

UNDERSTANDING THE FULL IMPACTS OF HEATHROW EXPANSION

a challenge to
Sir Howard Davies

June 2014



2M
against
Heathrow
expansion

Unfair process

At the T5 Inquiry Roy Vandermeer stated:

“I consider that I would be failing in my duty to local residents and to the Secretary of State if I did not acknowledge and investigate all of the significant implications of Terminal 5”

(para 21.1.11, Report by Roy Vandermeer,2001)

Our question to the Commission is can you demonstrate a similar commitment?
Have you appropriately dealt with the full implications of Heathrow expansion?

Community impacts

Heathrow is already **unsustainable in terms of its impact on noise, air quality and traffic congestion**. The prospect of expansion can only intensify those impacts.

The Commission can only proceed with confidence if it is able to demonstrate that it **fully understands those impacts** on the people affected by airports operations.

How will you evaluate the **adverse health impacts** for communities newly exposed to noise, night noise and air pollution? Will you take into account all the recent medical evidence?

How will you evaluate the impact of the total loss of Longford and the severing of Harmondsworth?

How will you evaluate the impact for those parts of Harmondsworth and Sipson that become uninhabitable and for Harlington where noise will become intolerable?

Air Quality

How will you guarantee EU compliant air quality for residents? Are you aware that that the European Commission has started infraction proceedings for current exceedences?

How will you prove that air quality limits can be met with expansion and that a proper process will be put in place to ensure these can be maintained?

Night flights and loss of runway alternation

Your ‘smoothing proposals’ will lead to a **near-doubling of the number of arrivals before 6.00am**. – how have you consulted with residents on the impact this will have on their lives? The latest generation of aircraft flying into Heathrow are not necessarily quieter on landing than previous generation types which are still flying. The UK’s independent Aviation Regulator – the CAA confirms this is a fact in its most recent report “Managing Noise” (CAP 1165).

The claim that the introduction of new generation aircraft at Heathrow will result in less noise at night, even with more flights is not borne out in the real world.

Your changes to runway alternation will add up to **59 additional movements** during the so-called quite quiet periods of the day – how have you consulted with residents on this?

How have you judged the balance between community impacts and industry benefits for the smoothing and de-alternation proposals?

Heathrow board member Akbar al-Baker **says the airport must operate 24 hours a day** to remain competitive (Daily Telegraph 21 May 2014). Have you formed a view on the extent of night noise nuisance that people must be expected to tolerate? Does your modelling accept that extended night time operations are essential for a fully functioning hub airport?

Noise modelling

The promoter says that the noise climate becomes quieter, even with a 50 per cent increase in capacity. Yet their modelling is based on an airport with a 12.5 per cent increase (540,000 ATMS) with the third runway operating at less than a third of its capacity. This is clearly not tenable if one is seeking to assess the full noise impacts of an additional runway.

With the third runway fully operational in 2050 the Mayor's Noise modelling using the promoters own projected fleet mix of aircraft suggest that far from an improvement in noise **Heathrow will be responsible for exposing over a million people to aviation noise** above 55dB Lden, an increase of 372,000 from today.

To date the promoters have provided no details on the assumptions made regarding the noise performance of individual aircraft they have used in their noise modelling. Their fleet mix assumes that new variants of existing aircraft types will be significantly quieter than the versions currently in service. We believe such claims are likely to be overly optimistic (particularly on landing) and will not be achievable in the real world around Heathrow. We have similar concerns surrounding the promoters assumptions for the noise performance of next generation new aircraft types predicted to be in service by 2050.

How will the Commission assess the accuracy of these claims? How will the Commission decide that these impacts are out-weighted by economic gain?

Outdated noise metric

We supplied you with a full review of the ANASE study. This concluded that the current noise benchmarks were more than 30 years out of date and no longer fit for purpose. Why does the appraisal framework say nothing about **the irrationality of persisting with an outdated, discredited metric?**

The CAA in its most recent report "Managing Aviation Noise" says " We believe that any noise metric and levels used for policy assessment should be evidence-based"

The UK's noise policy benchmark for defining the onset of significant community annoyance (the 57dB contour averaged over a 16 hour day) is out of calibration as demonstrated by the above ANASE work that we supplied to you.

The CAA agrees with our view that the social survey data underpinning the 57dB contour policy is now 32 years old and supports the need for a new aviation noise attitude survey.

Without a valid noise metric to work from we simply do not understand how you have been able to date to draw up your shortlist of preferred schemes for expansion.

Unfair comparisons

Your baseline is merely a forecast - you have assumed the application of operational freedoms that have not been subject to appropriate public consultation, have not been formally adopted by the Department for Transport and for which the claimed benefits have not been evidenced by the CAA. A credible baseline would be the airport as it is today operating within currently approved limits.

You are ready **to impose additional impacts on the communities affected without listening to how they feel this will affect them.** You are prepared to build these short term capacity gains into an inflated baseline for Heathrow which is not available to other airports.

By masking the full cumulative impact of additional capacity you are misleading residents who are entitled to expect a fair and even-handed appraisal process.

A constrained hub

You say in your technical assessments that a third Heathrow runway will be 80 per cent full by 2030. The Interim Report goes on to say that a further runway will be needed in the South East by 2050. You know this cannot be at Heathrow given the NATS report on the airspace impact for other airports. **If, as you concede, the case for extra hub capacity is at best 50/50 and if the existing hub airport is constrained to just one extra runway, why have you not removed Heathrow from the short list** and concentrated your efforts on other more sustainable options?

Fourth Runway at Heathrow – impact on other airports (Reproduced from NATS Support to Airports Commission, November 2013).

Configuration	LHR	LGW	STN	LTN	BMG	LCY	SEN	Total	Change
LHR4 (%)	160%	50%	50%	50%	100%	25%	100%	91%	-9%
LHR4 (ATMs)	800	125	125	125	250	25	100	1,550	-150

Surface access

The promoters say the surface access measures will ensure no additional Heathrow-related traffic on the roads with expansion and a 10 per cent increase in people accessing the airport by public transport. This is with an anticipated doubling of the current freight capacity. The costs associated with the surface access delivery are estimated at £2.1billion.

The Mayor's work on surface access says Heathrow are relying on enhancements such as Crossrail and the Piccadilly line upgrade, which are already needed to cope with the predicted increase in population growth. The Mayor forecast an extra 16,500 trips in the AM peak hour with Heathrow expansion which will have a considerable impact on an already congested transport network.

The Mayor's estimate of optimal surface access solution costs for an expanded Heathrow are £17.6 billion.

This note has been prepared for the 2M Leaders Meeting with Sir Howard Davies on 16 June 2014

Cllr Amrit Mann (Hounslow)

Cllr Ravi Govindia (Wandsworth)

Cllr Ray Puddifoot (Hillingdon)

Cllr Lord True (Richmond upon Thames)

How will the Commission reconcile these competing claims? How will the Commission assess whether the surface access model used by Heathrow is fit for purpose? How can stakeholders be confident that the evidence bases are sound, robust and fit for purpose?

Unfair process

We do not believe the process you have conducted so far will be seen as fair by the community – nor indeed by the promoters of airport options other than Heathrow. We do not think the process has been sufficiently robust and transparent to form the basis of a future National Policy Statement. As such it is a flawed basis on which to proceed.