

# Sarah Olney's submission to the Heathrow Expansion Draft Airports National Policy Statement

<https://www.gov.uk/government/consultations/heathrow-expansion-draft-airports-national-policy-statement>

**Question 1: The Government believes there is the need for additional airport capacity in the South East of England by 2030. Please tell us your views.**

Heathrow expansion diverts growth from the rest of the UK and reduces overall UK growth. Providing additional capacity in the South East will exaggerate the current regional inequalities in the UK and limit the growth of the regional airports with the resulting benefits to their regional economies.

Two-thirds of all UK flights go to/from the south-east of England even though only one-third live there and four of the UK's five busiest airports are based in the South East. It would greatly benefit the regions of the UK if investment in airports was instead diverted to airports outside of the South East.

By 2050 growth of terminating passengers at all UK airports, excluding Heathrow, is estimated to be reduced by 58 million a year as a result of Heathrow expansion (233 million terminating passengers compared to 291 million). The net loss for the UK, including Heathrow's additional 19 million terminating passengers, is 39 million passengers (338 million terminating passengers compared to 377 million).

Aviation growth diverted to Heathrow from the rest of the UK reduces competition and concentrates growth in the relatively overheated southeast. The diversion of growth in passengers to Heathrow from the rest of the UK translates into reduced growth in flights at virtually all UK airports. As examples, the Airports Commission estimated the number of flights in 2050 at Birmingham airport would be reduced from 206,000 to 113,000 (45%) (2011 – 86,000 flights), comparing no Heathrow expansion with expansion. Growth at Luton would be reduced by 35%, Glasgow: 22%, Bristol: 26%, East Midlands: 20%, Newcastle: 11%, Belfast International: 10%, Liverpool: 11%, Manchester: 10%, Stansted: 7% and Gatwick: 7%. Total UK flights in 2050 would be reduced from 3.039 million to 2.891 million (i.e. by 5%) as a result of Heathrow's expansion. Heathrow ends up serving 70% of the long-haul passenger market and 35% of UK passengers with many other UK airports left with substantial unused capacity. This concentration at Heathrow negatively impacts airport connectivity and competition. It has a negative impact on the UK as an aviation hub and on most UK airports, some of which may not survive, and on local economies and employment. This outcome works against the Government's aim of re-balancing the UK economy

If Heathrow was expanded, this would mean that air travel would be concentrated with limited competition at a single airport, Heathrow - the most expensive major airport in the world. Heathrow's aeronautical charges to airlines rise from £22.53 per

passenger in 2014 to £31.20 in 2035 with expansion or around £3.7 billion (£ real 2014). This compares with around £9 at Gatwick, £12 at Schipol, £8 at Dublin and Manchester and £11 at New York JFK, for example. The high cost of Heathrow is partly due to facilities for International-to- international transfers, which are of questionable value to the UK. The claim by Heathrow and the Government that there will be no increase in charges seems fanciful given the cash-flow modelling presented by the Airports Commission, from which the above figures are taken.

Heathrow is not full, there are around 74 million passengers a year currently using Heathrow compared to runway capacity of 94 million. Growth in Total Passenger numbers is set to continue without NWR expansion through use of larger aircraft and higher occupancy.

Heathrow is a high frequency airport with many popular routes but often less than full use. Three quarter empty planes to and from New York is an example of misuse of existing capacity.

Expansion of Heathrow is not acceptable given its considerable local downsides.

According to the European Commission, at least 725,000 people live under the Heathrow flight paths; that is, 28% of all people impacted by aircraft noise across Europe. A new runway would bring a considerable number of new people under a flight path for a first time. Additionally, those communities which currently enjoy a half day's break from the noise are likely to find that reduced (in order to ensure people under the new runway also get respite). A third runway is expected to increase the number of planes using Heathrow by around 250,000 a year. Quieter planes and improved operation practices cannot wish that number away.

Air Pollution levels already exceed the official safe levels in areas around Heathrow. With another quarter of a million or so planes using the airport if a third runway is built, is it really feasible that air pollution levels will fall even with quieter and cleaner planes coming on-stream? Vehicle traffic is the big problem. It is likely to require radical measures, such as scrapping/reducing diesel vehicles, to enable air pollution targets to be met.

At least 783 homes will need to be demolished to make way for a third runway. And many more people might need to leave their homes if the noise proves intolerable. Heathrow has offered to buy nearly 4,000 homes in total. These people are being offered compensation but I doubt it will be enough to enable them to buy a new home in the area of their choice and for many, nothing can compensate the loss of their community.

