**Rt Hon Justine Greening MP response to the Airports Commission consultation**

**Opening Broader Comments**

Overall context

My constituency is badly affected by aircraft noise from Heathrow airport. I enclose a large number of emails from my constituents in relation to the consultation, which if not already directly sent in to the consultation I would ask to be taken consideration of as part of it. They overwhelmingly oppose any further expansion of Heathrow.

In addition, I also include my response to the Airports Commission Discussion Paper on noise from 2013, which I would also like to be taken as part of my submission to the consultation. It also sets out my broader concerns about how noise affects my constituency.

Over the years, in spite of the planning condition against a third runway set by Sir Roy Vandermeer[[1]](#footnote-1) on approval of the fifth terminal at Heathrow, we have been faced with a number of similar consultations in relation to aircraft noise, proposals for more night flights, proposals for Heathrow expansion, and now, similarly in relation to the Airports Commission options consultation.

In the meantime, it is clear there has been a breakdown of trust between the airport and the communities around it.

At the public meeting with Heathrow and Heathrow Hub I held in my constituency in November 2014, in responding to residents’ questions, Heathrow Airport Ltd managers said previous promises on mitigating noise from expansion should not have been made to Londoners. They were clear that even the current respite period, which is vital for maintaining the quality of life for local residents, was not guaranteed under their expansion proposal.

Current respite periods are routinely breached by Heathrow and recent Parliamentary statistics showed a significant rise in the number of complaints to Heathrow from local communities about aircraft noise. The consultation notes how unpopular the trial of new flight paths has been[[2]](#footnote-2). The Heathrow expansion plans to use mixed mode runway operations will likely lead to a reduction in the daily respite period as admitted by Heathrow at the public meeting in Putney.

**Heathrow airport cannot grow its way out of being a hub airport that is in the wrong place.** Growing an airport that is in such a heavily residential and busy part of our capital city, is not only disruptive to do, as the consultation document sets out, but it is also significantly opposed by many of the 632,600 people already living under the flight path inside the 54dB Laeq, 16hr noise contour[[3]](#footnote-3). Heathrow expansion would compound the existing, detrimental consequences of our hub airport being in the wrong place, for our infrastructure, air pollution and noise borne by local communities. The third runway proposal is modelled as adding an extra 56,100 people affected[[4]](#footnote-4) under the same noise contour.

However, importantly, the Heathrow Airport Ltd third runway proposal contained in the consultation did not give any clear information about new flight paths if Heathrow expansion was to go ahead, so it is hard for potentially newly affected communities to be clear on the impact of this proposal and respond effectively to the consultation.

The Airports Commission has decided not to make longer term proposals beyond where the next runway in the south east should go. I have discussed this with Sir Howard and he believes it is not possible to decision further into the future because of uncertainty and risks over technology and demand profiles. I believe the risks of not taking clear long term decisions outweigh those risks.

The incremental, “next step” approach being consulted on at present, continues the short-termism and lack of strategic vision to date, which has led to the capacity constraints we see today. That approach has failed to carry the argument to date, leading to no practical progress on delivering new runway capacity. It is because we have not been prepared to step back and take a longer term view that we have systematically failed to confront and deal with the issue of our hub airport being in the wrong place.

The NATS analysis released as part of the earlier Airports Commission work[[5]](#footnote-5) showed that a fourth runway at Heathrow would lead to an overall decrease in airspace capacity over London due to crowding out the airspace for flights landing at other London airports further east. I believe we should tackle that looming issue now rather than putting our heads in the sand, and leaving it for future generations to deal with.

The “short-termista”, siren voices, generally and understandably self-interested, will continue to advocate expanding Heathrow. Though expansion might feel like a step forward, in reality it is a step further down the aviation cul-de-sac we are already in and away from a long term aviation strategy, to the significant cost of future generations.

The shortlisted options only give one option, Gatwick, that avoids going further down the aviation cul-de-sac and avoiding the step backward. According to the Airports Commission analysis, expanding Gatwick is less disruptive to the strategic road network, affects a fraction of people with extra aircraft noise (24,600 under the 54dB Laeq,16h noise contour[[6]](#footnote-6)) compared to Heathrow expansion (491,900 under the same contour[[7]](#footnote-7)), and adds competition. However, it is not a substitute for the longer term aviation strategy that Britain so badly needs. It could provide the competitive capacity stop-gap whilst we finally devise that long term strategy.

