



Caroline Russell AM

Chair of the Environment Committee

City Hall
The Queen's Walk
London SE1 2AA
Switchboard: 020 7983 4000
Minicom: 020 7983 4458
Web: www.london.gov.uk

15 August 2019

Heathrow Airport Expansion Consultation

(via email)

This letter gives the cross-party London Assembly Environment Committee's response to Heathrow's consultation on the proposed airport expansion plans.¹

The London Assembly's opposition to the expansion of Heathrow Airport is long-standing.^{2 3} The Assembly passed a unanimous motion to this effect in June 2018, stating that: "The Assembly believes that many fundamental issues remain unresolved about the expansion of Heathrow airport. The Assembly therefore wishes to reiterate its long-standing opposition to a third runway at Heathrow airport and the Assembly resolves that, in the light of its fundamental objection to this, we will campaign to prevent its implementation."⁴

Heathrow Airport's new runway proposal would enable it to grow from around 475,000 to around 740,000 flights a year. The proposed expansion will have an impact on air quality, noise pollution, and carbon emissions. In light of this, the Committee reiterates its position that **air traffic using Heathrow should not increase, and the proposed third runway at Heathrow should not go ahead.**⁵ **We are gravely concerned that Heathrow is prioritising the interests of the airline industry and passengers over and above the wellbeing of Londoners.**

This letter outlines the Committee's analysis and position on the following: a) the consultation process; b) noise pollution; c) air pollution; d) surface access; and e) carbon emissions.

¹ <https://aec.heathrowconsultation.com/>

² The Assembly has passed nine motions since 2007 opposing expansion to Heathrow.

³ In relation to the Heathrow expansion, the Assembly's Transport Committee conducted an investigation in 2013, title "Airport capacity in London". In addition to stressing the Committee's position against Heathrow expansion, the report recommends that the Airport Commission investigates whether there is scope to use other airports more effectively to meet capacity demands in London. See report here: https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Airport%20Capacity%20in%20London%20%28May%202013%29.pdf

⁴ <https://www.london.gov.uk/press-releases/assembly/assembly-opposed-to-heathrow-airport-expansion>

⁵ https://www.london.gov.uk/sites/default/files/aircraft_noise_report.pdf

Consultation Process

Heathrow Airport expansion is a large and complex infrastructure project. The consultation must therefore ensure documents are accessible and invite participation from non-technical audiences. The Committee does not believe this has been achieved. The consultation is highly inaccessible to those without the time or inclination to work through several hundred-page documents, and numerous webpages to find information on areas that may impact them.

Additionally, there does not seem to have been any attempt to bring communities together. Rather, the consultation leaves communities advocating for their own interests – especially on noise and overflowed paths – without the mechanisms to engage and propose solutions that aim to reduce the impact equally.

On the issue of accessibility and reach, the Committee heard the following:

“The furthest east of the consultation events is Lambeth, it has not gone further east. There are going to be implications from overflying and also from the impact on surface access for those boroughs. There is a whole swathe of east London that has been completely ignored. With the sheer scale you alluded to earlier on it is difficult for even campaigners who are on the ball with this all the time to get through the large volume of information...If you are looking from a particular community to understand, ‘What is the impact on me, my house or my community?’ you are going to struggle to navigate those documents.” – Paul Beckford, No Third Runway Coalition

Future consultation processes must be accessible to local people and communities, in all areas but especially those overflowed. Further, future consultations should facilitate engagement between communities, so that advocacy efforts do not leave any one community behind.

The Committee also inquired about the process Heathrow would follow to incorporate consultation responses in their plans, especially given that the Committee’s own previous consultation responses on night flights were not adopted. To this, Heathrow commented:

“We have a very broad range of stakeholders we are consulting with on expansion. For as many that have one particular view there is a range of stakeholders who might have the completely opposite view...We have an airline community to whom those early-morning flights are very valuable and we have a passenger cohort who wants to fly and arrive into London at those times of the morning.” – Tony Caccavone, Heathrow

As we have said before, we are gravely concerned that Heathrow is prioritising the interests of the airline industry and passengers over and above the wellbeing of Londoners, who are going to be the most affected by the expansion. We heard that many Londoners are cynical about the consultation process and that Heathrow is aware they have a trust deficit problem. Trust could be strengthened through a strong and independent scrutiny process that can offer Londoners the certainty that expansion interests will not outweigh the health and environmental concerns they have.

