

# MAYOR OF LONDON

**John Holland-Kaye**

Chief Executive Officer  
Heathrow Airport Holdings Limited  
The Compass Centre  
Nelson Road  
Hounslow  
Middlesex TW1 2GW

Date: 28 MAR 2018

*Dear Mr Holland-Kaye,*

I am writing in response to your consultations on Airport Expansion and associated Airspace Principles in the run up to your proposed Development Consent Order (DCO) on Heathrow expansion.

While this is your first consultation on the DCO, there has been an extensive process in recent years to get to this point. This has included multiple consultations by the Airports Commission and the Department for Transport. The Greater London Authority (GLA) and many other stakeholders have already responded to these so you will be aware of the key concerns and the issues that I believe a third runway at Heathrow has to address.

This consultation was an opportunity to tackle those concerns directly. It could have demonstrated that Heathrow is serious about dealing with the environmental and surface access impacts of a third runway by setting out a credible, committed plan for doing this. Instead, the scheme still relies on taking advantage of developments wholly unrelated to expansion to justify the scheme, counteracting the benefits of those developments. It is fundamentally wrong to exploit in this way the benefits of already planned improvements in air quality, noise and surface access, which would otherwise accrue to society.

### *Air quality*

Your air quality plans rely heavily on the air quality measures that I am implementing in London to deliver much needed reductions in air pollution. Your proposals would substantially undermine my efforts to tackle emissions and improve public health in the capital.

The air quality findings in the Government's Revised National Policy Statement (NPS) are stark. Even taking into account the measures that I am taking in London to improve air quality, it found there is a high risk before 2030 that Heathrow expansion will lead to an exceedance of legal limits across a large swathe of London. This is not consistent with the Government's Air Quality Plan, which says that London will be compliant by 2025.

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To show that expansion is lawful, you should be able to demonstrate that Heathrow expansion, regardless of the wider air quality context, is not going to result in an overall worsening in air pollution.

This requires you to publish your analysis and set out how this will be delivered, particularly as you have not shown how you would prevent an increase in highway trips as a result of expansion. Expansion cannot be allowed to proceed if it will be unlawfully detrimental to air quality and public health.

## *Surface access*

Your surface access plan is almost wholly dependent on pre-existing rail schemes such as the Elizabeth line and the Piccadilly line upgrade. These schemes were planned based on a two-runway Heathrow and are critical to enabling London to meet its forecast for housing and jobs, regardless of any expansion. Your plans would erode the ability of these schemes to do that and would mean worsening congestion and delays on the roads and increased crowding on the railways.

You have previously recognised that no increase in highway traffic is the only credible objective to mitigate the congestion and air quality impacts of a third runway. If this aspiration is to mean anything, it has to be matched by tangible commitments. Instead, you have presented a range of surface access measures in the consultation material, but state no one intervention is required and that if some measures don't come forward, the gap will be filled by the others. But this raises the question as to what happens if several of these measures do not materialise.

Analysis by Transport for London has identified an indicative package of measures, including Western Rail Access and an effective Southern Rail Access. In combination with a significant airport road user access charge, such a package could deliver the 65-70 per cent public transport mode share that is required to ensure no increase in highway trips. If your analysis has identified an alternative package of schemes, now is the time to publish that analysis and to set out how those schemes will be delivered.

## *Noise*

Your noise case is based on taking advantage of potential industry-wide developments such as quieter aircraft and the new navigation technologies being introduced as part of the London Airspace Management Programme. Long-suffering local communities should be able to enjoy the benefits of reduced noise exposure that these improvements will bring. However, your proposals mean banking these improvements to allow a 50 per cent increase in the number of flights.

Studies have shown aircraft noise is linked to an increased risk of heart attack, high blood pressure and stroke as well as reduced reading ages in schoolchildren. Heathrow already accounts for over a quarter of all significant aircraft noise across Europe: the importance of this issue to hundreds of thousands of residents, inside and outside London, should not be underestimated.

In this context, it is unacceptable that your indicative flightpaths, which are the explicit basis of the NPS and DCO, might bear no relation to the actual flightpath options that you will publish after you have secured planning approval. If you wanted to meaningfully tackle public concerns about the likely noise impacts of an expanded Heathrow, you could accelerate the process and publish actual flightpath options.

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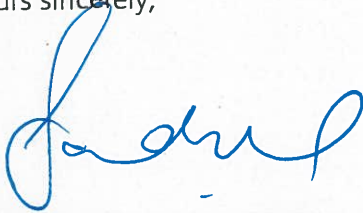
Furthermore, the noise measures in the consultation material appear largely unchanged from the flawed package of measures you have previously published. Your proposed respite through runway alternation would mean that most communities under the final approaches would have no aircraft flying overhead for just a quarter of the traffic day, half of what is offered today. Your proposed night flight ban between 11pm and 5.30am will actually lead to more flights scheduled in the current night quota period. Without any restrictions on the intensive use of all three runways after 5.30am, we estimate your proposals could result in three times the number of scheduled night flights (11pm-7am) compared to today.

Concerns also remain about your noise insulation package, including its phasing, the extent to which residents will have to pay and the threshold for eligibility which is too high. This is a particular problem in light of some of the flightpath approaches you are proposing. That approach will mean many households exposed to significant aircraft noise are not captured by a standard averaging noise metric (such as LAeq) because periods of intense aircraft noise will be averaged with periods without aircraft overhead.

This consultation is a missed opportunity to address the very substantial concerns about your proposals for a three-runway Heathrow and to set out clear commitments to address those concerns. In this letter, I have restated the very serious noise, air quality and surface access issues that remain. However, you will know, as set out in my NPS response, that there are other concerns. These include the communities affected by the demolition of homes, the limited forecast increase in flight connectivity to be offered and how the land for new housing and economic activity associated with expansion will be provided, all issues that you should address. Climate change impacts must also be minimised and Heathrow must contribute effectively to my ambition for London to be a zero carbon city by 2050, as set out in my draft Environment Strategy.

What is presented gives me no confidence that you can deliver a third runway without severe impacts on the environment and quality of life. I remain of the view that Heathrow expansion is the wrong answer for London and the UK.

Yours sincerely,



**Sadiq Khan**  
Mayor of London