

## **Heathrow Statutory Consultation – Response Guide**

August 2019

### **Introduction**

This consultation will inform Heathrow's planning application (DCO) for expansion. The final application will be judged on whether issues raised here have been appropriately addressed, in particular the final application will be judged by its ability to meet the challenges and conditions set out in the Airports National Policy Statement (NPS).

Whilst there are many flaws in the NPS it does set out some conditions that should be used to hold Heathrow to account.

It would be helpful if your response could

- refer to the conditions imposed by the NPS.
- contain specific criticisms of the proposals wherever possible.
- answer questions on any of the topics as you like but if you do not wish to answer a specific question then please state your opposition to expansion. It is NOT A DONE DEAL.
- You could include any of the impacts set out in more detail in the impact summary document [here](#).

### **How to respond – Please note – you do not have to use the online form.**

You can respond online here: <https://aec.heathrowconsultation.com/>

You can send comments via email to: [feedback@heathrowconsultation.com](mailto:feedback@heathrowconsultation.com)

Or send a **hard copy response** to:

*Heathrow Community Relations  
The Compass Centre  
Nelson Road  
Hounslow  
TW6 2GW*

Deadline for responses is **13<sup>th</sup> September**.

**Please send a copy of your response to the Coalition on [consultation@no3rdrunwaycoalition.co.uk](mailto:consultation@no3rdrunwaycoalition.co.uk) as we would like to maintain a record of the key issues raised.**

## **Masterplan**

- 1. Please tell us what you think about any specific parts of our Preferred Masterplan or the components that make up the masterplan.**

### **Key Issues for responses**

Over 2 million people could be exposed to noise pollution at levels that are detrimental to their health.

The proposals do nothing to address concerns around the continued breach of legal air pollution limits.

Construction of a 3<sup>rd</sup> runway would make achieving the UK's climate target of zero emissions by 2050 impossible.

Many communities will find themselves under new flight paths, which have not been revealed in this consultation and will not come to light until 2022 - **after** Heathrow expects planning approval for a 3<sup>rd</sup> runway.

The masterplan sets out the following impacts:

- Destruction of 750 homes.
- Nearly 6,000 home rendered uninhabitable.
- The massive increase in noise and air pollution from the extra 280,000 flights each year. (Incredibly, Heathrow claim that 767 additional flights every day will actually reduce the noise footprint and will not increase air pollution!)
- The volume of cargo is set to double.
- Increased numbers of HGVs and Lights Goods Vehicles on the local road network.
- Use up a large area of Green Belt
- Require large taxpayer subsidies for surface transport and/or increase congestion
- Increase pressure on housing, school, doctors, hospitals, water and sewerage.

- 2. Please tell us what you think about the sites we have identified for buildings and facilities we are proposing to move.**

### **Key Issues for responses**

The proposals will also destroy over 300 local businesses with minimal compensation.

There is the potential for significant negative impacts in terms of the relocation of the Lakeside incinerator and the sewage works.

Please set out your strong opposition to the planned destruction of communities for a purpose that is not justified, either in economic or environmental terms.

Compensation does not make up for loss of home and community.

In many ways those whose homes are next to the site of the third runway but will not be bought out are even worse off. They will not get the option to move out, but will have to stay and suffer the impacts.

**3. Please tell us what you think of our boundary design proposals to manage noise and the effects on views around the boundary of the expanded airport.**

**Key Issues for responses**

This section asks for views on Heathrow's proposals to help the airport 'blend into the surrounding area'!

Balance between aesthetics and noise mitigation – fact is local residents don't care what it will look like as their communities will be destroyed.

Only small section with noise attenuation wall along north of new runway – could this be larger?

**4. Please tell us what you think about our development proposals and the measures proposed to reduce effects in these areas:**

- Bedfont and Mayfield Farm;
- Brands Hill;
- Colnbrook and Poyle;
- Cranford, Hatton and North Feltham;
- Harlington and Cranford Park;
- Harmondsworth;
- Longford and Bath Road;
- Richings Park;
- Sipson; and
- Stanwell and Stanwell Moor.

**Key Issues for responses**

Building the runway will not just cause disruption to these communities, it will cause devastation.

The measures proposed will in no way make up for or offset the increase impacts of noise, air pollution or congestion on local communities.

The vast majority of people in Harmondsworth will be losing their homes. The illustration from Heathrow's consultation shows Longford and the majority of Harmondsworth wiped off the map.

Heathrow seem to have no idea of the area they wish to destroy. They plan to move Harmondsworth Primary School to 'a quieter location north of the M4' which happens to be right next to Stockley Bypass.

Sited just metres from the eastern end of the 3<sup>rd</sup> runway, Sipson residents will have planes less than 200ft above them. Most of these homes in the Public Safety Zone will be uninhabitable. Any remaining residents will have a newly diverted A4 in their back gardens as well as a runway in their front gardens. These residents will be also be surrounded on all sides and have planes taking off right over them.

There are also no proposals for many areas (e.g. Brentford, Chiswick, Ealing, Eton, Heston, Putney, Richmond, Ruislip, Spelthorne, Southwark, Teddington, Twickenham, Windsor) beyond the wider property zone, despite the fact that they will be substantially affected according to the noise maps. Many of these areas will be affected by both inward and outward-bound air traffic and will become noise sewers.

