

DfT Consultations

Runway Consultation

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These are the recorded submissions for Session 1. Only sections to which responses have been recorded are listed below.

The need for additional airport capacity

Question 1: The Government believes there is the need for additional airport capacity in the South East of England by 2030. Please tell us your views.

Your response:

The Authority accepts the need for additional airport capacity in the South East of England by 2030.

Heathrow Northwest Runway scheme

Question 2: Please give us your views on how best to address the issue of airport capacity in the South East of England by 2030. This could be through the Heathrow Northwest Runway scheme (the Government's preferred scheme), the Gatwick Second Runway scheme, the Heathrow Extended Northern Runway scheme, or any other scheme.

Your response:

The Authority has publically expressed support for the Gatwick Second Runway scheme as the more sustainable development. The Authority opposes the Heathrow Northwest Runway scheme.

The Gatwick Second Runway scheme would not adversely affect residents in Southwark and has a much lower adverse impact from noise in general, affecting a small fraction of the number of households as the Heathrow Scheme. It also provides significantly greater socio-economic benefits, with better surface access links to the Borough. By contrast, the Heathrow Northwest Runway scheme significantly increases the number of aircraft flying over the Borough and is likely to lead to increased daytime and early morning noise exposure from aircraft noise to some Southwark residents. The Heathrow scheme is subject to significant uncertainty over noise, air quality and health impacts. It risks delaying compliance with air quality obligations and suffers from significant risks in terms of deliverability.

Assessment principles

Question 3: The Secretary of State will use a range of assessment principles when considering any application for a Northwest Runway at Heathrow Airport. Please tell us your views.

Your response:

The Authority agrees with the broad assessment principles to be used however the detailed methodology of how noise will be assessed has a large bearing on the likely conclusions in respect of significance of effects. There is only very limited comment on this within the NPS.

Both the 'Attitudes to Noise from Aviation Sources in England' (ANASE) and 'Survey of Noise Attitudes' (SoNA) studies found that sensitivity to aircraft noise has increased in recent years with the latter study finding some adverse effects of annoyance occurring down to 51dB LAeq 16hr. Southwark Council receives complaints each year regarding noise from aircraft approaching Heathrow.

Noise contours are reported in terms of LAeq (16hr) or Lden (24hr). These are averages and so do not relate directly to the actual level of noise experienced at any given point in time. People experience aircraft movements as distinct events. The number of flights is as much a concern to residents in Southwark as the objectively measured average noise levels. This is supported by the ANASE study which found a strong relationship between annoyance and aircraft numbers.

The NPS should require that assessment of health and amenity impacts of noise should be based on up to date scientific evidence of thresholds of health and wellbeing impacts. Consideration should be given

to noise character and significance of effects from short term noise level. Assessment of significance for noise should refer specifically to the principles of the Noise Policy Statement for England. The Authority is concerned that an accurate assessment of noise and air quality impacts has been left to submission in the development consent process. These impacts should be much more fully known before finalising a policy position in a National Policy Statement. The draft NPS risks providing a firm policy basis for potentially unsustainable and damaging development, and for a development which may be undeliverable as a result of environmental impacts.

Impacts and requirements

Question 4: The Government has set out its approach to surface access for a Heathrow Northwest runway scheme. Please tell us your views.

Your response:

n/a

5.1. Air quality supporting measures

Your response:

The Authority agrees with the mitigations stated in paragraph 5.28 that Heathrow Airport should be held to performance targets to increase the percentage of employees and passengers accessing the airport by public transport; and that the introduction of a congestion or access charge for road vehicles should be considered. The Authority also agrees with mitigation measures in paragraphs 5.34-5.40, however, we would like to see a greater emphasis on possible regional air quality effects during both the construction and operational phases including a stronger focus on impacts and mitigations relating to increases in road traffic in London.

5.2. Noise supporting measures

Your response:

The Authority strongly supports the proposed scheduled night flight ban of 6.5 hours between 11pm and 7am although considers that a full 8 hour night period ban would be highly preferable to avoid high noise levels from the resultant concentration of flights into the shoulder period during the early morning 'night' hour. The NPS should require that the short term noise impact of a concentration of night flights during the remaining permitted shoulder hours should be fully reported and assessed against evidence of thresholds for adverse noise impacts at night.

The Authority supports the need for predictable periods of respite from noise although the NPS should require that the impact of this on worst-case daily average noise levels should be clearly reported.

