

**AIRPORT EXPANSION CONSULTATION
HEATHROW**

**Response from Richmond Heathrow Campaign
28 March 2018**

INTRODUCTION

This is the written response of the Richmond Heathrow Campaign (RHC) to the Heathrow Airport Limited (HAL) consultation titled '*Airport Expansion*' January 2018. We refer to Heathrow's northwest runway as NWR expansion. We are also responding separately to HAL's consultation on *Airspace Principles 2018*.

RHC represents three amenity groups in the London Borough of Richmond upon Thames: The Richmond Society, The Friends of Richmond Green, and the Kew Society, which together have over 2000 members. The members of our amenity groups are adversely affected by noise from Heathrow Airport's flight paths, poor air quality and road and rail congestion in west London. We acknowledge Heathrow's contribution to the UK economy and seek constructive engagement in pursuit of a better Heathrow. We are an active participant in the Heathrow Community Noise Forum.

Our premise is that it would be preferable to aim for a better Heathrow rather than bigger Heathrow and to capitalise on the world beating advantage of London's five airports, in particular by improving surface accessibility to all five airports, which would be a major benefit to users. Our approach, as explained below, is to continue supporting the case for no new runways in the UK. We believe the evidence produced by the Airports Commission supports this position even though the Commission recommended Heathrow's Northwest runway (NWR) expansion option. We believe the Revised draft NPS 2017 and supporting documents also supports the case for no new runways.

Over recent years we have undertaken extensive research on Heathrow and submitted a large number of papers to the Airports Commission (the Commission), the DfT, CAA and others - all of which can be found at www.richmondheathrowcampaign.org

References below are to the main *Airport Expansion Consultation Document*. Where we have responded to a specific question with no comment that does not mean the topic is not important or that we do not have a view. Where we have commented we ask please that HAL recognise the comments are neither exhaustive nor necessarily the most important ones.

Parliament's Transport Select Committee has in the last few days published its findings but we have not dealt with these specifically, although we note many of them appear to parallel our concerns.

We have raised a number of issues and would appreciate learning from HAL what its response to these might be.

As we explain below we believe this consultation is premature. Our response is without prejudice and we may add evidence and change our views.

1. EXPANDING HEATHROW

The expansion of Heathrow will be one of the largest infrastructure projects in the UK and developing our final plan will be a complex process. We now need your feedback which, together with our on-going design work and the findings of more detailed surveys and assessments, will be used to develop a preferred scheme for Heathrow's expansion.

1a. Please tell us what you think about Heathrow's plans to expand the airport.

RHC Response

RHC believes Heathrow's plans to expand the airport, as set out in its current consultation, are an inadequate basis for an objective response:

