

L.B. Lambeth Response to DfT Consultation: Adding Capacity at Heathrow Airport (27 February 2008)

Question 1. Do you agree or disagree with the proposals that a third runway at Heathrow, if built, should be supported by associated passenger terminal facilities? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

Council response:

The council disagrees strongly with the proposals to build a new 3rd runway with associated passenger terminal facilities.

The Council's reasons relate mainly (but not exclusively) to the adverse environmental impact that an expanded Heathrow airport will have on a large number of the borough's residents. A significant part of the borough is already overflowed on a daily basis by aircraft en route to Heathrow. The borough has a shortage of open spaces and in a number of these (Ruskin Park for example) tranquillity has already been destroyed due to the incessant numbers of overflights that occur for most of the year. A 2007 study by consultants Bureau Veritas working for HACAN confirmed the extent of this problem. It is clear that a sixth passenger terminal will permit greater use of the existing runways as well as any new 3rd runway.

The council is also concerned that the consultation contains significant omissions in relation to the impact on traffic and public transport over south west London and the M25. Apart from the provision of the Airtrack link to Waterloo there are no firm commitments or proposals relating to how it is propped to accommodate what amounts to a doubling of the number of passengers travelling by public transport to Heathrow in 2030.

Question 2. Do you agree or disagree with the Government's view on the continuing validity of the environmental conditions? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they.

Council response:

The council disagrees; it disputes the validity of the proposed environmental conditions for noise.

With respect to noise, the results of the latest ANASE study clearly show and the Department for Transport accepts that "people are more annoyed by all levels of aircraft noise than they were in 1985". Figure A9.5 of ANASE shows that even on the most cautious of approaches annoyance is now occurring (at any given level) at least 3decibels lower than with the 1985 ANIS study. The 57decibel contour as the sole determinant of significant community annoyance is effectively out of date.

The 2002 Air Transport White Paper (ATWP) clearly established an expectation that the 2002 57 decibel contour limit (127sq km) would need to be reviewed in the light of emerging developments. There is no evidence that the 57 dB contour benchmark has been reviewed as part of the consultation. The council urges the government to do so before announcing any decisions on future expansion.

The council also believes the noise condition should adopt 2006 as the base year for the assessment rather than 2002. The 2002 contours still included a substantial

element of Concorde operations. Although the contour only reflects 1 Concorde movement a day it was well known that it made a disproportionate impact on the size of the 57dB contour. It is notable how in 2006 the 57 dB contour had shrunk to 118.7sq km from 127km, in the most part due to Concorde being retired from service.

In the absence of any other information either in the ATWP or the consultation document the council cannot find any other reason for the adoption of 2002 as being the base year other than at the time of publishing the White Paper the 2002 contours were the most recent. The council urges the Government to reconsider adopting more recent data. For the reasons set out the 2002 57 decibel contour area can no longer be considered as a stringent limit.

The council is not satisfied that reliance on the use of average mode 16 hr noise contours by themselves can adequately describe the noise impact of these proposals. There is now a mass of evidence from both the Heathrow T5 inquiry and the more recent Stansted G1 public inquiry that sole reliance on average mode 16 hour daytime contours for airport development such as that being proposed is likely to underestimate the impacts and give rise to misleading conclusions. This is particularly the case with the proposal to change the mode of operations to mixed mode. Although a simple switch to mixed mode may not see a significant shift in the overall size of the contour area, the impact in terms of community response is likely to be very different. The council urges the government to reconsider its proposals to introduce mixed mode without a more detailed assessment of the implications.

The council is also concerned to find from the consultation that for some future situations there would be a loss of CDA, resulting in higher noise levels at some locations from Heathrow. Thus although the area within the 57 contour may not be exceeded, the impact at these locations will materially worsen.

Night Flights are of particular concern to the council as they adversely affect many of the borough's residents. The council's specific comments on this issue are provided in answer to questions 10 and 11.

Question 3. Do you agree or disagree with the Government's view on adding a third runway and being able to meet air quality limits without further measures? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

Council response:

The council disagrees with the Government's view on being able to meet air quality limits without further measures. The consultation document is silent on how it is proposed to ensure that air quality targets are maintained year on year. The council is concerned that it like other consultees has not been offered an opportunity to see the "degree of confidence" that can be attributed to the results. There is much uncertainty surrounding the changes in road and aircraft vehicle fleet growth and replacement. The council considers that it would be inappropriate of the government to seek derogation from EU air quality limit values around Heathrow in order to permit airport expansion.

Questions 4 and 5 (part). Do you agree or disagree with the Government's view that adding a third runway is achievable within the noise contour limit of 127 sq km at the indicated levels of air traffic? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

Council response:

The council is not satisfied that that what amounts to a 50% increase in air transport movements (atms) can be achieved for an 8% increase in the size of the current 57 decibel contour. Looking ahead to 2030 the council is concerned to find that the government's noise cap can only be met with the replacement of up to 85% of the current airline fleet by aircraft not yet operating. Even with these optimistic assumptions the outturns are in fact very close to the government's contour limit and if an allowance of 1dB is made for the declared margin of error in the modelling process the noise limits are in fact breached. .

The council notes that the international body which oversees the noise performance of aircraft (ICAO) has not agreed any further reductions in noise standards beyond current 2006 Chapter 4 limits. The consultation document produces no evidence to suggest that ICAO is considering adoption of more stringent noise standards for new aircraft.

Question 5. Do you agree or disagree with the Government's view that mixed mode operations could be introduced within the noise limits set out in the White Paper? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

The council does not agree that mixed mode operations can be introduced within the spirit of the White Paper commitments. As previously stated the introduction of mixed mode will give rise to a materially different impact for communities currently overflown and this does not appear to have been considered.

