HEATHROW CONSULTATIONS

Heathrow has launched two 'consultations'. Airport Expansion and Airspace Principles.

The Airport Expansion Consultation has **no official status – it is a public relations exercise run by Heathrow**. **It is for MPs to vote on whether to back Heathrow later this year**.

Like West London Friends of Earth, the dilemma we face is that if we boycott the consultation and don't respond, Heathrow claims no one is bothered about expansion options. If we do respond, Heathrow will use these to publicise and highlight the preferred 'options'.

It is up to each individual to consider how they respond, however, one suggestion is not to be led into complying with Heathrow tick box options – which could lead to many unforeseen pitfalls. Just because Heathrow prefers to herd us down an either/or response, does not mean that is how we need to respond.

Don't spend too much time responding. You could simply write *I do not support any of the options in the feedback form.*

This is impossible to achieve using the online document response but is possible by submitting your views and questions by email or in writing. Whichever response method you choose, please ensure you **include the fact that you are opposed to the expansion of Heathrow.**

If you opt to complete the feedback form, you will need to collect a copy, at any consultation event. The nearest event is:

Saturday 10 March, 10am-4pm
Tringham Hall, Benner Lane,
WEST END GU24 9JP

A full list of events can be viewed here

If you attend a consultation, I noted at the Weybridge event people were being encouraged to leave their email addresses. Bear in mind that in the past, such emails have been used by groups like Back Heathrow to swell Heathrow support numbers.....just saying! ☺

Can we have a few volunteers to hand out some leaflets (like TAGs) on the day of the event please. Email info@an3v.co.uk

The Consultation on Airspace Principles does have legal status and demands more of your attention. Again, you can pick up a hard copy of the necessary booklets and response form at a consultation event.

WLFOE considers this consultation even more of a potential trap than the airport expansion consultation. Any preference expressed, eg concentration versus dispersion, respite versus fewer planes all the time, respite version A versus respite version B, etc, will have lesser adverse impacts on some communities and more adverse impacts on others. Heathrow and DfT would be delighted if they could show that we disagree with each other and we are all just NOMBYs (not over my back yard).

HEATHROW CONSULTATIONS

The attached No 3rd Runway guidance is excellent for people who just wish to submit a few comments.

Many thanks to Carole Marr for the work done to summarise some of the main issues to think about and comment on:

Noise. Impact of PBN. You could ask what assessments Heathrow/the Government have undertaken into the mental and physical health implications of PBN (Precision Based Navigation responsible for the unprecedented noise levels of the 2014 trials to which we all objected to so strongly).
Also, questions could be put about the potential impact of an expanded Heathrow/PBN on areas such as ours which are under flight paths for both easterly and westerly operations. How will Heathrow ensure we are not unduly impacted? We are, after all, under both easterly and westerly flight paths. This point isn't mentioned in the two documents but is crucial for our area.

Night flights. In exchange for getting the 3rd runway, Heathrow has offered a ban on night flights. Most people won't realise this only means a 6.5 hour period, with Heathrow's preferred option being between 11pm and 5.30am. This will probably mean that we could have arrivals passing over from 5.15am. All groups are calling for a minimum 8 hour night flight ban.

Traffic. Already a real issue for both Lightwater and Windlesham! There are some good points made on the No 3rd Runway document about absence of traffic impact assessments whilst construction takes place (moving the M25). And what will be the long term impact on strategic and local roads if a third runway is built? Useful point about the 50% increase in freight (what assessment has Heathrow made?). Vehicles heavier than 7.5 tonnes have just been banned from the centre of Windlesham as they were causing such a problem already. There is a similar ban in Sunninghill and possibly one in Chobham – lorries have been using local roads as rat runs to avoid heavily congested main roads and motorways and that is with no third runway!

Open spaces. It is inevitable that in order to avoid populated areas, open spaces will be hammered with extra aircraft. It might be the lesser of two evils but this is where we all go to relax eg Windsor Great Park, Chobham Heath, Lightwater Country Park and arboretum etc. Good point on No 3rd Runway document attached that there has been no impact assessment.

Air quality. Dealt with in point 5 of Friends of the Earth document. (Attached.)

