

**Mayor's Draft Transport Strategy  
Consultation  
Response from Richmond Heathrow Campaign (RHC)  
2 October 2017**

RHC has responded only to Policy 20 which focusses on aviation and Heathrow. Policy 20 and proposal 96 set out the Mayor's proposed position on the expansion of Heathrow Airport (see pages 248 to 249). Pages 248 to 249 are attached here as an Annex.

**Richmond Heathrow Campaign Response:**

Partially agree to Policy 20 and proposal 96

**Comments:**

The following Richmond Heathrow Campaign response is based mostly on evidence in the Airports Commission's Report. See [www.rhcfacts.org](http://www.rhcfacts.org).

1. Use of additional runway capacity in the UK will result in the breach of the Climate Change Committee's planning limit for aviation of 37.5 million tonnes of CO2 equivalent in 2050 (25% of UK carbon).
2. Heathrow is not full - it currently serves 76 mill. passengers per annum and has existing runway capacity for 95 mill. passengers. Also, the 20 mill. international-to-international transfer passengers at Heathrow provide no economic net benefit to the UK. Only 2% support low frequency routes - 98% are on the most popular high frequency routes. We recommend removing their tax exemption and freeing up additional capacity for London and other terminating passengers.
3. A 3rd runway at Heathrow will cannibalize growth at other London airports and regional airports with a negative impact on the UK aviation market and local economies.
4. A 3rd runway does not increase UK connectivity (number of routes) and in the carbon capped case reduces UK passenger numbers, UK inbound tourism and UK business travel.
5. London's population growth is sizable (37% 2011-2050) and the ICAO Balanced approach to reducing noise impact requires Land Use planning so that homes and noise sensitive schools/hospitals etc are not exposed to excessive aviation noise. The expansion of Heathrow will make it even harder (if not impossible) for local authorities to plan additional homes. London is too densely populated for flight paths to avoid homes, other sensitive buildings and quiet areas such as Kew Gardens, Richmond Park etc. The blight over the next 35 years and more from noise will effect over a million people in an area extending at least 30 miles from the airport.
6. The economic impact of expansion would be disastrous: Heathrow expansion results in a loss to the UK economy of at least £10 billion (NPV). It will bankrupt the airport unless charges to passengers double and yet the Government has said there should be no increase. An NPV loss of over £10 billion to Heathrow's cash flow would wipe out the current debt of £12 bn and equity of £3bn . Heathrow is the most expensive major airport in the world and requires capital expenditure of over £80 billion (nominal) on a 3rd runway, core and asset replacement between 2016 and 2050.
7. The Mayor without delay should get confirmation from Government that the Government will not provide support for Heathrow expansion through subsidies, guarantees, contingent liabilities, favourable tax treatment or any other means - especially in relation to surface access. The Mayor should also confirm that London likewise will not fund any part of Heathrow's expansion. It is a private company 90% owned by overseas shareholders.
8. There is no credible plan for the investment in surface access required to serve not only the current number of terminating passengers but expansion with 2 runways and still more the expansion with three runways. The negative impact on air quality and comfort and convenience of Londoners and Heathrow

passengers will be severe without considerable investment of at least £10 billion in surface access.

9. Given the above impediments, we do not support Heathrow expansion even were noise and air quality impacts to be mitigated, which in any event is impossible. More flights from a 3rd runway plus heavier aircraft fleet (160 passengers rising to over 200 per aircraft) will mean noise energy inevitably will increase. There will be no scope for the community to share the benefits of less noisy aircraft and operational improvements - the aviation industry will take all the benefits.

10. The Mayor's Policy 20 and proposal 96 imply there could be circumstances (e.g. mitigation of noise and air pollution and investment in surface access) under which Heathrow expansion might be justified. We strongly disagree and say there are no circumstances whereby there should be a 3rd runway built. Hence our "partial agreement" to Policy 20.

11. Our recommendation is (a) for there to be substantive investment in surface access to all 5 London airports so that all Londoner's can access any of the airports reliably, comfortably and in the shortest possible time and (b) Heathrow and the other London airports should be made to better serve the public and communities both in terms of those using the airport(s) but in reducing the environmental harm from noise and air pollution. Such a Policy should also contribute to containing aviation carbon and the very significant negative impact it has on climate change.

12. We urge the mayor to include in the Policy a timetable to reduce noise levels from Heathrow to WHO limit levels and to ban scheduled night flights between 11pm and 7am. At the very least there should be no increase in the number of flights in this period.

13. We urge the mayor to include in the Policy a provision that there should be no increase in the number of passengers and staff travelling to/from Heathrow. Reason: to reduce air pollution. Also the Policy should ensure the public transport capacity (taking account of walking and cycling by staff) is sufficient to meet the increased demand resulting from this Policy.

