

Davies Commission response

Response from Englefield Green Action Group



Our response is focused on the two Heathrow expansion options.

Q1. What conclusions do you draw in respect of the three short-listed options?

Our conclusion is that the Gatwick option is preferable to either of the 2 Heathrow options for the following reasons:

Noise

Expanding Heathrow by 220,000/260,000 ATMs will inevitably increase the noise pollution around the airport. Recent trials highlighted the detrimental impact continual aircraft noise has on the village of Englefield Green. The village is higher than the surrounding area by approximately 75 metres and therefore the noise pollution is greater. Noise monitoring equipment installed by Heathrow in Englefield Green showed that aircraft noise **regularly** exceeded the 57dB level and on 9 separate dates (over a 32 day period) **exceeded** the noise level that would be considered acceptable under the Department of Trade aviation policy framework.

The WHO states that serious annoyance occurs above 55dB but noise can also have an impact starting from a lower level of 50dB (0700-2300) and 40dB (2300-0700). The data given above is based on a 57dB threshold which is therefore too high and does not take into account the WHO measures.

The report (page 32 2.75) states that the noise generated by airports has the potential to have significant effects on health and wellbeing. The European Environment Agency considers environmental noise, of which aircraft noise is the most significant element, to be more damaging to health than passive smoking. It has been proved that there is a detrimental impact to the learning of children (ERCD Report 0908 Aircraft Noise and Children's Learning). The WHO's key guidance documents explain the effect that a noise environment above 55dB has on society: an increase in aggressive behaviours; increase in stress hormones and blood pressure levels, and a reduction in child development.

The report states that the noise will be mitigated by quieter planes, for example 'new generation planes' such as A380s. However data from the Heathrow noise monitor installed in Englefield Green shows that the dB reading from A380s was not significantly lower than Boeing 747s; using new generation aircraft will not decrease **the frequency** of such noise: frequency being deemed to be the major irritant.

Many more people are affected by noise pollution from Heathrow than Gatwick. At present 766,000 people, **which is almost a third of the people affected by aircraft noise in Europe**, are impacted by the noise from Heathrow compared with 11,300 at Gatwick.

Expansion of Heathrow airport would mean that incidents of over 55dB would increase in frequency and cause further detriment to communities close to the airport.

Air Pollution

It has been stated in the press that, according to a new environmental report, Gatwick Airport has never breached EU and UK annual air quality limits and is committed to maintaining this 100% air quality record if it built a second runway. Gatwick can operate well within UK and EU air quality guidelines because the airport is located in a largely rural, sparsely populated area.

Unlike Gatwick, Heathrow regularly breaches legal air quality standards today. It sits between major motorways in one of the world's most densely populated metropolitan areas. If Heathrow is expanded, Heathrow could only begin to meet air quality standards if there was no more airport-related road traffic than there is today, which is clearly not realistic.

The area around Heathrow is an air pollution hotspot due to a combination of airport related traffic, air traffic, background pollution levels in Greater London and two major national motorways and other major roads. Breaches of air quality legal limits have been regularly recorded at monitoring stations close to the airport over the last ten years.

Increased surface traffic associated with increased passenger numbers, airport employment and a planned doubling in freight traffic will adversely impact on the already high levels of NO₂ gasses in the vicinity of the airport and the M25 and M4 motorways.

According to the World Health Organisation air pollution has a significant impact on public health risk.

The EU requires that reduced air pollution levels are enforced legally and that breaches of pollution levels are brought in to compliance 'in the shortest possible time'. The UK Supreme Court has now been charged with enforcing compliance, with potentially large financial penalties levied against the UK in the event of non compliance. Heathrow expansion and its associated increased air and surface densities, is at odds with the required, legally enforceable policies to reduce levels of air pollution.

Surface access

The whole road network around Heathrow is already more often than not grid locked at peak times and often outside of these hours. Additional surface transport investments are needed without expansion of the airport. Expanding Heathrow would negate the impact of these investments.

The Highways Agency states 'The M25 is one of Europe's busiest motorways with some sections handling around 200,000 vehicles per day. Traffic moves slowly, especially at busy times of day.' Regarding the M4 approaching Heathrow, they comment 'There are numerous occasions where demand exceeds capacity and severe congestion can be expected.' Heathrow states that 'around 25

percent of vehicles on the M4 and at least 15 percent of the vehicles on the M25 near Heathrow are travelling to/from Heathrow.' Capacity has been increased on the M4 by use of the hard shoulder so to increase capacity further would involve adding extra lanes.

