

# **Adding Capacity at Heathrow Airport**

## **Response from HACAN**

**HACAN represents residents under the Heathrow flight path.**

### **1. The Inadequacy of the Consultation**

HACAN's response to the consultation is made in the context of a history of broken promises. The most recent was the abandonment of the 480,000 atms limit, imposed by the Secretary of State, which was under threat less than a year of the promise being made.

The credibility of the current consultation depends upon it being seen to be impartial, easily understood, transparent, and involving all those affected by the proposals. It is none of these:

#### **1.1 Impartiality**

It is clear that the relationship between the Government and BAA Ferrovial was unhealthily close during the preparation of the consultation. Minutes of meetings obtained under the Freedom of Information Act by Justine Greening reveal that the cooperation went far beyond technical matters:

(i) "Revision of the wording" in the consultation document was suggested in order to assuage residents whose objections might put the project at risk.

(ii) BAA and DfT together worked on "how to handle difficult questions" at public exhibitions: "'Jonathan Sharrock [DfT senior official] asked how the exhibitions would be handled in Harlington. [A blanked out name] explained that a BAA comms team was working closely with DfT, going out to different associations and asking them what their major concerns were, to ensure that the exhibitions ....".

(iii) BAA and DfT discussed which potential opponents of your expansion plans should be put on a 'risk register'

The nature of these discussions with BAA Ferrovial gives us no confidence at all that you are interested in delivering a fair consultation.

#### **1.2 The Consultation Form**

(i) The form is incomprehensible to any resident without technical knowledge. The Plain English Society has strongly criticised its use of jargon without explanation. Neither the form nor the summary, for example, explain what is meant by a 57dBA Leq noise contour.

(ii) The questions in the form are loaded so that opponents of expansion can answer only to support it: "A3, Are the environmental conditions still appropriate? – there is no box on the form to tick that the respondent feels that the environmental conditions were inadequate in the first place. "A4 To what extent do you agree that a third runway, if built, should be supported by a sixth terminal? – however this is answered, a third runway is assumed.

(iii) Maps of the proposed new flight paths are not included in the summary. Thousands of people in wide swathes of London therefore have no idea that the plans would affect them, though for most of them whether or not they will be under the flight path is the critical issue. The consultation document explains that your flight paths are only "indicative". This is

because National Air Traffic Control (NATS) will be consulting on airspace changes in the future. Our view is that it would have made more sense to have had that information from NATS *before* this consultation took place? Indeed, it may be that, in law, people should have had this information in order to make an informed response. There are also no clear indications of where the Public Safety Zones will be.

(iv) The form does not consult on public transport improvements, presumably on the grounds that BAA Ferrovial would formulate a Surface Access Strategy when submitting a planning application. One of the Government's three conditions is thereby omitted from the current consultation and any Ministerial decision would not be informed on this topic.

### **1.3 Area of Consultation**

Consultation forms have been sent only to residents within the 57 Leq contour and one db beyond. This is in spite of the ANASE findings accepted by Government that this contour does not define the limit of community disturbance. It also found that the system of averaging out noise (Leq) doesn't adequately factor in the huge *number* of aircraft now using Heathrow. Although the DfT had criticisms of other aspects of the ANASE Report, the consultation document accepted these particular findings as valid. Yet, they have been ignored them. Of course, to have included them in the policy-making process would mean that the whole basis of this consultation would be fatally flawed as it is based on the fact that the noise limits, with expansion in place, should not exceed the 57 contour area as it was in 2002. The World Health Organisation (WHO) argues that people start to get moderately annoyed when noise averages out at 50 decibels (or even less) and seriously annoyed at 55 dBLeq. The ANASE findings are not dissimilar. On that basis, the consultation should have included people in South East London and many other places; with the DfT sending out more like up to 2 million rather than 200,000 response forms; and admitting the truth that these expansion plans will result in higher levels of noise across London and the Home Counties (from a Government which is committed to "bearing down" on noise levels).

We do not accept as tenable the argument that, because the consultation has been posted on the DfT website, anybody could have responded. In theory, that is true. In practice, many, many people across London and the Home Counties would not even have thought about going onto the website as they have no idea that these plans could affect them. No *meaningful* steps have been taken to alert them of what might be in store for them.