Further details on the local impacts can be found in the [SHE Disaster plan booklet](#).

## Construction

### **5. Please tell us what you think of our construction proposals and the ways we are proposing to minimise effects on communities and the environment.**

#### **Key Issues for responses**

The consultation includes preliminary findings show that the project is High Risk when considering the construction impacts in 2022.

There will be multiple construction support sites outside the boundary of the airport which will be operating 24-hours a day, seven days a week, including Bank Holidays. This is only required for the benefit of Heathrow to ensure that the new runway is operational as soon as possible.

The consultation reveals that the project involves moving more than 20 million m<sup>3</sup> of earth. The associated construction activities will increase emissions of dust and odour causing potential loss of residential properties, schools, medical facilities, commercial sites, businesses, work sites and haul roads.

The proposals included in this section are generic with no detail, e.g. *'In particular, measures will be taken to mitigate noise and lighting impact associated with any night time working near.'* What does this actually mean for communities around the airport?

The development of the associated infrastructure is to be constructed over a 30-year period – which is completely unacceptable for local communities. This is the first time Heathrow have revealed how long the project will take.

Heathrow admit that there will be negative effects on recreational spaces and routes during construction yet does not go into detail as to precisely what these are.

The masterplan shows that the construction of new roads, and diversion of existing roads and other works to move services will lead to both temporary and permanent effects. However, these are not mapped out, nor is the impact on congestion and associated impact on air pollution.

Heathrow also admit that other construction activity, including additional trips produced by construction vehicles and workforce travel, may also lead to disruption for travellers.

The masterplan reveals that construction activity and the construction workforce near local communities close to the site boundary or construction traffic routes may affect health and wellbeing.

During construction, noise will significantly affect some residents, schools and places of worship in areas closest to the new runway.

Construction will result in the loss of some habitats across the area, including within the Colne Valley Regional Park, Staines Moor Site of Special Scientific Interest and a number of Local Wildlife Sites. This habitat loss will also result in wildlife being lost or displaced from areas on which they have depended for foraging, sheltering or as movement corridors.

The construction cumulative GHG emissions for the modelled scenario from 2022 to 2050 result in 3.70 MtCO<sub>2</sub>e additional carbon over the 29 years.

## Future Operations

- 6. Please tell us what you think of our runway alternation proposals, in particular we would like to know if you think we should alternate the runways at 2pm or 3pm.**

### Key issues for responses

The documents describing the overall noise effect on communities are utterly impenetrable and require minute analysis to understand the facts behind the obfuscation. The following facts are nowhere stated in the documentation but can be painstakingly unearthed:

- Daytime respite will be reduced to about one third of a day for many communities that currently get half a day

- Communities that are not overflowed will get noise for the first time. It is not clear where those communities are as there has been no precise flight path information.
- Only a few communities will be lucky enough to get less noise than with two runways. Similarly, it is not clear where those are communities are through the absence of flight path information -
- The overall noise impact in total will be much greater.

These facts have been omitted from the consultation with a false impression of a net benefit, thereby giving a totally misleading picture of the noise impacts.

A further complication is that Heathrow is proposing to tie in respite during the night with the daytime respite periods. The Airports NPS requires Heathrow to provide people with 6.5 hours without planes between 11pm and 7am.

Heathrow propose a respite pattern to ensure communities get no flights the previous evening if they have planes landing before 6am the next day. However, whether this can be made to work in practice is debatable given the scale of the airspace change required.

There is significant concern how Heathrow is defining the 'night' period and questions to be asked whether this amounts to a 6.5-hour period without flights.

The proposal for an hour long 'recovery period' should not be part of the 6.5-hour period without flights. There should be no flights at all during this period.

**7. Please tell us what you think of our preferred proposal for a ban on scheduled night flights, and/or whether you would prefer an alternative proposal.**

**Key issues for responses**

Heathrow are proposing a ban on scheduled flights from 23:00 to 05:30. This means that at best a removal of about 4 of the current flights before 06:00.

6 hours sleep is insufficient for adults and far too little for children and there is an increasing body of academic evidence that demonstrates this.

In an area such as around Heathrow there should be an eight-hour outright ban (curfew) on all flights on all days. We believe that such a ban is vital for the health of the communities to guarantee a good night's sleep.

Heathrow are not proposing to control the numbers of arrivals and departures in the 5:30: - 07:00 period which means a potential massive increase in flights in the 05:30 - 06:00 - (the night quota period).

There is also likely to be a significant increase in current movements in the last hour of the official night period 06:00 - 07:00.

The potential increase is staggering. The Night Quota period could see another 13 arrivals and 33 departures - something like a 278% increase.

The consultation hides this under the guise of seeking rotate the arrivals and departures on a daily basis between the 3 runways in the early morning - so in theory if you're under one of the new flight paths you will get 'respite' one day in three.

A whole new group of people - those directly east and west of the third runway will be exposed to flights just outside Heathrow's definition of night for the first time.

The diagram in 'Future Runway Operations' page 44, figure 4.9 shows a one-hour recovery time and the first 'early morning arrival' at 5.15am. This means that the likely ban period will therefore run from 12am to 5.15am - five and a quarter hours which is less than the current night-time quota period.

