

**Herne Hill Society – Response to the Davies Airports Commission Options
Consultation
February 2015 (final issue following HHS Committee comments)**

1. Introduction

- 1.1 This response to the Davies Airports Commission Options Consultation has been prepared for, and agreed by, the Committee of the Herne Hill Society, in response to the invitation of November 2014. The response has been informed by the Consultation Document, the Interim Report from December 2013, and selective reading of the Detailed Analysis Reports (as listed in Annex A of the Consultation Document) where relevant.
- 1.2 The Herne Hill Society, founded in 1982, is a registered civic and amenity charity working to maintain and enhance the area of London SE24 - for the benefit of residents, visitors and local businesses. Further details can be found on the Society's website:
<http://www.hernehillsociety.org.uk/>
- 1.3 The Society can be contacted through the transport correspondent, [REDACTED]
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2. Herne Hill and Airports

- 2.1 Herne Hill lies under some of the busy flight paths to and from Heathrow and London City airports. The steady succession of morning peak aircraft lining up for Heathrow starts often before the 6am 'end' of the night – noted by insomniacs, and annoying light sleepers. In the summer, there is usually a noticeable stream of aircraft turning and lining up over our gardens – still fairly high up, but at times annoyingly intrusive.
- 2.2 Herne Hill railway station is served by GTR Thameslink services, allowing direct and frequent connections to Luton Airport, and providing easy access to London Gatwick via both London Victoria and London Blackfriars stations. Until recently, there were a few direct trains to London Gatwick, and this connection is still operationally feasible.

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| Herne Hill suffers from aircraft activity at Heathrow, and benefits from easy surface access to Luton and, potentially, to Gatwick. |
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3. Comments on the existing baseline situation, forecasting perspectives, and shortlisting

- 3.1 Heathrow is currently by some considerable multiple the most noise polluting airport in the world, by any metric. Gatwick airport, with half the passenger movements of Heathrow, affects seventy times less population with noise pollution. The technological possibilities to reduce aircraft noise through quieter engines, and through fewer larger aircraft, have reached diminishing returns.

- 3.2 All London airports are currently operated in the private sector as commercial concerns. At present, society at large has relatively weak powers to intervene for the general good in their on-going operation. National infrastructure planning controls represent one infrequent opportunity to influence the direction of airport activity. Important considerations for society which should be considered by the Davies Commission include:
- The widest range of airline activity patterns and levels – taking a wider view than hitherto of global warming and energy pricing, competition from middle eastern airports, future trends in the price of 'low-cost' air travel, and the relative price insensitivity of business users to landing charges;
 - The surface access cost (or planning gain contribution) to the public purse from the proposed private sector developments; and
 - The scope for fiscal intervention to influence passenger behaviour and airport operators' business decisions.
- 3.3 While it is appreciated that the Commission's Terms of Reference are heavily biased towards considering major new infrastructure, even so it is considered that insufficient attention has been given to the low economic growth scenario with consequent low demand for air transport; and the role of demand management and fiscal measures to allocate runway capacity resources efficiently for the overall public good.
- 3.4 The shortlisting of the two Heathrow and one Gatwick options is considered skewed; the case for shortlisting two Heathrow variants is not made – just one should have been included after a prior pairwise comparison. The MAG case for exploiting Stanstead to the full is also considered to be insufficiently emphasised. The early exit for the various estuary options – involving unrealistically huge public sector contributions - is heartily endorsed.

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| <p>The HHS considers that the Davies Commission has given insufficient weight to the 'Do minimum' conditions against which the private operators expansion plans have been compared; has not considered a sufficiently wide range of external factors affecting the forecasting scenarios, and has failed to emphasise the balance of public and private funding of the expansion plans.</p> |
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4. Comparison of the three options

- 4.1 The Consultation document is unhelpful in giving a simple sequential summary of the options without any direct comparisons. The following Table 4.1 seeks to remedy this. The side-by-side comparison shows that, if further new runway capacity is to be built, Gatwick is the cheapest, most economically sensible, and least environmentally damaging location for such capacity.

