



## RICHMOND HEATHROW CAMPAIGN



**AIRPORT EXPANSION CONSULTATION  
DEADLINE FRIDAY 13 SEPTEMBER 11.55pm**

Shhhhh!

### **YOUR OPPORTUNITY TO QUESTION & CHALLENGE HEATHROW'S IMPACT ON RICHMOND & KEW**

#### **INTRODUCTION**

Heathrow Airport Ltd is proposing to expand Heathrow airport, which involves building a new runway and terminals and changing how the airport operates. A statutory consultation between 18 June and 13 September 2019 seeks responses from stakeholders so that Heathrow can finalise and submit its plans to the planning inspector in 2020.

Summary consultation material, detailed technical documents and an online response form are available at [www.heathrowconsultation.com](http://www.heathrowconsultation.com). Also, Heathrow's drop-in at Richmond Adult Community College, Parkshot, Richmond, TW9 2RE is on **Wednesday 28 August from 2pm to 8pm**.

The Kew and Richmond areas seem likely to be one the worst hit areas by noise from Heathrow's expansion. Richmond Heathrow Campaign's brief comments on each consultation question are provided here to assist your response. RHC is itself preparing a detailed response which will be on its website in early September. RHC still has to review some of the topics. RHC's website is [www.richmondheathrowcampaign.org](http://www.richmondheathrowcampaign.org)

Respondents to the Consultation should use the RHC comments only as a guide and should provide their own views on the issues at hand. The questions numbering is for cross-referencing purposes here and is not used in the internet response form. Respondents may find it easiest to download a Consultation Response Form as explained below.

You have two main options for responding to the consultation. These are:

1. Via the **Airport Expansion Consultation Feedback Form**. You can obtain this from Heathrow's website via <https://aec.heathrowconsultation.com/documents/feedback-questionnaire>, or you can collect a form at one of the public events.

Completed forms should be returned by post to:

**Freepost LHR AIRPORT EXPANSION CONSULTATION**  
(you do not need a stamp).

2. **Enter your responses online** via the Heathrow Airport Limited website at <https://aec.heathrowconsultation.com>.

All options for responding are listed on the first page of the *Airport Expansion Consultation Feedback Form* above.

**Please respond to Heathrow by Friday 13 September 11:55pm.**

## QUESTIONS AND RICHMOND HEATHROW <sup>2</sup> CAMPAIGN COMMENTS

### MASTERPLAN

**Question 1.** Please tell us what you think about any specific parts of our Preferred Masterplan or the components that make up the Masterplan. See section 3 of the Consultation document and the Preferred Masterplan document.

**RHC Comment.** *This question we take to be about the spatial layout of the expanded airport and the additional facilities and access. We question moving the M25 and see no justification for the demolition of many homes and communities.*

**Question 2.** Please tell us what you think about the sites we have identified for buildings and facilities we are proposing to move. See section 3 of the Consultation document and section 7.8 of the Preferred Masterplan document.

**RHC Comment.** *RHC expresses no particular view on the replacement of facilities, except there does not appear to be a solution yet for the important Lakeside incinerator that will have to be moved.*

**Question 3.** Please tell us what you think of our boundary design proposals to manage noise and the effects on views around the boundary of the expanded airport. See section 3 of the Consultation document and section 7.9 of the Preferred Masterplan.

**RHC Comment.** *RHC still has to review this topic's Consultation documents.*

**Question 4.** Please tell us what you think about our development proposals and the measures proposed to reduce effects in identified areas. The Consultation gives focus to the plans and impact on 14 areas around the airport which exclude localities further away such as Richmond and Kew. See the effects of the Project on the 14 local areas in Heathrow Expansion and Your Area documents.