1. The options provided are descriptive and not sufficiently developed for objective response. For the most part, it is impossible for individuals or communities to assess the assumptions and decision criteria for choosing between options because the evidence is missing from the consultation and its supporting documents. It is not clear why the proposed options have been selected.
2. The topics are not linked into an overall decision framework making it impossible to discern and balance the priorities and assess the economic and environmental uncertainties and risks.
3. The Consultation fails to establish the strategic need or consequences of expansion and the choice of Heathrow and its hub model. We summarise the points (based on DfT and CAA data) we have made to the DfT in response to its Revised draft NPS. RHC's full report can be viewed on the RHC website. In our view the strategic case for Heathrow expansion fails:
 - a. Heathrow is not full and there is no need for NWR expansion:
 - i. Without NWR expansion, total passenger numbers at Heathrow are predicted to grow from 76 million in 2016 to 93 million in 2050 (+22%) through larger aircraft and higher occupancy, while retaining the 480,000 flights a year in segregated mode. But more importantly, a reduction in international-to-international transfers means terminating passengers are predicted to grow from 55.3 million in 2016 to 89.6 million in 2050 (+62%), which matches the unconstrained rate of growth across the rest of the UK.
 - ii. With NWR expansion, international-to-international transfers increase by 16 million by 2050 compared to the Do-minimum. They are of no economic value to the UK (see 3c). Their tax exemption should be removed. Their reduction would free up capacity for terminating passenger demand, as shown in (i) above.
 - iii. Pent-up demand for Heathrow is said to exist on account of constrained capacity and is said to support the case for NWR expansion. Evidence demonstrates this is not the case and instead, the NWR expansion would draw demand from other UK airports.
 - iv. Heathrow had around 20% turnover in international destinations between 2011 and 2016. The turnover provides plenty of scope to add new long-haul destinations, if needed.
 - v. The fast growth (full within 2 years of first flight) predicted by the Revised draft NPS is contrary to the phased growth being adopted by HAL, although the absence of cost and other detail leaves HAL's proposals in the dark and potentially financially undeliverable.
 - vi. Heathrow say they can add 25,000 flights a year without affecting resilience.
 - vii. It is probable that insufficient carbon credits and abatement of carbon emissions mean climate change will restrict growth and prevent full use of the NWR capacity.
 - b. Heathrow's NWR expansion has a substantially negative outcome at UK level:
 - i. NWR expansion adds 43 million passengers per year (mppa) at Heathrow by 2050 but only 26 mppa at UK level due to a reduction in growth of 17 mppa at other UK airports. Of this number 16 mppa are additional international-to-international transfer passengers resulting therefore in just 10 mppa UK terminating passengers (23% of additional runway capacity).
 - ii. The reduced growth at other airports of 17 mppa in 2050, for example, means that many of the regional airports will be negatively impacted over the next 30 years as well as Stansted in the early years. Furthermore, the downside risk on demand will be borne by the regional airports and some of the smaller airports may not survive. This adversely impacts the north-south economic balance.

- iii. No additional long-haul business passengers at UK level.
 - iv. Just 0.9 mppa additional international short-haul business passengers at UK level.
 - v. Just 2.0 mppa additional inbound tourists at UK level.
 - vi. Just 0.6 million additional domestic passengers.
 - vii. Just 6.4 mppa outbound tourists at UK level and these create a negative impact on the UK balance of payments.
 - viii. Just 2 additional long-haul destinations, 3 fewer international short-haul destinations at UK level and no change in the number of domestic destinations.
 - ix. An unnecessary increase in flight frequency to Heathrow's already popular destinations but reduced frequency to its thin international destinations and to regional airport international destinations.
- c. Heathrow's hub status and International-to-International (I-I) passengers provide little economic value and are highly inefficient use of the NWR expansion:
- i. Heathrow expansion results in 9 mppa additional I-I transfer long-haul passengers by 2050, i.e. 92% of the additional long-haul passengers at a UK level. This and the 7 mppa additional short-haul I-I transfers are highly inefficient use of the NWR capacity of 26 mppa (net of reduced growth at other UK airports).
 - ii. At a UK level and by 2050 for example the NWR expansion adds just 1.8 mppa terminating passengers to OECD countries, 1.5 mppa to NIC countries and 0.1 mppa to LCD countries. The benefits are negligible.
 - iii. Only 1% of Heathrow's I-I transfer passengers were to/from the airport's 36 thin long-haul destinations in 2016 and only 8 such destinations had any I-I transfers. Instead, 99% of I-I transfers were to/from popular destinations. Similar results apply to 2011. This demolishes the myth that Heathrow, as a hub airport, needs I-I transfers to support otherwise unviable long-haul destinations.
 - iv. Consultants PwC and Oxera and the Airports Commission say I-I transfers provide little economic value to the UK.
 - v. Passengers prefer direct routes and aircraft can now travel halfway around the world in a single flight thus adding a large number of point-to-point pairs and cutting out hub airports.
4. The Forward and Section 1 of the consultation establishes a bias without evidence in favour of the NWR expansion. The consultation is used by HAL to promote the NWR expansion, which unsuspecting respondents may be lulled into supporting. For example:
- a. *'[Expansion] is about securing the UK economy and connecting to global growth' (Page 1 para. 2). 'We connect to the whole world and drive investment back into the economy' (Page 1 para. 3).* The consultation provides no evidence to support these positive statements and RHC research, as summarised in Para. 3 above, concludes the NWR is unnecessary and harms the UK aviation market and UK economy.
 - b. *'Up to £187 bn in economic benefits across the country' (Page 1 para. 4).* This is a misleading and discredited figure from the PwC experimental econometric model and should not be used by HAL to promote its case. The DfT webTAG valuation is far smaller and is not mentioned. RHC calculates a substantial webTAG net cost to the UK economy.
 - c. *'What is a hub airport' (Page 4, Box).* As shown above in Para. 3c above, the description and benefits for Heathrow as a hub airport are substantially inaccurate.
 - d. *'Existing runways are full' (Page 5 para. 6).* This is not the case for passenger numbers, as shown in Para. 3a above.
 - e. *'Britain [is] losing out to our European competitors in the race for foreign investment,' (Page 5 para. 7).* There is no evidence provided and we suggest London will continue to have the best air service anywhere in the world with its five airports. It would be far better to ensure

