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London Assembly Environment Committee

Caroline Russell, Chair

21 June 2018

To London MPs

Via email

Dear Members,

Expansion of Heathrow Airport—noise and air pollution impacts

With the Commons vote on the Government's final National Policy Statement on Heathrow expansion, due on Monday, we are writing today to urge you to put the health of Londoners first and oppose this proposal.

The London Assembly, and successive Mayors of London, have been united in their opposition to expansion for many years. Earlier this month, the Assembly reiterated this opposition in a unanimous all-party vote.¹ There are many reasons, and prominent among these are the impacts on Londoners of noise and air pollution, especially from aircraft and surface transport.

Noise

Noise from aircraft at Heathrow is already a problem. Around 700,000 people are affected by noise from Heathrow, more than three times as many as any other European airport. Aircraft noise particularly affects residents' health (especially because of disturbed sleep from night flights) and their education (especially because of disturbed lessons from morning and afternoon flights).

Three runways will create more noise, and across a wider area, than two. Over 300,000 more people are set to be affected by increased noise. Also respite from noise for areas already affected would be reduced from one-half of the day to one-third.

The Government has made promises about noise reduction, regulation and noise insulation for homes. However, there are flaws with these proposals. The proposed measures for noise

¹ <https://www.london.gov.uk/press-releases/assembly/assembly-opposed-to-heathrow-airport-expansion>

reduction targets do not give enough weight to the frequency of noise episodes and to night noise between 11pm and 7am. It is proposed to target reductions from current noise levels, much of which would have occurred anyway as newer, quieter aircraft come into the fleet. Proposed noise mitigation measures are not to be delivered until up to 20 years after the new runway opens. And the proposed ‘independent’ aviation noise regulator will be anything but independent: it is to be established within the Civil Aviation Authority and with terms of reference, appointment processes and funding set by the Secretary of State. We have made recommendations to the Government about these specific issues, but the root problem is increased and more widespread noise from the extra runway, which can only be avoided by voting against the expansion.

Air pollution

Air pollution is one of London’s biggest public health challenges. It is responsible for thousands of additional deaths per year, impaired lung development in children, and a host of diseases and life-limiting conditions. Reducing pollution levels would reduce this harm. Reduction is also legally required, as nitrogen dioxide (NO₂) limits are breached in many London locations, including Heathrow airport and roads leading to it (particularly the those towards the airport from central London). These breaches are currently projected to continue until 2028. Particulate pollution also breaches World Health Organisation guidelines across London.

The Government’s proposal relies on the effective implementation of measures to bring the real driving emissions of diesel vehicles into line with on-paper emissions standards. This is challenging and controversial in itself—the diesel emissions scandal is well-known, and the Government itself acknowledges the extent to which even the latest diesel cars emit more pollution in real driving situations.² Since the publication of this analysis, findings have continued to emerge of the high real-world emissions of even newer diesel vehicles.³ In addition, the modelling still excludes construction impacts, which could come at crucial times for limit value compliance.

The case for Heathrow expansion also relies on Heathrow-specific measures to reduce air pollution, such as improved public transport links and an ultra-low-emission zone. Without these measures, expansion is projected to worsen pollution by a greater extent, increasing still further the air pollution impact and the likelihood of delaying zonal compliance. It is still unclear how the necessary transport improvements will be delivered and paid for, and the promised cap on airport-related traffic is not to be legally enforceable.

The Government itself acknowledges that Heathrow expansion would increase air pollution – both in construction and in operation, particularly due to increased surface travel – and that this would harm the health of, and increase mortality among, people exposed to the increased pollution. The Government argues, as did its Airports Commission, that this is acceptable as long as it is legal, and that it is legal as long as the increased pollution from

² *Improving air quality in the UK: tackling nitrogen dioxide in our towns and cities* Defra and DfT May 2017

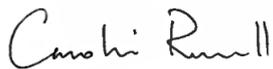
³ <https://www.airqualitynews.com/2018/06/06/diesel-cars-emissions-limits/>
<https://www.autovistagroup.com/news-and-insights/just-15-euro-6-diesels-pass-real-world-emissions-tests>

expansion does not exceed the worst pollution in the whole of Greater London.⁴ We reject this argument.⁵ However, even within this approach, the Government's own figures show⁶ that current policies carry a 49 per cent risk of expansion creating the worst pollution in London. The expansion proposal relies on a 'central projection' of its impacts, ignoring all risk and margin for error.

This disregard for the health of Londoners is simply unacceptable. The Government has a duty to protect and improve the health of the people it serves, yet this proposal will do the opposite. Those who vote to expand Heathrow would be consigning hundreds of thousands of Londoners to noise, air pollution and worse health for many years to come.

These impacts of expansion are likely to have a significant impact on your constituents, whether in their homes, their schools and workplaces, or as they travel around the city. I urge all London MPs to join the Assembly and the Mayor in opposing Heathrow expansion, by using their votes and by speaking to their Parliamentary colleagues.

Yours sincerely



Caroline Russell AM
Chair of the Environment Committee



Léonie Cooper AM
Deputy Chair of the Environment Committee



Shaun Bailey AM
GLA Conservatives Group Lead, Environment Committee

⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/653966/consultation-on-revised-draft-airports-nps-web.pdf

⁵ The London Assembly Environment Committee has outlined legal issues and other aspects of the air pollution impact in more detail in its response to the Government's December 2017 consultation on the aviation National Policy Statement. <https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/response-draft-aviation-national-policy>

⁶ <https://www.gov.uk/government/publications/airport-expansion-further-updated-air-quality-re-analysis>