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Heathrow Airport Expansion Consultation: The London Borough of Southwark Consultation Response

Southwark Council strongly opposes the proposal to expand Heathrow airport on the basis that the expansion is environmentally damaging and unsustainable and will be detrimental to the environment and the health and quality of life of both London and Southwark residents.

The impact of Heathrow Airport is already considerable with around 25% of all people adversely affected by aircraft noise across Europe living in the region of Heathrow and the majority of west and central London already exposed to noise levels above the WHO Environmental Noise Guideline target of 45dB LDEN. The Authority considers that this location is fundamentally unsuitable for further expansion.

Aviation noise causes a loss of amenity, disruption and annoyance to millions of people across Greater London. The stress resulting from long term noise exposure to aircraft noise leads to increased incidence of long term health effects including hypertension, acute myocardial infarctions, strokes and dementia. Aviation noise also reduces reading comprehension and recognition memory in schoolchildren with a 5 decibel increase in exposure being shown to correspond to a two month delay in reading age among UK pupils. Aviation noise at night and in particular during the early morning period causes sleep disturbance which leads to reduced work outputs and work quality. The health and social consequences of these effects will place an extra burden on the local services providing support to those affected, when such services are already under strain.

When aviation emissions are accounted, Heathrow Airport is the single biggest emitter of Carbon Dioxide in the UK and this proposal causes significant further increases in aviation emissions both in absolute terms and as a proportion of total UK emissions, significantly contributing to the climate emergency. The economic case for expansion fails to account for the external costs which will be borne by communities, the environment and other service providers.

With Heathrow Airport already causing such disproportionate effects there is an urgent need to reduce its current impact as quickly as possible. Instead, this proposal absorbs the future noise gains from anticipated improvements in aircraft technology and procedures and uses these gains to facilitate further expansion that will expose residents to over 280,000 additional aircraft movements each year with 25,000 additional flights a year before the 3rd runway is even constructed. Regionally, the proposed expansion will leave over 1 million people suffering an adverse effect from noise by 2050 with government figures suggesting 653,900 will suffer a significant effect over 54dB L_{Aeq} 16 hour. CAA figures suggest 2.2 million people will suffer some extent of noise increase. The Transport Select committee found 323,684 people will be newly adversely affected by noise. Precise figures will remain unknown until well after the scheme is approved as Heathrow have not been able to commit to a specific airspace design to inform this stage of the DCO application.

Within the London Borough of Southwark the Preliminary Environmental Information Report finds a significant effect with up to 66,900 people during the daytime and 42,400 people during the night time being newly exposed to aircraft noise above the lower observed adverse effect level as a result of the DCO project in comparison with the 2 runway baseline. Furthermore the effect levels used do not sufficiently account for the impact of an increase in overflight without consequent increases in average noise level, the added impact of people newly exposed to noise sufficient to wake them during the crucial early-morning and night time periods, or the number of people exposed above the level of 45dB LDEN recommended by the WHO.

The predicted scale of effects used in the consultation are measured against a 'do minimum' scenario which assumes many of the mitigation measures to reduce impacts would not take place in the absence of expansion. This serves to artificially reduce the future impact from the DCO scheme described in the PEIR by comparison to what could be achieved with stronger controls and a concerted focus on noise reduction from a two-runway Heathrow Airport.

Whilst it is clear from the PEIR that the impacts are unacceptable, the consultation does not give any specific detail about exactly where these impacts will fall as no flight-path detail is provided. This makes it impossible to understand the likely impact on specific areas or groups of residents. It is concerning that the PEIR does not assess the worst-case impact when flight path design is complete. Furthermore, in the event that the DCO is granted there is no requirement that the eventual flight path design relates closely to the indicative flight paths used to gain DCO approval.

The consultation does not account for the cumulative effects of the Heathrow expansion with those arising from current or expanded operations at London City Airport. The Authority considers it is crucial that cumulative impacts are properly considered in the Environmental Statement submitted with the DCO application.

The Noise Envelope

The Authority supports the principle of an enforceable noise envelope; however, the consultation makes clear that the proposed noise envelope will not be detailed at the time of the DCO application as the Airports NPS requires the DCO application to base its assessment of the likely significant effects of expansion on indicative flight paths. A Noise Envelope proposed for the DCO application '*cannot commit to limiting noise over a defined geographical area or a specific contour shape*' and therefore offers very little reassurance to communities that may be adversely affected.