competition between London's five airports and make best use of regional airports. Concentration at Heathrow will be bad for London and the UK as we have demonstrated above.

- f. *'Unanimous conclusion of the Airports Commission' (Page 7 para. 1).* RHC and others have demonstrated that the conclusion of the Commission bears little relation to the evidence gathered by the Commission and that the evidence does not support the NWR expansion.
 - g. *'Better neighbour and significantly enhanced connectivity and substantial long-term benefits for the whole UK.'* (Page 7 para 2). RHC has demonstrated that the Commission's evidence did not support the three benefits claimed here. The environment would be worse and at the UK level there would be no improved connectivity. The claimed economic benefits have since been reworked by the DfT and show there are none to speak of. Furthermore, RHC has shown there is a substantial net cost to the UK economy of at least £20 bn.
5. The claims by HAL regarding the environmental impact on communities are absent or misleading. We respond on the specific topics of surface access, air quality and noise under the respective headings in the consultation. But some generic points are:
- a. *'Expanding in the national interest must not come at the expense of our local communities.'* (Page 1 para. 5). The consultation gives neither assurance nor legal commitment that expansion will not be at the expense of local communities. The intensity of use of Heathrow and airspace means that inevitably it will be at their expense.
 - b. *'We want local communities to share in the benefits of Heathrow's growth'.* (Page 1 para. 6). We believe there is potential for improvements in air quality, noise and carbon with a two runway Heathrow as technology and intervention reduce emissions at source, notwithstanding London's population growth and people's increasing awareness of environmental pollution. There is scope for communities to share in the benefits. But a three runway Heathrow not only denies communities a share of these two runway benefits but increases the environmental costs for the communities. Compensation and mitigation are but small contributions towards the environmental costs. The health of over one million people will be negatively impacted by noise and over 100,000 by air pollution from NWR expansion. The passengers, airlines and HAL are largely unaffected by the environmental costs and retain all the benefits. Communities will not share in the benefits but will be burdened by all the environmental costs. It needs to be born in mind that the only UK benefit to speak of is just 6 mppa of UK outbound tourists by 2050 (i.e. just 14% of the NWR capacity) and these are at the expense of the UK balance of payments. Most of the remaining capacity results in a substantial dis-benefit to UK aviation and the UK economy. The potential winners are HAL's shareholders and 90% of these overseas shareholders.
6. It is not clear how the results of the consultation will be used by HAL.
- a. We have highlighted above some of the deficiencies of the consultation which we believe make it invalid. Page 2 starts by saying why HAL is consulting. But it is not explained how responses will be fed into the decision process and we cannot be sure that responses supporting HAL's approach and direction will not be given more weight than those with opposing views.
 - b. Of particular concern is the statement that the Government has concluded that *'Heathrow needs to expand'*. (Page 5 para.8) This can only mean the Government has decided on the need and location of additional capacity prior to the NPS being finalised and voted on by Parliament. Surely, the purpose of the NPS is to explore the question of need and choice of location. This statement and the many others seems likely to lead to a legal challenge.
 - c. Frequently the consultation says further detail will emerge later in the serial decision process. It is quite clear though that in this serial approach there will be no scope for going back to reconsider earlier decisions - for example the NPS designation. This approach seriously

disadvantages those that have a legitimate right to be involved in the decision process. The problem is compounded by evidence relevant at each stage being made available only after the stage has ended. For example, flight path positions and air traffic numbers will only be available just prior to first flight. The proposal for surface access is almost entirely unclear as are financeability and affordability. We refer to each of these later in the topic sections. We appreciate generally speaking detail follows policy but there is insufficient evidence for us to properly assess the broad principles and choice of options.

