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DEPARTMENT FOR TRANSPORT – ADDING CAPACITY AT HEATHROW

Your ref: Heathrowconsultation

Comments from: [REDACTED]

I am a local resident and am NOT in favour of any of the proposals: to add a third runway, make more use of existing runways, or end the Cranford agreement. I believe that the undesirable effects on the area and the country as a whole vastly outweigh the potential benefits.

Outlined below are the areas I believe have been overlooked or misjudged. I then cover the questions asked in the consultation document, which I will return by post. Finally I have made some suggestions to address the issues without having such devastating side effects.

I object to the proposals most strongly on the following grounds:

- 1) The effect on the environment, locally and nationally/globally, of a huge increase in flights and associated ground traffic.
- 2) The effect on health, including the more subtle effects of stress, from the noise nuisance, air pollution and visual intrusiveness of flights.
- 3) The effect on local transport for residents, commuters and other travellers, adding congestion to networks already at capacity.
- 4) The economic case, taken as read in the current consultation, appears partial, highly sensitive to changes in key factors, and based on out of date assumptions – in particular, with too little consideration of external costs such as pollution, stress, congestion and climate change.
- 5) The adverse impact on public confidence in government, arising from the way in which the Heathrow expansion has been handled and the poor quality of the current and previous consultations.

I am aware that there are other important issues: the effect on education in schools and colleges under the flight paths; the damage to world-leading heritage sites such as Kew Gardens and a wealth of local green spaces, music and leisure venues. These are specific instances of the environment, health and transport issues affecting everyone in West London and beyond.

I comment under section 5 on the poor accessibility of information; I have done my best to ensure the information on which I base my arguments is accurate, but as a private individual responding to the consultation in my spare time, I make no apologies if there are inaccuracies. Instead this can be taken as evidence that an informed, conscientious member of the public who has invested a week or more in trying to investigate the issues does not have easy access to relevant information.

1. The effect on the environment, locally and nationally/globally, of a huge increase in flights and associated ground traffic.

The consultation acknowledges that there will be an adverse impact on air quality, noise and carbon emissions (hardly surprising, given the 50% increase in flight numbers and 100% increase in passenger traffic) but assumes that unspecified technology advances, combined with enforced limits on emissions, and an as-yet undeveloped carbon trading scheme, will counteract the ill effects. The inconsistency between the DfT assumption of continuing demand-led growth – possibly beyond the current proposals - and all other government efforts to reduce harmful environmental impacts seems incomprehensible.

Global warming:

- The policy to allow Heathrow expansion is at odds with government Global warming targets.
- Carbon dioxide increases are to be offset by purchasing carbon credits (the example quoted at the consultation exhibition was from Eastern European airports) instead of tackling the issue. Promoting the idea of the UK “buying its way” out of its carbon reduction obligations is morally offensive.
- Ground traffic carbon emissions are excluded from the £4.8bn cost estimate in the impact assessment, for no apparent reason; yet according to DfT figures, passengers will double. Even if public transport capacity is able to double, this still leaves road traffic doubling; and as roads are likely to become more congested, emissions will more than double.

Other pollutants:

- Nitrogen dioxide and particulate emissions: the consultation document focuses on monitoring, rather than impact or mitigation.
- Fuel dumping is not mentioned (though may be wrapped up in the jargon under particulate emissions). It would be useful to see maps of where dumping takes place and its effect on vegetation, wildlife, road safety and people’s enjoyment of the outdoors.

Enforcement of limits:

- The DfT policy to allow expansion is predicated heavily on a series of assumptions about environmental limits being observed. At the consultation exhibition I was told that the Secretary of State for Transport would be responsible for monitoring limits and applying any sanctions. I explain in section 5 below that there is no public confidence at all that the Minister would enforce limits, given the department’s policy to support expansion. There is little public confidence in any government commitments on this subject, but at least if the responsibility lay with the Environment minister it might command slightly more credibility.

2. The effect on health, including the more subtle effects of stress, from the noise nuisance, air pollution and visual intrusiveness of flights.

The consultation document poses a series of questions along the lines of whether it is better to damage a few people’s health badly or more people’s health mildly, but does not shrink from the fact that flight paths and road traffic are bad for health. Medical evidence is continually emerging that the effects of the noisy urban lifestyle and planes in particular are bad for health, yet the health costs – in human as well as public finance terms - do not appear to have been factored into the impact assessment at all. The consultation’s noise and pollution models rely entirely on technology making planes and cars quieter and cleaner. If and when such technology advances occur, they should contribute to making residents’ lives healthier, not be used as an opportunity to add to the existing impact.