The Authority supports the expectation that all opportunities to mitigate operational noise in line with best practice should be explored in order to achieve development consent however the NPS is too vague on the detail of what this means. The NPS should specify best practice noise mitigations in detail and require specific and enforceable measures before any development consent can be granted.

The proposals for mitigation do not account for wider regional effects or situations where residents experience a worsening of their noise environment outside the 57dB LAeq (16hr) or 55dB Lden noise envelopes. Mitigation should make allowance for situations where people experience significant increases in noise outside of the noise envelopes and for those who can reasonably justify special circumstances that adversely affect their sensitivity (such as relevant medical conditions or night shift working).

Notwithstanding the Authority's opposition to the Heathrow third runway, the Authority supports a position of unambiguously ruling out a fourth runway in the foreseeable future.

5.3. Carbon emissions supporting measures

Your response:

n/a

5.4. Compensation for local communities

Your response:

n/a

Question 6: The Government has set out a number of planning requirements that a Heathrow Northwest Runway scheme must meet in order to operate. Please tell us your views. Are there any other requirements the Government should set out?

Your response:

The Authority broadly agrees in principle with the planning requirements that must be met in order to operate. It is the Authority's view that the draft NPS risks providing a national policy basis for a development which will be unachievable in practice if environmental impacts are assessed legitimately (for example:- difficulties in achieving the avoidance of significant adverse impacts from noise and non-compliance with air quality objectives).

Draft Airports NPS Appraisal of Sustainability

Question 7: The Appraisal of Sustainability sets out the Government's assessment of the Heathrow Northwest Runway scheme, and considers alternatives. Please tell us your views.

Your response:

The Authority considers that the Gatwick Second Runway scheme is clearly the more sustainable of the two options based on projected impacts from noise, air quality, carbon emissions and other local and regional environmental impacts. The Heathrow Northwest Runway scheme appears to have been preferred on economic grounds despite uncertain and detrimental environmental affects on local communities. Sufficient weight has not been given to the economic effects of environmental impacts.

The noise and air quality impacts of the Heathrow Northwest Runway scheme are still subject to significant uncertainty which the Appraisal of Sustainability and draft NPS do not resolve and instead the NPS pushes this into later assessment as part of the development consent process. This will leave a stated policy for the Heathrow Northwest Runway scheme without a true understanding of whether it represents a sustainable or deliverable development.

General questions

Question 8: Do you have any additional comments on the draft Airports National Policy Statement or other supporting documents?

Your response:

The consultation document highlights the reduction in absolute noise levels in some locations by comparison to the present situation as a result of mitigations including improvements in aircraft design, changes in flight paths and respite periods. This is misleading as there is a strong case that, where possible, beneficial mitigations could, and in most cases would be, implemented irrespective of whether the airport is expanded. If the expansion takes place then the future benefit of a quieter environment is removed from households that would otherwise have seen a reduction in an existing adverse or significantly adverse noise environment.

It is very difficult to comment with accuracy on the noise impact of the Heathrow proposal as the detailed flight paths and other measures are not available. Only a possible suite of flight paths and rotation options is presented to control noise, this is inadequate information. One consequence of newly defined preferred routes and tighter flight paths could be large increases in aircraft noise at certain times, and/or for quite specific groups of residents as aircraft movements become more concentrated.

The draft NPS states 'Precise flight path designs can only be defined at a later stage after detailed airspace design work has taken place. This work will need to consider the various options available to ensure a safe and efficient airspace which also mitigates the level of noise disturbance.' The Authority's view is that this position is unacceptable as once the NPS is approved it will be impossible in practice to then refuse development consent, even where there are adverse effects on some residents in the Borough. National policy and the draft NPS (at chapter 5) only require 'other adverse effects' to be mitigated and minimised which provides no guarantee whatsoever that such effects will not occur. The agreed flight paths should be determined in advance and consulted as part of the NPS so that it is possible to comment on genuine likely impacts for the proposal before the policy position is finalised.

The NPS does not accord with regional policy on airport expansion. In particular London Plan Policy 6.6 opposes further expansion of Heathrow leading to increased aircraft movements and Policy 7.15 requires aircraft noise management to reduce noise impacts.

Question 9: The Government has a public sector equality duty to ensure protected groups have the opportunity to respond to consultations. Please tell us your views on how this consultation has achieved this.

Your response:

There is insufficient information provided to assess how, or if, protected groups have been considered with regard to this consultation.