

EFRA - Heathrow Third Runway Consultation - DfT NPS, publ. 2nd February 2017

EFRA is emphatic about its opposition to the DfT's recommendation for expansion at Heathrow. Within the EU, 28.5% of residents affected by the 55 Lden contour live around Heathrow, a fact that speaks for itself. It simply does not make sense to expand an airport in such a heavily populated area already exposed to unacceptable levels of noise and air pollution throughout the day and much of the night. It is disingenuous to suggest that such issues can be addressed by quieter aircraft, airspace management, respite 'slots' and noise insulation. We categorically reject the proposal and note that the Environmental Audit Committee's Follow-up published on 20th February is highly critical of many aspects of the draft NPS.

More specifically, we have the following concerns:

1. Air pollution levels today exceed the official safe levels around Heathrow. We simply do not believe that it would be possible to operate an expanded Heathrow without making the situation worse. Heathrow says that it commits to no increase in airport related road traffic. We have serious doubts as to whether this is doable.
2. We echo the position of the Environmental Audit Committee (20th February), quote: "Since the Government intends to withdraw the UK from the EU before April 2019, there is no certainty about what our legally binding air quality limits will be after 2019. We are disappointed that these limits are not clearly laid out in the Draft NPS".
3. The absence, in the NPS, of clear indications of where the flight paths will be makes it difficult for local residents to assess impact. However, the proposed location of the new runway means that landing aircraft will have to be aligned over the A4 which is likely to lead to a 50% increase in air traffic for EFRA residents. This and the fact that noise respite will have to be shared more widely will result in a significant increase of noise for our area.
4. We echo the position of the Environmental Audit Committee report (20th February 2017) that without Heathrow expansion local communities might, by 2030, be expected to see a reduction in noise due to new technologies and airspace management. We quote: "The NPS does not clearly lay out the nature of the legally binding noise targets and it only compares an expanded airport in 2030 with noise levels today". This shows a lack of ambition by the Government to tackle the issue of noise and means that by definition local communities would be worse off should a third runway be built.
5. We are concerned about the levels of taxpayers' money that might potentially be needed to pay for road and rail infrastructure.
 - a. Does this refer to extra unbudgeted expenditure, or simply the current enormous bill for R3?
 - b. Even the current costing has now been challenged as to whether it's assumed financial benefit really adds up.

6. In addition to our opposition to any expansion at Heathrow we are confused by the Government's request that six domestic routes should be introduced at Heathrow. We were under the impression that policy was to move domestic travel away from air to rail. This shows lack of joined up thinking.
7. We would welcome the UK Government showing leadership in CO2 control and recognise that there is sufficient runway capacity within the UK already given that business flying is declining due to increased use of modern technology. Demand for short-haul leisure travel should be managed by addressing the anomalies of exemption from fuel duties and zero-rated VAT.