Transport for London has confirmed that 'in terms of delays and traffic levels Heathrow is the most congested quadrant of London's road network.' The London Plan states that much of the existing public transport and road network in the Heathrow Corridor are already operating at or beyond capacity, even before any expansion in Heathrow.

Englefield Green sits within the Borough of Runnymede, alongside Junction 13 of the M25. Heathrow related traffic also uses the area's A roads such as the A30 through Englefield Green, and lesser local roads. There are major congestion problems at the A30 junction with the M25, the Egham bypass, Sunningdale crossing and Windsor Road. This area does not have the amenities and local transport networks to cope with the influx of cars, lorries and goods associated with the development work - let alone in the longer term.

Against this background is it possible to provide for the surface travel needs of an expanded Heathrow, particularly given the growth in background travel resulting from population and employment growth, unrelated to Heathrow? Heathrow's suggestion of tolls on roads around Heathrow would adversely and unfairly impact local residents.

Heathrow's current proposal to deal with the surface access issues associated with expansion features the following improvements to public transport:

- Crossrail
- Piccadilly Upgrade
- Western Rail Access
- HS2 extension to Heathrow
- Airtrack to Staines

Heathrow argues that together these public transport improvements will allow 15 million extra passengers to use public transport, increasing passenger capacity from 19 million today to 34 million in 2030, increasing the public transport share of passenger movements from 40 to 50 per cent.

However of these five proposals only the first three are committed projects, with the other two not agreed in principle or having finance in place to implement. TfL have stated that the Piccadilly Line is already subject to overcrowding and that even with the planned modernisation overcrowding will continue due to population expansion. Crossrail is forecast to offer a minimal service to Heathrow, and will not serve Terminal 5.

The previous Airtrack proposal connecting Heathrow to Waterloo via Staines has been rejected due to the negative impact on communities located along the Waterloo / Reading rail line. The numerous level crossings on this line would result in major disruption from additional trains with major infrastructure and financial investment to remove the crossings problems. For example it was demonstrated that both Egham and Sunningdale crossings would be closed for 40 minutes in every hour causing major disruption to the area and a major trunk road.

There are three categories of surface transport users associated with Heathrow.

- Passengers
- Airport Employees
- Traffic servicing the airport: mostly business and good vehicles.

As a general rule 60% of passengers use car / taxis and 40% use public transport. Unless there is a major shift in passenger behaviour, which seems very unlikely, the projected increase in passengers associated with Heathrow expansion will result in a large increase in car/taxi journeys to the airport.

Of the 114 thousand airport employees, 77 thousand work within the airport boundary. Of these, 67% journey to work by car or motorbike. Again, unless there is a major shift in attitudes the additional employees associated with Heathrow expansion will further increase the road traffic in the Heathrow vicinity. Heathrow's 'surface access strategy' which was introduced to increase employee usage of public transport has not been very effective, achieving a limited change in employee behaviour. Heathrow's suggestion of removing staff car parking facilities will adversely and unfairly impact those who already work there.

Freight traffic is a major element of the Heathrow generated business traffic with a large number of the trips by the type of vehicle (diesel HGV), with larger environmental impact. The intended doubling of the freight business as part of the expansion is going to significantly increase the HGV traffic with its consequential adverse environmental impact. We have been told by those with haulage experience that much of the cargo flying in to Heathrow continues its journey – by road – to other points in the UK and Europe. This underlines the point that this cargo could be delivered to other UK destinations: Gatwick, for example.

TfL professional transport planners predict that public transport access (as a share of all journeys) will **reduce** rather than increase - as stated by Heathrow. An expanded Heathrow risks bringing the road network in the Heathrow area - including the M25 and M4 - to a standstill and producing unacceptable conditions on public transport.

Increased Employment

The report states that the number of jobs created will be potentially 47,400-112,400 with expansion at Heathrow. The South East of England currently has full employment, as defined by the Bank of England. To take as an example the Runnymede borough (in which Englefield Green sits) which is home to 82,000 people, there are currently 350 claiming job seekers allowance (October 2014). The area around Heathrow is commuter belt and London is creating new jobs without the airport expanding. Inevitably the workers required would have to come from **outside** areas immediately around Heathrow which would not be of economic benefit to the local areas and would put undue strain on housing (see below), roads, health services etc.

Housing

Heathrow has stated that it would voluntarily purchase up to 4,000 homes of those most adversely affected by expansion. This would be the biggest forced relocation in the UK in peacetime. No plan has been given for these people or where to build replacement schools.

