

Response to the Airports Commission Public Consultation

Submitted by Mary Macleod, MP for Brentford & Isleworth

February 2015

As the Member of Parliament for Brentford & Isleworth, a constituency directly under the existing Heathrow flight paths, my comments relate mainly to the proposed expansion of Heathrow.

My position on Heathrow expansion is very clear. Whilst I welcome the prosperity and jobs that come from Heathrow, and want the airport to continue to thrive, I do not believe it is in the interests of local residents or the UK economy to build a 3rd and 4th runway either now or in the future. There are better ways to deliver the benefits that increased aviation capacity can bring – without increasing the already-high burden that local residents currently bear.

My view is that Gatwick is the preferred option for expansion as it will enhance competition in the aviation industry. The Gatwick option also impacts far fewer residents, which would enable fair and appropriate compensation to be provided and can be delivered sooner, with less chance of political hold-ups and not require billions of taxpayers' money to develop the local transport infrastructure.

I ask that the Commission particularly examine the following concerns, as indicated:

NOISE

- **Number of people affected** – The Commission estimates that up to 992,000 people would be impacted by aircraft noise if a 3rd runway is built at Heathrow. This is a staggering number of people compared to the figure of 24,000 people that would be impacted if Gatwick expands. Crucially, this would also include up to 320,000 people who are not currently impacted by aircraft noise (equivalent to the population of Coventry) and Heathrow has admitted that it dealt with almost five times the number of complaints from local residents about aircraft noise in 2014 compared to the previous year due to its trials of new flight paths. This is nothing compared to the protests they would receive if new runways are built. The total number of people impacted by aircraft noise at Heathrow if a 3rd and 4th runway are built could be as high as 2 million.
- **Noise measurement** - The fact the Commission is moving away from using the discredited 57 LAeq contour as the way to measure noise annoyance and towards the more realistic 55Lden contour recommended by Europe is an important step forward. However, we know that people outside these contours are also impacted by aircraft noise and studies have shown that the number of flights overhead is a significant factor in this annoyance. Adding 260,000 additional flights at Heathrow, regardless of the noise efficiency of new planes, will impact local residents and the impact of this annoyance on the quality of lives of local residents must not be ignored by the Commission.
- **Quieter aircraft** – The Commission has accepted evidence produced by Heathrow that future aircraft will be quieter. However, by its own admission, Heathrow Airport Ltd is only able to 'influence' and 'incentivise' airlines to update their fleets to quieter planes and to adopt new operational procedures. It is the regulators such as CAA and NATS that control the adoption of mitigation procedures. Without their agreement, the proposed benefits from reduced noise (such as they are) will not be delivered and should not therefore be assumed as a given.
- **Appraisal of noise impacts** – The benchmark used by the Commission to assess noise impacts is crude and oversimplified. For example, the Heathrow North West runway option is assessed as an "adverse impact", with 637,700 people being impacted by 2015. However, the Gatwick

option which impacts 24,600 people by 2050 is also assessed as an “adverse impact” when the scale of difference between these two figures is considerable.

- **Noise contours** - Currently the noise contours from Heathrow and London City Airport are assessed separately. The Commission should undertake work to carry out a joint assessment. That will give a truer picture of the actual noise experienced in parts of east and south-east London.
- **Flight paths** – The absence of proposed flight paths in the Heathrow submissions makes it very difficult for communities, and those that represent them, to be able to give a proper considered response to this consultation. This information should be provided at the earliest opportunity.
- **Night noise** - Aviation noise from night flights is the major cause for concern and whichever option is recommended by the Airports Commission should include an operational ban on night flights between 23:30 and 06:00.
- **Operational measures to reduce noise** - All methods for reducing the impact of aviation noise on local residents should be considered including new operational measures for take-off and landing, dispersed flight paths and operational bans on the noisiest planes.
- **Respite from noise** - Runway alternation provides a critical respite for local residents and must be maintained, with improved communication in emergency situations that require it to be broken. It would seem inevitable that, with three runways each getting a period of respite, the half day’s break from the noise many people in West London enjoy will be reduced. And it appears the Heathrow Hub proposal could double the number of flights for many on the northern flight path, with minimal respite.
- **Noise compensation** - Existing noise compensation schemes for residents living around Heathrow are woefully inadequate when compared to the best of what’s on offer internationally. Local residents should receive consistent noise compensation regardless of which UK airport they live near and the standards should be in line with international best practice. The costs of this noise mitigation should be factored into the assessment by the Airports Commission. Hounslow Council has estimated that a minimum of £200 million would be required in its borough alone to noise-proof homes and schools if a 3rd runway at Heathrow was implemented. The full cost of noise mitigation should be taken into account when assessing the economic benefits of each of the proposed options. The much smaller number of people impacted by a second runway at Gatwick would allow for a much more generous and effective noise mitigation scheme, something that Gatwick airport has already proposed.
- **Noise from roads** - The impact of the increase in road noise must also be considered by the Commission.