The PEIR states the noise envelope will use a contour area cap and a QC limit. The Authority considers that this is unlikely to be sufficiently protective. It is made clear that QC limits are being designed to '*share noise reduction and growth*', confirming an explicit policy of depriving residents of future anticipated noise reductions in order to facilitate the airport's growth. The Authority considers that the noise envelope would need to incorporate the number of significant overflight events via a metric such as N60 in addition to use of average noise metrics. It would also be important that the envelope is reviewed at sufficient

intervals and that the independent scrutiny panel has strong powers to enforce compliance. It is essential that the noise envelope is defined by a single mode contour.

Night Flights

Night flights (in particular early morning arrivals) are a key source of concern and complaint from Southwark residents. Whilst the Authority viewed the 6.5 hour 'night flight ban' detailed in the recent Airports NPS as insufficient, it was welcomed as a limited improvement by comparison to the current situation. However, this consultation details that the proposed 6.5 hour night flight 'ban' will in fact only apply to scheduled flights and allows a 'recovery period' from 23.00 to 00.00 when aircraft may still land. Furthermore the 05.30 first arrival time means a touchdown time on the runway of 05.15, with the aircraft approaching over Southwark prior to this. It is the Authority's view that this does not amount to a 6.5 hour ban as mandated by the NPS. The 'ban' still allows flights at the most sensitive time of the morning when aircraft will wake residents on approach shortly after 5am. The proposal to use fines and the QC system to ensure that only the quietest aircraft land at the most sensitive times is welcomed in theory; however, the Authority notes that no detail or firm commitments on the specifics of this proposal are provided. It is not clear that this system will be designed to be sufficiently effective or whether it will be sufficiently detailed and enforceable in any DCO application.

Noise Insulation Arrangements

The Authority considers that proposed noise insulation policies do not go far enough and fail to cover the external cost to our communities of expanded operations. Specifically the outer zone only provides for people in the 57dB LAeq (16hr) or the annual average 55dB Lden noise contours. Evidence for aircraft noise annoyance shows community impacts from 51dB LAeq (16hr) and 45dB Lnight and this accords with our own record of residents' aircraft noise complaints. It is considered that insulation policies should have some level of provision available to people affected above the lower thresholds. Mitigation policies should also make allowance for situations where people experience significant increases in noise outside of the noise envelopes and for those who can reasonably justify special circumstances that adversely affect their individual sensitivity, for example medical conditions, shift and night workers, etc. Lessons could be learnt from the principle of the Thames Tideway Tunnel scheme Independent Compensation Panel in this respect. The Authority welcomes the use of single-mode when assessing insulation entitlement.

The Authority does not agree with the proposal to phase provision of insulation so that the outer zone is left without mitigation until after the expanded airport is operational. This may lead to unacceptable delays for residents who have to wait for an undefined period of time whilst they experience adverse effects from the expanded airport before they will be eligible for mitigation. With sufficient resource it would be possible to open all mitigation schemes simultaneously, at the earliest opportunity after consent is granted, without needing to prioritise one mitigation zone over the other.

Surface Access Regional Effects

The aspiration to secure no net increase in airport related highway trips is welcomed, however, it appears to be a clearly unachievable target. This would require an overall increase of sustainable mode from 39% to 66% accommodating 150,000 extra daily trips by sustainable modes. This requires both a significant penalty for surface access via private vehicle and a huge increase in public transport routes and capacity to provide alternative access strategies. Neither of these factors is convincingly detailed in the consultation. According to TfL and Airports Commission analysis, the proposed surface access charge is not set at a level to ensure sufficient behavioural change. Vital rail links such as the Southern and Western Rail Access schemes remain uncommitted and unfunded. Instead heavy reliance is placed on existing rail schemes not designed for this purpose and unrealistic assumptions are made over backfilling of taxis, new unfunded coach routes, uncommitted bus infrastructure and an unrealistic Heathrow Express fare. The highways model used is not WebTag compliant and the assumptions made are opaque.

There is no demonstration that the proposed ULEZ will accrue benefits beyond that which will already be in place as a result of the central London ULEZ and as such it appears to be little more than a revenue-raising scheme. The revenue from the ULEZ and surface access charges appears to accrue to Heathrow profitability rather than being ring-fenced for sustainable surface access. The parking strategy appears to strongly incentivise car use by placing huge new public car parks directly accessible from the motorway. The parking reduction promised is made almost entirely off the backs of staff, who suffer large cuts in parking provision, many of whom are less able to afford the consequences than the average airport user and who are most likely to work in sites away from the terminals and thus in the locations where public transport options are less available. These factors risk unsustainable increases in road traffic which will have knock-on regional effects on the London road network and cause wider overcrowding on public transport with the potential to impact Southwark and other Western and Central London Boroughs.