**RHC Comment.** *Richmond and Kew are outside the core area surrounding the airport and therefore the Consultation contains no specific local assessment of the area. RHC will refer in its response to Richmond and Kew in relation to each topic.*

### CONSTRUCTION

**Question 5.** Please tell us what you think of our construction proposals and the ways we are proposing to minimise effects on communities and the environment. See section 4 of the Consultation document and the Construction Proposals document

**RHC Comment.** *RHC is concerned that construction work will cause substantial disruption and impact on surface access as far away as Richmond and Kew over 10 years or more from 2022.*

### FUTURE OPERATIONS

**Question 6.** Please tell us what you think of our runway alternation proposals, in particular we would like to know if you think we should alternate the runways at 2pm or 3pm. See section 5 of the Consultation document and section 3 of the Future Runway Operations document.

**RHC Comment.**

*Kew and Richmond residents will experience harmful noise potentially from all three runways without meaningful respite, particularly residents in the centre of the area. Communities exposed to the northwest and southern runway approaches will have only 8 hours of daytime respite every other day instead of 8 hours every day. Every other day there will be 16 hours of non-stop flights. **How can this loss of respite be justified?***

*The choice between switching modes at 2pm or 3pm depends on each individual's activities but on*

**In the first 10 years from opening of the NWR and before the airport is at capacity will the noise impact be shared equally by communities under the three runway approaches or will the runways be used unequally?**

Heathrow currently gives preference to arrivals from the east (around 70% of the time). Heathrow propose Managed Preference in deciding the balance between westerly and easterly operations but the Consultation is silent on criteria used to target the arrivals direction. **Will there be a preference and will it be based on the number of flights or impact on health and quality of life, for example?**

**Question 7.** Please tell us what you think of our preferred proposal for a ban on scheduled night flights, and/or whether you would prefer an alternative proposal. Section 5 of the Consultation document and section 4 of the Future Runway Operations document.

#### **RHC Comment**

Analysis by RHC and others confirms there is no economic justification for night flights between 11pm and 7am and considerable harm to health. There is sufficient daytime capacity. **What evidence is there that shifting to the day around 16 flights arriving at Heathrow between 23:30 and 06:00 and around 40 arrivals between 06:00 and 07:00 cannot be achieved with minimal net commercial or economic cost? For example, what is so special about the 13 routes that they require night flight arrivals whereas 179 routes are without night flights? The Airports Commission found no reason for flights before 6am - why is this evidence ignored?**

**Will introducing a night flight ban transfer flights to the sensitive 6am - 7am morning shoulder period?**

Currently night flights use one runway for a week and every week cycle to the next of four (east and west) so there are three weeks of respite. With three runways there would be five weeks of respite and one week on flights. However, a choice is proposed between one runway or two on any night with the latter reducing the respite weeks but dispersing the flights each night.

It is not clear whether the runway use between 6am and 7am will follow the daytime pattern.

Night time restrictions relying on quota points has not worked historically, as evidenced by the ongoing harmful impact from night flights. **What other restrictions might be applied - such as number of flights or health impact from the night-time and early morning shoulder period 6am-7am?**

**Question 8.** Please tell us what you think about our proposals for managing Early Growth. See section 5 of the Consultation document and the Early Growth document.

**RHC Comment.** RHC does not believe there is any need for Early Growth starting in 2022 rising to 25,000 flights a year (departures and arrivals) by 2025. This is not a large increase in relation to the current 480,000 flights. But if the growth were concentrated into the 6am - 7am shoulder period that would be unacceptable. A major issue dealt with by the airspace and noise topic is the introduction of Independent Parallel Approaches (IPA), whereby planes curve on to the arrivals approach on the departure runway at around 6 miles from touchdown and in so doing impact new communities to the south and north of the existing approaches. The introduction of Performance Based Navigation (PBN) and its concentrated flight paths adds to the noise impact. Curved PBN flight paths are needed to provide for the early growth and as such will impact Kew and Richmond residents and are unacceptable.

#### **SURFACE ACCESS**

**Question 9.** Please tell us what you think of our proposals [for surface access] and how we could further encourage or improve public transport access to the airport. See section 6 of the Consultation document and the Surface Access Proposals document.