At the July meeting, Heathrow stressed that expansion would only go ahead if they kept within environmental limits, and that scrutiny bodies would ensure adherence to these limits. These scrutiny bodies include the Independent Commission on Civil Aviation Noise (ICCAN) and the Heathrow Community Engagement Board. However, ICCAN does not yet have statutory powers or any ability to monitor and hold Heathrow accountable for its performance on noise. The Community Engagement Board, which advised on the best way to conduct the consultation process, is funded by Heathrow.⁶ The Committee is not convinced there is a robust process to ensure proper oversight. **Heathrow must clarify how its scrutiny bodies will hold the airport accountable to environmental limits.**

To improve trust between Heathrow and Londoners, **the London Assembly Environment Committee recommends that the responses of Londoners are prioritised over those of people and organisations with an interest in expansion. We would also like to see these views reflected in actions and plans drafted following the end of the consultation period.**

Noise pollution

Expansion at Heathrow will have a significant impact on noise levels across London. Even with the current thresholds, the number of Londoners disturbed by noise would increase with any new runways or flight paths. The level of disturbance would also increase in response to any changes in the frequency of use of existing flight paths. The Committee's position on noise has been repeatedly outlined on consultation responses, most notably the 2019 Heathrow Airspace and Future Operations consultation,⁷ and its 2019 *Aircraft Noise* report.⁸

The Committee opposes night flights altogether. The Committee has recommended that limits on early morning flights should be retained and preferably strengthened (for example, extending the time of no or very limited flights before 7:00am). However, the proposed expansion plans suggest the ban on night flights would be between 23:00p.m. and 5:30a.m. Heathrow should take account of NHS guidelines on how much sleep children need and consider potential government guidance indicating that less than seven hours' sleep can damage adult mental and physical health.⁹ Given that the greatest impacts on health and wellbeing come from night noise which disrupts sleep, **we recommend that the ban on night flights is reviewed and extended.**

The UK government's guidance accepts the onset of annoyance at 51dB.¹⁰ In the past, the Committee has recommended Heathrow and other airports to follow the World Health

⁶ <https://www.hceb.org.uk/faqs>

⁷ https://www.london.gov.uk/sites/default/files/heathrow_airspace_consultation_letter_-_london_assembly.pdf

⁸ <https://www.london.gov.uk/sites/default/files/aircraft-noise-report.pdf>

⁹ [https://www.nhs.uk/live-well/sleep-and-tiredness/how-much-sleep-do-kids-need/;](https://www.nhs.uk/live-well/sleep-and-tiredness/how-much-sleep-do-kids-need/)
<https://www.theguardian.com/lifeandstyle/2019/jul/13/government-to-issue-sleep-hygiene-guidance>

¹⁰ This is known as the Lowest Observable Adverse Effect Level (LOAEL). It is worth noting, however, that the Government threshold in the National Policy Statement (NPS) is 54dB, which the Transport Select Committee has argued is reliant on averaging methods and at thresholds inconsistent with the Government's general guidance on noise. See:

https://publications.parliament.uk/pa/cm201719/cmselect/cmtrans/548/54807.htm#_idTextAnchor042

Organisation guidelines on noise, which indicate that average noise levels above 45dB are associated with adverse health effects.¹¹

At its meeting on Heathrow on 24 July, the Committee asked Heathrow representatives to indicate the number of people newly affected by noise as a result of the expansion. None of the representatives could provide this figure, despite its relevance to the discussion on noise impacts. Analysis conducted by the Transport Select Committee shows 323,684 people would be newly affected by noise that is above the 54dB limit. An extra 539,327 people would be affected should the threshold of annoyance be extended down to the 51dB level, taking the total number of people in the noise annoyance footprint to over 1.15 million.¹²

