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Our ref: AVIATION/DNH
Your ref:

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Dear Commissioner,

**Airports Commission Consultation on the assessment of three shortlisted options
Submission from the London Borough of Redbridge**

Thank you for consulting about the Commission's assessment of the three shortlisted options to provide an additional runway in the south east of England.

You will be aware of the Council's earlier responses dated 6 March 2013 and 28 February 2014 to the Commission's proposed criteria for identifying the most plausible options for expanding aviation capacity. These previous responses have pointed out that noise from aircraft is a powerfully felt local concern in Redbridge where changes to operational procedures for flights from Heathrow and London City Airport have increased the level of noise suffered by the borough's residents in recent years. As a result a full Council motion on 19 November 2009 agreed that:

This Council opposes further expansion or changes to flight paths or the mode of operation of airports (including without limitation any extension to the hours of operation of airports whether temporary or permanent) which would result in an increase in aircraft noise suffered by residents of this Borough.

The above motion remains the Council's formal position.

In responding to the current consultation, our comments will mainly focus on the issues of consultation arrangements, noise, economy and access to the airports.

Questions inviting views and conclusions in respect of the three short-listed options

Q1: What conclusions, if any, do you draw in respect of the three short-listed options? In answering this question please take into account the Commission's consultation documents and any other information you consider relevant. The options are described in section three.

As a general observation it is difficult to fully respond to the consultation with respect to noise impacts of the three shortlisted options as the noise modelling is based on indicative flight paths designs and the Commission's documentation notes that these may not reflect the actual flight paths post-implementation, which would be subject to detailed assessment and consultation. Redbridge's experience of flight paths associated with Heathrow and

London City Airport is that changes in flight paths can have a significant impact on our residents even though the physical infrastructure (i.e. airports / runways) remains the same.

Furthermore, the Council is unsure of the extent to which the noise impact assessment takes into account the cumulative impact of noise, noting that an area may be impacted upon by flight paths from a number of airports. For example, Redbridge experiences noise impact from flights to and from both Heathrow and London City Airport.

Furthermore, in previous consultations the Council noted that the appraisal framework did not appear to assign weightings to the 16 areas of assessment. It is unclear therefore how the outcomes of the assessments documented in the current consultation material will be weighed-up to form a final recommendation. The format of the consultation documentation makes comparison of the assessment outcomes of each option difficult, as the assessments are documented under each shortlisted option (using a common format following the 16 assessment criteria) rather than under the 16 assessment criteria, with the outcomes of the three shortlisted options alongside each other.

The noise modelling suggests improvements in the noise impacts experienced during night-time if a second runway is built at Gatwick. This is on the basis that night-time flight restrictions will remain in place and that new technology / quieter aircraft will reduce the noise impact of planes. This contrasts with daytime noise impacts, which despite new technologically quieter aircraft, will increase as the assumed overall flight numbers will increase. Less population growth is expected around Gatwick, so the additional number of people expected to be impacted by airport expansion is less than the two Heathrow options. It is noted that the Commission considers that whilst there would be an increase in the number of people impacted by noise by a second runway at Gatwick, the figure is nationally and internationally, comparatively small. Even with a second runway at Gatwick, six airports in the UK would have a greater noise impact.

In terms of the extended northern runway option at Heathrow, the Assessment indicates that the noise contours / impacts will be significantly extended to the east and west, and concludes (para. 9.2) that in general terms, the noise impacts will shift further east. There will be a significant increase in the number of people affected by noise, with many areas likely to see significant population growth at the same time flight numbers and noise impacts will be increasing over these areas. The benefits of extending the northern runway to the west will be limited in terms of noise impacts, as most flights will need to land on the eastern end of the runway (i.e. the existing runway) and as there will be an increased number of flights generally, noise impacts will be greater. It is these flights landing from the east that impact the most on Redbridge. Furthermore, unlike the night-time noise impacts at Gatwick (which will decrease in terms of number of people affected), the Heathrow extended northern runway option will see an increase in number of people affected by night-time noise due to population growth. Whilst Redbridge is beyond the 54 dB contour line, noise nuisance is experienced by Redbridge residents and with a new London Plan target of 1,123 homes per year the population of the borough is expected to grow significantly, meaning more people will be impacted upon. It is also noted that the Heathrow Northern Runway Extension option would result in more people being impacted by noise nationally, as decreases elsewhere would not offset the significant increase in people affected at Heathrow. The Commission also considers that scope to alternate operations to provide respite would not be significant.

