

Response to Transport for South East Draft Transport Strategy **consultation**

9th January 2020

Introduction

The No Third Runway Coalition was set up in March 2017, bringing together a number of community groups who are opposed to expansion at Heathrow. Our members include residents, NGOs, environmental campaigners, MP and local authorities.

Communities around Heathrow already suffer from excessive levels of noise pollution and illegal levels of air pollution. A three-runway Heathrow, however, would have severe air, noise and carbon impacts and would increase congestion and emissions on local public transport and road networks.

Our response to the draft strategy is thus confined to the impact that expansion at Heathrow would have on the South East.

Summary

Typically, there are 235,000 daily trips to/from Heathrow with 2 runways in place, with 60% of these using private car or taxi services. Once the 3rd Runway is in place, this will increase to 370,000 daily trips.

If Heathrow complies with its commitment of no additional traffic, then all of the extra journeys must be accommodated by public transport. Currently less than 100,000 daily trips are made in this way. In the future, the expectation is that well over 200,000 daily trips will be made by bus/coach and train/tube services.

The draft strategy includes a principle of environmental sustainability and rightly states that future economic growth must not come at the expense of the environment; yet this is precisely what would happen if a third runway is built at Heathrow.

Impact of Expansion

Government analysis predicts that a third runway would result in additional congestion on local transport networks which would have a significant economic cost on the South East. The draft strategy recognises that this will place greater pressure on transport networks in the South East.

However, it should more closely consider the significant impact that expansion at Heathrow would have. A third runway would result in at least 175,000 additional daily trips on local transport networks.

Heathrow's masterplan resorts to 'indicative' coach and bus links. It mentioned no new rail links in the main document. This is totally inadequate. The South East needs proper, funded and detailed plans.

It is not sufficient and is not sustainable to simply 'encourage' or 'improve' public transport. There must be credible and concrete plans to actually meet the aspirations of modal shift, prevent extra congestion.

The draft strategy rightly recognises the likely impact on the M4/A4/Great Western Main Line corridor and the risk that increased congestion will reduce any alleged economic benefit of a third runway. However, it should also include an analysis of the 30-year construction timeline that Heathrow have planned and the impact that will have on transport networks across the South East.

There is a need to focus on the costs of expansion on the local transport networks. To date Heathrow have provided no detail about their plans to build the runway over the M25 nor how they will seek to mitigate the impact on local road networks. Their costs to the local population in terms of increased congestion and air pollution are likely to be significant.

It is also unclear what the cost to the taxpayer of the road and rail infrastructure improvements will be. Estimates reach as high as £18bn, yet Heathrow has only committed to contributing £1bn. What impact would this have on available capital for other transport projects in the South East? The draft strategy does not appear to identify this significant risk to future funding.

Heathrow's Surface Access Plan (SAP) is lacking in detail and leaves a lot of uncertainty about the measures that Heathrow are fully committed to implementing and funding. The benefits of the measures are also not clear and, in many cases, do not appear to have been assessed.

The final TfSE strategy should include research that undertakes such an assessment. Perhaps, Heathrow can be approached for a financial contribution to this work.

Modal Share

The Airports National Policy Statement included a target for Heathrow has to increase the proportion of passengers accessing the airport by public transport from 40% today to 50% in 2030 and 55% in 2040. However, it has only increased

this figure by 1% since 2009. Heathrow have not demonstrated that such a significant step-change is achievable.

These concerns have only been heightened by the recent admission of Heathrow's CEO, that the airport has failed to meet their 2018 target of the share of passengers travelling to the airport by public transport.

This makes the required target set out in the Airports NPS even harder to achieve and demonstrates that Heathrow are likely to fail to meet the target.

There are real risks in our view that the public transport provisions will fall far short of requirements, especially in the early years, which will result in detrimental environmental impacts.

There should have been clear fully assessed and committed surface access policies and actions with defined performance indicators. These have not been provided.

Mitigation

Heathrow are required to set out the mitigation measures that it considers are required to minimise and mitigate the effect of expansion on existing surface access arrangements. They are also required to demonstrate that the proposed surface access strategy will support the additional transport demands generated by airport expansion. Thus far, this has only been done in a general way which means there is a lack of detail on the measures to be implemented.

The proposals put forward by Heathrow in their SAP fall short of the necessary information to show that mode shift will be secured in the way required by the NPS. There is no credible way for the NPS targets to be met; there is a lack of evidence to support Heathrow's assumptions that it can meet the targets with the measures it has set out.

The information provided by Heathrow to date does not demonstrate that there are transport measures to be implemented that can satisfactorily mitigate the surface access transport impacts associated with the expansion of the airport.

In the absence of proper commitments to the full range of surface access provisions it is not possible for the final transport strategy for TfSE to include information on costs or benefits of the schemes under consideration.

A final concern is that two of the proposed mitigation measures - the ULEZ and the Vehicle Access Charge - would raise revenue for Heathrow. Unless properly implemented, these schemes may do little to discourage use of vehicles or encourage low emission vehicles but may raise significant sums for Heathrow and there is no commitment that this revenue would be invested back into public

transport improvements. The problems associated with diversion of roads and increased congestion will then be passed to local authorities.

Freight

Heathrow claim that doubling of freight at the airport will not double number of vehicles or HGVs on the road yet provide no evidence to support this assertion.

The draft strategy commits to further research on this issue and should ensure that the impact of a doubling of freight handling is incorporated into this work, especially as Heathrow do not appear to have undertaken any.

Roads

Heathrow's masterplan shows that the construction of new roads, and diversion of existing roads and other works to move services will lead to both temporary and permanent effects. However, these are not mapped out, nor is the impact on congestion and associated impact on air pollution.

The draft strategy does not appear to include any assessment of these impacts nor the steps that will be need to be taken either by the airport or local authorities.