Noise:

- Residents report that life on the flight paths is currently only tolerable because of the half day’s respite brought by runway alternation. Anyone who spends time in gardens under the flight paths or listening to concerts at Kew Gardens is shocked by the noise and the incessant 90-second landing pattern, even 10-15 miles from Heathrow. Hounslow schools operate “stop-start” education because the children simply cannot hear the teachers, and the children are unable to play or exercise outside. This blight should be reduced, not extended.
- The 57db limit used as the benchmark for significant impact is outdated, but no information is available showing lower noise contours. People’s sensitivity varies but individuals are unable to assess future impact for themselves by drawing current comparisons. Officials also need access to detailed information to plan health impact and costs. Studies need to look at the 50db contour identified in the Department for

Transport's own study (Attitudes to Noise from Aviation Sources in England, October 2007) and the 35db contour identified by the European Heart Journal as the level which raises blood pressure. For instance, I am probably now more aware of planes overhead - every minute or two today as I write – but not in a position to judge how this will change. For some of us, it may even improve, but we have no data to make a decision. Overall it will worsen.

- Impact on sleep: the European Heart Journal study notes that blood pressure is raised by hearing 35db noise even when asleep. Policy-makers need to remember that increasing numbers of people, particularly in the vibrant international economy of London and the Thames Valley, do not work conventional 9-5 days so cannot be assumed to sleep between 11pm and 7am. Sleep deprivation affects health.

- BAA recently offered residents eg in Kew triple glazing – in rooms where they sleep. This recognises the scale of the problem but cannot offer adequate mitigation. It is of little use in hot summers.

Other emissions:

- Air pollution is a killer, and will increase from doubled ground traffic as well as more flights. The London Assembly has made clear its concerns about “some of the highest rates of asthma, Chronic Obstructive Pulmonary Disease and cancer in the country” which already exist near Heathrow. Pollution is predicted to worsen and even breach European safety standards.

Stress:

- Residents across large parts of London and west of Heathrow are already worried by the uncertain effects of expansion on their lifestyle; the cohesion of their local community (will affluent members move away?); and the value of their homes - for most, our main asset. People's sensitivity to flights is already heightened. The long process of planning enquiries, flight path planning and difficulty of getting accurate information will create anxiety over a long period; perhaps unnecessarily.

- Even for those not on the flight path, doubled ground traffic will bring stress.

Commuting has been identified as one of the major causes of work-related stress; this will increase as roads and tubes become more congested.

- Even if flights become quieter, as DfT hopes, people resent the invasion of privacy of having flights overhead when they are trying to relax in gardens and parks.

- Many London residents fear that planes will continue to present an accident risk and that the results of a crash in such a densely populated area would be catastrophic. Experts dismiss this as statistically insignificant and emphasise that crashes, like the Boeing 777 in January, usually occur very close to the airport. Statistically unlikely or not, this is a real fear for a community which has grown used to the idea that major transport accidents and terrorist attacks happen close to home. Plans for more flights and an additional flight path are adding to that anxiety.

3. The effect on local transport for residents, commuters and other travellers, adding congestion to networks already at capacity.

To those living and travelling to work in West London, the assumption that minor public transport improvements will cater for twice as many passengers getting to and from Heathrow is not credible. The consultation stance appears to be that the operators will work out transport arrangements as part of their planning submission. Given the major impact this will have on pollution and delays for non-Heathrow users, this is an incomprehensible stance for the Department responsible for Transport. Proper modelling is needed to test the assumptions about current spare capacity, additional services and assumed behavioural changes, to see how transport volumes can possibly be accommodated.

The surrounding area:

- The surrounding trunk roads: M25, M3/A316 and M4/A4 are already vulnerable. Small delays escalate quickly, causing congestion on side roads and affecting

journey times for miles around. The presence of drivers under pressure to reach Heathrow in time to catch a flight leads to particularly reckless driving.

- Tube trains are already at capacity; try the Piccadilly line between Acton Town and South Ealing on any weekday rush hour, particularly in the summer heat. Airport passengers getting on in Central London to travel out, or at Heathrow to travel in, displace local residents who simply cannot squeeze on to the train. Their suitcases exacerbate the problem.