In addition there would be a requirement to accommodate higher numbers of workers. The report states that potentially 60,600/70,800 new homes would be required. How can the report state that building such a vast number of homes MAY present challenges for local authorities when they already struggle to meet housing targets? Expansion has the potential to destroy large areas of Green Belt.

Flooding

The report states there is a potential increased risk from flooding downstream from the airport expanding. This is an area which has already suffered badly with flooding - which was significant in the winter of 2013/2014. Again there is not just the financial cost but also the impact on quality of life.

Quality of life

The report states that there will need to be trade-offs between objectives. However there is one objective that should not be compromised and that is 'to maintain and where possible improve the quality of life for local residents and the wider population'. We strongly believe that expansion of Heathrow would compromise this objective for all the reasons outlined above.

Heathrow –propaganda and size

We would like to bring to the attention of the commission that misleading, unsubstantiated propaganda has been circulated by Heathrow (particularly through the 'Back Heathrow' campaign) to local residents.

Heathrow is already the largest of the London airports in terms of passengers with 84% of London's long-haul: surely expanding the airport would lead to a monopoly?

The BAA monopoly was broken up to liberalize the market and increase competition. It has been one of the great success stories of UK aviation policy. Expansion at Gatwick will increase competition which will lead to lower fares and better service.

Q3. Do you have any comments on how the Commission has carried out its appraisal?

We have the following comments to highlight to the commission:

Noise

Why has Englefield Green been excluded from the noise study area in the Jacobs report on noise? This is a serious omission and highlights a potential fundamental flaw with the noise methodology if the Commission believes that this area is not impacted by aircraft noise. In other words if the noise mapping methodology employed in the analysis suggests that this area is not adversely impacted under current operations then that does not match reality- **or the proven data obtained from the Heathrow noise monitor** - for the people living in Englefield Green.

The PWC report on wellbeing states that living with aircraft noise at night does not produce a statistically significant result in their regression analysis; does the Commission agree that the modelling approach must be flawed? How can it be that disturbance by airplane noise at night does not negatively impact on wellbeing, given it wakes up both adults and children? When basic common sense is contradicted by the results of a consultant's report this is very worrying. Previous research in this area is shown in the Review on the Effect of Nocturnal Aircraft Noise on Health (Sept 2011) by Barts and The London. **To underline this point: The European Commission Science for Environment Policy has just published its Thematic Issue 47 (Noise Impacts on Health) which states that Aircraft Noise at night can result in dysfunction of blood vessels and cause long-term cardiovascular disease.**

The impact of increased noise on the learning of children has not been addressed – although can be accessed in the CAA ERCD Report Aircraft Noise and Children's Learning (Feb 2010.)

Why have such readily available reports and medical research been overlooked in the considerations of the Commission and its consultant?

Will the Commission acknowledge that the noise methodology used by Heathrow is outdated and is not a proper measure of the nuisance value? What work is the Commission doing to develop a more appropriate methodology, given Heathrow impacts on such a huge population?

The Commission has previously noted, in its publications, that there is no methodology to value the impact of noise on those who live in quiet areas compared to those who already live in fairly noisy areas, which is particularly important when considering changes to flight paths. What is the Commission doing to fill this important gap in the methodology?

Air Pollution

The impact of air pollution has not been fully addressed. What are the impacts of the increase in traffic volumes, the loss of green belt land? Air pollution has an impact on life expectancy. Has this been reviewed? It has recently been reported that EU guidelines for London are unlikely to be met until 2025.

The UK's target to reduce domestic CO2 emissions by 80% is unachievable if transport emissions are allowed to continue growing. How is the Commission addressing this?

How will the Commission treat the potential breach of EU air quality standards in its analysis?

Quality of life

An obvious flaw in the PWC analysis is the omission regarding the assessment of quality of life in the Commission's overall analysis. It completely omits the reduction in quality of life that occurs when there is less green space and wildlife, as the areas surrounding the airport become more built up to accommodate the additional workforce. It ignores the impact on quality of life as a result of increased congestion levels as demands on roads and transport networks increase.

The report states how the Commission has visited heritage sites around Gatwick but **does not mention the sites around Heathrow such as The Air Force Memorial in Englefield Green, the Kennedy memorial , Runnymede (the birthplace of democracy), Coopers' Hill Slopes and the surrounding National Trust woodland and wetlands.**

Surface access

An adequate surface access assessment of Heathrow and its proposed expansion has not been carried out. There is an overriding need to address the surface access issues BEFORE AVIATION CAPACITY INCREASES CAN BE CONSIDERED.