## **8. Please tell us what you think about our proposals for managing early growth.**

### **Key Issues for responses**

Heathrow proposes to introduce 25,000 more flights a year before the 3<sup>rd</sup> runway opens.

Heathrow gives two reasons for this proposal:

- to meet the NPS requirement to 'develop capacity more quickly 4 years before opening the 3<sup>rd</sup> runway;
- to raise revenue early to meet Government's requirement to keep landing charges broadly similar to today.

Heathrow are attempting to smuggle past a proposal with significant environmental impacts for newly affected communities with only vague aspirations for mitigation. Under the guise of a 'Brexit boost', the proposal would bring in the additional landing charges which Heathrow needs to plug a gap in its financing of the 3<sup>rd</sup> runway.

MPs were not able to consider this proposal before voting on the NPS and were unaware of the full extent of Heathrow's plans. Despite this Heathrow are now presenting them as integral to a 3<sup>rd</sup> runway and as part of the submission they are preparing for the DCO.

Heathrow propose a phased introduction with the phases dependent on service standards and resilience. Illustratively there would be 15,000 additional ATMs from late 2022 (assuming DCO consent in late 2021) and a further 10,000 by 2025.

We are strongly opposed to 'early growth'. It is 'growth by stealth'. The limit of 480,000 flights was imposed in order to limit impacts on local communities. Heathrow is seeking to jettison this protection.

Heathrow has no mandate for early growth and there was no mention of this proposal in the Airports National Policy Statement or the Parliamentary vote. In fact, the Government has undertaken no assessment of the impact of this early growth in terms of noise air pollution or health.

Although the current night noise restrictions would limit the numbers before 06:00 the DfT scheme runs out in 2022. The 'mitigation' for this is to be provided 'as soon as reasonably practicable' - so there no guarantee of mitigation before the new flights begin operating.

Heathrow claims economic benefits from these additional flights whilst claiming that there is minimal impact in terms of noise or air pollution. However, it is worth highlighting that without the revenue arising from these four years of extra flights, Heathrow would have to increase landing charges to airlines which would lead to increased passenger fares. This would mean Heathrow breaking a promise to Government and a condition of the Airports NPS that they'd keep charges close to current levels.

The map showing noise exposure contours in 2025 with and without early growth is unclear, in contrast to the high production values of the consultation material generally. It is impossible to read the map to ascertain whether any particular address is affected. The numbers affected equate to 43,300 people but respondents cannot tell whether they are in that number. Once again flightpaths are not included.

The document states that the enhanced Noise Insulation Scheme would be in place prior to Early Growth. Is that the same as the insulation itself being in place? How many homes, where, what level of insulation and what year? The document states that the enhanced Noise Insulation Scheme would be in place prior to Early Growth. Is that the same as the insulation itself being in place? How many homes, where, what level of insulation and what year?

The air quality assessment of early ATM growth does not include concentrations of particulate matter (PM10 AND PM2.5). Currently NO2 concentrations exceed the annual mean EU limit values and UK Air Quality Objectives at two roadside monitoring sites near Heathrow. With early growth there would be an increase 'at receptors near the airport' of 0.5mg/m<sup>3</sup>. But construction works would further damage air quality. Heathrow admits this and says that analysis combining these two factors needs to be done to understand the total impact. However, they have not conducted that analysis so cannot quantify the total impact.

The document does not go on to undertake this analysis of this additional pollution alongside the harmful air quality impacts caused by project construction. Why is an assessment of any increase in particulate matter not included?

The elements of the Surface Access Strategy will be ‘implemented proportionately to mitigate impacts as they arise. For example, vehicles emission charging may be implemented before the first date of operation of early ATM growth.’ This is vague and non-committal.

Heathrow’s strategy for Environmentally Managed Growth would begin from the onset of early ATM growth. Heathrow says it intends to define specific limits (for e.g. noise, air quality, carbon and surface access) which early ATM growth would need to observe, but Heathrow does not specify what these limits should be.

## Surface Access

### **9. Please tell us what you think of our proposals and how we could further encourage or improve public transport access to the airport.**

#### **Key issues for responses**

The NPS sets out stringent outcomes which Heathrow must meet requiring them to: *‘increase the proportion of journeys made to the airport by public transport, cycling and walking to achieve a passenger public transport mode share of at least 50% by 2030 and at least 55% by 2040.’*

There are significant concerns about the ability of Heathrow to achieve these modal share targets and the impact that increased congestion will have on our communities.

These concerns have only been heightened by the recent admission of Heathrow’s CEO, that the airport has failed to meet their 2018 target of the share of passengers travelling to the airport by public transport.

There has only been a 1% increase in the past decade and the figure currently sits at 41%.

This makes the required target set out in the Airports NPS even harder to achieve and demonstrates that Heathrow are likely to fail to meet the target.

Government analysis predicts that expansion would result in additional congestion on local transport networks which would have a significant economic cost, yet no cost was allowed for in the evaluation of the net economic benefit of expansion.

Heathrow has said it will not contribute more than about £1bn to support new road and rail capacity. But the Airport Commission estimated that some £5bn was needed and Transport for London estimated up to £15bn.

The consultation states that Heathrow might be prepared to contribute to Western and Southern rail access schemes but gives no specific commitment of precise amount.

We are strongly opposed to a taxpayer subsidy to support expansion.