**Question 2: Please give us your views on how best to address the issue of airport capacity in the South East of England by 2030. This could be through the Heathrow Northwest Runway scheme (the Government's preferred scheme), the Gatwick**

**Second Runway scheme, the Heathrow Extended Northern Runway scheme, or any other scheme.**

The Government's focus should move away from the South East and instead look to improve regional airports such as Birmingham, Manchester and Bristol where there is significant room for growth without the need to build more runways.

**Question 3: The Secretary of State will use a range of assessment principles when considering any application for a Northwest Runway at Heathrow Airport. Please tell us your views.**

In light of the extremely high levels of air pollution which already exist in South West London, assessment of the effect on air quality of a third runway must be a priority when considering consent for the development. Assessment of levels of noise pollution should also be a key part of the assessment.

**Question 4: The Government has set out its approach to surface access for a Heathrow Northwest Runway scheme. Please tell us your views.**

The requirement on Heathrow 'to implement measures to deliver on its commitment of no increase in airport related road traffic, with more than half of passengers using public transport' is admirable but the National Policy Statement does not make clear how this will happen.

There is also a lack of clarity from the Department of Transport on the cost of surface access upgrade and how that is to be funded. Transport for London estimates the cost at between £15 billion and £20 billion and Heathrow has committed to meeting just £1.1 billion of that cost, leaving a black hole of between £14 billion and £19 billion.

The business case for Heathrow expansion rests on delivering £61 billion of benefit to the UK over 60 years. That number has already been substantially revised downwards from Heathrow's previous estimate of £147 billion over 60 years. If it should be proved that up to £19 billion of costs have not been brought into consideration, the business case for expanding Heathrow weakens even further. Should Heathrow airport be required to fund the bulk of the surface access upgrade itself, it may find it difficult to interest investors and shareholders in its revised business case. If the costs of funding upgraded surface access should fall to the taxpayer, that may affect the level of support that Heathrow expansion is currently enjoying around the country. The public are entitled to ask whether or not that additional £19 billion could be better spent elsewhere.

I am also concerned about reports that proposals to run Elizabeth Line trains through Heathrow Airport are being jeopardised by a legal dispute over fees imposed by the airport. Heathrow, which spent £1bn building the five-mile line linking Heathrow to the Great Western main line 20 years ago, have argued that TfL should pay for the construction of the line through track access charges that could amount to £42m a

year. These charges are broken down into a £597 fee per train to recoup historical building costs and a charge for operational expenditure amounting to £138 per train. The Office of Rail and Road had ruled that Heathrow would not be allowed to charge Crossrail for the costs of building the line, the Heathrow Express, which the Elizabeth Line would run on but Heathrow is attempting to challenge this.

This case shows that Heathrow is not prepared to pay their share of the costs of improving surface access to the airport via public transport which means that taxpayers are likely to ultimately foot the bill. This is unacceptable.

While there are warm words in the national policy statement about increasing the number of cycling and walking journeys made to the airport and of moving passenger journeys on to public transport, there remains little mention of the effect of increased freight on the roads. The economic case for expanding Heathrow airport rests on being able to increase the amount of freight that will pass through the airport. Clearly this freight will not be transported to the airport on the backs of bicycles or carried on the tube. It is however difficult to see how there will be a sufficient reduction in passenger journeys to compensate for the increased number of freight movements in order for the Government to fulfil its commitment to no net increase in road journeys. There is also no evidence of plans to ensure, where possible, that those freight movements are made by low-emission vehicles to limit the impact on air pollution.

Finally, I am concerned about how residents in Mortlake and Barnes will be affected by rail upgrade plans which might increase the length of time that level crossing gates block the roads in their area. Mortlake is currently blocked for around three quarters of an hour, every hour, to allow trains to cross. Residents are entitled to know whether the plans for Heathrow expansion mean that level crossing gates will be down for even longer. There has been absolutely no clarity on this.

**Question 5: The draft Airports National Policy Statement sets out a package of supporting measures to mitigate negative impacts of a Heathrow Northwest Runway scheme. Please tell us your views. Are there any other supporting measures that should be set out? In particular, please tell us your views on:**

#### **5.1. Air quality supporting measures**

The DfT has made clear that failure by Heathrow to demonstrate that it can comply with air quality requirements will result in refusal of development consent. Air quality will present Heathrow with a major challenge because the measures needed to deal with it are largely outside of its control. The main source of air pollution in the area is from road vehicles. There will need to be a step-change in getting rid of the dirty vehicles over the next 10 years if Heathrow is to meet its target by the time any third runway opened. In short, the air pollution challenge which already exists for Heathrow is such that the third runway cannot and should not be given consent.

