

## **Consultation**

Some of the communities we represent were consulted that are further from the airport than others that were not consulted, all underneath the arrival path from the east to the proposed third runway. That means the Department for Transport will not receive back all the comments that it should have and MPs will not be informed by constituents of their views in the quantity that would reflect true opinion.

We consider the consultation to be flawed for that reason. Also, the consultation questions give no opportunity to state that a respondent simply objects to the ending of runway alternation and to expansion with runway 3.

**The London Forum objects strongly to the proposals to increase capacity at Heathrow airport and the ending of alternation of use of the existing runways and we are firmly opposed to the expansion with a third runway, for the following reasons.**

## **Noise**

Many areas in west central and west London would be very close to the flight path of planes approaching a third runway at Heathrow, if constructed. This would expose residents to noise disturbance in areas which, to date, have experienced generally only intermittent disturbance from aircraft joining the final approach to Heathrow at a late stage.

Your analysis excludes most of the areas that will be affected by noise, and applies the test to areas within the 57 dBA contour, and you average out the noise levels over a year, ignoring the disturbance of a plane flying over head. Average levels of noise are irrelevant if it becomes too unpleasant for a household to enjoy their home and garden or individuals are awakened at times they need sleep. Your own ANASE report suggests that 50 decibels is a more realistic figure at which there is significant annoyance.

The third runway is now planned to be longer than originally proposed and that would bring larger and noisier aircraft than those on only short haul routes. That would add to the disturbance.

In your consultation document you claim that aircraft will become quieter in the future, hence the number of people affected by specified levels of noise will not increase significantly. Your proposals seem to ignore the fact that there will be noise disturbance for people living, working and trying to learn in areas that have not had that disturbance before.

The implications for schools are serious and teaching will be affected in many of them for the first time. The World Health Organisation sets a much lower level of background noise for children to be able to learn than would be achieved in very many schools without modification to most of their windows. The adaptation against increased noise could cost the owners of buildings a great deal of money and the process could take years.

The current financial difficulties of Ferovial, as reported in the Daily Telegraph on 27th February 2008, may mean they could have problems in committing to all the expenditure, including double or secondary glazing of building near to new flight paths, that the Heathrow expansion will necessitate.

The assumption that airlines will phase out older aircraft, in favour of the quieter ones, is not accepted as an argument for being able to allow almost a doubling of flights annually at Heathrow. In a new period of cut-backs, borrowing problems and recession in some countries the switch by airlines to new aircraft could be delayed.

## Pollution

Aircraft bring significant levels of airborne pollution as well as noise pollution and the effects are serious for global warming when the emissions are in the higher flight paths. We do not accept your assertion that Heathrow could be expanded and air quality near to ground level would not deteriorate. More flights will mean more pollution from aircraft and extra road journeys to the airport. If new aircraft are employed eventually with lower rates of emissions, then this benefit should be used to improve air quality in West London to ensure pollution levels will meet European and UK standards at all times in the years ahead, not used to increase the number of flights at Heathrow.

CO<sub>2</sub> emissions projected for Heathrow will mean that Government targets for reductions in emissions will not be achieved. Aviation could account for 100% of the UK's carbon allocation by 2050 in a climate stabilisation scenario.

The London Forum and its members that we have consulted do not agree with your support for an international emissions trading regime for aviation to ensure that the aviation sector plays its part in tackling climate change. You have not reconciled your twin goals of supporting the economy and tackling emissions. Your proposals seek to reduce emissions and, at the same time, to double the capacity of Heathrow. This is a nonsense and is contradictory. Moreover, emissions trading schemes do nothing for those whose quality of life will be reduced if Heathrow is allowed to expand.

The Department for Transport appears not to be concerned about the potential health problems due to pollution of people living in areas that will be affected by increased road traffic and aircraft noise or considerable aircraft noise for the first time. The aims of the Department for Health for lowering NHS costs should be supported by your department. Additional people affected by noise and pollution may become ill (ashma, stress, distress, etc) costing local businesses and the NHS more than the five billion pound Heathrow return on investment that is planned over the next 70 years.

We note Rod Eddington's comments on users paying for the environmental costs of their journeys, and his proposal that Heathrow should expand. We also note that he was previously the Chief Executive of BA. We also note from papers acquired by Greenpeace under an FOI that BAA and your Department have set up a joint body - the Heathrow Delivery Group - aimed at steering the plans through the consultation process, that BAA officials have written parts of the consultation, that BAA supplied the data for calculations of noise and pollution that inform the premise of the consultation document, and that opposition groups have not been permitted to challenge the data.