The consultation resorts to 'indicative' coach and bus links. No new rail links are mentioned in Section 6 of the main consultation document. This is totally inadequate. We need proper, funded, plans. Not vague, unfunded, ideas.

It is not sufficient and is not sustainable to simply 'encourage' or 'improve' public transport. There must be credible and concrete plans to actually meet the aspirations of modal shift, prevent extra congestion, etc.

Heathrow claim that doubling of freight at the airport will not double number of vehicles or HGVs on the road yet provide no evidence to support this assertion.

For all these reasons, the surface access proposals are totally inadequate.

**10. Please tell us what you think about our proposals for the Heathrow Ultra Low Emission Zone and Heathrow Vehicle Access Charge as ways to manage congestion and air quality impacts.**

**Key Issues for responses**

Heathrow is heavily polluted and congested now, even with two runways. A ULEZ and access charge should therefore be introduced irrespective of a third runway.

Heathrow have grossly overestimated the effects of their actions and grossly underestimated the ability of public transport to cater for the increased needs generated by expansion. Public transport upgrades had already been planned for to accommodate known population increase, without the added pressure of Heathrow expansion.

The M25 is a major artery around London and charging passengers in an ultra-low emission zone will not affect that.

In addition, road traffic is the only option for freight that Heathrow handles, and again that will not be restricted. The net effect will simply be more traffic, more pollution, and more cost to the people who are levied with extra charges for the ULEZ. Clearly TfL and the London Assembly are of the same view, judging by their responses

**Possible Answers**

1. I am totally opposed to expansion of Heathrow by the building of a 3rd runway.
2. If the airport was not expanded, there would be no need for these air pollution measures.
3. The best way to keep air pollution in areas near Heathrow at low levels, without breaching legal limits, would be not to expand the airport.
4. It would not be possible to force almost all air passengers to the airport to use rail transport.

5. Heathrow would not pay for the improvements needed to the rail network, to ensure all passengers could get to /from the airport by rail. The taxpayer should not be expected to pay for these improvements, to assist Heathrow in its plans.
6. Other non-airport related road users should not be penalised, just in order to help Heathrow deal with its air pollution problems, caused by unnecessary expansion.

## **11. Do you have any other comments on our Surface Access Proposals?**

### **Key issues for responses**

We question why there is now no mention of targets in Section 6 of the main document?

In order to approach sustainability, car traffic needs to be stabilised in absolute terms. This requires a massive increase in modal share of public transport. The lack of any plan to achieve that shift demonstrates that Heathrow's plan for expansion is unsustainable.

The carbon emissions from surface transport would be about 0.95 MtCO<sub>2</sub> (metric tons of carbon dioxide) in 2022 to 0.9 MrCO<sub>2</sub> by 2050 with 2runways and Up to about 1.24 MtCO<sub>2</sub> by 2050 with a 3rd runway. (This is not entirely clearly as there is just a chart, not actual numbers given). This would be a difference of something of the order of 0.25MtCO<sub>2</sub> per year.

Heathrow claims (Graphic 9.4.2.) the cumulative carbon emissions from surface access would be, by 2050, about 27 MtCO<sub>2</sub>, and it would be about 34 MtCO<sub>2</sub> with the 3rd runway. i.e. about 7 Mt CO<sub>2</sub> more over the 29 years, with a 3rd runway.

An insignificant amount compared to the planes (which would add, on Heathrow's calculation, 173 Mt CO<sub>2</sub> more).

The carbon assessment does include carbon from trips made by bus and rail.

## **Preliminary Environmental Information and Managing the effects of expansion**

### **12. Please tell us what you think about our proposals to manage the environmental effects of expansion.**

#### **Key Issues for responses**

The key overall problem here is that there is no reference to settled Government policy of moving to the lower carbon emissions targets set by the Paris Agreement. Since issuing this consultation document this has been enshrined in legislation for net zero carbon emissions by 2050 and Heathrow will need to demonstrate in their planning submission specifically how they will contribute to meeting that target. Not only that, they will need

to demonstrate how building a 3<sup>rd</sup> runway won't make it a great deal harder for the UK to meet that target.

Basic problem is that the carbon emissions with the new runway will be about 8 - 9 million tonnes of CO<sub>2</sub> more, with the 3<sup>rd</sup> runway, than without it.

Heathrow's figures suggest the difference, by 2050, between having the 3<sup>rd</sup> runway and not having it, would be 7.53 MtCO<sub>2</sub> per year. (i.e. 19.9 MtCO<sub>2</sub> with the 3<sup>rd</sup> runway, compared to 12.37 Mt CO<sub>2</sub> by 2050 if they stuck with two runways.)

Heathrow admits the cumulative emissions of Heathrow flights would be, over the period 2022 to 2050, 456 MtCO<sub>2</sub> if they stuck with two runways - and 629 MtCO<sub>2</sub> with the 3<sup>rd</sup> runway.

That would mean a difference of 173 MtCO<sub>2</sub> over the 29 years - so a total of 173 MtCO<sub>2</sub> more with the 3<sup>rd</sup> runway.

That spread over the 29 years (2022 to 2050) is on average 6.18 MtCO<sub>2</sub> more CO<sub>2</sub> per year. More in peak years, less in others. (They give some rather unconvincing explanations are given for the assumed carbon reductions.)