7. Conditions are vague and provide little assured protection for those potentially harmed by the expansion.
 - a. There are assurances offered in respect of domestic connections, aero charges, surface access, air quality and noise (including a ban on night flights), on funding and on a 4th runway. We comment under the topic headings but broadly it is important that the conditions need to be placed on a legal footing and that there are substantial (but proportional) penalties accruing to HAL's shareholders for any breach of the conditions should approval be given for the NWR expansion.
8. The HAL consultation is very remiss in making no mention of the costs and financial viability of the NWR expansion. Responses are likely to be overridden by the financeability constraint, potentially making responses irrelevant. We deal with this crucial issue further in answer to Section 6 - Other Considerations.

2. RUNWAY, TERMINALS, APRONS AND TAXIWAYS

Runway

The new runway will be located to the north west of our two existing runways. Runway options in this area have been identified that vary in length from 3,200m to 3,500m and their east-west position. Before answering this question please read Section 2.1 of the Airport Expansion Consultation Document.

2a. Please tell us what you think about the options for the new runway.

RHC Response

No new runways are needed. There is sufficient runway capacity across the UK, including the five airports which serve London already.

The Airports Commission recommendation in 2015 and Secretary of State's announcement in October 2016 quite clearly stated the runway length should be 3,500 metres and gave the precise co-ordinates. Presumably this was for good reason so as to establish, inter alia, the land take and follow on consequences, the M25 and road modification, surface access, air-side terminals and taxi-ways and the implications for use of terminal airspace. Clearly cost is a major factor but also is safety and the impact on the number and types of flight. It is not clear why at this stage Heathrow is opening up the debate on the runway length and position.

2b. What factors do you think should be important in fixing the precise location and length of the runway?

RHC Response

Heathrow will need to obtain certification that it can operate the three runways as independent parallel runways and without additional ATC resources and restrictions on throughput in all types of weather and for all types of aircraft if it is to serve 740,000 flights a year. RHC strongly oppose an NWR that is restricted in use so as to increase the noise impact from the central and southern runways, which are of immediate concern to RHC members. We would expect any difficulties in gaining certification be

resolved by capping total flights at say 700,000 per annum instead of a fix that results in differential use of the three runways. We would need to see the outcomes of the alternatives, especially the ground and elevated noise outcomes before commenting further. Our comments are without prejudice because the consultation does not provide sufficient evidence to judge whether the options are feasible and if so what the priorities might be.

Terminals and Aprons

To serve the increased number of passengers and aircraft that will use the expanded airport, new terminal and apron infrastructure will be required. Before answering this question please read Section 2.2 of the Airport Expansion Consultation Document.

2c. What factors do you think should be important in locating new terminal and apron space?

RHC Response

As above, no new runways are needed.

We believe the NWR expansion is not financially deliverable. In HAL's efforts to reduce costs there is a risk that corners will be cut and customer service will be eroded. The CAA, as economic regulator, will need to ensure this does not happen. The phasing of expansion is especially relevant. HAL may need to phase expenditure and capacity in order to obtain adequate finance. If demand and airlines' eagerness to take up slots is ahead of the capacity build up then service may be eroded.

Taxiways

A well-designed taxiway system must provide efficient and safe links that deliver predictable journey times for passengers, lower operating costs for airlines, and greater efficiencies which will help us deliver on our commitments around noise and air quality. Before answering this question please read Section 2.3 of the Airport Expansion Consultation Document.

2d. What factors do you think should be important in deciding the location of new taxiways?

RHC Response

As above, no new runways are needed.

Taxiway design is key to an efficient airport and being able to use all three runways interchangeably. We believe the relatively small footprint of Heathrow makes it difficult to design the taxiways. Taxiing aircraft are a sizable contributor to NOX pollution and non-compliant concentrations.

