacts of noise, air quality and surface access constraints are fully prepared to engage constructively with the Commission in helping to develop a robust model.

Such a model will do much to reassure local residents that the environmental impacts of expansion are being thoroughly assessed and the costs of mitigation and compensation extensively tested. This is essential if the impacts for communities are to be properly evaluated and the business case fully informed.

The fate of the most recent expansion proposals for Heathrow demonstrates the importance of accurate inputs to the process. In the rest of this submission we include specific comments on the consequences of an incomplete assessment of the impacts on air quality, noise and congestion. The communities we represent have lived under the shadow of a third runway for 10 years. While the Commission is not taking decisions, any recommendation favouring a third – or fourth - runway at Heathrow will prolong the uncertainty for those residents. The previous Government could not demonstrate that the environmental conditions for expansion could be met. Yet it justified its decision supporting a third runway with the assurance that additional capacity would not be released until these conditions had been satisfied. This created the prospect of a runway being built yet not allowed to operate.

This is clearly the wrong way round. The next time a Government decides in favour of a particular expansion option it should be able to demonstrate to the communities affected how the environmental impacts will be addressed – and that the new capacity, once built, will not lie unused. This is the objective, scientific analysis that we look to the Commission to deliver in its detailed appraisal of the different proposals for expansion.

Air quality

The Aviation Policy Framework (2013) commits the Government to achieving full compliance with European Union (EU) air quality standards.

The area around Heathrow currently exceeds the levels set by the EU for the protection of health. The pollution is the consequence both of airside operations and the level of traffic on surrounding roads. The current forecasts are based on a two-runway airport operating within a ceiling of 480,000 ATMs. Any proposal for further expansion will have to demonstrate how this can be achieved without making air quality worse and prolonging the period when the limits are breached.

The previous government sought a consensus on the air quality model being used for assessment. The Project for the Sustainable Development of Heathrow included experts on air quality and road transport emissions with representation from the aviation industry and the local councils. The process

failed by not seeking agreement on the final assumptions used for the future air quality predictions. The resulting consultation document presented to the public simply stated that a third runway could be fully operational by 2020 with air quality limits met throughout the area.

There was no transparency in this process. It took a raft of FOI requests and a BBC TV Panorama investigation to unearth the assumptions that had been used about future aircraft, the drastic reductions assumed to occur with future road vehicle emissions and the crucial inputs from the surface access traffic model which had been supplied by the airport operator without any external, independent audit or scrutiny.

The expert consultants employed by the local authorities to inform the Adding Capacity consultation response concluded that the forecast improvement trends in air quality concentrations were not substantiated by scientific fact.

The then Government's response was to add a condition to the effect that additional capacity would not be released until the EU limits could be met and maintained. There was no explanation of how this might work. The reason for this silence was self-evident – short of cutting back on air traffic movements or, perhaps, shutting the M4 - there was no practical solution.

The current Government does not expect the area around the current two-runway airport to meet air quality limits until 2020. Any new proposal for expansion will face the same hurdles as before. We would urge the Airports Commission to apply the rigour to its detailed assessment that was lacking in the previous government's approach.

Surface Access

Heathrow is situated in one of the most congested parts of the UK. Its heavily constrained west London location means the airport has not been able to develop as a local tube and rail hub that might serve communities on all sides. The Air Transport White Paper (2003) recognised that expansion in this location would 'place pressure on already congested road and rail networks.' It went on to identify the solution as 'the airport operator spending several hundred million pounds on new rail infrastructure' together with the 'introduction of some form of road user charging' (paragraph 11.58).

As with the air quality limits, the decision on expanding Heathrow ducked the surface access challenge. It implied that existing projects such as Crossrail, Airtrack and the Piccadilly Line upgrade would be sufficient for the increased number of passengers. The Transport for London witness statements prepared for the Judicial Review of the Government's decision (LB Hillingdon and others v Secretary of State for Transport 2010) demonstrated that these infrastructure improvements were predicated on existing and forecast levels of demand associated with a two-runway airport.

The result was an inadequate surface access methodology with no assessment of the impacts on the current public transport networks and no identification of the measures required to address them. Neither was there any assessment of the dis-benefits to road users of increased congestion arising from the additional 11.8 million air passenger road trips a year generated by a third runway. Once again the local communities were expected to take the expansion proposals on trust.

Noise

The Commission will have to establish how the different expansion options would affect the airport communities concerned.

