

Response from Stop Heathrow Expansion

Stop Heathrow Expansion is the campaign group set up by residents who live in the Heathrow villages situated on the northern perimeter of Heathrow airport. Committee members include local people who were involved with the No Third Runway Action Group (NoTRAG), the previous residents-led campaign group which was active from 2002 to 2010 and successfully fought against an earlier proposal to build a third runway in this inappropriate location.

In this response we use the term “local” to refer to the people who live directly north of the airport. We have particular concern for those who live in the Heathrow Villages of Harmondsworth, Sipson, Longford, Harlington and Cranford but also people in West Drayton and Hayes who will be in the front line for air pollution should permission be granted for the destruction of the villages.

Comments on how the Commission has carried out its appraisal of air pollution.

The way that the latest public consultation into air pollution has been carried out does not inspire confidence. This is a fundamental issue since ensuring that people are able to breathe air that will not lead to health problems and shorten their lives should be a primary consideration of the Commission.

The Consultation was announced, without warning, on the day following the General Election to commence immediately. The Commission would have been aware that this timing guaranteed the Consultation would effectively be buried and receive minimal, if any, coverage in the media.

The three-week consultation period (8th May to midday on 29th May) is too short for the public to become aware of the consultation, read and analyse the information and formulate a detailed response. No attempt appears to have been made to produce information or accompanying notes in a form that a layperson could easily understand.

To make matters worse, an additional document was added to the consultation on 19th May, which may only have been picked up by people who follow The Airports Commission on Twitter or regularly look at the website. It is unfortunate that it took a member of the public to point out the typographical error in the table of figures relating to the minimum/maximum benefit of mitigation measures. How can the Commission expect people to analyse tables of data to draw a conclusion on supposed mitigation benefits when these key figures have not been checked for accuracy?

We know of no attempt by the Airports Commission to make this important consultation accessible to the people most affected. Assumptions that everyone has access to the internet have been made throughout the whole process, even restricting tickets for a public event in December 2014 to those who could apply online and turning away local residents who were unable to obtain tickets. (There were many vacant seats including rows reserved for the press.)

Even if people have internet access, many use phones and small devices that are not conducive to reading tables of data and detailed maps.

The documents are very technical and the language used is not aimed at people without specialist knowledge - i.e. the general public, including those who will be severely impacted by any increase in air pollution.

We conclude that air pollution and the health impacts of expansion have been given a low priority during the long process of producing a final recommendation. This last gasp examination of dispersal and mitigation, in the wake of a Supreme Court ruling that is not mentioned, has the signs of a desperate box-ticking exercise.

Comments on content - the order is not an indication of priority.

The Commission chooses timeframes that can distort the conclusions. For example, previous examination of economic benefits (which are dubious and small per annum) are lumped together with a prediction date decades into the future. Yet when there are negative impacts such as air pollution (which are certain to be significant per annum) the predictions only go to 2030, which ignores aviation industry claims that there is likely to be substantial growth beyond that - hence the lobbying for third and fourth runways in the South East by 2050.

Consultation documents make the same old assumptions and predictions that were given to the public during the 2002-2010 campaign by Heathrow for a third runway and were proved to be inaccurate. During that period, the aim was to have a third runway operational by 2015 when air would meet EU standards. A large display at consultation events showed the list of legislation that would ensure all transport would produce so few emissions that EU targets would be met before 2015. Residents were assured that workers and travellers would be using public transport and a congestion charge could be introduced to discourage private vehicles. Experts at the events said there was no room for debate because legislation would guarantee clean air.

Modelling for 2030 is guesswork but we are now in 2015 and can compare previous modelling with the reality, for example: vehicles that are marketed as meeting legal standards cannot operate at those levels in the congested traffic conditions of the London area. Drivers have been encouraged to buy diesel vehicles to reduce greenhouse gas emissions but these same vehicles pump out particulates that cause severe damage to health.

Heathrow has not made sufficient effort to keep its promises on air quality. In addition to all the existing parking at Heathrow and surrounding area, the airport continues to encourage vehicle use with its on-site parking facilities. The T5 planning application showed Heathrow's lack of concern for improving air quality when it requested 46,000 parking spaces - it was granted 42,000. Parking fees are a major source of revenue for HAL. Spaces for staff enable the airport to attract a workforce that can commute by car from outlying areas. While HAL may be conscious of the need to show that many of its jobs go to people living in surrounding boroughs, it is evident that public transport is not being used by a huge proportion of workers. Some appear to be using public transport for the short part of their journey into the airport while completing most of their journey by car and parking in residential streets. Current proposals still include provision for cars and there is an indication that this will massively increase. For example, HAL now owns a significant number of properties in Sipson - (240 properties, including a small number in Harmondsworth, were purchased by HAL in 2009/10). Maps indicate that Sipson will remain on the new boundary but it is evident that life in the village would be intolerable with airport boundaries bordering gardens, properties overflown at very low level and

pollution likely to be excessive. Blunts Avenue, to take just one residential road, is surrounded on three sides by airport perimeter fence. (Despite this, the Commission has not included this road in its 783 properties to be destroyed for the NWR option, although it does acknowledge the possible loss of more.) Next to the street is a large area, which is currently a public recreation ground (mostly grassed) but is due to be a car park. It seems inevitable that once the homes are gone, the whole land area would also be used by vehicles.

