

Submission to the Airports Commission from the Yiewsley and West Drayton Town Centre Action Group

The Yiewsley and West Drayton Town Centre Action Group is a group of residents and businesses committed to the continued improvement of life in our area. We are recognised by our Borough Council and consulted as a matter of course on planning and other key local issues and we act as a significant point of local liaison in the South of Hillingdon Borough.

This submission mainly concerns the two options for expansion at Heathrow airport, but also applies to the expansion option for Gatwick airport too. Where our responses apply solely to particular options this is indicated below.

Introduction

- 1 The Commission's work on this issue is clearly extensive and we are grateful for the technical reports and appendices and various other explanatory documentation that has been made available.
- 2 It is our view, though, that the fundamental principles of the Consultation require reassessment. Additionally we feel that some of the key areas of detail are in need of significant attention.
- 3 Our view is that
 - the baseline assumptions for this Consultation are untenable. There is a tacit argument underlying this Consultation that current levels of disbenefits from aviation are acceptable. They are not. This needs to be addressed as a matter of core policy before expansion at Heathrow should be considered;
 - levels of future disbenefits have not been adequately addressed. This is a major weakness in the case for change in the two Heathrow options;
 - the overall case for economic benefit from expansion has been oversimplified and is very likely to have been overstated;
 - the Commission's decision to proceed to a three option shortlist without sufficient public scrutiny and appraisal of other options was not a sufficiently robust or democratic process;
 - the lack of transparency around the final stages of the decision making process is unfeasible and that this may lead to an inadequate process of information capture.

Question 1

What conclusions, if any, do you draw in respect of the three short listed options? In answering the question please take into account the Commission's consultation documents and any other information you consider relevant. The options are described in section three.

Process

- 1 We are not convinced by the rationale for additional runway capacity. As this matter is not the subject of this Consultation, we will not elaborate further on the merits of options such as unused capacity at Stansted airport and regional airports whilst providing for further scoping of an iconic offshore airport.
- 2 We feel that the Airports Commission unfortunately has not had adequate time to consider the key findings so far and consult upon the necessary detail. The rush to shortlist three options, with viable options prematurely dismissed has provided for a process which has not been adequately scoped and appears not to be fit for purpose for a decision of this magnitude.
- 3 We feel that the chase to a “white paper”-style shortlist, rather than detailed public consideration of the earlier “green paper” stages demonstrates an intrinsic weakness of process. This has led to a hasty and insufficient analysis of the key issues, leading to the significant possibility that the best solutions have not been identified, and that public and democratic scrutiny has not taken place.
- 4 Our submission predominantly addresses the two Heathrow airport expansion options, which we do not support. We wish to be clear that we also do not support the case for expansion at Gatwick airport. Our main focal point is the effects of aviation where large numbers of population are present.

Heathrow options: lack of disbenefits analysis

- 5 We do not feel expansion is viable at Heathrow airport. Huge numbers of the population of London and the surrounding areas would be significantly adversely affected.
- 6 We do not feel the consultation has evaluated these disbenefits in sufficient depth. This may be because core economic theory for societal disbenefits is not sufficiently well advanced in policy making circles but we would like to see far greater effort applied - as there is a very clear disbenefits case that is not being assessed metrically in the Consultation.
- 7 In the case of the two Heathrow options the disbenefits are monumental. Even the most ambitious quantification of fiscal operating benefit would be dwarfed by the nefarious effect that expansion would have on many hundreds of thousands - and maybe even millions - of people.