At Heathrow the coalition government's decision cancelling the third runway (2010) left no doubt as to the scale of the problem... *'the quality of life impact of a third runway, with up to 220,000 more flights over London every year, would be massive and there is no technological solution in sight to ensure planes become quiet enough quickly enough to make this burden in any way tolerable. So we need another solution...'*

The Draft Aviation Policy Framework (2012) put Heathrow's noise impact in a European context... *'Heathrow Airport accounts for approximately 70 per cent of people in the UK exposed to average noise from airports above 55 decibels. More than one in four people exposed to this level of noise around European airports lives near Heathrow. In fact, by this measure, Heathrow's noise impact easily exceeds the combined impact of all the other hub airports in Western Europe despite each having approximately similar numbers of movements... Comparing numbers of movements to population exposed to noise, it is evident that Heathrow has a significantly greater noise impact per flight than any other major European airport... (Chapter 4, paragraphs 4.5 and 4.6)*

It is likely however that even this is a serious understatement of the true community impact of noise. The current benchmark of a 57dBA Leq contour (measured over a 16-hour day) has been unchanged since 1985. It dates back to the Aircraft Noise Index study (ANIS) of that period.

Despite the area contained within the 57dB contour shrinking over the last 20 years, the numbers of complaints made both to local authorities and the airport operator about noise has increased. This suggests that the assumption that annoyance will remain the same as long as total noise energy and movements trade equally is no longer supportable.

The possibility that above a certain movement level the equal energy principal fails was raised by the Terminal 5 Inspector Roy Vandermeer QC in his 2001 report:

“The greatest single criticism of the LAeq approach was that it failed to give adequate weight to the number of aircraft movements. ...As the Department acknowledged even a difference of half a decibel could be significant and the area enclosed by a contour would increase by 15-20% for each 1dB increase in the LAeq level. To this extent the LAeq is influenced by the number of events. The issue is whether that influence is sufficient to reflect the experience of those affected.

In May 2001 foreshadowing the above criticisms the then Minister for Aviation (Bob Ainsworth) announced:

‘My Department is to carry out a major study to reassess attitudes to aircraft noise. This new study underlines the Government’s commitment to underpin our policy on aircraft noise by substantial research that commands the widest possible confidence.’

This study was the ANASE project which eventually reported in 2008. The study broadly found that the 57dB contour had become widely out of calibration as representing the onset of significant community annoyance. It suggested that the onset of annoyance could more accurately be assessed as 50 dB. This is consistent with World Health Organisation guidelines for daytime noise. At Heathrow this could mean that up to 1 million people are seriously annoyed daily by Heathrow’s operations.

The 2M Group has recently commissioned the authors of the ANASE study to update their work and respond to the criticisms that were directed towards the findings by the government-appointed peer reviewers at the time. Whilst this new work may not yet provide a definitive answer to the question of when people start becoming annoyed by noise, it will provide a coherent basis for reviewing a benchmark that dates back almost thirty years. We intend to present the findings to the Commission in July.

The Aviation Policy Framework, while not departing from the long-standing 57dB contour, commits the government to keeping the noise metrics under review in the light of any emerging new evidence (paragraph 3.18). We will therefore submit the updated ANASE work to both the government and the Commission as part of this process.

As with the air quality and surface access constraints the previous third runway proposals sought to cloud the facts. The noise impact calculations for example used the last year when Concorde was flying as the base year.

The Commission has the opportunity to bring credibility and transparency to the process of noise assessment. In recommending any changes to current operations or new airport schemes, the key metric will be the numbers of people affected. This will also help to identify the extent to which it is possible to mitigate the worst effects of a number of potentially competing schemes.

The Aviation Policy Framework (paragraph 3.40) confirms: *'Any potential proposals for new nationally significant airport development projects following any Government decision on future recommendation(s) from the Airports Commission would need to consider tailored compensation schemes where appropriate, which would be subject to separate consultation.'*

This of course is the wrong way round. The noise impact should be considered now in weighing the merits of competing schemes – not after the event when a decision has been made to proceed on other grounds. The Commission's detailed assessment should take into account the different costs of providing appropriate noise compensation and mitigation for each project – and it should be based on a credible benchmark level for annoyance.

Conclusion

We have not sought in this evidence to direct expansion to other airports. Nor have we sought to quantify the environmental impacts of the various proposals that have begun to emerge at Heathrow. Our concern has been to focus on the need for scientific rigour and transparency in the way the Commission assesses competing proposals and options.

The overriding task for the Commission must be to win the confidence of those who will pay the price for any expansion – wherever it is located. It is for these reasons we urge the Commission to publish its assessment methodology for the second phase of its work so this can be opened for public debate.

We have explained at length why the previous expansion proposals failed. They fell short quite simply because the promoters failed to spell out the true environmental, financial and human costs. Without this discipline there can be no confidence that the business case has been properly evaluated and the environmental impacts for local communities fully articulated.

The constraints that made a third runway 'untenable' in 2010 are the same today (Lord Justice Carnwath judgment, LB Hillingdon and others v Secretary of State for Transport). Nothing has changed for the better. The EU air quality limits will still not be met until 2020, the additional rail infrastructure required to support additional runways has not been identified and a credible, contemporary measure for the onset of community annoyance from noise has not been established.