**RHC Comment**

*Roads are already heavily congested and increased background traffic and traffic during construction and traffic from business expansion alongside Heathrow appears not to be adequately recognised by the Consultation.*

*The targeted modal shift from road to public transport by air passengers and airport staff is highly optimistic with inadequate interventions to achieve the high public transfer shares projected.*

*Were public transport to achieve a high share of demand then the available public transport capacity would be grossly insufficient.*

*To provide sufficient public transport would require large sums of money and there is no provision being made by Heathrow thus leaving the tax payer exposed.*

**Question 10.** Please tell us what you think about our proposals for the Heathrow Ultra Low Emission Zone and Heathrow Vehicle Access Charge as ways to manage congestion and air quality impacts. see section 6 of the Consultation document and the Surface Access Proposals document

**RHC Comment.** *The Heathrow ULEZ and VAC would be insufficient to achieve the modal shift to public transport that is needed.*

**Question 11.** Do you have any other comments on our Surface Access Proposals?

**RHC Comment.** *The Southern Rail Link from Heathrow to Waterloo via Richmond would add to overcrowding and level crossing congestion and at great cost and avoided by Heathrow. It would provide better access from Kew and Richmond.*

## **PRELIMINARY ENVIRONMENTAL INFORMATION AND MANAGING THE EFFECTS OF EXPANSION**

**Question 12.** Please tell us what you think about our proposals to manage the environmental effects of expansion. See section 7 of the Consultation document and the Preliminary Environmental Information Report.

**RHC Comment.** *Broadly the proposals covering noise, surface access, air pollution, and carbon emissions do not recognise the already high cost of environmental harm and that the polluter should pay. The management interventions to mitigate the harm rely on lax standards and ineffective enforcement.*

### **Air Quality**

**Question 13.** Please tell us if there are any other initiatives or proposals that we should consider in order to address the emissions from airport related traffic or airport operations? See section 7.1 of the Consultation document and Chapter 7 of the Preliminary Environmental Information Report.

#### **RHC Comment**

1. *The Consultation largely ignores the risks of PM<sub>2.5</sub> and ultrafine particulates. Mitigation is focused on NO<sub>2</sub> which is important but not as dangerous as the particulates and because of the trend to electric vehicles NO<sub>2</sub> is likely to reduce, whereas particulates from brakes and tyres are unlikely to do so.*
2. *The Consultation relies on the EU limit of 25 micrograms/m<sup>2</sup> for particulates PM<sub>2.5</sub> but the WHO limit of 10µg/m<sup>2</sup> should be applied to reduce the harm.*
3. *Particulates from aircraft above 1,000 feet are ignored but there is increasing evidence they can cause dangerous pollution.*

## **Health and Well Being**

**Question 14.** Please tell us what you think about our proposals to help health and well-being. Are there any other proposals that you think we should consider to address the effects of the Project on the health and wellbeing of our colleagues, neighbours and passengers? The outcomes of our preliminary health assessments are explained in section 7.3 of the Consultation document and Chapter 12 of the Preliminary Environmental Information Report

***RHC Comment.** RHC still has to review this topic's Consultation documents. But health and well-being are hugely important and RHC is concerned that they are being treated as subsidiary to growth.*

## **Noise Insulation Scheme**

**Question 15.** Please tell us what you think about our noise insulation schemes. See section 7.4 of the Consultation document, the Proposals for Mitigation and Compensation document and the draft Noise Insulation Policy document.

***RHC Comment.** RHC still has to review this topic's Consultation documents. Our initial concern is that Heathrow has promised substantial investment of nearly one billion pounds for insulation but historically has failed to deliver more than around £10 million of investment in insulation schemes. Furthermore, the noise thresholds giving entitlement to insulation are too high. Insulation is of no effect outdoors in gardens and parks and children's playgrounds.*

**Question 16.** Please tell us what factors are most important as we develop our proposals for noise management, in particular our proposals for the design and implementation of a noise envelope. please see section 7 of the Consultation document and Chapter 17 of the Preliminary Environmental Information Report.