The Committee also heard that based on the current proposals, around 44 schools (a total of approximately 25,000 children) in the local area will experience an increase in noise. Evidence suggests that, aside from health outcomes, noise also severely impacts educational attainment, by reducing children's concentration, memory and overall ability to learn.¹³ **The Committee recommends that Heathrow commissions an independent noise impact assessment to better understand the harms of aviation noise and determine an appropriate, evidence-based noise threshold. In addition to that research, the Committee calls for specific, stringent and binding targets for noise reduction, based on lower thresholds of disturbance, as specified by the WHO.** These thresholds account for the need for ventilation, particularly during warmer periods and heatwaves, which are expected to increase in severity and frequency.¹⁴

Further, the threshold for receiving compensation is much higher than that at which individuals can experience the health impacts of noise disturbance (i.e. 54dB). The proposed insulation scheme offers: 1) acoustic insulation to noise sensitive buildings (e.g. schools and hospitals) exposed to levels of noise of at least 63dB; and 2) financial assistance towards acoustic insulation to residential properties exposed to levels of noise of at least 63dB.¹⁵

The Committee heard that a proposed offer of £3000 contribution per household is inadequate to cover the full costs of sound insulation. The proposed plans also suggest that ventilation may be provided on account of warm weather. With increasingly warmer summers, it will be imperative that adequate ventilation is accounted for in all the households affected by noise as a result of the expansion. **The Committee recommends that Heathrow lowers its compensation threshold. Further, open windows should be factored more strongly in the insulation schemes, which should offer the certainty that adequate ventilation systems will be an integral part of the upgrades offered to affected Londoners.**

¹¹ Exposure to noise can lead to auditory and non-auditory effects on health. For example: 1) noise can lead to hearing loss and tinnitus, through direct injury to the auditory system, 2) noise is a nonspecific stressor and has been shown to have an adverse psychological and physiological distress, as well as a disturbance of the organism's homeostasis. Please see: *Environmental noise guidelines for the European region*. World Health Organisation 2018. Available online at http://www.euro.who.int/__data/assets/pdf_file/0008/383921/noise-guidelines-eng.pdf?ua=1 accessed 11 June 2019. The measure of average noise used is the Lden measure, which averages noise across the Day, Evening and Night.

¹² https://publications.parliament.uk/pa/cm201719/cmselect/cmtrans/548/54807.htm#_idTextAnchor042

¹³ <https://pdfs.semanticscholar.org/b9cc/64b991c3f981bf9e57dcfdd58e68953d41d6.pdf>

¹⁴ <https://www.bbc.co.uk/news/science-environment-46343103>

¹⁵ <https://aec.heathrowconsultation.com/wp-content/uploads/sites/5/2019/04/190329-hep-nip-framework-v3.pdf>

We have long argued that noise from London’s airports must be mapped, monitored, managed and regulated together. More precise air traffic control has the effect of concentrating flights into narrower corridors. This considerably reduces direct overflying for a number of people who were on the margins of less precise flight paths, but it greatly increases it for those who are under current, narrower paths. A London-wide view of noise impacts should therefore inform London-wide airspace management and flight routing – this is currently not being undertaken. Because of the way the airports select flight paths according to weather conditions, parts of London are overflowed by aircraft from at least one of Heathrow and City airports on nearly every day of the year—up to 300 flights per day.¹⁶ Combined with concentrated flight paths, this can leave affected residents without respite and generates some of the worst health impacts.¹⁷

In its proposal, Heathrow indicates it will alternate runways and flight paths to spread the noise caused by additional flights. It has also suggested that new technology will allow aircraft to be quieter. However, the consultation documents do not explain how Heathrow is working with London City Airport in their re-mapping and creation of flight paths. With regards to technology, the Committee heard that the fleet mix that Heathrow has now is relatively new and will be around for the next 25-30 years. This fleet will therefore not incorporate future technological changes that will provide quieter aviation. **The Committee calls for Heathrow to work together with London City Airport, and the Civil Aviation Authority to review and map overlapping flights paths and their noise impacts. This work should aim to minimise and eliminate overlapping flight paths and reduce the severity of noise in non-respite periods.**

Air pollution

Nitrogen oxides and particulate emissions come from aircraft taking off, landing and running engines on the ground, from vehicles and buildings involved in airport operations, and from transport of passengers, freight, materials and staff to and from the airport, particularly by road.