See below the answers to the Airports Commission Consultation questions.

**Responses to consultation questions**

It is concerning that additional analysis was published and added to the consultation by the Airports Commission during the consultation period itself with the latest documents added on 23rd January, 2015. It meant that people submitting arguments before had no chance to see the extra analysis and those yet to submit had far less time than the overall consultation period to review the new data.

**Q1: What conclusions, if any, do you draw in respect of the three short-listed options? In answering this question please take into account the Commission’s consultation documents and any other information you consider relevant. The options are described in section three.**

The Airports Commission work shows that the costs of the two Heathrow options far exceed the third Gatwick options, whether:

* Financial;
* surface access investment required;
* increased numbers of people affected by aircraft noise with those affected by Gatwick expansion (24,600) being a fraction of those affected by Heathrow expansion (491,900);
* environmental

In terms of benefits, all three options have modelled economic benefits, although the benefits of Gatwick do not seem to include sufficient assessment of the likely economic corridor effect of an expanded Gatwick, running from central London, via Croydon to Gatwick, and then further south towards Brighton and the South Coast.

**Air Pollution:** A further issue that is given insufficient weight by the consultation is the issue of air pollution in the West London area. The UK is already in breach of EU air pollution limits in this area, with detrimental effects on residents. The Commission’s analysis[[8]](#footnote-8) is clear that mitigation of road traffic emissions may be required along the A4 and M4. Under the previous third runway proposal this included congestion charging measures for HGVs and older high emission vehicles. To place a congestion charge on two parts of the key strategic road network would place a high cost on non-airport traffic in the area.

I note that the details submitted by HAL claimed a significantly lower pollution impact than that modelled by the Commission[[9]](#footnote-9) and that the data submitted by the Northern Runway extension proposer was limited in its assessment of pollution impacts[[10]](#footnote-10). The Airports Commission is right to highlight air quality as a key risk[[11]](#footnote-11).

**Aircraft Noise:** On the issue of aircraft noise, there is scant information in the Airports Commission consultation about the likely new flight paths that the two Heathrow expansion options would generate. Neither Heathrow proposer has provided any concrete details on flight paths, but more flights will mean more noise and more residents affected. It is hard to understand how the Airports Commission can rate all the options as simply “adverse” when the scale of impact it assesses across the options, is so completely different between expansion at the two sites, with the Gatwick option affecting a fraction (5% or 1 in 20 people) of those affected by Heathrow expansion.

I would also question how rigorously the Airports Commission can have assessed the viability of the mitigation options that the Heathrow options are proposing that enable its claims of lower noise. They reduce the numbers of people assessed in the 54 dB contour by 196,800[[12]](#footnote-12), or 50%. In particular, one proposal for different flightpaths for planes landing into the airport has never been made before, in spite of the longstanding debate on excessive aircraft noise. That and other proposals are simply not within the gift of Heathrow Airport Ltd (HAL) to deliver without significant work from aviation regulators. In addition, the technology shift assumptions that are used by HAL and drive lower noise are not adequately justified.

A third runway will mean a new flightpath and new communities affected by aircraft noise under the flightpaths, including potentially Roehampton and West Hill and Southfields in my constituency which are currently less affected than East Putney, West Putney and Thamesfields wards.

Combined with the issues of EU Air Pollution breaches, the Airports Commission analysis in these areas seems overly optimistic. It should have contained more analysis in relation to the ‘most likely’ version of the options and I would like to see this sort of far more detailed analysis in the Commissions considered response to the consultation.

It is concerning that hundreds of thousands of Londoners currently not under any flightpath, but who may be badly affected by noise under the Heathrow expansion proposals, will have not realised they would have wished to respond to the Airports Commission consultation with concerns.

Turning to particular and additional points in relation to each of the shortlisted options:

**Heathrow Northern Runway Extension proposed by Heathrow Hub:**

This proposal would lead to the only major airport runway used in this way, of its kind in the world. From questioning at my November 2014 public meeting, as I understand it, the runway would have planes simultaneously landing at the eastern end whilst taking off at the western end.