In 2010 the High Court found that improvements to transport access required as a condition for Heathrow expansion had not been met. By implication new proposals for expansion at Heathrow must be based on a detailed assessment of the surface transport implications.

Heathrow is located in one of the most congested parts of London. Roads and much of the public transport network in the Heathrow area are already under serious stress from the weight of current travel demands. The M25 has the worst reliability record in the UK.

Will the Airports Commission consider the potential impact on tourism for key sites such as the National Trust fields at Runnymede, Windsor etc, as more congestion on the M25 and local roads will deter visitors? The Airports Commission should include the value of lost amenity and the value of lost tourism income for local communities in its analysis.

In relation to the distributional consequences, has the Commission considered a scenario in which the government uses congestion charges and Heathrow applies charges for entering the airport, including for drop off and pick up? It should include this in the analysis.

Housing

The report has not detailed how the facilities for an extra 60,600 - 70,800 homes would be managed - along with schools, health care, road access, transport etc. Has the cost of these been included in the analysis of the total costs of Heathrow expansion? If not, why not?

Loss of Green Belt

The report states that the extended northern runway at Heathrow would involve taking approximately 238ha of Green Belt land and the third runway involves taking 431ha of Green belt (Expansion of Gatwick would result in a substantially lower area of 9ha). However this does not give the full picture as the estimate does not include the amount of Green belt lost due to the increase in new homes and changes in surface access.

Increased Employment

Analysis of the last published employment survey for Heathrow demonstrates that two thirds of workers are employed at below the national average wage. Will the Commission consider if this is due to the nature of the work or if Heathrow has monopsony power in the labour market and consider the potential for Heathrow to have monopsony power if it expands? **

Given actual shortages in skilled building labours at present in the South East of England (as recently reported in the press) will the Commission give increased weight in the analysis for potential higher costs, to attract skilled labour from overseas, and an extended timetable for construction?

Transport for London have published a study which illustrates that Heathrow's claims about job losses if it does not expand - or even if it were forced to close are flawed: <https://www.tfl.gov.uk/cdn/static/cms/documents/review-of-heathrow-employment-study.pdf>

Project risk

In relation to its scale and potential indebtedness has the Commission considered the risk of Heathrow becoming too big to fail and the potential public sector implications and knock-on effects?

Heathrow ownership

In assessing the producer surplus benefits of the airport expansion, will the Commission take into account the ownership structure of Heathrow and the airlines to demonstrate what proportion of the producer surplus is likely to flow overseas and what proportion is likely to remain in the UK?

Summary

The report states that 'For those within 5km of the airport, the Commission's quality of life analysis suggests that the 'bundled impact is likely to be broadly neutral with the positive impacts of the airport (such as transport connections and jobs) and the negative impacts (such as noise and congestion)'. This is not true for those living within 15km of the airport let alone 5km. In an area that is already at full employment and with excellent transport connections, expansion of the airport will only reduce the quality of life with the increase in noise, congestion, air pollution & loss of green space and wild life.

We, as residents of Englefield Green, cannot be compensated for the loss of quality of life, increased stress levels and the potential for a reduction in life expectancy with the expansion of Heathrow airport.

Background information

The Bank of England and Office of Budget Responsibility currently put Britain's long-term full employment figure at 5 per cent. In other words when unemployment is at 5 per cent this represents the level at which anyone who wants a job can find one. Zero unemployment is unachievable and undesirable, in a flexible economy you want people to be moving between jobs.

**In the last published employment survey for Heathrow, the median salary (paid to 42 per cent of their workforce) was in the range £20k to £24k with only one third earning more than this N.B. The average will be skewed by a few at the top earning millions which is why it is better to look at the median. This is based on figures for 2011 when the UK average salary was £26,200, according to the ONS, whilst the average salary for London was £33,900 Airport employment is highest in the following categories: car parks, freight services, catering – which are traditionally lower paid occupations.

<http://www.heathrowairport.com/static/Heathrow/Downloads/PDF/Heathrow-Related-Employment-Report.pdf>

<http://www.ons.gov.uk/ons/rel/ashe/annual-survey-of-hours-and-earnings/ashe-results-2011/ashe-statistical-bulletin-2011.html>

<http://www.heathrowairport.com/static/Heathrow/Downloads/PDF/Employment-survey.pdf>