The impact on air quality of removing green spaces, gardens and trees and replacing with concrete and building that generate traffic has to be more seriously considered.

Air pollution from road traffic is a problem that has not been improved despite promises a decade ago. LBH reports that the use of a Congestion Charge appeared in an Action Plan 10 years ago. The reality is that Heathrow airport generates road traffic and is even promoting the airport as a freight and bus terminal, generating further large vehicles onto many roads that weren't designed to take them. SHE does not believe that the full impact on local communities of increased passenger and freight traffic associated with the airport has been sufficiently examined.

The current A4 Bath Road at Sipson and Harlington is often virtually static due to the road width reducing to two lanes in each direction and one of those in each direction being a bus lane. Numerous businesses (hotels, fast food outlets, petrol station and side roads (Sipson Way, Sipson Road, New Road, Harlington High Street) need to access the A4 and they further reduce the flow of traffic. The replacement redirected A4 is likely to be bigger than proposed when actually built and will have a bigger impact on air quality. If Heathrow is given the go ahead for a third runway it is likely that the entire road scheme will be redesigned with bigger roads to improve its bid for a fourth runway in the future.

Jacobs states that "the alignment of new roads will, in practice, be different from this simulated in the dispersion model". Past experience with expansion proposals has shown local residents that new or realigned roads are always "indicative" on maps and tend to be shown in a way most likely to gain approval. Although "the emissions from these new roads have been calculated in detail" even Jacobs realises they are based on flawed basic information.

Residential roads off of the Bath Road are also clogged with hire vehicles parked illegally. Residents groups have pressured the police, council and Heathrow to come up with a workable solution to this problem. Transport for London (TfL), who supply the licenses, asked all drivers in London to turn off their engines when parked to improve air quality but they take no effective action against drivers who ignore the guidance. In the winter, most hire car drivers keep their engines idling when parked to provide warmth and to power electric devices like laptops.

We note that emissions from the airport car parks, fire training grounds and aircraft engine ground-running have not been included. While Jacobs considers that these emissions only make a minor contribution to ground-level concentrations for the "pollutants of interest", local residents are concerned about ALL the pollution they inhale from airport related sources. Item 3.7 does state, "the assignment of these sources in a consistent manner across the three schemes in 2030 would have been extremely difficult" but we feel that pollution figures should not be underestimated by excluding some sources and that some calculation should be made.

Heathrow is again suggesting a considerable shift (50%) from car use to public transport. We agree with the Commission that this target is not deliverable.

TfL said in April 2015 that both the airport and Commission had “significantly underestimated” the challenge of improving transport access to an expanded Heathrow. The Airports Commission estimate of £5bn to make improvements is seen as inadequate. TfL believes a figure nearer £20bn would be needed to provide the service that passengers expect. (Not the shoddy standing-room-only service currently available at many times of day.) It should also be acknowledged that the heavy burden placed on transport systems by the airport affects residents who have no connection to the airport and simply wish to get on with their daily lives such as going to work and attending appointments on time and in reasonable comfort.

SHE agrees with the comments made by Zac Goldsmith, MP for Richmond Park and north Kingston, “TfL is better placed than any other organisation to understand the effects Heathrow expansion will have on London’s transport network, and it is extraordinary therefore that the commission never bothered to ask for its assessment.

“This raises serious questions about the thoroughness and reliability of the commission’s work. If TfL is right, the taxpayer may end up having to cough up an additional £15bn to help Heathrow secure its monopoly, in addition to all the associated problems of gridlock, noise and air pollution.”

The Supreme Court ruling, which the Commission does not mention, will result in yet another Action Plan. Frankly, local residents and Londoners have seen too many plans and too little action. As mentioned, the London Borough of Hillingdon has stated that an Air Quality Action Plan 10 years ago proposed a congestion charge but we are no nearer implementing this than we were then. Despite congestion charging in London, areas of our capital city have some of the worse levels of air pollution in the country.

By shortlisting the Heathrow options, the Commission has already shown that it has accepted Heathrow’s predictions on air quality. If Heathrow could improve air quality surely we would already be seeing all monitors within EU limits as it has known for decades that air pollution would be a barrier to expansion. The solution offered appears to be to move roads and disperse pollution rather than deal with it, which would initially entail reducing heavy goods vehicles, cutting parking facilities for workers, enforcing parking restrictions and anti-social behaviour laws on local roads (requiring more police and council staff), introducing a congesting charge with exclusions for local businesses and residents. It has to be recognised that because of the airport’s geographic dominance, some communities need to use airport perimeter roads to access facilities and businesses on the other side of the airport necessitating many exclusions to the congestion charge.

