

Heathrow Expansion DCO Consultation Response

Early growth

September 2019

1. Overview

- 1.1 This paper sets out the Mayor's response on early growth to the statutory consultation by Heathrow Airport Limited (HAL) on its expansion proposals.
- 1.2 HAL's proposals to increase the well-established cap in air traffic movements (ATMs) for the two-runway airport in advance of expansion is deeply concerning and will exacerbate Heathrow's impacts on hundreds of thousands of Londoners.
- 1.3 The Airports National Policy Statement (NPS) does not provide policy support for early growth in ATMs at Heathrow, and in fact it appears to specifically exclude it.
- 1.4 HAL's argument that early growth is necessary for it to meet its obligations in the NPS to keep charges down should be given short shrift. HAL cannot recast the NPS at will. If HAL's proposals cannot meet the conditions of the NPS, then it should not seek to use the NPS as the legal basis.
- 1.5 In any case, HAL's proposals for early ATM growth appear half-baked, with an incomplete and wholly inadequate assessment of the impacts. Even if it did want to take forward these proposals, it would have to address the defects cited and then formally reconsult.
- 1.6 But with neither the policy nor evidence to underpin them, HAL should cease pursuit of its plans for early ATM growth.

2. Lack of policy support

- 2.1 Heathrow airport currently operates under an annual cap on movements of 480,000 ATMs, which was imposed as a condition for the approval of Terminal 5. That cap was set at that level for a reason and places a limit on even more excessive environmental impacts resulting from Heathrow's operations. There is no policy justification for increasing that cap on a two-runway Heathrow.
- 2.2 While the NPS expresses support for airports making best use of existing capacity, it explicitly excludes Heathrow: "the Government has confirmed that it is supportive of airports *beyond Heathrow* making best use of their existing runways"¹ (emphasis

¹ Airports NPS, 1.39

added). This point is reiterated in “Beyond the horizon”, published alongside the draft NPS in June 2018².

- 2.3 Instead HAL seeks to rely on the more general line in the NPS about “developing capacity more quickly”³ as evidence for support of its early growth plans⁴ – while at the same time failing to acknowledge that its proposed extended, multi-decade, phasing approach runs counter to this.
- 2.4 Government could not be clearer that there is no policy support for increasing the ATMs at Heathrow while it is operating off two runways.

Early growth and funding

- 2.5 The NPS is clear on the need for HAL to demonstrate that “its scheme is cost-efficient and sustainable, and seeks to minimise costs to airlines, passengers and freight owners over its lifetime”⁵. HAL now states that “early ATM growth is an important component in delivering (this) obligation”⁶.
- 2.6 This carries the implicit threat from HAL that, if it is not given permission for early growth in ATMs, it will not be able to meet its obligations under the DCO to keep charges in check.
- 2.7 This is not acceptable. The NPS is clear that early ATM growth is not supported and that the DCO is to be taken forward on the basis of minimising costs for airlines, passengers and freight users. If HAL is saying it cannot comply with both these parameters, then it cannot seek to bring forward its proposals on the basis of the NPS.

3. Environmental and surface access impacts

- 3.1 Heathrow today already has significant impacts on noise, air quality and surface access and it a source of great anguish as well as demonstrable negative health outcomes for many communities.
- 3.2 It is incumbent on HAL to demonstrate that it has fully identified and mitigated the impacts of early ATM growth. Notwithstanding the broader concerns about the assessment of the environmental and surface access impacts across the DCO material, the information presented specifically in relation to early growth appears to be provisional and high-level. As such, the analysis falls considerably short of what would be required for statutory consultation.
- 3.3 It is suggested that for many of the impacts, mitigation planned for expansion might be brought forward. But the likely effectiveness of these measures cannot be taken for granted, nor should it be assumed that they are capable of being brought forward in the

² Beyond the horizon: The future of UK aviation, 1.5 and 1.29

³ Airports NPS, 3.74

⁴ Early Growth, 2.17

⁵ Airports NPS, 4.39

⁶ Early Growth, 2.2.3

requisite timescales – just a year after a decision on the DCO is made.

- 3.4 It is important that the first year of ATM growth is modelled and presented – alongside intermediate years – and not just the last. There is no obvious reason to assume that the early ATM growth would be subject to any substantial phasing. As such, the first full year of early ATM growth is more likely to represent a worst case scenario – because aircraft technology, vehicle emissions and transport network capacity/connectivity are likely to witness some improvement over the period of early growth.
- 3.5 A cumulative assessment of the impacts of early growth alongside the initial construction phase of expansion is also missing. It is not enough for HAL to reference the need for this in the material; it needs to have undertaken the assessment. In addition, there is no evidence of any consideration of other pertinent impacts of early growth, including on health, community and carbon.
- 3.6 With specific regard to the noise impacts, much more information is required including testing of a full range of metrics, what exactly has been assumed and the likely effectiveness of potential mitigation measures. But even HAL’s high-level analysis indicates that an additional 40,000 people will be exposed above 51dB LAeq 16h in 2025 when compared to a “without early ATM growth” scenario⁷.
- 3.7 The assessment of the air quality impacts of early growth appears to suffer from similar flaws as the main expansion assessment, applying an incorrect test and relying on unsound surface access modelling. HAL appears to make an entirely spurious comparison of the early ATM growth “in isolation” – i.e. comparing against legal limit values without including the existing air pollution relating to airport and non-airport traffic. It seeks to bank the “headroom” resulting from air quality improvements elsewhere – and suggests mitigation measures can be brought forward if the headroom is less than expected, without tackling the likely effectiveness of those measures and whether indeed they can be brought forward in the given timeframes.
- 3.8 Little information is provided as to the surface access impacts, beyond an apparently unsubstantiated claim that the increased demand can be accommodated. To mitigate the surface access impacts, it is suggested that some expansion-related interventions might be deployed earlier. However, this does not address their effectiveness, or indeed whether they could be brought forward in the given timeframes. There is no discussion as to how sustainable mode shift might be secured during the early growth period. There does not seem to be any attempt by HAL to show that early growth can be delivered without increasing highway traffic.
- 3.9 If HAL intends to pursue early growth, it would need to undertake considerable further work and reconsult on that basis. For the avoidance of doubt, the environmentally managed growth approach is not applicable in this context and in any case subject to its own flaws (which we set out to in our response paper on that topic).

⁷ Early Growth, Appendix B, Figure B 1