Runway alternation was introduced in 1972 as a noise mitigation measure to provide communities under the arrival flightpaths with predictable periods of relief. The consultation document makes no attempt to quantify the benefits of runway alternation either in noise or economic cost terms.

Question 6

To what extent would you support the introduction of mixed mode operations a) throughout the day b) limited to specific hours(if so would you support mixed mode between 0600 and 1200 hours? Some other period? Please specify)

Council response:

The council does not support at all the introduction of mixed mode operations.

The council views with concern the claims made in the consultation document that the government does not have any reliable data regarding the extent to which communities under the Heathrow flightpaths value runway alternation, provided by segregated mode operations. There is in the council's view ample evidence collected over the years to confirm that runway alternation is highly valued by communities currently overflown.

Runway alternation was introduced in 1972 expressly for the purpose of providing predictable periods of noise respite for communities under the Heathrow flightpaths. This was confirmed by former transport secretary Chris Mullin who informed parliament "The current pattern of use of Heathrow's runways has remained unchanged since the 1970s and is largely determined by three operational noise

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mitigation measures.” Mr Mullin confirmed that “The third measure is runway alternation, which was introduced in 1972. It applies during westerly operations only. Westerly landings use one runway from 7.00 a.m. until 3.00 p.m. and switch to the other runway from 3.00 p.m. until 11.00 p.m. The pattern is reversed each week to achieve a fairer balance. Its purpose is to provide communities east of the airport under the final approach tracks with predictable periods of relief from the noise of landing aircraft”.

Locally this concession is known to be valued particularly at weekends and during the evening when people are more likely to be at home. A recent (2006) poll carried out by ICM Research on behalf of Mayor of London found that 74% of Londoners living under the Heathrow flightpaths said that getting a break from constant aircraft noise was important to them.

The Inspector at the Airport Inquiries 1981-83 was also in no doubt of the value of runway alternation “I gained the firm impression that, of all the measures in force at Heathrow, the loss of this mode of operation and the prospect of increased night flying were the most feared. The benefits were not disputed.” (Chap. 7, 7.18)

If you support additional movements, in what periods of the day do you think they should be provided?

N/A

What are your reasons for these answers? Are there any significant considerations you believe need to be taken into account? If so, what are they? Please provide evidence where you can (e.g. environmental impacts, business benefits)

Council response:

Please see above

Question 7. Do you agree or disagree with the Government’s view that full mixed mode could be introduced by 2015 and be compatible with compliance with the air quality limits in the vicinity of the airport? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

Council response:

The council does not agree that the government has demonstrated sufficient confidence in being able to meet air quality limits with full mixed mode operations by 2015. The consultation document fails to provide any sensitivity results to show what degree of confidence is possible in the prediction. No risk assessment is presented in respect of the highly optimistic assumptions that have been made about future road and aircraft fleet replacement. The council believes that the government should clearly spell out how it would ensure that the future rolling annual average limit for Nitrogen Dioxide is not exceeded in the event that a third runway is constructed..

Question 8. Do you agree or disagree with the Government’s views on retaining westerly preference? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

Council response:

The council agrees that a move away from westerly preference would be an overall worsening in noise climate around Heathrow and therefore the council agrees that

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that there would appear to be little to be gained overall by changing the current arrangements.

Question 9. Do you agree or disagree with the Government's proposal to end the Cranford agreement? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

Council response:

The council disagrees with the Government's proposal to end the Cranford Agreement. Abolition of the Cranford agreement will facilitate the introduction of true mixed mode operations at Heathrow which the council objects to for the reasons stated at questions 5 and 6 above.

Question 10. Do you agree or disagree with the Government's views on continuing night time rotation? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

Council response:

The council disagrees with government's views on night flying at Heathrow. Lambeth residents continue to complain that their sleep is regularly disturbed from 4 am.

The council does not agree with the statement contained at paragraph 2.7 of the consultation document which states "Night Flights at Heathrow are strictly controlled between 23:00 and 07:00 hours, including limits on the permitted numbers and total amount of noise (noise quota) in the night quota period (23:30 to 06:00)".

Whilst it is indeed the case that there are controls on numbers of aircraft in the night quota period there are virtually no controls in the shoulder periods 23:00 – 23:30 and 06:00 to 07:00 hrs other than a theoretical restriction on the noisiest types of aircraft that no longer operate at Heathrow.

The council is disappointed that the consultation document does not clearly spell out to consultees the fact that a third runway will bring opportunities to increase the numbers of night flights. It is envisaged that total movements in the 8 hour night period are expected to rise from around 75 currently to 96, an increase of around 28%.

The council is further disappointed to find that the above information can only be gleaned by reference to a companion ERCD report (0705) which is highly technical and not easy to understand. Paragraph 7.9 of the ERCD document further reveals that "the night time contour area would be comparable to the current area, although it is recognised that more detailed analysis would need to be undertaken to verify this". The council is very concerned that this detailed analysis has apparently not been undertaken as it is clear that there will be more movements overall in the 23:00 to 07:00 period.

Within the context of the above concerns the council agrees that it would seem to be sensible to continue with the concept of night time rotation in order to distribute night noise impact around the airport, even though for the years 2003/4 and 2004/5 the percentage of westerly landings was more than twice the numbers of easterlies. In practice the scheme is not delivering its declared aim. .

Question 11. Do you agree or disagree with the Government's view on continuing runway alternation in the 0600 to 0700 period? What are your reasons? Are there

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any significant considerations you believe need to be taken into account? If so, what are they?

Council response:

Although the council does not agree with the Government's night flights policy alternation between 06:00 and 07:00 hrs period does provide some relief for communities under the approach flightpaths.

ENDS