It is repeatedly suggested that Heathrow is a suitable place for a third runway because the infrastructure already exists. This is not the case. TfL, for example, has made it clear that suitable extra transport infrastructure would cost a further £15bn than the current estimate. Health facilities in the area to the north of Heathrow are already a breaking point yet would be expected to deal with the additional load generated by air pollution on public health.

If there was a major incident at Heathrow or on local roads and motorways, injured people would be taken to Hillingdon Hospital even though it is in urgent need of major work to the buildings. A Care Quality Commission report in February 2015 highlighted failings including a critical care unit that did not “conform to modern building standards”. MPs

covering Hillingdon Borough are asking the government for £300m for an overdue refurbishment.

There is little point encouraging further business into the area when the infrastructure is not there. Cuts are still being made in the NHS, such as the maternity unit closing at Ealing Hospital this summer, and the British taxpayer cannot be asked to subsidise Heathrow, a foreign-owned business.

Any sick travellers at Heathrow who need medical attention are taken to Hillingdon, often taking priority over local people.

There is a lengthy disclaimer from Jacobs to ensure the company is not held responsible for the consequences of its work. Jacobs points out that the data on which their study is based has not been independently checked. Any media coverage of the information in the report should be prefaced by a similar disclaimer.

The report includes “ifs” and “mights”, which show that Jacobs is unsure of its own predictions for mitigation. From past experience, we remain sceptical about predictions regarding mitigation and believe the only way forward to reducing dangerous pollutants is actually cutting emissions from aircraft and road vehicles.

Past predictions have been unrealistically optimistic. This time, Jacobs predicts that the NWR runway option will increase NO_x by 26.2%, PM₁₀ emissions by 15.7% and the most dangerous PM_{2.5} emissions by 22.7%. Even if this is anything like accurate it would be astounding if the Airport Commissions recommends Heathrow for expansion.

Heathrow's own documents, examined by the London Borough of Hillingdon, indicate that houses that remain in Sipson and Harmondsworth (according to Commission figures of 783 demolitions) will be at EU limits or exceed them. The report does not make it absolutely clear that reaching an EU limit does not make the air clean or safe. The British government has a responsibility to ensure its citizens breathe the best quality air possible, not something full of pollutants that borders on, or exceeds, a legal limit.

Precise numbers give the impression that the figures can be relied upon although they are just predictions and rely on the input data, which is subject to the overarching disclaimer. For example, 47,063 properties (121,377 people) would have higher annual mean NO₂ concentrations and that there are 14 “at risk” properties.

Our understanding is that the proposal to move the A4 Bath Road closer to West Drayton is essential for dispersal of pollutants but it is not possible to provide a further assessment that includes this realignment of the road. When this road is moved, we are convinced that the size will be dramatically increased.

There is no specific examination of the impact of pollution on the developing lungs of children, which medical research shows has significant affect on health in later life. The Commission figures for demolition do not include a number of schools that would be near a new airport perimeter and/or busy roads. Schools would have to be replaced at the taxpayers expense.

It must not be assumed that because Londoners already suffer high pollution levels (such as those on the Marylebone Road) they are somehow less deserving of clean air than people who are used to breathing air in a countryside environment. For too long some of

the areas around Heathrow with poor air quality have been seen as places to site yet more industrial developments like incinerators, factories and hotels since arguments can be made that residents are resigned to the health impacts.

The most effective mitigation schemes to reduce road traffic and remove the demand for ever increasing flights are likely to be those that involve charging the user a new or higher fee. The British government would be under pressure to remove financial benefits given to the aviation industry.

As with all calculations made on behalf of business, the report puts a price in pounds sterling on the damage caused by pollution. SHE is concerned that predictions for business profit and damage to the UK (which will include extreme levels of human suffering) are being weighed up in this way with emphasis on possible financial profit.

London's population is rapidly increasing and people seek to live in areas where there are employment opportunities. It is acknowledged that further expansion of Heathrow will bring vast numbers of people into the area, thus increasing the numbers of people affected by pollution.

Any improvement in diesel engine technology will be counteracted by the number of vehicles that Heathrow hopes to generate as a result of 260,000 more flights and larger aircraft carrying more freight.

HAL has been very coy about relating any increase in freight to an increase in air pollution and the Airports Commission consultation does not deal specifically with the impact of road freight on air pollution and the road network. If freight transport increases the vehicles will not only produce more pollution but they are likely to slow down other vehicles and increase their emissions.

It should be remembered that new concentrated flightpaths will have an impact on air quality in some areas that is not currently being assessed.

While there is considerable research that links air pollution with serious health conditions including coronary heart disease, high blood pressure and even obesity, we are not aware of any medical research that proves there are positive benefits of inhaling toxic pollutants. Therefore any level of pollution should be seen as needing improvement.


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