“We know the WHO¹⁸ has declared that outdoor air pollution is in the same category as smoking for causing lung cancer.” – Jenny Bates, Friends of the Earth

Heathrow expansion would increase air pollution¹⁹—both in construction and in operation, particularly due to increased surface travel—and that this would harm the health of, and

¹⁶ *South East London: no respite from aircraft noise*, Tim Walker, 2018. Available online at <http://hacan.org.uk/wp-content/uploads/2018/08/No-aircraft-noise-respite-for-London-SE23-August-2018.pdf> accessed 10 June 2019

¹⁷ Impacts in terms of level of noise exposure and associated adverse health effects, as outlined in *Environmental noise guidelines for the European region*. World Health Organisation 2018. Available online at http://www.euro.who.int/__data/assets/pdf_file/0008/383921/noise-guidelines-eng.pdf?ua=1 accessed 11 June 2019.

¹⁸ See:

https://www.who.int/airpollution/events/conference/CAPH1_Parallel_sessions_III.3_3_AP_major_risk_factor_for_cancer_Weiderpass.pdf and [https://www.who.int/news-room/fact-sheets/detail/ambient-\(outdoor\)-air-quality-and-health](https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health)

¹⁹ <https://www.aef.org.uk/uploads/PlanningGuide2.pdf>

increase mortality among, people exposed to increased pollution. However, the Government has said that any increase in pollution from an expanded Heathrow would be acceptable, as long as emissions remain within legal limits—i.e. do not exceed the worst pollution levels in the whole Greater London area.^{20 21} This approach delays the region’s overall compliance with legal limits on pollutant concentrations. Further, that air quality is improved in certain areas of London should not make it acceptable for Heathrow to increase its contributions to air pollution. **The Environment Committee forcefully rejects this “zonal compliance” argument, as it would be illegal and unacceptable to worsen and prolong local breaches in health-based air pollutant concentration limits in places where people are exposed.²² It is also unacceptable to worsen and prolong breaches of health-based guidelines. It is acknowledged that expanding Heathrow would do this.**

Surface access

The London Assembly’s Environment and Transport Committees have expressed serious concern about the lack of planning for improving surface access to Heathrow Airport. The expansion of Heathrow would require significant capacity upgrades on routes to the airport. As well as generating additional passengers, the proposed expansion of Heathrow will significantly increase freight traffic.²³ This increase will have a serious impact on air quality in an area already experiencing high – and potentially illegal – levels of pollution. It therefore also risks negatively affecting local communities as passenger and freight traffic increase on the road network.

At its 24 July 2019 meeting, the Environment Committee heard that Heathrow was required by the Airports National Policy Statement (NPS) to: a) drive up the number of passengers using public transport to 50 per cent by 2030 and 55 per cent by 2040; and b) reduce the number of employees using car trips by 25 per cent in 2030 and 50 per cent in 2040. These objectives are significantly lower than the Mayor’s city-wide modal share target of 80 per cent of journeys being taken by walking, cycling and public transport by 2041. **Heathrow’s targets should be consistent with the Mayor’s Transport Strategy and the draft London Plan, so as to not undermine city-wide efforts on modal share targets.²⁴**

The Committee also heard that the current modal share of public transport passengers accessing the Airport was 40 per cent, which is an increase of 1 per cent compared to the modal share in 2009 – that is an increase of 1 per cent in 10 years. With another 10 to 12 million passengers travelling to and from the airport, it is difficult to understand how

²⁰ London Assembly Environment committee, [Response to draft Aviation National Policy Statement](#), June 2017

²¹ Department for Transport, [Consultation on Revised Draft Airports National Policy Statement](#), October 2017

²² Environment Committee, [Response to the draft Aviation National Policy Statement](#), June 2017