In terms of the North West Runway at Heathrow option, it is noted that the third runway leads to a three pronged noise contour as opposed to a single elongated protrusion and that in general terms, the noise impacts can be seen to shift further west, where population growth is anticipated to be less than to the east. This contrasts with the extended northern runway option, where the noise impact moves towards the east. A third runway would mean

greater number of people affected by noise during the day as overall flight numbers increase, but will decrease the number of people affected at night due to an assumed continuing cap on night-time flights, the three pronged noise contour to the east, and improvements to aircraft technology / noise. It is noted that even by 2050 when the airport is operating at full capacity, the Commission's modelling predicts that the Heathrow North West Runway scheme will cause less noise pollution than currently. This contrasts with the extended northern runway option, which sees an increase. It is noted that nationally, the number of people affected by aircraft noise would remain broadly the same during the daytime and would decrease at night-time.

In terms of employment and economic activity, the Commission's assessments suggest that additional runway capacity at Heathrow would deliver generally greater GDP and employment benefits than a second runway at Gatwick. Given there is greater transport connectivity between East London and Heathrow (which would be further enhanced by the introduction of Crossrail), compared to with Gatwick, there is also greater likelihood that Redbridge would be able to enjoy a greater share in this increased GDP and employment than the second runway at Gatwick. The Commission's assessment however notes that the greater employment activity resulting from expansion of Heathrow compared to Gatwick is likely to translate into much greater housing demand, noting that London already has difficulty in meeting housing need. As the GLA considers London is seen as one large housing market, such housing pressure is likely to impact upon housing affordability in Redbridge.

Q2: Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in section three.

In numerous consultation responses on aviation matters, particularly flight paths and noise impacts, the Council has expressed concern that flight path design in the south east of England appears to be done on a piecemeal manner, with various parties responsible, i.e. CAA, NATS and individual airport operators. The Commission's noise impact modelling is based on assumed flight paths for each of the options, but recognises that the situation / impacts may change as a result of more refined flight path development. It would be preferable if this work was done prior to a preferred option being recommended. This should include options for respite at Heathrow, particularly for the North West Runway Option.

Redbridge is also concerned about the operational aspects of Crossrail with respect to improved surface connectivity between North-East London / Essex and Heathrow. Current plans by Crossrail are that there will be few direct trains operating between Shenfield and Heathrow, with interchange required in central London. Only the Abbey Wood branch of Crossrail will have frequent direct connections to Heathrow. Such an approach will impact upon the connectivity and economic benefits of an expanded Heathrow airport on North-East London / Essex. This is particularly important if additional runway capacity is provided at Heathrow as the Commission's economic assessments suggest that there is more substantial economic (national GDP) and employment (direct, indirect, induced) benefits in providing additional runway capacity at Heathrow, compared to Gatwick.

The Council also considers that further work is required to understand the impacts of the proposals on the wider transport network (all modes) across the south-east, with additional measures potentially needing to be implemented to mitigate any negative impacts on the wider transport network. Our response to question 4 (relevant factors not addressed) expands on our concern.

Questions on the Commission's appraisal and overall approach

Q3: *Do you have any comments on how the Commission has carried out its appraisal? The appraisal process is summarised in section two.*

The Council considers that the consultation on the Commission's appraisal has been completely inadequate. Our concerns include:

- (a) The appraisal by its very nature is very extensive and full of technical detail and the Council accepts that such level of detail is necessary and appropriate (and in-fact has concerns that further work is required – see Q4 below). However, the presentation of the material makes it difficult (particularly for non-technical people such as the general public) to bring together the cumulative impacts of each proposal and to then compare these for all three options.
- (b) The positive and negative impacts of increased aviation capacity are felt across a wide area, not just those in the immediate vicinity of Heathrow or Gatwick. Consequently, wider and more direct and proactive engagement is warranted.
- (c) The limited formal consultation events (number and duration) are completely inadequate given the scale and complexity of the proposals and extent and nature of potential impacts.
- (d) There have been no London-wide or sub-regional sessions on the outcomes of the appraisal. Whilst Redbridge was (for example) invited to a round-table discussion on the potential impacts of the Thames Estuary proposal, we have not been approached directly by the Commission to discuss the appraisal of the three shortlisted options.

Consequently, the level of engagement on the outcomes of the appraisal falls well short of what would be expected for such a significant process. The recent consultation on alternative development strategies for the Redbridge Local Plan 2015-2030 was far more extensive, despite relating to proposals substantially smaller than additional runway capacity. Furthermore, despite being focused on local development issues such as housing and infrastructure, the impact of noise from aircraft flying over the borough was raised several times.

The Council is also concerned about the large degree of variation in the noise modelling outcomes between work commissioned by Transport for London, Gatwick Airport and the Commission. It is accepted that modelling for periods over 35 years into the future will require a number of assumptions to be made; the Commission needs to be transparent in what assumptions were used and on what basis. In some instances, some assumptions are based on outdated or less precise data i.e. use of 2012 population data when the Mayor's 2014 Strategic Housing Land Availability Assessment / associated population projections gives a more up-to-date and accurate indication of where population growth will occur within London.