- At the consultation exhibition I was told that buses are assumed to be the main source of extra capacity. These will increase road pollution and lengthen residents' journey times.

- Given the policy emphasis on Heathrow as a hub for affluent incoming business travellers, use of public transport rather than taxis and chauffeur-driven cars seems naive.

Within the airport:

- Regular travellers report that journey times on the spur road into Heathrow are already unpredictable; worse than 5 years ago.

- The importance of Heathrow as a "hub" is emphasised by pro-expansion campaigners, yet there are no links to high-speed trains to major UK or European cities, and no new proposals as part of the expansion plans.

- Congestion charging is envisaged within the terminal area, with no consideration of how this will affect areas just outside. Residents along the Piccadilly line are likely to find themselves subject to the same parking invasion which has already spread outwards from central London to the North Circular.

4. The economic case, taken as read in the current consultation, appears partial, highly sensitive to changes in key factors, and based on out of date assumptions - in particular, with too little consideration of external costs such as pollution, stress, congestion and climate change.

The policy to support expansion relies heavily on a micro-economic case that Heathrow will lose out to European competitor airports if it does not expand; and a macro-economic case that the UK's economic health relies on a vibrant South-East, with the South-East in turn driven by easy access through Heathrow. Both propositions are flawed: a poorly-managed, poorly connected large airport will not attract high-value business travellers. The case for Heathrow being the dynamo of the South-East is contradicted by the South-East's growth despite Heathrow's current constraints. There is ample evidence that economic dynamism comes from entrepreneurs, who are more likely to be squeezed out by price and lifestyle issues than attracted by a Heathrow expansion.

There are serious questions over the economic viability of Heathrow under its current operators; and the cost-benefit analysis conducted to support the policy.

Viability of airport:

- Assumptions that demand for flights will continue to rise are extremely sensitive to costs of carbon trading, continued availability of fuel, consumers continuing to ignore environmental concerns, and businesses continuing to rely on physical meetings. If any of these change, demand could slump quickly with airline and airport operator bankruptcies following. The aftermath of September 11 2001 showed how quickly financial conditions in this sector change.

- Costs and timescales for large construction projects are notoriously unpredictable. Delays, for example to evict protesters or respond to new security threats, will escalate costs.

- Costs of developing supporting infrastructure, for example new rail links, have not been assessed as these are assumed not to be needed.

- Some of the arguments in favour of expansion highlight current congestion as the reason for a poor current service to customers: baggage handling problems, long

queues for security checks, aeroplanes sitting on the tarmac waiting for steps, and even flight delays following the recent crash. However travellers' evidence and aircrew reactions highlight basic administrative failings. Inability to run current operations effectively is not usually regarded as a good case for doubling the size of an organisation.

- Taxpayers will not look favourably on another government bail-out, following MetroNet and Northern Rock. If, however, the developer meets financial difficulties in mid-construction, or during operation, it will be extremely difficult for the government to allow Britain's major airport to fail.

Value to regional and national economy:

- External costs have not been adequately considered, and undermine the whole economic case for expansion. Full environmental costs, including the effects of health issues on productivity, need to be assessed and included.

- There is finite capacity locally to provide workers, and all the associated services: housing, transport, schools, healthcare, shopping. West London is already one of the most congested and expensive parts of the country, with shortages of medical staff, teachers and other key workers. The other employers who provide the dynamism and essential services to support the region are in danger of being priced out of the market. This crowding-out effect is not even mentioned in the consultation.

- Only industrial inertia is keeping the airport in its current place. The Future Heathrow group promotes the importance of Heathrow as a hub, yet it is not now and does not have the capacity to become a true hub, with the associated excellent transport links to the rest of the country that would entail. Clive Soley drew a parallel with the London docks, which he observed fell into disuse. The comparison is apt: larger and larger docks were built in the 1950s despite ample evidence that the industry was facing long term decline. Smaller, more agile facilities will be better able to adapt to changes in travel preferences and economics than a huge white elephant. If a single employer or industry dominates a region too heavily, its demise will have a disproportionate effect.

5. The adverse impact on public confidence in government, arising from the way in which the Heathrow expansion has been handled, and the poor quality of the current and previous consultations.