Aside from the hugely disruptive work required to build the extended runway, the lack of detailed operational analysis provided by the proposers meant there was little reference to the mitigation of any safety risks with this Heathrow expansion proposal.

From my discussions with industry experts, it is not clear to me how the risks of an incoming plane aborting a landing on the eastern end and having to ascend, continuing the flight westerly, would not be excessively high for those planes on the western end taking off (into the path of the aborted landing plane) or to a lesser extent standing awaiting taking off. The Airports Commission analysis had no assessment on this operational scenario and safety risk.

Similarly for a plane experiencing difficulties on landing, unable to control or break, the industry expert I consulted with raised a question as to the risks to planes standing awaiting takeoff, or in the process of taking off.

These seem to be basic safety risk issues, set alongside its costs and other delivery and infrastructure challenges. I would urge the Airports Commission to carry out the necessary detailed operational assessments.

The inclusion of this option, one used by no other major airport in the world, because of its complexity of operation and likely safety risks to mitigate, highlights the extreme problems associated with attempting to expand Heathrow, and the lack of viable expansion options.

There are local impacts for my own community in relation to this option that I would like to highlight require more work. Because the extended runway would need a necessarily complex arrangement for running the northern runway safely – essentially operating it as two shorter runways, the previous analysis carried out under the former government’s proposal for a third runway at Heathrow suggests that larger planes requiring a longer runway would be disproportionately used on the south runway meaning larger, noisier planes in the southern runway approach flightpaths which are over my local community. This granularity of operation has not yet been reflected by the Airports Commission modelling in its noise mapping but it is important that this work is carried out.

**Heathrow North West Third Runway proposal by HAL**

Alongside the Northern Runway extension proposal, the Airports Commission consultation shows both Heathrow options delivering fewer extra air traffic movements than the Gatwick proposal. In addition the Airports Commission seems to assesses the third runway proposal will lead to fewer extra seats to emerging market routes opened up than the Gatwick expansion proposal[[13]](#footnote-13).

A third runway will mean a third runway flightpath, which alongside a broader reconfiguration of how to cope with additional air traffic movements when Heathrow goes from two to three runways, means our local 8 hour period of respite is not guaranteed by HAL. The inability of HAL to confirm existing respite periods was explicitly confirmed publicly at the meeting in Putney in November 2014. Current respite periods are absolutely vital to our local quality of life. They are already routinely breached by Heathrow with minimal fines or sanctions on aircraft operators which is totally unacceptable.

In addition, as set out by Wandsworth Borough Council in its response to this consultation, any increase in night flights would be entirely unacceptable. Major airports such as Frankfurt have night curfews to allow residents’ a good nights sleep and so should Heathrow. The options set out previously by the Airports Commission to have more early morning flights would be unacceptable to local residents. If early morning flights are strategically important then they would be better landing at an airport that is not surrounded by a heavily residential area.

As the 2M Group of local councils opposing Heathrow expansion have pointed out, the level of rehousing and resettlement needed with the Heathrow third runway option would be the largest since WW2. Again, this is symptomatic of trying to shoehorn extra Heathrow capacity into a space it simply cannot fit.

**General Heathrow Expansion options comments:**

The additional passengers and need for improved surface access to an expanded Heathrow will be extremely costly and disruptive to build as consultation document sets out. When the last government proposed a third runway at Heathrow congestion charging options on the M4 were modelled as potential ways to reduce congestion and pollution.

Although Heathrow has an excellent safety record, we are reliant on origin airports in part for planes landing at Heathrow, coming in over my own and many other communities. My constituents regularly raise concerns in relation to the safety of having even more flights landing over such densely populated urban areas. Our concerns are that as more runways are added the complexity of the air traffic control only increases. Safety should be a primary concern of the Airports Commission, rather than something to be addressed at a later stage.

**Q2: Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in section three.**

The Gatwick option requires more work done by the Airports Commission on the economic benefits generated from expansion. In particular the potential for a strategic economic corridor from central London moving south towards Croydon, mirroring the M4 corridor, has not been adequately factored into the economic appraisal.

