



Lord Deighton
Non-Executive Chairman
Heathrow Airport Holdings Limited
The Compass Centre
Nelson Road
London Heathrow Airport
Hounslow
Middlesex TW6 2GW

And via FREEPOST LHR AFO CONSULTATION

By email to feedback@heathrowconsultation.com

25 February 2019

Dear Lord Deighton

Heathrow Airspace and Future Operations Consultation

I am writing on behalf of Clean Air in London (CAL) to respond to the Heathrow Airspace and Future Operations Consultation (the ‘Consultation’ or ‘HAFOC’). See <https://afo.heathrowconsultation.com>.

CAL is a voluntary organisation which has campaigned since 2006 to achieve urgently and sustainably full compliance with World Health Organisation (WHO) guidelines for air quality throughout London and elsewhere. Since 2015, CAL has broadened its campaigning to include other environmental issues. CAL knows the City of Westminster (Westminster) particularly well. Further information about CAL can be found at <https://cleanair.london/>.

CAL is independent of any government funding, has cross-party support and a large number of supporters both individuals and organisations. CAL provides a channel for both public concern and expert opinion on air pollution, greenhouse gases, climate change and other environmental issues. This submission provides both general and expert comments in response to the Consultation.

CAL was shocked by the information contained in the Consultation. Having been aware of the Government’s consultation on the Airports National Policy Statement (“ANPS”), CAL was under the impression that most of Westminster would not be significantly and directly affected by air pollution and noise. For example, none of the Government’s noise contour maps showed most of Westminster as potentially being affected by noise. However, we now see that the Government’s consultation was misleading and Westminster could be subject to significant noise and air pollution impacts from the expansion of Heathrow. Had residents, businesses and non-governmental organisations known that Westminster could have been subject to significant air pollution and noise impacts as a result of the ANPS, they would have objected strongly to the ANPS. That these groups are only being informed of the true impact of the expansion Heathrow Airport now is unacceptable.

For this reason, CAL is sending our letter not only to Heathrow, as our response to the Consultation, but also to the Civil Aviation Authority (CAA), the Secretary of State for Transport, the Member of Parliament for the Cities of London and Westminster and the Leader and leading councillors from Westminster City Council. CAL believes there should be no further action on a proposal for expanded operations at Heathrow without a full consultation with all those potentially affected.

In terms of the information presented in this Consultation, CAL makes the following overarching comments:

1. CAL does not consider that there should be any expansion of Heathrow Airport. The environmental damage, especially in terms of air pollution, greenhouse gas emissions and noise, that would be caused is unacceptable. There should be fewer flights, more respite for residents and businesses and less air pollution, greenhouse gases and noise overall from flights.
2. Westminster is likely to be badly affected by the proposal to expand Heathrow Airport and/or adopt “Independent Parallel Approaches”; the area is likely to be affected by the A1, A2, D2 and I1 scenarios for more flights nearby and overhead at low altitudes. It is unacceptable that residents and others weren’t told that this would be the impact of the expansion of Heathrow airport.
3. There should be no change to the existing flightpaths for a 2-runway Heathrow Airport which at least provides some respite to members of the public. Westminster is currently affected by the latest and earliest flights and the residents of Westminster sometimes have only three or four hours respite over night (or less). The IP1 scenario will result in many more overflights in the early morning (night period) which will worsen the current noise environment. There is no justification for this and it is not in the interests of anyone but the airport.
4. Westminster is a particularly sensitive area for air pollution and noise. It is a largely residential area with many protected sites including: Conservation Areas; Metropolitan Open Land; Registered Parks and Gardens; and world renown cultural and educational sites (including the Royal Albert Hall and Imperial College London). It is extremely important that these uses are not significantly affected as they play a key role in London’s society and economy. Further, Hyde Park and Kensington Gardens are key areas of freely accessible open space for the public to use for leisure and recreation which are used throughout the day. Impacts from aircraft air pollution and nuisance noise on these areas of open space cannot be mitigated in any way. They should be minimised and not increased.
5. The Consultation has been conducted in an unsatisfactory way:
 - i. The period of consultation has been too short; this is particularly so given the Consultation informs members of the public, for the first time, that they are likely to be significantly impacted by any expansion of Heathrow Airport.
 - ii. There is a large amount of detailed and technical information presented alongside the Consultation which is difficult to navigate through, difficult to understand and difficult to share widely (for instance some content requires age verification). This makes the Consultation difficult to understand and puts members of the public off responding to it.

- iii. The Consultation questions are presented in an illogical order e.g. when completed online.
- iv. The Consultation seems designed to discourage people from replying e.g. by highlighting that it includes 11 questions, across six topics with an estimated total completion time of 45 minutes.

The Consultation does not present all of the noise information required by the Government's UK Airspace Policy. For instance, the potential extent of the "Lowest Observed Adverse Effect Level" noise contour (i.e. the 51 dB LAeq 16hr contour) has not been presented. This may result in a failure to consult even more members of the public who would live outside the extent of the design envelopes but are not told, even in this Consultation, that they could be significantly adversely affected by aircraft noise.

We should be grateful if all addressees would acknowledge safe receipt of this letter. We will publish this letter on our website so it can be referenced by others.

Yours sincerely

Simon Birkett
Founder and Director
Clean Air in London

Cc:

Dame Diedre Hutton, DBE, Chair of the Civil Aviation Authority

The Rt. Hon. Mark Field MP, Minister of State for the Foreign and Commonwealth Office
The Rt. Hon. Chris Grayling MP, Secretary of State for Transport

Heather Acton, Cabinet Member for Family Service and Public Health, Westminster City Council
Councillor, Nickie Aiken, Leader of Westminster City Council
Councillor Tony Devenish AM, Westminster City Council and London Assembly
Councillor Elizabeth Hitchcock, Westminster City Council
Councillor Baroness Robathan, Cabinet Member for Finance, Property and Regeneration

Kate Harrison, Harrison Grant Solicitors