A third runway would result in more traffic to and from Heathrow. BAA expect an additional 30m passengers to arrive by road. That would increase the pollution caused by extra vehicles around the airport. It had been expected that the cap on flights at Heathrow imposed as a condition with the approval of Terminal 5 would assist in addressing that problem. The introduction of a third runway would considerably worsen the pollution arising from more traffic, with the attendant adverse effects upon the health of those living along the main routes, many in social housing blocks.

The Government has not initiated, apparently, the negotiations for taxes and charges that would better manage the growth in aviation. It is unreasonable that airlines continue to have around one quarter the cost of fuel compared with other petrol users. The switch from air travel to train travel to reduce pollution and delays is inhibited by the ticket price differences.

A condition imposed with the grant of permission for Terminal 5 required BAA to reduce on-airport parking from 46,000 places and apply a cap of 17,000 spaces for staff parking. Those levels are far too high in a climate change scenario and BAA's reports indicate that progress in their achievement is slow. The journeys associated with that parking are added to the vast number of car and taxi trips every year for delivering and collecting passengers by road that the consultation papers explain.

## **Safety**

We are extremely concerned about the safety of those people living within an area which would be overflowed by planes using a third Heathrow runway and during mixed mode use of the existing runways. The recent accident at Heathrow reminds everyone, including those in your department, of the risk of an aircraft crashing due to aircraft failure or terrorist action over central or west London. Doubling of the number of flights would be very foolish. It has been calculated by one correspondent that on the basis of rate of incidents involving aircraft, a crash on London could be expected on average every twelve years with over 720,000 flights a year at Heathrow.

A major hub airport for London should be sited on the leeward side of the city to minimise overflying and maximise use of prevailing winds.

If a third runway is permitted, it will remove the smaller aircraft from the approach paths to the main existing runways. That would allow the Civil Aviation Authority and National Air Traffic Services to reduce the gap between landing aircraft on the guide slope to those two runways because the vortex problem would no longer apply in a sequence of predominantly large aircraft.

The noise interruptions, the number of aircraft movements and risk of accidents would be increased and the effect will be worse with mixed mode working.

## **Economic case**

We do not accept that expansion of Heathrow is essential to the health of the UK economy. Your consultation document does not provide hard evidence to support that. London thrives because of a combination of location in the time zone, relatively benign regulation (though undermined in the past 10 years), and being a major international city in which it has been pleasant to live. The proposals to expand Heathrow risk harming those benefits and by allowing whole swathes of London to be overflowed they will significantly reduce the attractiveness of London as a place to live and work, and people and businesses will relocate. Your consultation document states that "the financial services sector uses six times more air travel than other businesses". It should be recognised that the sector's employees live in London and, if they find life intolerable you can expect them to go elsewhere to the detriment of London and the country.

Also, there is a proposal to double the number of flights at London City airport and to use larger aircraft there. Air Partner, the business air travel company, is seeking to build an extra terminal at Biggin Hill airport and improve transport links to it. As people in the financial services offices are closer to those airports than Heathrow, your assumptions about increased demand for flights at Heathrow is flawed.

Only 40% of the passengers at Heathrow are business people.

The case for expanding Heathrow is based on forecast increases in air traffic. These are questionable given as they were based on a price of US\$60 per barrel for oil.

Over 35 per cent of passengers landing at Heathrow are just switching planes to fly out again. There is no case for retaining or increasing the number of those passengers, as there is no benefit to the UK.

There are too many flights each week at Heathrow to and from destinations that could be served by train and to and from regional airports that could have more flights to serve the destinations needed by those using them. There is no harm to the UK in people from regions outside the south east travelling by air to other European destinations to connect with onward flights, rather than doing so at Heathrow.

The Minister for Transport has mentioned the rail link HS2 in Parliament. That could reduce air travel between Heathrow, Birmingham and Manchester and should be committed and taken into account.

There is no hard evidence that the UK economy will suffer without Heathrow expansion.

78% of businesses in London oppose the third runway according to the London Chamber of Commerce.

## Summary

The London Forum considers that the further expansion of Heathrow is not justified and would have unacceptable impacts of increased noise and risk, excessive pollution, more road congestion and reduced quality of life of those living, working, attending schools and using open spaces in many parts of London. There are too many flaws in the data, assumptions and interpretations used in the consultation paper and many aspects not fully considered. For mitigation of climate change, unlimited growth of air travel must be curbed by international agreements and there should be UK Government leadership on that.

Yours sincerely,



Peter Eversden