Local residents in Kew, Chiswick and Acton with whom I have discussed this divide into three camps:

- The policy decision has been taken and the consultation will make no difference;
- BAA will run out of money and the expansion will never take place;
- Heathrow expansion? I haven't been told anything about it.

As a strong believer in democratic processes I have invested a lot of time – when I would prefer to be concentrating on other priorities – in attending meetings, reading documents and websites and talking to the call line to try to find out more. However the reaction of intelligent, influential people underlines how easy it is to see the expansion history as an exemplar of cynical, vested interest-led policy making.

Reasons range from the inconsistent conduct of the current consultation to the track record of 50 years' worth of broken commitments on Heathrow.

Awareness of consultations:

- The DfT's policy has been developed based on close work with BAA, and the consultation document even uses the same language as Clive Soley campaigning for Future Heathrow. I understand that previous consultation meetings leading to the formation of the policy were held around Heathrow itself, without any attempt to engage people further away affected by flight paths or other impacts. Without being aviation experts most London residents have been unaware of the impact of a third runway. Residents further out who will be under new flight stacks are even less likely

to know this. Meanwhile those in a position to gain have been close to the action and organised by well-funded business pressure groups.

- The third runway consultation has been separated from flight path and transport planning, leading to newspaper headlines which suggested there was no need to worry about new flight paths yet. Having seen the plans for the new runway, it becomes clear that without an additional flight path it would be inoperable. Many of those affected, for example in Acton, are not even aware of the plans.

- The distribution of consultation documents and public meetings has been patchy and irrational. Local residents and even councillors have been unable to get answers to the most basic questions about which roads have received the packs, in order to assess who has been informed. This air of secrecy has contributed to cynicism about the desire to engage with the public.

- The consultation has taken the 57db contour as its boundary for distributing consultation documents as well as impact analysis. In light of the Department's own ANASE study identifying 50db as the significant level, this looks either deliberately manipulative or irresponsibly stupid.

- There has been no visible engagement with local councils, of the type which might be expected if a genuinely representative response were sought. This has resulted in patchy engagement with the public, depending on the dynamism and experience of the council. In Chiswick, Hounslow, covering the southern half, with a long history of working with Heathrow, has actively translated the issues into a comprehensible newsletter for its residents, organised public meetings and encouraged response. Unfortunately Ealing, covering the northern part of Chiswick including my area, has been slow to wake up to issue; belatedly printing response cards but doing nothing to distribute them in time. We have therefore been reliant on local residents and newspapers taking the initiative to tell us that we will be affected, and luckily this has happened. Nearby Acton has not been so fortunate, with most residents completely unaware of the plans, even though they are on both current and future flight paths and some of the main train, tube and road links. Turnout at the one public meeting organised there by the council was tiny; only people already aware of the issue (mainly from Chiswick) knew the meeting was happening. This is hardly representative democracy. By contrast, on the West London Tram we all received a consultation form, and awareness was very high.

- When I criticised the lack of the publicity at the consultation exhibition, I was told that the consultation had been advertised extensively, including on the tube. Despite having been interested in the issue for the last month, travelling regularly by public transport in west and central London (on District and Piccadilly lines and bus), and even receiving the weekly Transport for London e-mail, I have seen no publicity at all.

- One of the advisers at the consultation exhibition said that the 57db limit was used as the cut-off to keep down the costs of the consultation, which are being met by the taxpayer. Given the far greater financial and health costs which will affect households if expansion goes ahead – and the supposedly enormous benefits outweighing this – I can only regard this as a pathetic excuse.

- Despite explicit requests by local residents and councils to allow time for councils to make up for the gaps in consultation cover, DfT has refused to extend the consultation period. This reinforces views that there is no desire actually to understand what residents think.

Access to comprehensible information:

- The documentation is tailored for an academic/policy maker audience with a strong preference for detailed, written documentation. There is no provision for people with a visual or auditory preference: the summary does not include a single map, the detailed document includes so many maps that it is impossible to work out which one to refer to without reading acres of dense text.

- When challenged on this at the consultation exhibition, officials said that they had to avoid a precedent set in another consultation when documentation was criticised as

over-simplified. This is not an acceptable excuse not to produce a comprehensible summary.