So, the total carbon costs for the 29 modelled years, 2022 to 2050 - the extra 173 Mt CO<sub>2</sub> from flights, the 3.7 MtCO<sub>2</sub> from construction, and the 7Mt CO<sub>2</sub> from surface access, that comes to about 183 MtCO<sub>2</sub> more if the 3<sup>rd</sup> runway is built. That is using Heathrow's own figures, which make various assumptions about aircraft and vehicle fuel efficiency.

The consultation claims that 'Expansion at Heathrow is not considered to materially affect the ability of the Government to meet UK carbon reduction targets.' This is highly misleading when Heathrow's own data show the massive increase in CO<sub>2</sub> emissions resulting from a third runway.

Heathrow is hoping that the UK government is going to allow international offsets. The consultation notes that International flights are by far the largest source of emissions. It then seeks to sidestep the issue by claiming that an international 'offsetting' scheme (CORSIA) will resolve the problem.

This is highly misleading because:

- there no assurance that CORSIA will be implemented at all
- Major countries as India are not committed
- Most offset schemes do not work (that is, they do not achieve genuine net reductions)
- As emissions worldwide are reduced in accordance with the Paris agreement, there will be a rapidly shrinking source of emissions available to be offset against aviation.

The Committee on Climate Change (CCC) is clear that aircraft emissions must be counted. Given that there is no technological solution on the horizon, CCC has done some work to show how continued aircraft emissions of CO<sub>2</sub> can be squared with zero emissions. It concludes that 'carbon capture and storage will be needed and that, reasonably enough, the aviation industry should pay for it. But no tax or carbon has been proposed by Heathrow, the aviation industry or government.

The above demonstrates that Heathrow's claims that third runway is consistent with climate targets is at best unsupported by evidence and at worst deceitful.

Heathrow does also not consider any of the non-CO<sub>2</sub> impacts from its expansion proposals.

**13. Please tell us if there are any other initiatives or proposals that we should consider in order to address the emissions from airport related traffic or airport operations? (Air Quality)**

**Key issues for responses**

Some 9,500 people in London die every year, illegal limits of air pollution are commonplace around Heathrow and the courts have found the government's air quality strategy is inadequate.

On air pollution there is only the vaguest commitment in the main consultation document: '*...our surface access proposals [not plans] will minimise these efforts by increasing public transport use*'.

PEIR chapter 7 forecasts there would be only slight increases on existing air pollution exceedances. Heathrow claim that aircraft emissions are dispersed so do not have a significant effect on air quality.

We believe that the evidence shows this is not correct.

For example, the Air Quality Expert Group of DEFRA state in their paper on ultra-fine particles that: '*For example a location such as Heathrow where aircraft tend to approach the airport from the east (flying over the London conurbation), there is potential for considerable exposure to ultra fine particles from aircraft*'.

They also reference the Hudda study from Los Angeles, which states that:

*'Locations of maximum concentrations were aligned to eastern downwind jet trajectories during prevailing westerly winds and to 8km downwind concentrations exceeded 75,000 particles cm<sup>3</sup>, more than the average freeway PN concentration in Los Angeles'*

Basic logic says that the installation of an expansion the size of Gatwick airport in a built-up residential area is going to increase the amount of harmful emission in the air.

There should be a proper independent assessment of the amounts and the effects of extra emissions.

Particles or particulates are fine particles of matter, mostly carbon but can be metal, that are emitted. These fine particles and ultra-fine particles are particularly dangerous. They penetrate deep into the lungs and blood stream are also transmitted onto the next generation. They have been found in the placentas of expectant mothers and then affect the unborn foetus.

London and the areas surrounding Heathrow are unlikely to be compliant with the WHO Guidelines or, in the case of NO<sub>x</sub>, the EU Regulations of 2008. They should have been compliant by 2015 under the EU regulations.

There are four Heathrow monitoring sites and they are all at the side of the airport rather than under the flight paths. They are neither in the 'line of fire' of the jet exhaust of arriving or departing planes, nor are they in the line of the prevailing wind. They clearly do get some wind in their direction since the wind does blow from due north and due south for some of the time.

The daily maxima of PM<sub>2.5</sub>s are all well above 40 mg per cm<sup>3</sup> and in one case over 60 mg cm<sup>3</sup>. The hourly ones are even higher. Those readings should be less than 25 mg per cm<sup>3</sup> and so are far and away above the WHO limits – and this is with only 2 runways. The likelihood is that these emissions receptors would give readings significantly higher if they were put under the flight paths, but we do not have this data. This is a huge omission and one that should be rectified before any DCO is considered, let alone granted.

The Air Quality concentration levels are set out in PIER at Table 7.18. Those levels are not in accordance with WHO levels. Firstly, we see that the PM<sub>2.5</sub>s limit is two and a half times the level recommended by the WHO. Secondly, we see that Heathrow are not operating any hourly or daily maxima of PM<sub>2.5</sub>s. Thirdly, neither Heathrow nor the Department for Transport test at all for ultra-fine particles even though they come within the legal definition of PM<sub>2.5</sub>s (because they are smaller than 2.5 micrometres).

There must be a legally binding mechanism whereby the runway cannot be used if and until the legal air pollution limits are not being breached.