Air Quality

Whilst the Authority would anticipate that direct air quality impacts from the Heathrow expansion proposed will be low within Southwark, the consultation offers no confidence that the scheme can proceed without causing delay or non-compliance with air quality objectives for the London region. It is noted that the PEIR states that *'Impacts outside of the Core AQO Assessment Area will therefore be dictated by potential changes in the number of airport-related road traffic movements and their associated emissions'*. In light of the Authority's concerns over the unrealistic modelling and undeliverable surface access assumptions, it is considered that the PEIR air quality assessment based on this transport modelling fails to demonstrate compliance with air quality objective limits.

Even where the modelling and assumptions behind the assessment are accepted, the PEIR shows widespread detrimental impacts on air quality, including in areas where the Mayor's and other local policies lead to improvements and in areas where legal limits are otherwise expected to have been met for the first time. In some areas, large impacts are expected that would otherwise have resulted in breaches of

air quality limits were it not for actions of the Mayor and ordinary Londoners. In a similar manner to the noise impacts, 'Environmentally Managed Growth' consumes the past and future gains from successive public air quality management policies in order to facilitate growth of Heathrow. This directly affects the ability of current and future Mayors to deliver their statutory duties on air quality and to reduce the exposure of Londoners to poor air quality.

Carbon Dioxide, Global Warming & Climate Change

The PEIR is keen to state that the DCO proposal will lead to no (net) impact on the airport's emissions and therefore no 'material impact' on the Government's ability to meet climate change targets. In reaching this conclusion a series of mitigation proposals are highlighted including airline efficiency measures, the CORSIA scheme (Carbon Offsetting and Reduction Scheme for International Aviation), and other measures. Many of the measures listed are largely within the remit of airlines and aircraft manufacturers rather than Heathrow Airport itself, (e.g. aircraft design and fuel efficiency, fuel mix, etc.) or are not likely to have a significant impact in the timescale to 2050 (e.g. commercially viable electric aircraft). To the extent that proposals will curtail emissions the measures put forward amount to little more than a summary of existing international, national and industry initiatives and can be achieved with very little dedicated action by Heathrow. The proposals to use offsetting to achieve carbon neutrality are misleading in so far as the benefits of many offsetting schemes are highly contestable. Offsetting for emissions reductions by funding schemes that are needed in any case to meet climate targets does not provide genuine emissions reductions to counterbalance increases from the aviation industry. The only way to reliably reduce the greenhouse gas (GHG) impact of the aviation industry in the timescale required is to limit and reduce the overall size of the aviation sector.

Furthermore, Heathrow's carbon neutrality target itself is absurd given it relies on the exclusion of international aviation emissions from the carbon neutral commitment. The claim to have no impact on the UK's ability to comply with climate targets can only be made because Heathrow does not consider those targets to apply to international aviation emissions.

There can be no doubt that a three runway Heathrow will lead to significant increases in emissions of GHGs which are causing catastrophic global climate impacts. Graphic 9.7 in the PEIR Chapter 9 indicates the DCO scheme (including aviation emissions) leading to an increase of around 8 million tonnes of CO₂ equivalent each year by 2050 and even larger increases in the period 2025-2040.

The climate impact of aviation is highly inequitable with 70% of all flights being taken by 15% of the population, weighted heavily towards those with the greatest income and wealth and with the majority of the population taking no flights in any given year. The Authority believes that expansion at Heathrow is incompatible with the UK's obligations under the Paris Agreement and should be refused. CAA airport data shows millions of passenger journeys each year take place from Heathrow airport to short haul destinations in Northern and Western Europe which are within easy reach by international rail. For example, in 2018 1,250,771 passengers flew from Heathrow to Paris Charles de Gaul, releasing at least 137,585 tonnes of CO₂

equivalent on one-way trips on this route alone^[1]. This situation is wholly unsustainable. The focus must now be on measures which could immediately reduce the demand for aviation and reduce the environmental impact of the aviation sector in a sustainable and more equitable way.

For all the reasons above the Authority considers that permission to expand Heathrow Airport should be refused.

^[1] Conservatively assuming all passengers are in economy class emitting 0.06 tonnes of CO₂e per passenger and using DEFRA's recommended radiative forcing factor of 1.891 to equal a total of 0.11 tonnes CO₂e per passenger.