It is also unclear as to the extent to which the Commission has considered additional means of mitigating the impacts of the proposals. This is particularly important as the expansion of Heathrow appears to generate significantly greater economic and employment benefits, but also results in significantly greater impacts such as noise and housing pressure.

Q4: In your view, are there any relevant factors that have not been fully addressed by the Commission to date?

It is unclear whether the accumulative impact of flight paths associated with all airports in the south east of England has been factored into the noise impact assessment of each option.

Furthermore, Redbridge shares with Transport for London (and, it is believed, many other London Boroughs) very considerable concerns that the surface transport access implications of the three options have not been adequately addressed. This is especially the case with regard to the impacts upon both the strategic rail and road networks beyond the 2030 horizon for all of the options, but particularly in respect of either Heathrow option as demand moves towards potential 149 million air passengers per year arising from eventual full utilisation of runways. It is essential that the longer term impacts on all the key strategic routes and the key central London rail interchanges are adequately examined and the findings fully taken into account by the Commission.

As far as the rail network is concerned, while planned upgrades of the Piccadilly Line and Thameslink are noted and the existence by 2030 of Crossrail 1 has been duly acknowledged, inadequate regard has been paid to the ability of these routes (and the Great Western main line) to handle further demand growth stimulated by any of the airport expansion options. Future estimated background demand growth on these rail routes will generally consume additional capacity arising from planned infrastructure enhancements before any extra airport traffic comes into the equation. Heathrow expansion options would also benefit from clarity (or examination of implications of different scenarios) regarding the feasibility and potential usage of new Piccadilly and Crossrail links to a new sixth terminal. Any role to be played by Heathrow Express trains in a sixth terminal scenario should also be examined. Against the foregoing background, it is all the more important that rail impacts modelling takes into account the latest population growth forecasts and also the specific impacts upon (but not limited to) key central London interchanges such as Paddington and Victoria. It is very disappointing that such modelling undertaken so far appears not to have done so.

Regarding the highway network, though additional traffic impacts arising from the three airports expansion proposals are remote enough from this Borough to cause no direct concern, given the strategic importance of efficient operation of the M25 and M4 (and to a lesser extent of the M23) to the London, wider South East, and indeed national economy, it is felt that much more detailed analysis needs to be undertaken regarding the effects of the airports proposals. In all cases, specific traffic flow and congestion impacts need to be assessed across the whole day/ week rather than just in the case of the perceived worst case morning peak situation. In the case of Heathrow, the evaluation should also be supported by examination of the traffic flow/ congestion/ productivity impacts arising from the inevitable delays that will occur during construction of the enhancements needed on the M4 and at its key junctions, and on the M25 in the airport vicinity with regard to the additional tunnelling that will be necessary.

Additionally, the Council feels that the strategic planning fit of the three shortlisted options in relation to the future development of the south-east and indeed nationally, has not been fully considered. The appraisal somewhat naively assumes that employment and housing growth associated with airport expansion can be accommodated within areas 'local' to Gatwick and Heathrow and utilising the existing planning framework (i.e. the London Plan). It also suggests that housing needs can be accommodated by increasing densities and realising a greater supply of brownfield land; such a view has been rejected by the Planning Inspector examining the recent Further Alterations to the London Plan, with the Inspector requiring an immediate full review of the London Plan. The housing and employment

impacts of the options will be wide-spread and will have implications for boroughs far beyond the local area. For the benefits of airport expansion to be captured and the negative impacts mitigated, a much wider approach to meeting employment and housing demand arising from such expansion is required. However, such a process will be exacerbated by the absence of any formal regional planning structures outside London.

Questions inviting comments on specific areas of the Commission's appraisal

Q5: Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?

As addressed above, we have a number of specific concerns relating to the noise and transport appraisals.

Q6: Do you have any comments on the Commission's sustainability assessments, including methodology and results?

As noted above, the Council feels that the appraisal framework is unclear about how the outcomes of the assessments will be weighed-up to form a recommended option. The Council's consultation response dated 6 March 2013 expressed this view and it is felt that the current criteria / consultation still does not adequately identify how the criteria will be weighed up and balanced. This Council's view is that the impact of aircraft noise on affected communities is not just one issue among many. It should be regarded as a key priority and any successful option must be able to demonstrate real, measurable reductions in aircraft noise nuisance. Furthermore, there are other criteria where there is greater scope for mitigation measures to be implemented effectively and in principle less weight could be given to these.

Q7: Do you have any comments on the Commission's business cases, including methodology and results?

No.

Other comments

Q8: Do you have any other comments?

As noted above, the Council considers the consultation process associated with the appraisals completely inadequate.

[REDACTED]

Yours faithfully

[REDACTED]

[REDACTED]

[REDACTED]