Help is also needed for the main campaign. To date, only 3 of us have tried to cover all the bases. This is not sustainable. With the continued fight to address current noise. as well as expansion issues hotting up and the stakes high, we need to keep across quite a few subjects. Tasks are not onerous – but numerous - so it would be beneficial if we could organise individuals or groups to keep abreast of a particular subject for example, environment news or economy and feed that back, or simply help with the updating of the website. Again, please email info@an3v.co.uk

Read on for information and guidance compiled by other groups

TEDDINGTON ACTION GROUP
Against Increased Aircraft Noise and Pollution

Heathrow Consultation

Introduction

Heathrow is promoting two consultations simultaneously, one in relation to Airport Expansion (new runway and terminal infrastructure); the other in respect of Airspace Principles (changes to airspace and flight paths to accommodate the new runway).

The consultation documents can be found at www.heathrowconsultation.com
The deadline for responses is 28 March 2018.

Status of consultations

Both consultations are, in TAG's opinion, premature. Parliament has yet to vote on the National Policy Statement (NPS) issued by the Department for Transport (DfT) that would be a precursor to Heathrow expansion. It will not consider the NPS until later this year – and crucially after the parliamentary Transport Select Committee (TSC) issues its report following detailed examination of the proposals. The TSC is still sitting and will hear evidence from the Transport Minister and his officials later this week. The TSC will then commence writing its report.

The timing of the consultations is regarded by TAG to be part of a publicity initiative by Heathrow to give the impression that approval of a third runway is a formality. Whilst this is currently the Government's preferred option, approval is not a foregone conclusion. The TSC has found many holes in the DfT's evidence base for a third runway and Heathrow's proposals (which now seem to differ from each other in a number of respects).

Consultation on Airport Expansion

This deals with the physical aspects of the third runway proposals. It is non- statutory and voluntary on the part of the airport and communities. It is recommended that if you oppose expansion of the airport that you base your response on this, making your opposition clear but otherwise not spending much time on it.

Consultation on Airspace Principles

This consultation could have more serious and far reaching implications for our community. Although Heathrow's documentation states it applies to a third runway, actually it applies to airspace modernisation, which is something the Government has signed up to introducing across the UK - whether or not Heathrow is expanded.

People living in Teddington and Twickenham will have experienced the full horrors of PBN (performance based navigation – satnav technology) that was trialled in 2014. This met with massive protest – over 7,000 people signed the Teddington Town petition and TAG grew out

of this. Heathrow had to abandon the trials early. PBN involves extreme concentration of flights – making normal life for those living under flight paths impossible.

The consultation alludes to this 'divide and rule' approach which until recently has been official government policy (minimising the number of people 'significantly affected' using discredited average sound level bases of measurement). TAG considers that PBN will lead to the creation of what has been described by the Civil Aviation Authority as 'noise sewers'. As our area lies under multiple flight paths, especially given new technology to concentrate to a great extent and the possibility of 54% more flights with a third runway, this represents a massive threat to our quality of life and community.

As the Airspace Principles consultation has legal status under the DfT's new airspace change processes, TAG considers it is very important that the public respond to this consultation.

In formulating responses to the consultation it is suggested your comments could include;

- No to extreme concentration
- Increase heights of departures to reduce noise on the ground for departure and arrivals
- There should be a 'fair and equitable distribution' of flights over our heads.
- Existing flight paths should not be intensified (the Government may see this as an easy option). The aviation industry should be placed under an obligation to devise an action plan to comply with World Health Organisation noise standards.
- Focussing flight paths over major open spaces is also unacceptable. Places like Richmond, Bushy, Windsor Great and Home Parks, as well as Kew Gardens are key recreational resources for local residents, as well as being assets of national importance. As well as destroying their amenity, the communities overflown before the parks are reached will be decimated by aviation noise.
- A reduction in the night period for those under departures to 11.00 pm to 5.30 am, as proposed with Heathrow expansion is totally unacceptable
- There should be much more stringent controls over late evening and early morning flights – both in terms of numbers and the loudness of the planes that are permissible.

You may have other points you would like to raise in your responses.