- 14. Please tell us what you think about our proposals to help health and well-being. Are there any other proposals that you think we should consider to address the effects of the Project on the health and wellbeing of our colleagues, neighbours and passengers?** (Health and Well Being)

### **Key issues for responses**

It is not clear what benefits for health and well-being there would be. A third runway will produce more noise, more air pollution, more congestion, loss of Green Belt and more climate change. These will have an adverse effect on health and well-being. In

particular, noise and vibration are said to have a 'significant adverse effect on health and quality of life'.

Indeed, the consultation states that residential receptors health outcomes assessed consistent with government's WebTAG include:

1. Annoyance
2. Acute Myocardial Infarction (AMI)
3. Sleep disturbance
4. Hypertension - (stroke/vascular dementia)

It also states that there are a number of vulnerable groups affected by the expansion:

- Children and young people
- Older people who are particularly frail
- Those with already existing poor health.

Given the potential for elevated and long-term exposures there is also the potential for more permanent, progressive or irreversible health effects. The long-term effects could lead to life changing effects to health at Heathrow due to the long process it will involve.

The consultation documents reveal that, *'Effects may be particularly influential where people spend extended periods at home, for example due to being in poor health, unemployed, retired, shift workers or proving care'*.

Those who spend significantly more time at home will be severely affected by the noise and commotion of the building process, particularly those with already poor health, shift workers on minimum wage and carers need to be highlighted more as they will suffer from the building works.

Heathrow are seeking to linking unemployment as a negative health impact so they can highlight the 'amount of jobs' Heathrow could provide to many and thus categorise this as a benefit. They assert that some of the job opportunities would result in greater spending on goods and services but provide no evidence for this.

## **15. Please tell us what you think about our noise insulation schemes.** (Noise)

### **Key issues for responses**

The proposals seek to maximise the number of flight movements over the most densely populated part of the UK. This is a fundamental problem and no amount of 'mitigation' can get around it.

The most recent Government policy on noise states that the onset of community annoyance begins at 54dB (LAeq). It is vital that this metric is applied to the proposed changes as a minimum standard.

Given that many people are affected at noise levels down to 51dB, there is a good case for providing insulation at properties exposed to aircraft noise down to 51dB.

**419,803** - gross number of people who will be exposed to worse noise above 54dB. That is, they are either newly affected by this level of noise or were already above this threshold and are exposed to higher levels of noise.

The way noise measurement is averaged out is effectively meaningless. It is the single noise events that cause the disturbance.

Communities on the ground do not hear noise in average levels. DfT has accepted in its general aviation guidance policies that Noise events (N>65 dB Lmax) and single mode should be used as key supplementary metrics, but it seems Heathrow are trying to avoid this.

The WHO strongly recommends reducing average noise levels to below 45 decibels as aircraft noise above this level is associated with raised blood pressure, cardio-vascular disease and stress.

The **lack of detail about actual flightpaths remains a huge concern.**

There have been no noise assessments carried out for the intervening years from R3 opening until 2035.

An admission by HAL that **740,000 ATMs (Air Traffic Movements) is the minimum number of ATMs** on a 3-runway airport they are aiming for.

The use of **highly questionable and speculative noise performance characteristics for future aircraft types in 2035** - way in excess of the 01.dB / year claimed by Government in the Appraisal of Sustainability by reference to Sustainable Aviation Road Map. There has been no validation or peer review of these enhanced performance characteristics.

Heathrow say they will 'strive' to use enhanced take off profile (5 degrees) but this means more engine wear and the airlines only lease their engines from the manufacturers. Therefore, there can be no guarantee that this will occur. This combined with 3.2 angle of descent shrinks the contour / impact area.

Heathrow claim that there will be **'less noise than today..... with 3 runways' will almost certainly not be true from opening date in 2026 to 2035.** Again, there are no noise assessments for this period.

Both the proposed airspace changes and future airport expansion will result in more noise for local communities near to the airport.

Communities further from the airport are also likely to experience more noise, though the planes may be slightly higher the further away they are from the airport.

Depending on the precise alignment of the new flight paths, some communities will be experiencing noise for the first time. This will clearly increase the noise pollution endured by these communities.

The maps provided by Heathrow do not clearly show which areas will get more noise. Precise flight paths should be published to show residents exactly what noise levels they will experience.

Further, the impact of the proposed changes should be communicated directly and clearly, especially to those communities who will be newly overflowed.

This consultation does not do this through the absence of a clear picture of the total impact of current noise levels compared to the impacts of the proposed arrivals and departures from IPAs.

Noise insulation is obviously only useful when one is indoors. Outside, noise cannot be mitigated (other than by using quieter aircraft). It is therefore reasonable that residents should be compensated for outdoor noise. A noise compensation scheme could also support those who are below the noise insulation criteria but who are nonetheless affected by aircraft noise.

Other noise sources that are not associated with the airport activity such as existing roads and railways are also excluded from this Noise Insulation Policy. (p. 25) This is a cop out. Those existing roads and railways will be impacted in some form and excluding their noise emissions is not fair.

Local communities around the airport will experience as much as 6-9dB increase in noise from ground operations from a 3<sup>rd</sup> runway.

Potentially 20-year roll of insulation and mitigation measures – blighting people homes for years – timescale not confirmed.

Proposals will have huge impact on local schools – up to 44 who will experience a significant increase in noise – between 6 and 9dB increase in some cases. The total number of children enrolled in those 44 schools is 27,000.