3. ROADS AND RIVERS

M25 Alignment and Junctions

The construction of a new north west runway will extend the airport to the west. This will affect the route of the M25 between Junctions 14 and 15 and the operation of Junctions 14 and 14a. Before answering this question please read Sections 2.4 and 2.5 of the Airport Expansion Consultation Document.

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

RHC Response

The redesign to accommodate a runway that is not required is likely to be very disruptive.

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

RHC Response

No new runways are needed and the alterations are therefore unnecessary and hard to see how it will not be disruptive.

Local Roads

The expansion of Heathrow will affect local roads. There are a number of options for replacing these roads, transferring traffic on to other routes and re-establishing local connections. Before answering these questions please read Section 2.6 of the Airport Expansion Consultation Document.

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

RHC Response

No new runways are needed and therefore the diversion is not needed and is likely to be disruptive.

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

RHC Response

No new runways are needed and therefore this diversion is not needed.

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

RHC Response

No new runways are needed and this is not needed.

River Diversions and Flood Storage

The expansion of Heathrow will affect local rivers and areas of flood plain. There are a number of options for the diversion of these rivers and the replacement of flood storage. Before answering these questions please read Section 2.7 of the Airport Expansion Consultation Document.

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

RHC Response

No new runways are needed and the diversions are therefore not needed.

4. ADDITIONAL LAND

To support the operation of an expanded airport we will need additional land outside the airport boundary. This will include land for construction sites, car parking and commercial facilities, as well as new landscaping. We will also need land to accommodate businesses that need to be relocated. Before answering these questions please read Sections 2.8 to 2.11 of the Airport Expansion Consultation Document.

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

RHC Response

No new runways are needed and the diversions are therefore not needed.

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

RHC Response

No new runways are needed. Car parking should be reduced to the minimum to encourage less polluting modes of transport to help improve air quality. But alternative public transport needs to be available.

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

RHC Response

No new runways are needed and therefore there should be no impact on land use.

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

RHC Response

No comment

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

RHC Response

No comment

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

RHC Response

No comment

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.

RHC Response

The most important factors are the impacts on local and wider communities: noise reduction; air quality improvements; reducing carbon emissions and incentivising the "greenest" aircraft operations. Costs for passengers and taxpayers are also a key factor.

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.

RHC Response

No new runways are needed. The construction impact is widespread and disruptive.

5. MANAGING THE EFFECTS OF EXPANSION

The expansion of Heathrow must happen in the right way. We have developed a number of approaches to ensure that the effects associated with the construction and operation of an expanded Heathrow are effectively managed. You can find relevant information on these approaches in Section 4 of the Airport Expansion Consultation Document.

Property Compensation, Property Hardship and Land Acquisition

We recognise that people who live in or own property near Heathrow will be affected by its expansion. Section 4.1 of the Airport Expansion Consultation Document and our Property Policies Information Paper sets out our proposals to ensure that those affected are fairly compensated.

5a. Please tell us what you think about our Property Policies.

RHC Response

This is of course an important topic and we support local people who will be impacted. The quantum and timing of the compensation and how it is being administered are nowhere near appropriate to the issue at hand.

Noise

Noise is one of the most significant concerns for communities living close to airports. Section 4.2 of the Airport Expansion Consultation Document and Our Approach to Noise set out options to reduce, minimise or mitigate the effects of noise arising from the expansion of Heathrow. We would like to know your views on Our Approach to Noise, in particular:

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.

RHC Response

The following points are further explained in our response to the DfT's Revised draft NPS on the RHC website.