Table 4.1 Option comparison

| | Gatwick Second runway | Heathrow Hub extended N | Heathrow NW |
|--|--|--|---|
| Capacity change (mppa) | 35 to 70 | 70 to 123 | 70 to 130 |
| Private development cost (£b) | £9.3 | £13.5 | £18.6 |
| Wider surface infrastructure cost (£b) | £0.8 | £6.3 to £2.1 | £5.7 |
| Maturity of proposals | Refinement of previous Public Inquiry ready proposals | Recent plan with only outline surface ideas | Recent plan |
| Fit with existing and planned surface access | Takes advantage of Thameslink and Crossrail | Takes advantage of Crossrail; requires development of rail links to the south; assumes HS2 will happen. A Heathrow Hub' idea is suggested to reduce the cost | Takes advantage of Crossrail; requires development of rail links to the south; assumes HS2 will happen |
| Fit with surrounding economic activity | Supportive | Will overheat and require excessive local infrastructure | Will overheat and require excessive local infrastructure |
| Noise impact (Population affected by L57) | Increase from 3,400 to 11,800 | Claimed small reduction from 243,000 | Claimed small reduction from 243,000 |

The HHS consider that the Consultation Document is unhelpful and potentially misleading in obscuring the advantages of the Gatwick option, and is insufficiently questioning of the Heathrow noise assumptions.

5. Responses to the Consultation questions

5.1 The Society's responses to the eight questions posed in the Consultation Document are as follows:

| Question | Herne Hill Society response |
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| Q1 Conclusions on options | The HHS is not persuaded by the evidence in the Interim Report that a full new runway is a necessity to support the economic well-being of the UK. Of the three new runway options presented in the Consultation Document, the Gatwick option is considered clearly the best, by a considerable margin. |
| Q2 Refinements to options | The Gatwick option, and its associated impact mitigation measures, are already well developed. We would suggest a sub-regional study to examine how the potential increased employment and passenger activity is integrated into the local communities and transport networks. The major environmental and wider surface access externalities of the Heathrow options are considered beyond mere mitigation. |
| Q3 Comments on appraisal | The lack of detailed examination of the 'Do Minimum' case and its economic and environmental impact, particularly under low growth scenarios, is considered to have resulted in the premature discounting of such an option. It is unclear why the Commission did not present a side-by-side appraisal of the options in the Consultation Document. |
| Q4 Factors not fully addressed | The appraisal, while commendably comprehensive, fails to draw out the distinctions between the public and private contributions to funding, and their respective feasibility - in times of public expenditure restraint, and given the risk-averse nature of the private sector. It is considered that insufficient weight has been given to the huge impact of the current noise levels caused by the existing Heathrow activity, and how this can be substantially reduced under all options. |
| Q5 Comments on specific topic methodology | A full review of the Appraisal Framework is beyond the scope of these comments; the methodology appears commendably comprehensive, if somewhat diffuse. A clearer approach to enabling consultees to apply their own value weightings to the 16 modules would be helpful. |
| Q6 Comments on sustainability assessments | Not examined for this short submission |
| Q7 Comments on business cases | Not examined for this short submission |
| Q8 Other comments | The long term noise impact of the airports is heavily influenced by the operational management – alternating flight paths, altering 'day' and 'night' flying patterns, and this needs to be given greater emphasis |

6. Conclusions

- 6.1 As is clear from the comments made above, the Consultation document raises serious concerns. It fails adequately to address many important issues and hence presents insufficient information on which to base valid conclusions and is thus potentially misleading and could result in ill-informed decisions that the nation – and particularly on the many thousands of residents whose lives would be blighted by the results of those decisions. There are also serious deficiencies in the economic case made. Again, in the absence of full and clear evidence relating to the impact of the options chosen, it is impossible to make a valid and fully informed choice between them – something that may well lead to serious damage to the local and national economies.
- 6.2 The Herne Hill Society urges that no action or decisions are made on the basis of the current consultation document. We are strongly of the view that the document be revised and reissued for further comment, taking full account of the observations and comments made in our present response.