Schools still won't qualify until 60dB for mitigation yet reading attainment begins to fall below average at around 55dB LAeq16 hour at school.

Large aircraft – will be noisier – especially if flown at lower altitudes – greater risk of annoyance.

The issue with contours is that it gives too much weighting to the noise of individual aircraft and not enough to the number of flights.

**16. Please tell us what factors are most important as we develop our proposals for noise management, in particular our proposals for the design and implementation of a noise envelope. (Noise)**

**Key Issues for responses**

This is the design framework for how Heathrow can grow – to be monitored by an independent body. The key will be how restrictions and limits are defined and what metrics utilised.

Government policy now recognises some people can get annoyed when noise averages out over the year at 51dB. The World Health Organisation (WHO) argues the level is even lower. Heathrow should commit to using at least the 51LAeq contour to frame the envelope and to review it every 5 years in the light of any new evidence that a lower figure would be more meaningful.

It is the sheer number of planes overhead that really disturb residents and this is not fully considered with the Leq metric. For example, 'N60' would indicate the number of planes passing overhead in excess of 60 decibels.

It is important to use LOAEL (Lowest Observed Effect Level) of 51dB as an absolute minimum and this could be pushed this further to 45dB as per WHO guidance.

A noise cap is currently used but the fines and penalties are paltry and do not incentivise airlines to utilise the quietest aircraft.

Heathrow are proposing a noise quota system – this would benefit airlines and airport but not local communities.

It would have an impact on the size on the noise contours – individually quieter planes may allow an increase in flight numbers within existing contours. However, this would not be reflected by the experience of communities under the flight paths.

Heathrow are forecasting a reduction in noise from 2035 owing to technological improvements but this is vague and they cannot be held to account for this. There is no remedy if this doesn't occur. Even electric planes may not be that quieter especially for departing and arriving aircraft.

Many of the communities we represent would suffer a reduction in the amount of respite under these proposals. Any such reduction in respite is unacceptable.

It is invidious to make a choice between alternatives which both do harm to communities. The question is misleading as it presents the reduction in respite as inevitable.

Communities at either end of the runway used for 'mixed mode' operations will potentially experience a significant loss of respite as they experience noise for a longer period, or if it's the new runway, will be subject to continuous operations for the first time.

It is difficult to know the full impact of the proposed changes because at this stage it is not clear where these new flight paths will be, nor how any alternation would be operated.

Further, there are no clear proposals for defining respite, monitoring respite periods, or for penalising for failure to adhere to respite. Neither of the respite periods proposed are long enough to prevent harm to health and there are no formal governance structures planned to enforce respite arrangements.

We note that the consultation attempts to define 'respite' but again not in a clear or straight forward way. Most people would think respite simply means not hearing any aircraft for a period of time, but Heathrow are attempting to hedge their bets by saying it could be a 'reduction in noise'. This 'reduction' is neither defined in terms of say 'half as loud' or in terms of numbers. Overall it is meaningless and we know from Heathrow's own social research that people need noise to be reduced by around a half in decibel terms before they report any 'respite' value.

Heathrow claims that when runway alternation and airspace alternation are combined they will generate respite that extends to areas well beyond that offered by their current two runway alternation pattern. However, this highlights that the noise from an expanded area will also affect a much larger area than today.

Another metric that has been proposed a single-mode contour. This means that the noise in any particular area is only measured on the days when the planes are flying over, i.e. excluding the days when there are no planes because of wind direction. It is a more meaningful measure in places such as Hanwell (Borough of Ealing) where planes are only a problem during easterlies. When the very considerable noise during easterlies is averaged with no noise during the westerlies the average is lower such that is claimed there is no significant annoyance. But there most certainly is annoyance when people want to enjoy their parks and gardens in summer (the time of most easterlies).

Rather than use multiple metrics, we propose that the currently recognised metrics (Leq, N60, etc) are combined into a single metric. There are standard statistical techniques which can be weight and combine individual metrics so that the extent to which each of the metric is an 'explanatory variable' of annoyance. A single metric. This would simplify presentation, communication and estimating compensation.

Noise reduction is conspicuously absent from Heathrow's proposals. Efforts should be made to reduce the noise from individual aircraft. This can be achieved by regulation, simply banning the noisiest aircraft from Heathrow. Or, as noted below, by noise-related charges. The great advantage of these approaches is that they benefit everyone who suffers (or will suffer) from aircraft noise.

Alternative designs of noise envelope and re-arrangements of flight paths, including respite and runway alternation, do not reduce noise overall. They can benefit one area, but only at the expense of another.

No empirical evidence or research on health impacts.

UK aviation policy based on Survey of Noise Attitudes (SoNA) 2014. This does not consider the change effect which is universally accepted. The only question is whether it makes 6 or 9 dBLAeq impact, a massive amount.

SoNA did not even look at whether people were annoyed below 51 dBLAeq – prejudging the LOAEL level. It is not clear whether either Public Health England, DEFRA or Dept of Health have actively considered the UK LOAEL. A FOI has provided absolutely no evidence of this.

The increased health impact cost on Heathrow's economic case could be as much as £7-9 billion, taking the project massively into negative. The health costs will fall back on society.