14. Should Heathrow get permission for a 3rd runway, we urge the Mayor to support legally binding conditions to limit and where possible reduce the environmental harm. Also, we urge the mayor to consider how the ICAO Balanced Approach on Land Use planning can be integrated with local authority Local Plans for housing in the boroughs surrounding the airport.

Peter Willan, Richmond Heathrow Campaign  
2 October 2017

## **Mayor's draft Transport Strategy June 2017**

Chapter 5 Homes and Jobs - Extract page 247-249

### **FOCUS ON: GETTING THE PLANNING PROCESS RIGHT**

#### **Public transport links to airports**

##### **Proposal 95**

*The Mayor will promote the improvement of surface links to London's airports, with airport operators contributing a fair share of the funding required.*

London's airports play a vital role in maintaining and enhancing its international connectivity for both passengers and freight. Improved public transport links, notably rail, have a key role to play in making the best use of existing capacity while supporting a shift to more sustainable ways of travelling. Improvements should include:

- New, longer trains for Gatwick and Luton airports as part of the Thameslink Programme and Brighton Main Line upgrade.
- Upgrading the West Anglia Main Line serving Stansted airport, including four-tracking, to be followed by increasing frequencies associated with Crossrail 2.
- Enabling new routes and frequencies to Heathrow airport, with the delivery of the Elizabeth line.
- Further introduction of full-length and more frequent DLR services to London City airport.
- Increased frequencies on rail services to Southend airport.
- New automated people-mover to better connect Luton airport with the rail network.

In addition to these major schemes, improvements to coach, bus, cycling and walking facilities have a valuable part to play in supporting sustainable access to all six of London's airports. These enhancements will help to integrate the airports into the wider public transport network, enabling passengers and staff to make better use of them. All surface access improvements should be planned based on the principle that airport operators provide a fair share of funding.

### **FOCUS ON: THE UNACCEPTABLE IMPACT OF EXPANDING HEATHROW**

##### **Policy 20**

*The Mayor will continue to oppose expansion of Heathrow airport unless it can be shown that no new noise or air quality harm would result and the benefits of future regulatory and technology improvements would be fairly shared with affected communities. Any such expansion must also demonstrate how the surface access networks will be invested in to accommodate the resultant additional demand alongside background growth.*

## **Proposal 96**

*The Mayor will seek a commitment from Government to fund and deliver within an appropriate timescale the extensive transport measures required to support the expansion of Heathrow.*

The Government announced its preference for a new north west runway at Heathrow in October 2016. This would increase the airport's current cap by more than 50 per cent, from 480,000 flights to 740,000 flights per year. The Mayor is engaging with the planning process around Heathrow expansion to ensure his fundamental concerns are raised and addressed.

The demand generated by the current airport combined with local traffic already place considerable strain on the roads and railways serving the airport and contribute to levels of NO<sub>2</sub> that are well in exceedance of legal limits. The Mayor considers that, as a result of the additional flights and associated traffic, any expansion at Heathrow would significantly impair London's ability to meet international air quality obligations in the shortest possible timescale and would contribute to an overall worsening of air quality relative to the situation without expansion.

Heathrow already exposes more people to significant aircraft noise than its five main European rivals combined, and the proposed increase in flights cannot avoid many people being newly exposed to significant noise.

Moreover, it would be unacceptable if the air quality gains secured by the Mayor and the potential noise improvements as a result of new technologies were not allowed to accrue to local communities to improve public health, but were instead used to enable expansion of Heathrow airport.

The forecast additional airport related highway trips are an essential component of the air quality impacts and one that any expansion would have to address. Without significant rail investment, the Government aspiration for 'no net increase in passenger and staff highway trips' is not credible and would place further pressure on already congested streets, in addition to the increase in freight vehicles as a result of the expansion.

If the aspiration for no new highway trips is achieved, this would result in an increase in public transport trips of more than 250 per cent. But without significant new infrastructure, it will place severe strain on the public transport networks that serve the airport. Existing planned/committed schemes such as the Elizabeth line and the Piccadilly line upgrade – designed to support London's population growth – will not be able to accommodate this increase. Figure 52 shows the additional capacity and connectivity required to enable expansion. Delivering the shift to public transport requires Government commitment to new schemes, notably:

- A western rail link to Heathrow – direct services from the Thames Valley: Slough, Maidenhead and Reading.
- A southern rail link to Heathrow – direct services via a route with sufficient spare capacity from central, south and south west London, as well as Surrey. The delivery and operation of the western and southern rail links, and any other links needed, should not disadvantage users of the existing rail services in these areas. There is an important role for improvements to bus, cycling and walking infrastructure serving the airport, particularly for staff journeys. It is also essential that the access for disabled people to the airport is improved.

FIGURE 52: ADDITIONAL SURFACE ACCESS REQUIREMENTS FOR EXPANDED HEATHROW AIRPORT