TAG proposes to issue further guidance on its website as the consultation progresses and we may also hold a public meeting so these issues can be openly discussed.
www.teddingtonactiongroup.com

You can email us or sign up to our mailing list via our website to ensure that you receive further updates. http://www.teddingtonactiongroup.com/contact/

Response to Heathrow Airport's 'Consultation'

Comment on "Airport Expansion Consultation Document" by Heathrow Airport by West London Friends of the Earth.

General comments on the 'consultation'

There has already been an official government consultation on the Airport National Policy Statement (NPS) which proposes a third runway at Heathrow. The responses are being analysed now. If the government decides to support a third runway, if it is supported by a vote in Parliament and if it survives a legal challenge, Heathrow Airport will then apply for a Development Consent Order (DCO). This is the equivalent of a planning application. There will then be another official consultation.

The current 'consultation' or is being run by Heathrow is not an official consultation. It is not bound by rules of balance, transparency or impartiality that apply to government consultations. The recipient of the responses, namely Heathrow Airport, is under no obligation to take notice of any comments made or demonstrate that it has done so. This 'consultation'. better called a 'pseudo consultation', clouds the issue of Heathrow expansion for the general public, who cannot be expected to understand that this is a partisan, non-official 'consultation' which will inevitably be used by Heathrow for public relations purposes.

Heathrow Airport is arranging a series of consultation exhibitions/events in West London and London. This greatly exceeds the official programme of events from the government (Department for Transport). By 'out-gunning' the government, Heathrow Airport hopes that its 'consultation' will drown out the more impartial government consultation. Principles of accountability and democracy are at stake here.

Heathrow's trap

Heathrow's 'consultation' is a trap! Heathrow wants people to think that a third runway is a done deal. The 'consultation' then leads them down the path of discussing various options for a new runway. This is colourfully illustrated in a tweet from Richmond & Twickenham FOE:
"Heathrow consultation - here's how it works:
Heathrow: would you prefer – i) having your finger cut off or ii) losing your whole arm? (no option to say neither)
Result: most people opt for i)
Heathrow press release "99% of locals said they'd support having their finger cut off"

Mis-information

The deceit and mis-information starts in the Forward by John Holland-Kaye on page 1. It says expanding Heathrow will create "up to £187 billion in economic benefits". No evidence is given for this figure. The official estimate by the government for net economic benefit (expressed as 'Net Present Value') is a range of -£2.2 billion to +£3.3bn over 60 years. The net economic benefit is at worst negative and at best negligible (compared with the UK's GDP of about £2 trillion pa, a benefit of £3.3bn over 60 years is negligible and invisible).

The deceit and mis-representation continues throughout the 'consultation'. A few examples are hinted at in the suggested responses to consultation questions.

The prisoners' dilemma

Communities concerned about expansion have a dilemma with the consultation. If they don't respond, Heathrow will claim few people are bothered about expansion generally or the options for it. But if they do respond, Heathrow will just publicise how people preferred some options to others and ignore any responses that point to the fact that all their expansion options are negative in terms of land-take, Green Belt, homes, communities, noise, air pollution, climate change, congestion on road and rail, burden on taxpayer, etc.

A compromise approach is to respond to the consultation but to make sure you are not led into giving any answers which Heathrow can readily subvert and use in their propaganda. Suggested responses follow.

Before launching into suggested responses, a plea. Don't spend too much time responding. Remember, this consultation has no official status – it is a public relations exercise run by Heathrow. Heathrow is under no obligation to take any notice of what you say. Please use your valuable time to support the campaign against a new runway.

If you do respond, keep a copy, particularly important if you respond online. Copies of your response (with covering note and maybe headlines) copied to your councillor, MP and the press are at least as useful as those to Heathrow.

Suggested responses to Heathrow's question

Q1a. *Please tell us what you think about Heathrow's plans to expand the airport.*

I am strongly opposed to a third runway.

Q2a. *Please tell us what you think about the options for the new runway*

All options have significantly adverse impacts in terms of land-take, Green Belt, destruction of homes and communities, noise, air pollution, climate change, wildlife and habitats, heritage, congestion on road and rail, burden on taxpayer, etc as compared with no third runway. There is not even, according to official government estimates, a significant net economic benefit of a third runway.

