

## **Heathrow expansion: revised draft Airports National Policy Statement – London Borough of Southwark Consultation Response**

### **Case for Heathrow**

The Authority welcomes use of up-to-date figures for passenger demand and an updated economic case for the NPS. The updated analysis shows predicted monetised benefits have risen more for Gatwick than Heathrow. This further weakens the already contentious case for expansion at Heathrow and reinforces the Authority's view that the Government's favoured option is economically inappropriate and environmentally damaging and unsustainable.

### **Noise**

The Authority welcomes the commitment to introduce new metrics to assess noise impacts and their health effects, including a measure that considers the frequency of aircraft events experienced. However, it is unclear what weight such metrics will be given in the decision making process and the commitment is insufficiently strong to give assurance that this could make any practical difference. It appears that the NPS will still fail to adequately account for overflight numbers when considering the significance of Heathrow expansion. This is of concern to residents of Southwark who raise overflight numbers and concentrated flight paths as being matters of particular concern. The Authority has commented previously on the structure and lack of regulatory power of the proposed ICCAN, and our concerns on this remain, however, we welcome the commitment to review this in two years.

The Authority welcomes the use of updated figures in line with the SoNA Study which demonstrate the increase in numbers of people affected by noise. The revised assessment of sustainability (AoS) shows the total number of people affected by noise at 54dB  $L_{Aeq\ 16hr}$  will be 653,900 by 2030 if the scheme goes ahead, a vastly greater number than would be created by expansion at Gatwick and a further increase on an already totally unacceptable adverse noise impact. The Authority considers the admission (based on new contours) that around 92,700 more people will be affected by noise with a third runway than compared to a two runway Heathrow Airport in 2030 as further significant evidence that the Government's current policy position will support unsustainable development. This figure itself is likely to underestimate the impact as it fails to account for overflight changes or the additional adverse effect of entirely new aircraft noise exposure in locations where none is currently experienced.

The Authority considers 51dB  $L_{Aeq\ 16hr}$  and 45dB  $L_{Aeq\ 8hr}$  as the appropriate LOAEL for health impacts from aircraft noise. The Health Impact Analysis points out that noise impacts arising from the proposed Gatwick option were predicted to be of a significantly lower magnitude and affect a smaller population than either of the unmitigated Heathrow shortlisted schemes. The additional Disability-Adjusted Life Years (DALYs) lost to adverse health and amenity effects associated with environmental noise as a consequence of the Gatwick option, considered over a 60-year period, were lower than for either Heathrow shortlisted scheme. It is the Authority's view that the updated health impact analysis shows an unacceptable impact as a result of the Heathrow proposal.

The revised NPS still fails to provide suitable flight path information and allows decisions to be made on the basis of indicative flightpaths that may bear no resemblance to reality once consent is granted. This makes it impossible to know the likely impact of decisions on communities in Southwark and provides for an unacceptable level of uncertainty in predicting the overall noise impacts. Furthermore the projected noise impact assumes the benefit of mitigation and route optimisation that may be unfeasible in practice and it allows the technological benefits of future noise reductions to be used to facilitate further expansion rather than reduce noise impacts for communities that are already suffering significant adverse effects.

The revised NPS and AoS fail to address the other comments made by the Authority in response to the previous consultation (re-attached in appendix A) and in our view sets a policy position which is unsustainable and detrimental to our communities and which may be undeliverable in practice.

### **Air Quality**

It is recognised that the current local air quality at Heathrow exceeds national air quality standards. To increase surface traffic to and from Heathrow will exacerbate the known local air quality issues into intractable problems affecting the health of thousands of west London residents.

Southwark recognise that there will be a diminution of local air quality if the surface traffic issue to serve expansion was at Gatwick, however, that location exposes far fewer residents to poor air quality and there is the space for improved access routes to spread the traffic load through a variety of surface transport networks thus resulting in a manageable rather than intractable issue.

The latest air quality impact assessment document to support the “Revised Draft Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England” is a re-analysis of the Airports Commission study and subsequent two previous re – analysis studies in connection with air quality.

The latest re-analysis takes into account the Government’s 2017 Air Quality Plan and associated Pollution Climate Mapping projections and the latest aviation demand forecasts. The Government is currently subject to a third High Court case by Client Earth in connection with its Air Quality Plan and the hearing in the High Court is due to be heard before the 23rd February 2018. The Client Earth case is based on the contention that the latest version of the UK Air Quality Plan is too weak and too vague to ensure that the UK is compliant with the EU Air Quality Directive in the shortest possible time. There has also been criticism of the performance and accuracy of the Pollution Climate Mapping (PCM) projections. The streamlined PCM model does not fully incorporate the complexities of atmospheric science, but it can be used as a screening tool.

The air quality projections rely on the effective implementation of the Government’s 2017 Plan measures and that the updated surface access strategy iteration 3 must be place. The latest conclusions as to whether the UK’s Air Quality Action Plan will be fully compliant with the Air Quality Directive do not include any new air quality modelling. There has been only a re-analysis of the data input and the assumptions that the Government’s 2017 Air Quality Plan measures and Real Driving Emission legislation to reduce emissions from road transport will be effective and will deliver the stated emission reductions. In the past this has not happened.

The preferred Heathrow expansion option is stated that it will increase pollutant concentrations on roads across London; this is contrary to policies of the Greater London Authority.

With all the iterations of the data analysis and the inherent uncertainties with air quality modelling, the expansion of London Heathrow will increase the risk of non – compliance with the Air Quality limit values in the wider London area.

**Appendix A:**

**Copy of London Borough of Southwark response to Consultation on Draft Airports National Policy Statement (16/5/17)**

## DfT Consultations

### Runway Consultation

**Name of participant: Richard Earis, The London Borough of Southwark.**

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

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**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.**

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**Your response:**

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

#### Heathrow Northwest Runway scheme

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**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.**

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**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

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**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.**

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**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

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

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**Your response:**

n/a

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### 5.1. Air quality supporting measures

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**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.

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### 5.2. Noise supporting measures

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**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.

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### 5.3. Carbon emissions supporting measures

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**Your response:**

n/a

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### 5.4. Compensation for local communities

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**Your response:**

n/a

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**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?**

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**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**

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**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.**

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**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**

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

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**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.

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**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.**

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**Your response:**

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