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

The appraisal process involved additional detailed work carried out on all aspects of the options that are shortlisted and consulted but it failed to update the 30 year old approach on assessing the levels and impact of noise annoyance. This is a point I raised in my previous submission to the Airports Commission in response to the Noise Discussion Paper. Because of this issue, the Airports Commission should have done more advance work to properly understand community concerns than has done, and this should have been carried out as part of the work to develop the consultation on the shortlisted options. Work should have been done to directly survey and meet a wide spread of the communities affected by aircraft noise and expansion at all the shortlisted options, as part of the preparatory work for the consultation, rather than simply being left as something to be considered once the consultation was underway.

It would have enabled the commission to provide a more informed, systematic assessment of the impact of aircraft noise in the consultation, rather than purely depending on the responses to the consultation.

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

Already covered elsewhere in the response

**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?**

Already covered elsewhere in the response

**Q6: Do you have any comments on the Commission’s sustainability assessments, including methodology and results?**

In relation to the noise baseline work, in its conclusions[[14]](#footnote-14) on the North West Runway option, the Commission rightly points out that HAL have used over optimistic assumptions on fleet mix improvements which then gives a noise baseline that is better, less noisy than that which is likely. It is possible that the Commission’s assumptions on fleet mix improvements themselves still remain over optimistic. The consequence is to provide an overall picture of the noise impact of the proposal that is overly positive because the underlying baseline, as reduced by fleet mix improvement assumptions is more optimistically rosy than it should be.

Even so, by 2050 when the Heathrow third runway is fully operational it will add a further 56,100 people to the 54dB Laeq16 noise contour even after assumed noise/technology improvements which may well be overoptimistic.

The Gatwick proposal’s assessment of noise impact seems to model the basic impact of the second runway, with little by way of other mitigating fleet mix assumptions as the Heathrow proposers have made.

**Q7: Do you have any comments on the Commission’s business cases, including methodology and results?**

Already covered elsewhere in the response

**Q8: Do you have any other comments?**

The Airports Commission has provided a set of three shortlisted options for a solution to where the next runway adding capacity in the South East should be situated. I do understand that the Commission believes that it is not possible to meaningfully project forward with any certainty beyond this point. However, given the UK’s island status, the growth of emerging markets and the more general demand side dynamics, combined with continued potential structural shifts on the supply side model of aviation, both in relation to aircraft design and competition, the downside risk of having no long term aviation strategy at all would seem to outweigh the risk of at least having a strategy but one that was not perfect.

**Justine Greening MP**

**Putney, Roehampton and Southfields**

**February, 2015**

1. Describing a third runway: “would have such severe and widespread impacts on the environment as to be totally unacceptable” [↑](#footnote-ref-1)
2. Airports Commission: Heathrow North West Runway: Business Case and Sustainability Assessment, 4.20, p79 [↑](#footnote-ref-2)
3. Airports Commission supporting document - 5 Noise: Local Assessment, Jacobs Table 4.1, p81 [↑](#footnote-ref-3)
4. Airports Commission supporting document - 5 Noise: Local Assessment, Jacobs p87 [↑](#footnote-ref-4)
5. “Fourth Runway at Heathrow would block flightpaths”, The Times, 10, March 2014 [↑](#footnote-ref-5)
6. Airports Commission supporting document - 5 Noise: Local Assessment, Jacobs Table 3.8, p17 [↑](#footnote-ref-6)
7. Airports Commission supporting document - 5 Noise: Local Assessment, Jacobs Table 4.8, p85 [↑](#footnote-ref-7)
8. 6. Air Quality: National and Local Assessment, p62, and, Heathrow North West Runway: Business Case and Sustainability Assessment, 4.26, p80 [↑](#footnote-ref-8)
9. 6. Air Quality: National and Local Assessment, p57 [↑](#footnote-ref-9)
10. 6. Air Quality: National and Local Assessment, p73 [↑](#footnote-ref-10)
11. Heathrow North West Runway: Business Case and Sustainability Assessment, 4.28, p81 [↑](#footnote-ref-11)
12. Airports Commission supporting document - 5 Noise: Local Assessment, Jacobs Table 4.5, p83 [↑](#footnote-ref-12)
13. Heathrow North West Runway: Business Case and Sustainability Assessment, 1.23, p15, assessing 6-9 million extra seats vs Gatwick Airport Second Runway: Business Case and Sustainability Assessment 1.21, p14, assessing 9 million more seats [↑](#footnote-ref-13)
14. 5. Noise: Local Assessment, p205 [↑](#footnote-ref-14)