- a. HAL is seeking response on noise issues before revised noise objectives have been consulted on by the DfT later in 2018. Flight paths, their use and operating parameters should be designed and consulted on without delay.
- b. Targets for reduction in noise need to address the WHO guidelines and be placed on a legal footing, as in the case of air pollution.
- c. Communities should share with the industry in the reduction of noise from less noisy aircraft and there should be a reduction each year.
- d. Comparisons with today or any single future date, such as at first flight (e.g. 2026), are not a basis for decisions on expansion except that the noise climate in the future should be no worse than at any legacy date. The comparison should be with a Do-minimum annual profile enhanced by modernisation that is planned to be implemented in any event.
- e. The aims set by Government and in this consultation to limit or reduce noise impacts and for fewer people to be affected by noise compared to the future Do-minimum have not been shown to be achievable with a third runway. Over one million people are affected by noise at the WHO Guideline level of 50 dB LAeq or the Significant Observed Adverse Effect Level (SOAEL) of 51 dBLAeq.
- f. It has not been demonstrated that the conflict between land use for population growth and housing and flight paths can be resolved to satisfy both noise and housing objectives. The ICAO Balanced Approach is unworkable.
- g. It has not been demonstrated that London's parks and open and green spaces will not be negatively impacted.
- h. Fleets should be modernised as quickly as possible to reach the highest possible standards of noise and emission reduction with financial incentives applied 24/7, so that Chapter 14 standards for 100% of aircraft are reached as quickly as possible.
- i. Noise metrics need to be revised to better reflect the impact on people by individual flight paths and frequency and pattern of flights.
- j. Release of runway capacity should be linked to noise tests based on predicted outcomes. The noise climate should be no worse than today but also at first flight (e.g. in 2026) and the tests must be**

based on targeted reduction in noise towards WHO guidance values and also on a reduction in noise compared to a Do-minimum over future years, including modernisation of air space. There must be no recourse to the Government or passengers should financeability fail as a result.

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

RHC Response

HAL does need to provide information on the change in its fleet over time as this is key to noise reduction. HAL's estimate of fleet change over 15 years is questionable compared to current turnover of around 25 years and similar turnover predicted by the Airports Commission. We also seek information on the impact of larger aircraft over time. The noise energy is likely to increase (other things being equal) on the basis of 50% more flights but also heavier aircraft. We would like to reserve the opportunity to comment further in due course when HAL has provided more definitive proposals. There needs to be more information on population growth and housing as referred to above in the balanced approach.

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

RHC Response

- a. Respite is currently only being considered by HAL in terms of its benefits. There are two fundamental flaws in this approach. Firstly, respite is not a benefit but a reduction in an environmental cost. Second, creating respite for one community results in noise for another.
- b. RHC noise modelling strongly suggests that there is not sufficient airspace to provide adequate flight path separation, meaningful respite and noise dispersion.
- c. There should be no reduction in existing respite – for example over Richmond and Kew.

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

RHC Response

- a. Based on the rate of insulation provision implemented over recent years it seems unlikely that HAL will be able to provide insulation for many people until many years after they start experiencing increased noise from the NWR expansion.
- b. Listed buildings and council restrictions mean that a not insubstantial number of homes may not gain planning consent to be insulated.
- c. The noise contours prescribed for insulation are too high. More than one million people will be affected by noise at the WHO guideline level of 50 dBA LAeq.
- d. Insulation does not deal with the serious noise problem outside in people's gardens and in parks and open spaces.
- e. Insulation is not a substitute for peace and quiet, especially for children and the vulnerable.
- f. The Balanced Approach and land use should not just be remedied with insulation but should include location of housing and flight paths.

5f. A 6.5 hour night flight ban on scheduled flights is required sometime 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.

RHC Response

- a. There should be an 8 hour ban on night flights between 11pm and 7am as recommended by WHO.
- b. There should be no increase in flights in the shoulder periods 11:00-11:30 and 06:00-07:00.
- c. RHC research demonstrates that the economic cost of an 8 hour ban is outweighed by the benefit.
- d. A night flight ban should not be treated as a trade off with expansion as is suggested on Page 7 para.