²³ The Transport Committee heard from Heathrow Airport that, without mitigation, the number of freight trips to the airport is projected to grow by 80 per cent from its current level of 10,000-15,000 per day. The additional business activity around the airport will also create more freight traffic, as the Airports Commission accepted. See: <https://www.london.gov.uk/moderngov/documents/b14970/Minutes%20-%20Appendix%20%20-%20Transcript%20Heathrow%20Thursday%2008-Dec-2016%2010.00%20Transport%20Committee.pdf?T=9>

²⁴ https://www.london.gov.uk/sites/default/files/draft_london_plan_-_consolidated_changes_version_july_2019.pdf; <https://www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf>

Heathrow will deliver a 10 per cent increase in the next 10 years. Based on this evidence, the Committee has no confidence that Heathrow will achieve its modal share targets.

The Committee heard that Heathrow's strategy on surface access relied on infrastructure projects such as Crossrail, High Speed 2, the promotion of Western Rail and Southern Rail, as well as strengthening the bus and coach network. However, the Committee recognises that most of these plans fall outside the governance and financial jurisdiction of Heathrow, with Transport for London and taxpayers ultimately bearing the burden:

"I do not see anything in the plans put out so far that gives me any confidence [Heathrow] can deliver [on the modal share objectives]. They are relying on things that are already existing, Crossrail and the Piccadilly line. Those are designed to cope with the population increase in London, not to cope with the expansion of the Airport...at the moment [rail access] schemes are not in place and if they are not agreed very quickly, there is no chance that they will be open by the time a third runway, if constructed, is open, so there is no way that they will be able to help mitigate some of that increase in passengers." – Paul Beckford, No Third Runway Coalition

Without a clear and detailed understanding of surface access needs, expansion risks creating severe overcrowding on London's transport network, and undermining efforts to encourage modal shift to sustainable transport modes. The London Assembly's Transport Committee has stressed the need for a clear plan in the past, and we reiterate the Committee's **recommendation that decisions are made on precisely what surface access is required, how much it would cost and who would be expected to pay for it. Additionally, we recommend that these more detailed plans include timelines for the introduction and implementation of surface access schemes, and what their contribution to the modal share objectives would be.**

Carbon emissions

The Environment Committee has previously highlighted that the business case for Heathrow does not make sense in the context of the UK's carbon budgeting commitments.²⁵ In June 2019, the Government announced plans to amend the Climate Change Act 2008 to abide by the new, much tougher "net zero" greenhouse gas target by 2050. However, aviation is not currently included in these carbon budgets. Additionally, evidence presented to the Committee suggests the NPS did not include any climate change conditions on Heathrow's expansion.²⁶ There has therefore been no significant motivation for Heathrow to propose plans that strongly address carbon emissions.

Heathrow is the biggest single source of carbon emissions in the UK,²⁷ and based on Heathrow's own analysis, emissions after expansion will be eight to nine million tonnes higher

²⁵ Environment Committee, London Assembly response to National Policy Statement on Aviation, December 2017

²⁶ Environment Committee meeting, 24 July 2019

²⁷ <https://www.aef.org.uk/2019/05/02/cc-c-net-zero-report-well-still-be-flying-in-2050-but-government-can-no-longer-ignore-aviation-emissions-in-its-climate-policies/>

per year than they would have been otherwise.²⁸ This is equivalent to over seven million passenger vehicles driven for one year.²⁹

In its consultation documents, Heathrow highlights that carbon emissions from flights currently make up over 96 per cent of the carbon and greenhouse gas emissions from the airport, with surface access contributing three per cent.³⁰ However, none of the commitments relating to emission reductions significantly address carbon from flights. Proposed plans relating to airplane activity rely primarily on technological improvements. For instance, Heathrow indicated landing fees would be waived for electric planes. However, the Committee also heard that there was no credible evidence that technology would be available sufficiently fast to support and deliver on Heathrow's net-zero carbon objectives:

"We have talked, for example, about technology and electric aircraft. Let us be very clear about that, the Department for Transport and the CCC [Committee on Climate Change] jointly commissioned some analysis on aircraft technology and foresaw no electric aircraft this side of 2050. Therefore this waiving of landing fees is not likely to be a cost that is going to [hit] Heathrow any time soon." – Cait Hewitt, Aviation Environment Federation

Likewise, the Committee heard that reliance on carbon removal technology is misplaced:

"To the extent there are any emissions from aircraft at all, they will have to be balanced by carbon removal. Technologies around that are complicated, expensive and uncertain. It is going to be difficult anyway." – Cait Hewitt, Aviation Environment Federation

Heathrow's proposed plans on carbon emissions, the evidence on the effectiveness of these plans to address the carbon challenge, and the current carbon budgeting commitments for the UK, make it difficult for the Committee to understand how Heathrow can expand while ensuring the Government meets its carbon objectives.