We also note that some very strange anomalies seem to have occurred in who received the official consultation response form. Some people in Reading have received consultation forms (as they probably should have done), but some people in Hayes, who will be very much affected by a third runway, have not. Nor people in Chiswick who will find themselves under a flight path to a third runway. We trust that there was no question of the forms being targeted at areas where it was felt the DfT might get as favourable response, even those areas were some way outside the 57 decibel contour.

### **1.4 Transparency**

(i) Nowhere is it explained that the noise limit, a noise contour of 127 sq kms, 57 dBA, is calculated in such a way that a large increase in movements is allowed with only a barely perceptible reduction in noise from individual aircraft. Nor do the noise contour calculations reflect the value of alternation.

(ii) Table 4 omits the air quality impact in a scenario of two runways with 540,000 atms in 2015, which is the favoured option if mixed mode is introduced.

(iii) There is confusion over Government policy: paragraph 1.3 of the consultation document says that policy “is to seek to reduce the environmental impact”; paragraphs 3.83 and 3.30 that it is “to prevent deterioration in aircraft noise; not the same thing.

### **1.5 Conclusion**

The consultation is deeply flawed. It has added to the deep distrust there is of the Government (and of the DfT in particular) by the governed. The consultation documents should have been withdrawn.

## **2. Circumstances have Changed**

The consultation is five years out of date. It is concerned with proposals made in 2003, based on the earlier SERAS consultation. Policy must now be reviewed to take into account changes since then. There are a number of areas where this applies.

### **2.1 Climate Change**

There is a new urgency to address climate change. The UK Climate Change Bill is based on a report in 2000 which advocated a reduction in CO2 emissions of at least 60% by 2050. More recent developments in climate change science show that this is not enough; an 80% reduction is needed to avert the worst scenario. The Fourth Assessment of the IPCC, November 2007, confirms the need for urgent action in all sectors, including transport. Expansion at Heathrow is incompatible with this current and overwhelming challenge, and with Government policy on other sectors. Therefore climate change should have been addressed in this consultation.

### **2.2 The ANASE Noise Study**

Our response has referred to this study already and will return to throughout our response as we feel your ignoring of it fatally undermines the case being made by the DfT. The ANASE Study confirms that the level of annoyance is higher than previously found and that there is no threshold at which there is “an onset of community annoyance”. The consultation document accepts that Government “needs to take account of these findings in how we treat aircraft noise as a factor in future aviation development” – but goes on to ignore them. This is in spite of earlier assurances given at the time of the T5 Inquiry.

### **2.3 Rail Alternatives**

Since the publication of the 2003 White Paper, there has been significant improvement in rail alternatives to air traffic, with the opening of the new St Pancras. Much of the short haul traffic to nearby continental destinations, including the sixty or so daily flights to Paris, could now move by rail, thus relieving demand at Heathrow. This consultation appears to take no account of this.

**2.4 There are other changes since the previous consultation:** the increased runway length, the sixth terminal, the recognition that, if expansion takes place, you would require permission from the European Union that you would not be required to meet its air pollution legal limits until 2015 (instead of 2010). Our response deals with these matters in more detail later on.

### **2.5 Conclusion**

Our conclusion is that this consultation is wholly inadequate to deal with the changed circumstances.

### **3. Air Pollution**

**3.1** The consultation document claims that, largely as a result of less polluting planes and cars, EU legal limits with mixed-mode in place by 2015 and also by 2020 with a third runway in place. The detailed basis for these claims are buried in the technical documents which few respondents will have seen. We enclose as part of our response, *Emissions: Impossible*, a report from the Aviation Environment Federation which, we believe, gives a more realistic assessment of future air pollution levels (Appendix 2). Quite simply, with the level of expansion you are envisaging, it argues you are on a mission impossible to stay within the EU legal limits.

**3.2** The consultation document admits that meeting the air pollution targets will be “particularly challenging over next five to seven years” (para 3.119). It also admits that worked will be needed to cater for the effects of 25 million more road trips per annum. Table 4 omits the 540,000, 2015 scenario. We note the DfT is seeking a derogation until 2015 to enable it to meet the EU legal limits. We question the legality of basing this consultation on the *assumption* of gaining something which may not be forthcoming. Seeking derogation is an admission of non-compliance

### **4. Noise**

It’s as simple as this. If expansion goes ahead, many people’s lives will be changed forever because of the impact of aircraft noise: people under new flight paths; extended flights; people with flights all day long; green spaces, such as Kew Gardens, Osterley Park and Greenwich Park, experiencing constant noise. The “challenging” target the White Paper sets out - that the area within the 57 decibel contour should not be greater than it was in 2002 – will do little to ease the problem. We return, once again, to the ANASE Report which the Government, while accepting its main findings, has refused to adopt as part of its policy-making process. This undermines the noise section of the consultation document.

