

Response to Airports Commission Consultation

I respond as a Hounslow resident living in Isleworth under the existing Heathrow flightpath.

Q1: What conclusions, if any, do you draw in respect of the three short-listed options?

I do not believe that any of the three options are sustainable or deliverable.

Q2: Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated

I think the Heathrow options would require much greater attention to surface transport access to limit vehicle emissions – probably necessitating prohibitive congestion charging within a cordon around the airport, possibly including the M25/M4, to ensure a virtual ban on diesel transport.

Extensive noise mitigation around the airport to cover not only those within the 55 dB Lden contour (as potentially announced today), but also those newly-exposed locations underneath concentrated PBN flightpaths outside this zone will be needed. I suspect, in the case of the Heathrow options, that this would be prohibitively expensive.

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

Initial screening was done without sufficient regard to local environmental impacts, particularly noise and air quality. Leaving detailed consideration to the later stage may result in not have any deliverable options to consider.

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

Climate change / carbon dioxide emission considerations have been insufficient. It is not clear how, if an additional south-east runway is built, the growth expectations of airports in other regions of the UK will be limited.

The **surface access implications** of expansion at Heathrow have not been properly described, particularly as regards the freight ambitions.

Without this information it has not been possible to produce the required **air quality dispersion modelling**. The assumptions behind the air quality modelling need to be well explained, independently scrutinised and open to challenge.

The previous 2007 “Adding Capacity” Heathrow consultation hinged on an expected reduction in emissions from road vehicles, driven by increasingly stringent European standards, which would permit headroom for more aircraft emissions in the Heathrow area while still allowing the EU health standards for air quality to be met. The Environment Agency then responded that the assumptions made for future progress were not in line with the evidence of recent monitoring information and could not be supported.

http://collections.europarchive.org/tna/20090205022244/http://www.environment-agency.gov.uk/static/documents/Research/heathrow_1980743.pdf

As I pointed out in my previous response to the Commission, the predictions made for the air quality around Heathrow for 2010 were hopelessly optimistic and not realised. The recent work by Carslaw et al has shown that real-world NO₂ emissions from diesel vehicles have barely changed over the last 20 years. It may be that Euro VI standards may deliver more improvement, but there is considerable doubt as to whether their real-world emissions are also meeting the hoped-for levels. Heathrow did its own air quality analysis using an obsolete version of the Emissions Factor Toolkit and although the Commission used the latest version for what analysis it did provide on air quality, there must still be considerable doubt as to whether even that can be used to provide accurate predictions.

As infraction proceedings for failure to meet the health limits for air quality in London get closer, it would be wrong to plan for yet more emissions without a very solid analysis of the implications. This demands publication of and **further consultation** on a credible air quality dispersion model.

It should also be borne in mind that **interim short-term measures** also require the environmental impact assessment of air quality. I note that the Airports Commission Senior Delivery Group noted in their First Report that “any decision on TEAM (Tactically Enhanced Arrivals Measures = “mixed mode”) will be taken alongside the final report in 2015”. As the CAA have pointed out to the Airports Commission, Heathrow did not adequately report on the air quality impact of the Operational Freedom Trials that have previously been conducted, contrary to their undertakings given at the start of the trials :

<http://www.caa.co.uk/docs/589/20131119FurtherLtrFromCAAtoAirportsCommissionReCAP1117.pdf>

Noise

Proper assessment of the environmental impact of the development on noise requires information on flight paths , an adequate model to calculate the noise from planes using those paths and an understanding of the effects on people, including health effects, when subjected to that noise.

The detail provided on the **flight paths** is not definitive enough to be used as a basis for decision. The CAA ERCD analysis that underpinned the Jacobs Noise local assessment report used the three different airspace designs (H-3R-T, H-3R-N and H-3R-R) provided by the scheme

promoter of the Heathrow LHR NWR proposal . But it is not at all clear these these are compatible with those routes used in the Operational Efficiency module and it is certain that some of those proposals have significant unresolved issues as to which modes are practical as identified by the CAA in the Operational Risk report. A common basis needs to be used for all modules to underpin decision-making.

The CAA ERCD **ANCOM noise model** must also be in some doubt after the experiences of the PBN RNAV flightpath trials over the summer of 2014. Flight paths were moved away from some districts in Teddington and modelling work predicted that they would suffer less noise. In the event people in these areas were more disturbed than usual and the effect is yet to be explained. It is possible that sharper turns create more noise disturbance than ANCOM currently predicts. This is worrying considering that many of the noise mitigation options involve the use of curved departure or approach paths at relatively low levels.