In light of this, the Environment Committee has repeatedly asserted its support for the CCC's recommendation that the Government include all greenhouse gases from all sectors in its new 2050 net-zero greenhouse gas targets, including those from aviation.^{31 32 33} The Environment Committee also agrees that this requirement should be reflected in the revised Climate

²⁸ <https://www.aef.org.uk/2019/07/25/how-can-heathrow-add-50-more-flights-without-impacting-the-uks-ability-to-meet-carbon-targets/>

²⁹ See the following tool from the United States Environmental Protection Agency <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

³⁰ Heathrow, [Topic: Carbon](#), June 2019

³¹ In June 2019, the Government announced plans to amend the Climate Change Act 2008 to abide by the new, much tougher "net zero" GHG target by 2050. Currently, aviation is not included in the carbon budgets and the Committee on Climate Change (CCC) recommended that the UK should not only set a net-zero target to cover all GHGs but also include "all sectors, including aviation."

³² Aviation 2050 position letter

³³ Please note that the Brexit Alliance Group does not accept the premises of the Climate Change Act. The Group supports energy efficiency but does not support artificial carbon budgets.


Change Act and carbon budgets,^{34 35 36} and that future business cases for aviation projects be assessed against realistic carbon policy assumptions, that account for the resulting impacts these projects would have on other airports and sectors of the economy.^{37 38}

As an extension of these recommendations, **the Committee advises that Heathrow strengthens its proposed plans relating to carbon emissions: 1) focusing primarily on reducing carbon emissions from flights (take off and landing and inflight emissions), which as per their own assessments make the bulk of the airport's carbon footprint; 2) assessing the timelines for the introduction of aircraft and fuel technology and the adequacy of these measures for ensuring the expansion does not undermine national carbon emission objectives; and 3) setting out how much carbon each of their carbon offset programmes is due to offset.** Further, in the context of aviation being included in national carbon budgets, **Heathrow should specify how recent commitments to net-zero targets will affect its expansion plans.**

Our concerns about the health impact of noise and air pollution, the inconsistency and lack of planning to facilitate achievement of modal share objectives, and the inability of expansion to support national GHG targets, remain. Based on these, it is difficult to understand the case for Heathrow expansion – and the Committee reiterates its fundamental position that the expansion should not move ahead.

Although we welcome the opportunity to feed into the consultation, the consultation process itself does not allow Londoners to get a full understanding of how the expansion will impact them. We strongly believe that the views of Londoners must be prioritised – and we hope that this response, and the many others you will receive from Londoners, will inform your future actions.

Yours sincerely,



Caroline Russell AM
Chair of the Environment Committee

³⁴ The Brexit Alliance Group does not accept the premises of the Climate Change Act. The Group supports energy efficiency but does not support artificial carbon budgets.

³⁵ The Climate Change Act requires that carbon budgets – five-year caps on the UK's greenhouse gas (GHG) emissions are set on the path to the long-term target to reduce emissions of GHGs by at least 80 per cent by 2050 relative to 1990 levels. In June 2019, the Government announced plans to amend the Climate Change Act 2008 to abide by the new, much tougher “net zero” GHG target by 2050. See:

<https://www.bbc.co.uk/news/science-environment-48596775>.

³⁶ <http://www.legislation.gov.uk/ukpga/2008/27/contents>

³⁷ London Assembly, Aviation 2050 – the future of UK aviation consultation, July 2019

³⁸ The Brexit Alliance Group does not agree with the 2008 Climate Change Act, and thus does not support this recommendation.