*See appendix 1 for more details of on noise.*

### **5. Mixed-Mode**

#### **Terminal 5 Inspector:**

*“I am strongly of the opinion that for environmental reasons the system should remain unchanged” (Chap 42 8.11)*

*“I gained the firm impression that, of all the measures in force at Heathrow, the loss of this mode of operation and the prospect of increased night flying were the most feared. The benefits were not disputed.” (Chap 7 7.18)*

**5.1** We assume the consultation is on the *principle* of mixed-mode as this not yet been the subject of a consultation since the principle of introducing mixed-mode was not part of the SERAS Consultation. But it is not really clear from the consultation document. And the waters have been made murkier by the statements of Gordon Brown and Ruth Kelly that they want expansion at Heathrow if the environmental conditions can be met. Those statements hardly suggest the consultation is on the principle of introducing mixed-mode.

**5.2** No Health Impact Assessment or Strategic Environmental Assessment Study has been carried out as it should have been before consulting on the principle of mixed-mode. It is also not clear what impute your colleagues from the Departments of Health, Education or

Environment had in preparing this consultation document. We would argue that all this should have been done when consulting on *the principle* of mixed-mode.

**5.3** The consequences of mixed-mode for people living under the flight paths are not made clear enough in the consultation document. Residents, schools, businesses, hospitals etc across vast swathes of West London will lose their valued half day's peace and quiet. Residents in areas such as West Windsor and Wraysbury will have landing aircraft on a regular basis for the first time. Residents in places like Stanwell Moor and Longford will have take-offs all day long. **The Cranford Agreement** would be abolished. Given the history of broken promises, we have no confidence that in the statement in the consultation document that runway alternation will be restored if a third runways built. Mixed mode would be a reversion to the system that obtained in 1972 before the introduction of alternation, but very much worse since the number of movements has hugely increased.

## **6. A Third Runway**

**6.1** We note the view in the consultation document that the principle of a third runway has already been the subject of consultation. Most people will say: *when?* During the SERAS Consultation it was not clearly spelt out to many people who would potentially affected by a third runway that they were being consulting on the principle of introducing it. For example, SERAS did not spell this out to people who would be under a new flight path in Chiswick, Holland Park or High St Kensington.

**6.2** Given that so many people were not aware during SERAS that they were being consulted about the principle of a third runway, the scope of this consultation is too narrow: whether a third runway can be built within the noise and air pollution limits outlined in the 2003 White Paper. Our response makes clear that we do not believe it can be achieved and, moreover, the noise limits you have become irrelevant (because of the findings of the ANASE Report).

**6.3** We note we are now being consulted on a longer runway. This is not just a matter of lengthening the runway by a few hundred yards. The implications are significant, both for the extra destruction that would be involved and the higher noise levels which would result from the larger planes which the longer runway can accommodate. We question whether the latter has been spelt out to the residents who will be under the new landing and take-off flight paths.

**6.4 This question may not be in any of your tick boxes but we want to emphasise we are totally opposed to the principle of a 3<sup>rd</sup> runway. It contradicts government policy on climate change. Its impact on noise, air pollution, biodiversity and community destruction is unacceptable. And the economic justification for is lacking.**