It must also be pointed out that the assumed routing operations frequently involve new **Performance Based Navigation techniques** that rely on the concentration of planes into very narrow defined corridors. This has a disastrous effect on those below the flightpaths and the recent trials have caused outrage in many areas that were previously not overflown . One suspects that exposing another 300,000 people to this effect from new Heathrow routes would not be acceptable and would be politically undeliverable.

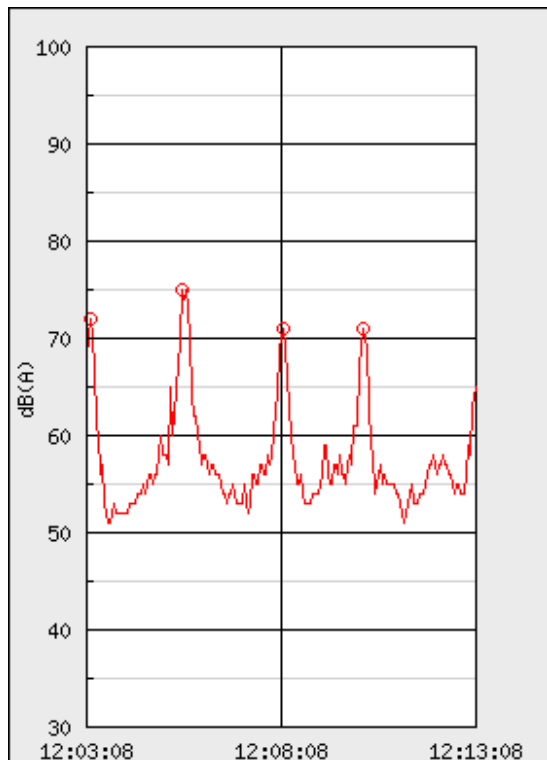
Similarly, it is argued that **technology** will result in a quieter environment from new plane types. However, as Sir Howard undertook to investigate at the Heathrow Evidence Event, the new A380 landing over Putney in Wandsworth is as noisy if not, in some versions, noisier than the old 747 it is meant to replace. In December, in the Financial Times, Sir Howard wrote :

“The second development will be new aircraft that are coming into operation, notably the Boeing 787 and the Airbus A350 — both at least 20 per cent more fuel-efficient than the models they replace. They are also quieter, meaning fewer local residents will be affected by noise.”

However, the approach noise of the A350 is shown in the Commission’s methodology for future and imminent plane models to be noisier than the A330 surrogate plane used for modelling.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/389579/noise_methodology_addendum.pdf

Heathrow claimed to be testing the noise impact of the A350 in trial flights by the Qatar launch plane in January, but no results have been published to date and at the Heathrow Airport Consultative Committee a representative made the remark that it was normal practice to only issue an assessment a year after a new plane type had begun commercial operations at the airport. The silence does not bode well. Frankfurt has a citizen-science web-linked network of noise monitors. cursory examination of the noise from landing A350 planes over neighbourhoods which might mimic my West London location do not show the plane to be remarkably quiet :



http://dfld.de/Mess/TrackInfo.php?L=G&E=D&R=1&Z=18.01.2015/10:08:12&F=000000_DLH4LX&I=&AD=v&H=2101&A=B735&S=206

Sound monitor trace from Frankfurt Niederrad2 location Sunday 18th January 2015 – Central cursor is sound from Lufthansa Boeing 737. The Qatar A350 was the previous plane with the higher sound level at approx 12:05.

In addition, many areas in London suffer plane noise from both **Heathrow and London City** Airport operations. It is wrong that these are assessed independently. **A combined noise contour** study should be prepared so that the impact from both sources is considered.

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?

See response to Q4 for factors that have not been adequately assessed.

Q8: Do you have any other comments?

I do not think that the assessments done to date are sufficient to allow a recommendation for an additional runway at either location.

There is still much scope to improve operations at both airports and with improvements to rail connectivity there should be no major difficulties in maintaining adequate links to the rest of the world from UK airports for the foreseeable future. As has been said before, locking the UK in to high-carbon infrastructure risks wasting public and private money in what will soon become stranded assets.

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