#### **5.2. Noise supporting measures**

The proposals for less noisy planes, improved operational practices, guaranteed periods of respite and a slightly longer night ban are welcome but they don't go nearly far enough and, indeed, for the NPS to argue that they will result in less noise annoyance than there is today, despite 250,000 extra flights using Heathrow, is unconvincing.

The NPS has failed to factor in four critical things:

- 1) In predicting future levels of noise annoyance the NPS has largely relied on the method of averaging out noise. This method gives too much weight to the noise of individual aircraft (which is on the whole falling) and not enough weight to the number of planes (which will rise). It is this distortion which allows both the Airports Commission and the NPS to claim that, despite 250,000 (albeit quieter) more planes, the noise contours will shrink.
- 2) The NPS has failed to fully take into account the particular impact aircraft will have on people newly under a busy flight path. Residents who are under a flight path for the first time, with planes going over as many as one every 90 seconds, will on the whole have a much lower tolerance level than those who have lived with the planes all their lives.
- 3) The NPS has failed to use any metric which tests the real level of annoyance of people in areas that may just have planes for part of the year but, when they do so, are badly hit. Places such as Teddington and Ealing are overflowed for about 30% of the time in a typical year (when an east wind blows). They fall outside the annual noise annoyance contours. A metric should have been used to capture their situation.
- 4) There is not enough in the NPS on the impact that the reduction in the length of their respite period will have on many residents in West London. The NPS acknowledges this reduction but then skates over the problem by saying the shorter periods of respite will be more predictable (para 5.60). It is also worth stressing that people want less noise not just predictable noise.

### **5.3. Carbon emissions supporting measures**

The NPS endorses the view of the Committee on Climate Change (the Government's independent advisers on climate change) that a third runway could be built without the UK breaching its target to reduce CO2 emissions from aviation to their 2005 levels by 2050. The Airports Commission also took that view but added that, if growth at other airports in the country exceeded expectations, the Government would need to look at introducing some form of carbon tax or carbon trading scheme to manage overall demand so that the targets would not be exceeded. The NPS says nothing about this.

### **5.4. Compensation for local communities**

The Government is to offer to those people whose homes would be demolished the pre-blighted cost of their home, plus 25% plus paying their stamp duty and removal costs. People in the immediate area who felt the noise of living under the new flight path was unbearable would be offered the same package. Many people in the Heathrow villages don't believe the package is acceptable: see <http://stopheathrowexpansion.co.uk/>

Heathrow has offered to set aside £700 million to help with noise insulation for everybody within the 55Lden contour (that stretches to about 16 miles from the airport), to be paid over a 20 year period. The Environmental Audit Committee in its report (February 2017) said: "We believe that communities affected by noise in 2026 should not have to wait 20 years for insulation." The timetable needs to be accelerated significantly. And there needs to be a reassessment as to whether £700 million is sufficient.

**Question 6: The Government has set out a number of planning requirements that a Heathrow Northwest Runway scheme must meet in order to operate. Please tell us your views. Are there any other requirements the Government should set out?**

**Night Flights.** The Government is proposing a 6½ hour ban. This is simply not long enough. The World Health Organisation recommends an eight hour night, citing a growing body of evidence which shows that disturbed sleep can impact on health and productivity at work. 8 hours should be the norm at Heathrow.

**Respite.** The Government is proposing predictable periods of respite but these periods need to be better defined. The half day's break that many communities in West London currently enjoy should be guaranteed but the noise is not confined to West London. Aircraft fly over vast swathes of London and the Home Counties. People many miles from the airport are calling for periods of relief. It is essential that predictable and meaningful respite is guaranteed for everybody within 25 miles of Heathrow.

**Question 7: The Appraisal of Sustainability sets out the Government's assessment of the Heathrow Northwest Runway scheme, and considers alternatives. Please tell us your views.**

N/A

**Question 8: Do you have any additional comments on the draft Airports National Policy Statement or other supporting documents?**

The lack of information regarding Government plans to reduce levels of air pollution posed by the third runway and the lack of robust plans and costings for improvements to surface access has prevented many from responding to this consultation in an informed manner. This has been unacceptable.

**Question 9: The Government has a public sector equality duty to ensure protected groups have the opportunity to respond to consultations. Please tell us your views on how this consultation has achieved this.**

N/A