Q2b. What factors do you think should be important in fixing the precise location and length of the runway?

All the options have a range of adverse impacts of the types mentioned in answer to Q2a.

Q2c *What factors do you think should be important in locating new terminal and apron space?*

None of the options avoid the impacts mentioned in the answer to Q2a

Q2d *What factors do you think should be important in deciding the location of new taxiways?*

None of the options avoid the impacts mentioned in the answer to Q2a

3a *Please tell us what you think about the re-positioning of the M25.*

I am opposed to re-positioning the M25.

3b *Please tell us which family of options you prefer for the alterations to Junctions 14 and 14a and reasons why.*

I do not support any of the options.

3c *Please tell us which option you prefer for the diversion of the A4 and the reasons why*

I do not support any of the options.

3d *Please tell us which option you prefer for the diversion of the A3044 and the reasons why.*

I do not support any of the options.

3e *Please tell us which option you prefer for the Stanwell Moor junction and the reasons why.*

I do not support any of the options.

3f *Please tell us what you think about the options to improve access to the Central Terminal Area.*

I do not support any of the options because access is satisfactory with two runways.

3g *Please tell us what you think about the options for the diversion of rivers and the approaches to replacement flood storage.*

I oppose all the options, none of which are necessary with two runways.

4a *Please tell us what you think about the locations and sites that we have identified as being potentially suitable for airport supporting facilities.*

I am opposed taking up greenfield and brownfield land with more airport supporting facilities.

4b *Please tell us what you think about our approach to providing car parking and the potential site options we have identified.*

I am opposed to taking up greenfield and brownfield land with new car parks. If Heathrow were not planning to increase the amount of car travel, and instead intended any growth to be taken up by public transport, extra parking would not be needed.

4c *Do you have any comments on the land uses that will be affected by Heathrow's expansion.*

Yes, the changes are overwhelmingly negative.

4d *Please tell us what you think about the sites identified for the relocation of the Immigration Removal Centres, and if you have a preference please tell us why.*

No comments.

4e *Please tell us what you think about the locations and sites that we have identified as being potentially suitable for airport related development.*

The impacts on these locations and sites are overwhelmingly negative and would not be needed without a third runway.

4f *Do you have any views on how the demand for additional airport related development such as hotels and offices might best be delivered?*

There would not be demand for these without a third runway.

4g *Please tell us how you think we should best bring the various components together to build our masterplan for the expansion of the airport and what factors you think should be most important in our decision-making.*

I do not consider a masterplan should be developed until if and when the government agrees to a third runway and until any conditions, such as limits on use due to air pollution, are finalised.

4h *Please tell us what you think about the sites we have identified as potential construction sites and the approaches we are considering to manage the effects of construction.*

The impacts on these locations and sites are overwhelmingly negative and would not be needed without a third runway.

5a *Please tell us what you think about our property policies.*

No comments

5b. *A noise envelope is a package of measures that can be used to reduce noise. Please tell us your views on the objectives of the noise envelope and the timeline for its development.*

A noise envelope is NOT a package of measures. Therefore I cannot answer this question directly.

The objective should be to minimise the totality of noise for all those people overflown or close to flight paths, taking account of both the numbers of people in any location and the level of noise they experience.

5c. *Is there anything further we should be considering to reduce noise?*

The most effective means of minimising noise is to restrict the number of flights to the present cap.

5d. *Please tell us what you think about our suggested approach to the provision of respite.*

The consultation is highly misleading in that it emphases "predictable" respite while ignoring the amount of it. The reality is that with a third runway, respite would typically be reduced from half to one third. Such reduction in respite is more important than the occasional breach of the current respite.

5e. *Please tell us what you think of our proposals for noise insulation and phasing of delivery.*

I believe that in in addition to noise insulation, full compensation should be provided to all citizens affected by noise, whether they get insulation or not. (Insulation would reduce the compensation needed but not obviate it because noise insulation does not alleviate any problem outside the building.)

5f *A 6.5 hour night flight ban on scheduled flights is required between 11pm and 7am. Our current preferred option for this is from 11pm to 5.30am. Please tell us when you think the night-flight ban should be scheduled and why.*

A 6.5 hour ban is insufficient – adults and children need more than 6.5 hours sleep.