COMPETITION

- **The importance of competition** - The break-up of the near-monopoly previously held by British Airports Authority (BAA) has already resulted in significant benefits to consumers, with lower fares and greater choice. Effectively reinstating this monopoly by expanding at Heathrow restricts competition once more and reduces the benefits to airline passengers.
- **Point-to-point travel** - The growth in the UK aviation market in recent years has been almost entirely down to the growth in low-cost, point-to-point air travel, whose airlines currently operate at Gatwick. London is the destination of choice for many millions of business people and visitors. This is the UK’s area of competitive advantage and is where we should continue to focus. We should look to boosting the competitiveness, choice and connectivity of all London’s airports (and indeed our regional airports) so we can continue to increase the number of passengers who want to visit the UK. The global hub battle is one that we will struggle to win, given the geographical advantage, low landing charges and 24 hour operations that massive hub airports like Dubai can offer.

COST TO TAXPAYERS

- **Additional costs for taxpayers to bear** - The Commission currently estimates that expansion at Heathrow would cost the taxpayer £5.7 billion for work to adapt the local transport infrastructure (vs just £787,000 at Gatwick). However, this sum, whilst significant in itself, fails to take into account the cost for additional social housing, schools, public facilities and maintaining local roads. These bills will also fall to UK taxpayers.

POLITICAL DELIVERABILITY

- **Risk of judicial reviews and inaction** – With millions of people impacted by the noise from aircraft and the resultant traffic congestion and pollution if Heathrow is the recommended option, the likelihood of mass demonstrations and judicial reviews is high. The Heathrow Mega Rally attended by thousands in 2013 is just a taste of the number of people that would be motivated to protest. The risk is that any decision to develop at Heathrow is delayed by several years, if it happens at all, and we may well end up in the same position as we are today 20 years from now.

SAFETY

- **Safety risks** - Increasing the number of aircraft flying over densely populated areas in increasingly busy air space around Heathrow and our capital is taking chances based on a past safety record. The crash of a 777 just inside the Heathrow boundary in January 2008 could have killed hundreds of people. A former Transport Secretary has already told the Commission, “we cannot beat the odds forever”. This issue cannot be ignored.

AIR POLLUTION

- **EU air quality limits** – EU limits for air pollution have to be met by 2020. Currently, the air quality near Heathrow is in breach of these limits on a daily basis. It is inconceivable that these limits could ever be met with the addition of 260,000 additional flights at Heathrow, not to mention the estimated 25 million extra road passenger journeys that an extra runway would bring. A full assessment of air quality limits should be included in the analysis of aviation expansion options. In contrast to Heathrow, Gatwick does not breach EU air quality limits and is in a better situation to tolerate future development within the required restrictions.
- **Assessment criteria** – The criteria used by the Commission to assess the degree of impact on carbon emissions appears overly crude. Despite the Heathrow options being four times higher in terms of carbon emissions than the Gatwick option, all three schemes are appraised as “adverse”.
- **Carbon costs** – The Commission must fully factor in the carbon costs when assigning the overall economic benefits of a new runway. A workable carbon trading or carbon-capped scheme will be required which will result in the economic benefits of a new runway being lower than currently predicted.

HEALTH

- **Impact on health of local residents** – The omission of a separate appraisal module on health is a distinct flaw in the analysis of the Commission. Both qualitative and quantitative assessments of the health impacts on local communities should be undertaken as part of the assessment of relative merits, something particularly lacking from the Heathrow submissions. The existing approach taken by the Commission that attempts to ‘trade off’ the positive impacts of living near airports (access to jobs, improved transport infrastructure) against the negative impacts

(noise, pollution and amenity) is not helpful, in part because the positives may not impact the same people as the negatives.

SURFACE ACCESS

- **Grid-lock in West London** – There appears to be a real complacency about the issue of surface access to an expanded Heathrow. There are already significant problems with traffic congestion and crumbling bridges on our main M4/A4 route into London from Heathrow. The prospect of an additional 25 million car journeys on this arterial route for the capital as well as on our local roads if Heathrow is expanded has the potential to cause complete grid-lock on our roads.

HOUSING AND PUBLIC SERVICES

- **Impact on housing and public services** - The analysis presented by the Commission assumes that, for the Heathrow options, between 2,100 and 5,100 extra homes per local authority would be required over a 10 year period. No detailed assessment has been undertaken as to whether this degree of provision is achievable. In addition, a more detailed assessment of how the supporting infrastructure for such a scale of development including schools, GPs, hospitals, leisure facilities can be delivered should be included. The borough of Hounslow is one of the fastest growing boroughs in London and there is already significant pressure on school places. An increase in development of this scale would pose significant additional challenges to the area.

ENVIRONMENTAL IMPACT

- **Demolition of homes and communities** – the North West runway option would require the demolition of just under 800 properties, a significant proportion of the community of Harmondsworth.
- **Removal of green belt land** - The North West runway option would take away around 700 hectares of green belt land, destroy heritage assets, and remove the “Green Lung” buffer from the current airport and the more densely populated areas surrounding.
- **Risk of flooding** - Many areas close to Heathrow have already suffered severe flooding. It would be irresponsible to recommend laying vast amounts of concrete in this area, regardless of any reports commissioned by Heathrow.

IMPLEMENTATION COMPLEXITY

- **Complexity of the build** - The challenges posed by the development of the land around Heathrow are much more significant than those around Gatwick where the land has been preserved for possible future development. Building a new runway that potentially included rerouting, developing or tunnelling the M25, will inevitably disrupt day-to-day transport and business in London.