## **7. Surface Access**

The improvement of public transport access is a condition in the White Paper of adding capacity at Heathrow. This condition is not met by proposals in the consultation document. The consultation document assumes that public transport mode share would increase from around 36 to around 40/42% with a third runway; but public transport improvement, including Airtrack and expanded bus and coach services, would increase public transport mode share by only 1 percentage point. 40% of Piccadilly Line capacity would be taken by airport passengers, reducing available space for commuters. The number of passengers, with mixed mode and a third runway, would more than double. Mixed mode would result in some 25 million extra passenger trips by road per annum (para 3.181). Traffic volumes on roads in the vicinity of Heathrow are expected to grow and speeds to fall. It is obvious from these projections that congestion is inevitable on all roads near Heathrow, including the M4 and, in particular, the principal access to central London. In the face of this inadequacy, the DfT is

sheltering behind BAA putting forward a Surface Transport Strategy as part of a planning application. It is premature to introduce mixed mode before the improvement of surface access. More significantly, even if Crossrail, Airtrack and proposed bus improvements were in place, public transport would not meet the demand for travel to and from the airport. Government admits that it has not monetised the cost of local air pollution associated with this extra road and air traffic. It also admits that both aircraft and road emissions would increase before there is a benefit from tighter emission standards for road vehicles. These issues, it says, need to be addressed by BAA and other agencies. With local air pollution, as with congestion, it is premature to proceed before the issues have been addressed.

## **8. Economics**

No independent study has been done into the economic benefits of expansion at Heathrow. The figures given in the consultation report are largely based on the 1999 and 2006 Oxford Economic Forecasting Reports (OEF), a consultancy based in Oxford but not part of the prestigious Oxford University. These reports were dominated by the aviation industry. Two of their leading figures wrote the forward to the first report! Even so, the estimated net benefit of Heathrow expansion, as outlined in the consultation, still only amounts to £5bn...over 70 years! That is about a benefit per head of about £1 per head per year over a 70-year period!

**8.1** And it is almost certainly less than £5 billion. The impact of noise has not been fully costed. Noise has been costed based on the estimated effect on house prices – using by default the same formula as for new busy roads. The calculated total cost is £300 million. The number of houses that will experience an increase in noise, according to you, is just 30,100 and these are the only houses that are taken into account. There are also 9,700 houses where you claim there will be a decrease in noise. The consultant we spoke to at your Richmond Exhibition couldn't tell us whether the £300 million was based on the full 30,000 or the net figure of 20,000. The loss is therefore either £15,000 or £10,000 per unit.

**8.2** We pointed out to your consultant economist that a far greater number of houses in various parts of London will also be affected and no calculation has been made in respect of these. To our surprise he agreed. We don't know the actual number of other affected houses in places like Chiswick and Kensington but if one does the calculation backwards at the cost of £10,000 per unit *it would take* 450,000 more dwellings affected to cancel out completely the *claimed* benefit of £4.5bn. In fact considerably less than this number *would be needed* due to the higher property prices in the newly affected areas. *But it is unreasonable to take* £300 million as a proxy for all the additional noise to be suffered by the affected parts of London and its environs over the next 70 years. If the number of people affected is, say, one million that *equates the cost in terms of increased stress and reduced quality of life* to 8p a week or about two cups of Starbucks coffee *per person* per year!

**8.3** It is also unclear whether the impact on air pollution, loss of landscape, biodiversity, parks under the flights paths that would experience more aircraft (such as Osterley and Richmond Parks), far less the cost of climate change, has been fully costed. All in all, the benefits are likely to be much less “significant” than the consultation claims.

**8.4** Of course, we also hear the arguments that the expansion of Heathrow is essential to London's economy and that, if Heathrow doesn't expand, businesses will relocate to other European cities with expand airports. We deal with these two arguments in the attached documents (Appendices 3 and 4).

## **9. Community Destruction**

The consultation document claims that the benefits of economic expansion are so “significant” that they justify one of the biggest forced removal of people this country will ever have seen. It admits that over 700 homes will go, a school, some pubs, the entire village of Sipson. What isn’t spelt out is that some of the remaining homes, schools and shops will find life so unbearable that, in the real world, it is impossible to see how they could remain. And, many of those which do remain, will be within yards of the airport or re-aligned roads. It is admitted, though, that the final plans may be different to the ones you’ve outlined in this consultation document; that “an option” not necessarily “the option” is being outlined. What that means is that the destruction could be greater than outlined in this consultation. What is really “significant” is the real level of destruction the final proposals might involve.

## **10. Conclusion**

- The consultation document is inadequate and confusing
- Many people whom the proposed changes will affect have not been properly consulted
- The air pollution projections are speculative
- The economic benefits are overstated
- The noise claims are rigged
- The community destruction is under-estimated.
- The surface is hardly touched upon

**In short, this is a discredited consultation document**