5g *Please tell us what you think about the priorities and initiatives we propose to use to develop our surface access strategy.*

The priority should be to ensure there is no increase in road traffic. This would mean no need for destructive new car parks or more road capacity.

5h *Please tell us what you think about the options to use road-user charging to reduce emissions and to manage vehicular access to the airport.*

Road user charging is not a matter over which Heathrow Airport has any control (except within the confines of its property). It should therefore be the subject of government consultation, not Heathrow's.

5i *Please tell us what you think about the measures proposed to manage emissions. Are there any other measures that we should consider?*

The consultation document says: "*Expansion can be delivered while meeting all relevant legal air quality obligations*" (page 58). This is profoundly misleading and no evidence is given for the assertion. It has been determined by the courts that the government has no tenable plan to meet legal air pollution limits, even without a third runway. A third runway would make air pollution worse as compared with two runways.

There are no proposals that would make a significant difference to air pollution levels. Section 4.4 of the consultation document is unspecific and qualitative.

Airport ground-based sources contribute only a small proportion of the total emissions due to Heathrow. Aircraft have a vastly higher emissions while emissions from airport-related road traffic are also considerable. To have a significant impact on air pollution, action would need to be taken on these sources.

5j *Do you have any comments on our approach to limiting carbon emissions from the design, construction and operation of an expanded Heathrow?*

The vast majority of carbon (dioxide) emissions are from the extra aircraft that Heathrow is promoting. I see no proposal that would appreciably offset this increase.

There is no mention of the impact of Heathrow expansion on the UK's obligations in the Climate Act. The Committee on Climate Change advised government that it would probably be just possible for the UK's target at 2050 to be met if UK's aviation's emissions were constrained to 37.5 million tonnes of CO2 pa. However, they noted that this would require other sectors to make even more stringent cuts – about 85% instead of 80%. This will place huge pressure and perhaps economic and financial cost on these sectors. Lack of mention of such issues in the section 4.5 of the consultation document is deceitful.

There is no recognition in the consultation of the significant greenhouse-causing emissions at altitude from the extra aircraft (NOx and H2O).

5k *Please tell us what you think about our approach to natural environment issues.*

I do not support an approach which where it is cynically planned to destroy habitat and therefore wildlife.

5l *Are there any opportunities that the expansion of Heathrow could provide to enhance the natural environment?*

I am not aware of any.

5m *Please tell us what you think about our approach to historic environment issues.*

I do not support an approach whereby heritage sites will be destroyed or adversely impacted.

6. *Having considered everything you have read, do you have any further comments in relation to our proposals for the expansion of Heathrow?*

The consultation should have made it clear that this is not a statutory consultation. It should have been explained clearly at the outset that statutory consultations on the NPS have been carried out and results are still being analysed. Furthermore, that statutory consultation will take place on the proposed Development Consent Order. Absence of mention means that respondents are given a misleading impression of the context and status of this privately promoted venture.

NO 3RD RUNWAY COALITION

www.no3rdrunwaycoalition.co.uk

POSITION STATEMENT

Heathrow Consultations

Heathrow Airport recently launched two consultations designed to facilitate community support for their expansion proposals. One consultation is on the options of the physical changes on the ground needed to build a third runway. The second is on the potential principles Heathrow could apply when designing the new airspace required for an expanded airport.

The No Third Runway Coalition campaigns against expansion at Heathrow, so will not be advising Heathrow on how to construct a third runway by formally responding to these consultations.

The Coalition believes that the proposal to construct a third runway is simply not deliverable. The proposal is considered to be unaffordable for the airport and risks passing significant and as yet undefined financial cost onto the taxpayer. Further, there are still no robust plans to address the environmental, health and transport challenges presented by expansion.

To run both consultations simultaneously is potentially misleading as Heathrow seeks to present the third runway as inevitable. This is very far from the truth as Parliamentary scrutiny of the proposal is still underway and the vote on the final Airports National Policy Statement still has no confirmed date (although expected by end of July 2018).

The consultation on expansion seeks a range of views about Heathrow's proposals and is ultimately trying to get input from local communities in order to claim their support. It is the view of the Coalition that any responses to sections of this consultation must make clear opposition to expansion and highlight the absence of credible and costed plans, particularly in relation to noise mitigation, air quality and surface access.