- By contrast, a useful document was produced by the 2M group of councils, with basic maps, an overview of the main areas to consider (economic benefits, emissions, ground access, noise etc) and a breakdown by area of the impact the plans would have. This is an excellent summary at a comprehensible level. Unfortunately most residents have not seen it ; it has not been widely distributed as this has been too expensive for the councils to fund. Local residents were offered the chance to buy copies to distribute themselves!
- The FAQs section of the website tries to answer some of the basic questions in a more helpful way, which is a gesture in the right direction. However the site design is poor, with the documentation not searchable, and an almost impossible process to download a response questionnaire.
- The document has been condemned by the Plain English campaign.

Questionnaire:

- The questionnaire is patronising in tone and reads more like a comprehension exercise. It is easy to see the questions as invasive or rude.
- It is impossible to leave blank answers in the on-line response form.

Phone line:

- The phone line staff have been extremely polite, patient and helpful but undermined by their lack of access to basic information. They don't appear to have an easily searchable database, but rather have to refer to the physical document. The response to written or unusual questions is slow.

Record of broken commitments:

- Even as someone only recently aware of issues, it is easy to see why people place no trust at all in commitments associated with Heathrow. The current consultation explicitly recommends overturning the Cranford agreement, in place since the 1950s. The ink on the planning inspector's recommendation that Terminal 5 should be the last expansion seems barely dry. The length of the third runway and size of planes have already increased since the 2003 policy decision. BAA recently refused at the London Assembly to rule out further expansion. It seems naive to believe that any promises will be observed in the trade-off between jobs threats by powerful lobbies and individuals' quality of life.
- Promises to reintroduce runway alternation and to enforce environmental and noise limits carry no credibility at all, given this legacy.

Response form:

I have completed the paper version of the response form and will submit it, but have been amazed at the tone and content of questions and found some so ambiguous or patronising that I cannot answer them. I outline here my criticisms and how in some cases the ambiguity makes responses invalid. I know several other people who hold highly responsible jobs who have been so irritated by the form that they have given up in mid-response and sent a blanket "no" instead.

Personal details.

Proposal A: Adding a third runway.

Proposal B: Making more use of the existing runways.

Proposal C: Westerly preference and the Cranford agreement

Proposal D: Night-time rotation and early morning runway alternation

[Answers removed as they relate to the details of the response form.]

Alternative:

The Government has a rare opportunity to defy the sceptics, listen to the issues, develop a policy which looks forward to a healthy, economically vibrant society and overturn a policy based on 20th century assumptions and economics.

Be a global leader in reducing business dependence on flying: Instead of following the pack of airports competing by building more and more runways, which a crowded country like the UK can only lose, make SE England an exemplar in the global warming fight and use technology to communicate in 21st century ways. Forward-thinking, socially-responsible employers of the type the government wishes to encourage are actively looking at ways to reduce their environmental impact, including reducing flights. Instead of encouraging airport expansion, the government could facilitate regional technology centres to showcase alternatives such as collaboration tools and videoconferencing. This could address threats noted in the latest PricewaterhouseCoopers global CEO survey, where business leaders in the UK were less aware than others of the impact of insecure energy supplies on their business; frustrated by lack of government encouragement of technology; and complacent about the impact of global warming.

Recognise air travel as a luxury which imposes external costs on the rest of society, and price it accordingly. Assess use of slots and plan for maximum overall economic benefit, countering concerns about diminishing numbers of destinations. 60% of Heathrow's flights are for leisure, and make no contribution to the dynamism of the UK economy.

Discourage use of Heathrow as an air interchange, with 30% of passengers merely changing planes, bringing little of the economic catalyst effect on which the government's policy is based. Analyse the routes which bring economic benefit to the UK and favour those in allocating slots. Encourage the use of high speed rail, rather than air, for onward connection to other UK destinations.

Work vigorously with the travel industry to promote alternatives to cheap air holidays with a lower environmental effect: promoting rail links to Europe and within the UK.

Work with employers, commentators and health professionals to discourage commuting and frequent, short holidays: switch holidaymakers and business travellers to fewer, longer breaks rather than numerous weekend flights.

Summary:

The world has moved on since the industry-led research which informed policy in the early '00s. The Department has an opportunity to prove the cynics wrong by using the consultation to re-examine the true costs of expansion and develop a fresh policy, much more in line with other government policies on the environment, health, education and business. By responding to the concerns of individual voters, not just the powerful industry lobby, this might even go some way to reversing the current disengagement between government and the public.