***RHC Comment.** We comment on runway alternation, night flights, early growth and directional preference in questions 6, 7 and 8. We comment on noise envelopes in question 19.*

1. *A key factor is the rate at which noise at source is reduced, i.e. from aircraft engines and airframes and the rate at which less noisy aircraft replace noisy aircraft in Heathrow's fleet. We believe the estimates are over-optimistic. Heathrow proposes to share the noise credit from less noisy aircraft between the community and growth. Given the polluter should pay and that the environmental cost is already too high., RHC believes growth is being unfairly credited ahead of a reduction in environmental harm.*
2. *National noise objectives avoid, mitigate and reduce noise impact on health and quality of life. But there is no noise objective that allocates noise across communities. RHC proposes an objective which results in dispersion but is contrary to Heathrow's approach which is concentration of noise impact.*

## **Economic Development**

**Question 17.** Please tell us what you think of our proposals for maximising new jobs and training. Are there any other ways that we can maximise skills and training opportunities to benefit our local communities? See section 7 of the Consultation document and Chapter 18 of the Preliminary Environmental Information Report and the Economic Development Framework document.

***RHC Comment.** RHC supports employment and training.*

## **Historic Environment**

**Question 18.** Please tell us what you think about our approach to addressing effects on the historic environment, including any particular proposals you would like us to consider. See section 7 of the Consultation document, section 7.10 of the Preferred Masterplan document and Chapter 13 of the Preliminary Environmental Information Report.

***RHC Comment.** RHC still has to review this topic's Consultation documents.*

## **Environmentally Managed Growth**

**Question 19.** Please tell us what you think of our proposed approach to manage the future growth of the airport within environmental limits. Is there anything else we should consider as we develop the framework and its potential limits?

*RHC Comment.* We support limits being placed on environmental hazards - surface access congestion and overcrowding, air pollution, noise and carbon emissions. But at any one time only one of these will bite leaving the others ineffective in controlling growth. The approach is fundamentally flawed. We strongly believe the limits will be lax and enforcement inefficient. Growth will always be supreme. In the case of noise the proposed noise contour and Quota Count (QC) limits are too broad to control concentrated flight path noise impacts. Quota Counts are a measure of an aircraft noise fingerprint.

### **Community Fund**

**Question 20.** Please tell us what you think about our proposals for the [Community] Fund, including what it is spent on, where it is spent, and how it should be funded and delivered. See section 9 of the Consultation document and the Proposals for Mitigation and Compensation document.

*RHC Comment.* RHC still has to review this topic's Consultation documents.

### **Property and Compensation**

**Question 21.** Please tell us what you think about our interim Property Policies, including our general approach to buying properties and land and our approach to compensation, including our discretionary compensation offers. Section 10 of the Consultation document and the Property Policies Information Paper set out a summary of the interim Property Policies

*RHC Comment.* RHC still has to review this topic's Consultation documents.

### **Development Consent Order**

**Question 22.** Do you have any comments on what we think will need to be contained in our Development Consent Order (DCO) and do you have any views on anything else the DCO should contain? See our 'How do we obtain approval to expand Heathrow?' document.

*RHC Comment.* RHC seeks a declared maximum operational capacity of the airport (number of flights and passengers). RHC also seeks definitive flight path design and not indicative design so that the noise impact can be properly dealt with by the DCO. RHC seeks a commitment from Heathrow that it will not seek tax payer funding for any part of the development including road and public transport infrastructure.

### **General Comments**

**Question 23.** Do you have any other comments in response to this consultation?

*RHC Comment.* Not at this time.

**Question 24.** Please give us your feedback on this consultation (such as the quality of the documents, website and events).

*RHC Comment.* The quantity of documents (over 15,000 pages) and the document structure is impenetrable. The website is complex. There are errors and omissions. Vol 2 Chapter 17 of the PEIR documents omits key contour maps for the future baseline.

**End**