The proposed changes to airspace will not be necessary when it becomes clear that the third runway will not be built. Therefore, it is the view of the Coalition that engagement on the airspace consultation is a waste of time and risks lending legitimacy to Heathrow's expansion aspirations.

However, we recognise that individual groups and members of the Coalition may wish to respond to one or both consultations.

If you do decide to respond please strongly state your opposition to expansion at Heathrow and highlight key issues relevant to your communities.

We have produced a short briefing to help highlight the key issues and areas where information is missing.

NO 3RD RUNWAY COALITION

The Heathrow Consultation

CONTEXT

Heathrow Airport launched a consultation on 17 January, running until 28 March. This is separate from the Government's consultation on the Draft Airports National Policy Statement which is still ongoing.

The Transport Select Committee is currently running an inquiry into the Draft NPS and is expected to submit a report to Government by the 29 March.

The final Airports NPS is expected to be put to a vote in the House of Commons by the end of July 2018. It is only then that Heathrow Expansion will be formally considered by Parliament.

OVERVIEW

This consultation is formed of two separate components. One consultation is on the options of the physical changes on the ground needed to build a new north west runway and operate an expanded airport. The second is on the potential principles Heathrow could apply when designing the new airspace required for an expanded airport. This does not include any detail on actual flightpaths.

MAIN AREAS OF CONCERN - EXPANSION CONSULTATION

It is clear from the series of consultation documents that the impacts of the expansion proposal go far beyond that described and assessed in the Airports NPS.

Should Heathrow proceed with a shorter runway this would invalidate the Appraisal of Sustainability in the NPS and require a fresh round of parliamentary scrutiny.

The consultation includes a number of glaring omissions of the local impacts:

- No clarity on plans for road and rail access and no commitment to pay for them.
- No assessment of cost of moving the M25 nor a traffic impact assessment whilst construction takes place.
- No assessment of the impact of construction of local air quality.
- No assessment of impact on assets of national importance (parks and open spaces) from potentially being overflown for 12-hour periods with no respite from noise.
- No information or views sought on the impact on demand for housing in the local areas.

- No assessment of cost to local authorities of increased demand on services.
- No plan to cover the costs that will be imposed on local authorities arising from the relocation of the Lakeside Waste Energy plant.
- No plans at all to address the adverse health impacts of a third runway.
- No assessment of the impact of freight traffic associated with expansion.
- No information on possible flight paths of a three-runway airport.
- No detail of areas that may be newly overflown.
- No proposal for continued respite for communities.

QUESTIONS TO ASK HEATHROW

- Why does the current Heathrow consultation on expansion include proposals for a shorter runway that have not been considered by the Airports Commission nor included in the Airports NPS?
- What assessment has been made of the financial cost of the proposals to move the M25 or put it into a tunnel?
- What traffic impact assessment has been undertaken for the effects on strategic and local roads of moving the M25?
- What assessment has been made of the impact on local roads of a potential 50% increase in the level of freight handled by Heathrow?
- What increase in surface access capacity will be required to facilitate a third runway?
- What rail improvements do Heathrow believe are required to support expansion given that Crossrail and the Piccadilly Line upgrade have been designed to support London's population growth?
- What plans do Heathrow have to introduce a road user charge around the airport?
- Why have detailed flight paths for a third runway not been published?
- What assessment has been made of impacts to residents during the construction of the runway?
- What guarantees of respite are being offered to communities currently overflown?
- How many communities will be newly impacted by noise from airport operations with a third runway?
- How will Heathrow finance the third runway?

FLIGHT PATH DESIGN PRINCIPLES

The operation of Heathrow airport currently exposes hundreds of thousands of people to the intolerable, detrimental impacts of aircraft noise. Any expansion will simply expose thousands more to unacceptable levels of aircraft noise. The consultation presents some of its airspace policy choices as zero sum and is simply seeking to divide those opposed to expansion. The Coalition advises against engagement with this consultation.

Send your views to Freepost LHR EXPANSION CONSULTATION or email expansion.feedback@heathrowconsultation.com