3. An 8 hour ban should be implemented irrespective of expansion.

Surface Access

Section 4.3 of the Airport Expansion Consultation Document and Our Approach to the Development of a Surface Access Strategy set out our priorities and targets for the ways in which passengers, visitors, workers and commercial traffic will access the expanded airport. We would like to know your views on Our Approach to the Development of a Surface Access Strategy, in particular:

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

RHC Response

a. The switch in mode from road to public transport and to less polluting vehicles is speculative. The risk is that demand and required capacity for road and public transport is significantly under-estimated. Merely to incentivise and support mode share shift is far too weak (see Page 7 para.3). The surface access options, many of which are speculative proposals requiring input from and cooperation with others, have not been through a proper (WebTag type) assessment identifying the costs and benefits in terms of their environmental, operational, economic and financial implications nor is any evidence provided of the levels of service and congestion resulting should the options/proposals be constructed. In particular little if any evidence is provided on the pros and cons of the road proposals for the M25, Junction 14/14a, Local Roads and A3044. Without such objective evidence, people's preferences will be ill informed rendering the Consultation meaningless.

b. Planned increases in public transport capacity are barely sufficient to cater for growth in two runway demand and growth in background demand, taking account of population growth and mode shift to public transport. This Do-minimum has not been adequately addressed.

c. In the case of a 3rd runway case it has not been demonstrated what additional public transport capacity is required for the NWR expansion (it is likely to be significant), what is its cost and who will pay.

d. Not least because of air quality, HAL should commit to reduce airport related road use and less polluting vehicles accessing the airport. How this will be done is not clear.

e. The scope for mitigation and the benefits and costs have not been adequately assessed.

f. HAL should commit to the additional public transport capacity required and the related costs. This applies to both the two and three runway cases and to passengers, staff and freight.

g. There is inadequate co-ordination between the several organisations responsible for surface access and there is a lack of progress.

h. There is a significant risk the Government will end up paying Heathrow's surface access costs. But there should be no recourse to the tax payer.

i. Initiatives should be pursued regardless of a third runway development so that rapid improvements to air quality are delivered over and above those to be delivered in the draft London Plan.

j. Release of runway capacity should be linked to surface access tests based on predicted outcomes. The number of Heathrow related vehicles should be no more than today but also at first flight (e.g. in 2026) and the tests must be based on targeted reduction in such traffic compared to a Do-minimum over future years. There must be no recourse to the Government or passengers should financeability fail as a result.

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.

RHC Response

We believe road-user charging can be an effective tool and in this we would include car parking charges. But there must be alternative public transport. These should be pursued regardless of a third runway

development so as to improve air quality.

Air Quality and Emissions

Section 4.4 of the Airport Expansion Consultation Document and Our Approach to Air Quality set out options and approaches to reduce or mitigate the potential local air quality effects that may arise due to the expansion of Heathrow. We would like to know your views on Our Approach to Air Quality, in particular:

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

RHC Response

- a. Air pollution is damaging to health and quality of life.
- b. Improvements and value limit compliance (both essential to health and required in legislation) have still not been shown to be deliverable as soon as possible and with sufficient certainty.
- c. The health of over 100,000 people is potentially at risk from air pollution relating to Heathrow expansion. The risk needs to be eliminated.
- d. Heathrow air-side and flights produce substantial quantities of NOX. These aviation emissions are said to disperse and therefore to be of less importance to sensitive NOX concentrations than road side emissions. We believe aviation emissions in due course contribute to background levels and are more significant contributors to local concentrations than is being recognised.
- e. **The release of runway capacity should be linked to AQ tests based on predicted outcomes. This must be based not just on value limit compliance but also reduction in pollution compared to the Dominium over future years. There must be no recourse to the Government or passengers should financeability fail as a result.**

Carbon and Climate Change

Section 4.5 of the Airport Expansion Consultation Document and our Approach to Carbon and Climate Change set out potential options and approaches that could be used to reduce or mitigate the carbon and climate change effects anticipated to arise as a result of the expansion of Heathrow. We would like to know your views on Our Approach to Carbon and Climate Change, in particular:

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

RHC Response

Carbon emissions from expanded Heathrow flights seem likely to require adverse restrictions on other sectors of the UK economy and reduced growth at other UK airports. The Airports Commission produced a carbon capped scenario as its main case. It constrained flight and passenger numbers and we believe it is a more likely outcome and more conservative than is being promoted by the DfT demand forecasts 2017. **There must be no recourse to the Government or passengers should demand be constrained by carbon limits.**

Natural Environment

Section 4.6 of the Airport Expansion Consultation Document and Our Approach to the Natural Environment set out the key design considerations and provide our likely response to the natural environment as part of the expansion of Heathrow. We would like to know your views on Our Approach to the Natural Environment, in particular:

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

RHC Response

No comment

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

RHC Response

No comment

Historic Environment

Section 4.7 of the Airport Expansion Consultation Document and Our Approach to Historic Environment set out the key considerations and provide our likely response to the historic environment as part of the expansion of Heathrow.