**17. Please tell us what you think of our proposals for maximising new jobs and training. Are there any other ways that we can maximise skills and training opportunities to benefit our local communities?** (Economic Development)

**Key issues for responses**

Heathrow is a significant employer in the area. However, west London is not an area in which there is significant unemployment compared to other areas of the UK.

There is already significant pressure on housing, local schools and hospitals. Further pressure will be detrimental (including raised property prices putting housing more out of reach of young people). Increased employment would be far more beneficial elsewhere.

Heathrow is undoubtedly a large employer, but this is not a justification for trying to expand the number of jobs. However, it only directly employs a few thousand people – it is a facilitator of other employment.

Heathrow is significant part of the local economy but that, too, is no justification for expansion. Indeed, there is a good case for diversifying the local economy, not concentrating it on aviation. Relying on about the most damaging and unsustainable sector of the economy is a high-risk strategy.

The causes of unemployment are deep and complex. They include the state of the national economy, the economic cycle, education, skills, social factors, regional differences and demographics. There is no evidence that unemployment would be helped by building a new runway at Heathrow.

The Airports Commission recognised that extra jobs locally would be achieved by increasing the population: 'The additional employment supported by Heathrow's expansion would lead to a significant requirement for additional housing. The Commission's analysis indicates this would total between 29,800 and 70,800 houses by 2030 within the local authorities assessed as part of the local economy assessment. This additional housing and population growth would also require substantial supporting infrastructure including schools and health care facilities.'

West London and areas beyond are already struggling with a shortage of school places, hospitals close to breaking point, overcrowded transport, green spaces being built on and even pressures on water and sewerage. The last thing councils, communities or the NHS need is even more pressure. Especially when they will have to foot the bill for any enhancements to infrastructure.

**18. Please tell us what you think about our approach to addressing effects on the historic environment, including any particular proposals you would like us to consider.** (Historic Environment)

**Key issues for responses**

Given the density of London, the prevalence of historic site and the fact that there will be planes flying over huge swathes of London, not just near the airport, the impact will be huge.

Places as diverse as Hampstead Heath, the Tower of London, Hyde Park, Fulham Palace, Windsor Castle, Wimbledon and Kew Botanical Gardens will have a significantly intrusive noise environment and will be blighted in a major fashion.

Construction will result in the loss of part of Harmondsworth Conservation Area and some listed buildings within it.

In the Longford area, all designated built heritage assets and the Conservation Area will be lost.

Heritage assets of archaeological interest within the construction footprint will also be lost and there is the potential for significant effects on remaining historic landscape character.

During operation of an expanded Heathrow, noise levels may change for several historic buildings and landscapes resulting in the potential for significant effects:

- To the east of the airport: the Royal Botanic Garden World Heritage Site at Kew, Chiswick House, Syon Park, Richmond Park, Osterley Park, Richmond Terrace Walk and Terrace and Buccleuch Gardens (Grade II) ;

- To the west of the airport: six Registered Historic Park and Gardens of the Royal Estate Windsor, and two those at Eton College and Ditton Park

## Environmentally Managed Growth

- 19. Please tell us what you think of our proposed approach to manage the future growth of the airport within environmental limits. Is there anything else we should consider as we develop the framework and its potential limits?**

### Key points for responses

There are no genuine enforceable limits set out, either for air pollutants or greenhouse gases. How can Heathrow be held to account without them?

The proposed Independent Parallel Approach is likely to cause very serious noise and health issues since it inflicts noise upon both sides of the airport at the same time. Respite is therefore likely to be further diminished.

There should be stricter controls and fines imposed for breaches of the night time curfew.

There should be independent oversight of the noise monitoring and complaint handling process.

## Community Fund

- 20. Please tell us what you think about our proposals for the Fund, including what it is spent on, where it is spent, and how it should be funded and delivered.**

### Key issues for responses

This fund should be significantly larger.

It should be administered by an independent body consisting of local councillors and community representatives.

The fund should be spent on genuine world class mitigation.

There should be a dedicated proportion of the fund allocated to local schools.

## Property and Compensation

**21. Please tell us what you think about our interim Property Policies, including our general approach to buying properties and land and our approach to compensation, including our discretionary compensation offers.**

**Key points for responses**

Loss of 300 businesses

Poor compensation for business owners

Inadequate compensation for renters

No plan to identify areas where those residents who will have to be relocated can be housed.

No contribution to local authority budgets to address housing pressures

**Development Consent Order**

**22. Do you have any comments on what we think will need to be contained in our DCO and do you have any views on anything else the DCO should contain?**

**Key issues for responses**

Final flight paths for with associated noise footprints – across a range of metrics

Assessment of noise impact under a change scenario

Full Health Impact Assessment including costs to health service

**General Comments & Feedback**

**23. Do you have any other comments in response to this consultation?**

Please include any other points here that did not fit in other sections.

**24. Please give us your feedback on this consultation (such as the quality of the documents, website and events).**

- Massive volume of documentation
- Extremely complex and difficult to follow
- Important details buried in Appendices – particularly relating to the PEIR.

- Very limited availability of documentation in hard copy - attempts to charge public who requested these is scandalous.
- The designation 3<sup>rd</sup> runway is misleading. Subsequent consultations should describe this as Heathrow's 2<sup>nd</sup> airport which conveys the scale of the project and operations