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

RHC Response

Full weight should be given to protecting and improving the World Heritage Site of the Royal Botanic Gardens, Kew, which is significantly impacted by noise, in accordance with the draft revised National Planning Policy Framework which proposes strengthening the protection of World Heritage sites by (a) clarifying that World Heritage Sites are recognised internationally for their Outstanding Universal Value and that this forms part of their significance and should be taken into account and (b) clarifying that when considering the impact of a proposed development on a designated heritage asset, decision-makers should give great weight to the asset's conservation irrespective of whether the potential harm to its significance amounts to 'less than substantial harm' or 'substantial harm or total loss of significance.

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

RHC Response

No comment.

6. OTHER CONSIDERATIONS

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

RHC Response

a. If proponents of a 3rd runway are successful there will be every incentive to use the same methods to achieve a 4th runway, irrespective of any Government ruling. A Government decision to approve a 3rd runway is in effect approving a 4th without having to make a case for two new runways. The Consultation is largely silent on a 4th runway (see Page 7 para.3). We oppose a 4th runway. Communities should be left in no doubt that a 4th runway is likely if a 3rd runway proceeds.

b. Affordability and Financeability

i. The HAL consultation is very remiss in making no mention of the costs and financial viability of the NWR expansion. We realise that these matters depend on the proposals. But this is no answer to the silence when HAL and the Airports Commission have both previously provided costed proposals. The question is – how have the costs and corporate cash flow changed and is the project financeable?

- ii. There are considerable uncertainties and we believe that there is a high probability the NWR expansion cannot be justified financially. We believe it likely that the underlying project return is insufficient to satisfy passengers, freight owners and airlines with no increase in Heathrow charges from today's charges (in real terms) and the bond and shareholders with an adequate return after sharing out all the construction, demand and operational risks. The airlines appear to share our concerns.
- iii. RHC calculates an incremental loss of £12bn to corporate HAL (comparing the Do-minimum and NWR option) if charges to the airlines and in turn passengers are to be maintained broadly at today's levels and based on cash flow NPVs. This assumes NWR capital cost of 19bn and surface access costs of £6bn in 2016 money. Savings of £2.5bn indicated by HAL will be nowhere sufficient to breakeven. These figures are derived from Airports Commission projected cash flows and can be viewed on RHC's website in responses to the DfT on the NPS and to the CAA on economic regulation.
- iv. The incremental loss of £12bn should be viewed in the context of HAL's book debt of around £12bn and equity of £3bn for Heathrow airport. There is a high risk the Treasury will end up having to meet a substantial proportion of the costs and risks of the NWR expansion, which would be wholly unacceptable. It is essential the local communities do not end up paying, as corners are cut on environmental protection.
- v. In our view, it is essential HAL cost the project including the surface access and obtain bond holder and shareholder funding commitments plus a HAL commitment that it will not increase charges and will not resort to the Treasury for support – actual or implicit. Communities need to be protected with environmental conditions that prevent HAL from expanding the airport at the expense of local communities. Passengers need to be protected with no increase in fares.
- vi. This matter needs to be resolved before an NPS is presented to parliament for approval. In so far as responses to the HAL consultation are fed into the NPS process we would ask that this RHC comment be highlighted to the DfT by HAL at the earliest possible moment. Also, when HAL reports on the consultation responses we ask please that HAL respond explicitly to this particular issue of cost and financeability.
- vii. With this very substantial potential financeability constraint on the NWR expansion, it is questionable as to how HAL expect people to respond to the consultation in a meaningful way. Responses are likely to be overridden by the financeability constraint.

7. Please tell us your views on this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and feedback form etc.).

RHC Response

We have found many of the reports use two columns and often this is difficult to read at appropriate magnification on a computer screen.

Contact details:

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