- 8 Infrastructure is there to aid the health and economic wellbeing of a population: when the reverse applies then a reassessment is necessary. This is what we propose in response to Question 2.
- 9 **Core economics:** We strongly feel that London should not be subject to the dystopian future that Heathrow expansion would bring. We do not see how economic benefit case - which seem to us to have a very fanciful air in many aspects – can possibly balance this situation.
- 10 **Public investment:** We are also most concerned that the investment case for the Heathrow options is so far outside Green Book public spending evaluation methodology that public subsidy into the proposed infrastructure capability should not be contemplated. We feel that any change that would so benefit private industry and non UK shareholders should be prepared to fund the supporting infrastructure changes such as roads.
- 11 **Health:** Health experts from at least the 1980s onwards have been increasingly clear in their analysis of the negative health and wellbeing impact of aviation. The World Health Organisation’s key reports such as the 1999 *Guidelines for Community Noise* could not be more direct in their judgments on the deleterious impact of aviation. Aviation has the potential to damage huge areas of population through noise blight and air quality issues. Aviation is particularly dangerous to the vulnerable – the young, the old, those with respiratory problems and underlying illnesses such as heart conditions. Studies show that aviation noise limit “helping” responses and increase stress levels, leading to mental health problems. Hypertension. There does not appear to be any assessment of the impacts of these issues in the Consultation.
- 12 **Noise - EU context:** Heathrow airport is at the heart of a vast population. It is the largest noise polluting airport in Europe. Heathrow in its current two runway operation affects **725,000** people at noise levels of 55 dB Lden or above. 55dB is the level at which the World Health Organisation say that “significant” annoyance begins: where noise becomes a health problem. Airports for most major cities in the EU affect less than **45,000** people at such levels. This is no coincidence. Most planning controls in the EU have ensured aviation blight is under a sensible level of control. The gigantic Schiphol airport for example, much quoted as Heathrow’s hub rival, affects population only at these far lower levels – around 17 times less than Heathrow. The scale of blight from Heathrow is simply staggering. It is in our view that further expansion is inconceivable against this backdrop.
- 13 Furthermore, many more – perhaps millions more - are currently impacted by noise pollution at levels above 50dB Lden from the current 2 runway operation at Heathrow airport. This lower level - “moderate annoyance” in WHO terms - also carries a cost and many new studies are starting to calculate the true health and environment disbenefits. It is our understanding that

noise disturbance at this level is not even monitored by Heathrow Airport under current monitoring frameworks.

- 14 **Noise reduction:** We believe that noise reduction claims by the aviation industry and HAL in particular are fanciful. We note the regulators' views on the technical difficulty in some of the issues and we simply do not believe that technology (noise controls for example faced with trade-offs on carbon) will permit such radical development. We agree with comments on these technologies by the London Borough of Hillingdon and investigations by the campaign group HACAN, and in other sources such as the Noise at Heathrow Airport report by the All Party Parliamentary Group on Heathrow and the Wider Economy.
- 15 The World Health Organisation in the 1999 *Guidelines for Community Noise* is scathing about the myopia of historic planning processes for various airports (and with Heathrow already being more than three times worse than the next worst noise polluter, it is not hard to guess to whom this comment is directed). In response to question 2 we set out what we think would be a better way to examine aviation capacity in the UK.
- 16 **Night flights:** We also find that the expansion argument around night flights is flawed. If the business case to expand Heathrow airport is so predicated in expanding trade capability with emerging markets - with such different time zones in play - the need for night flights would surely be central to the Heathrow expansion business case. This view has indeed already been expressed by shareholders of Heathrow Airport Limited, who have demonstrated in their public comments little care for the plight of Heathrow's London neighbours.
- 17 We do not believe that if a third (or fourth) runway were to be built at Heathrow that the pledge to limit night flights to current levels would be honoured. If a third runway were built we believe that the airport operators would gradually press for more and more night flights, leading to an even more substantial night noise problem with massive health damage.
- 18 As the current EU noise regulations have been given no regulatory "teeth" when transposed into UK law there is little incentive for the current Heathrow operators to do much beyond pledge to keep its operations "under review". If expansion at Heathrow were to occur, the operators' pledges would we believe eventually be eroded and millions would suffer the misery of being unable to live with the "luxury" of a passable night's sleep. The economic disbenefit of this would be huge and appears not to have been costed.
19. **Air quality:** Our area suffers from some of the poorest air quality in Europe. It has amongst the highest levels of asthma and respiratory problems. Worsening air quality in London should not be considered – it is only in

recent history that clean air legislation has prevented urban death on a massive scale, such as with the great smogs of the 1950s. WHO studies have established causal links with these types of illnesses in the proximity of airports, so we are concerned that this area does not appear to have been adequately covered in the consultation.

20. The disbenefits of poorer air quality with the two Heathrow options would have profound effects on the health of Londoners, both from the additional 250,000 annual aircraft movements from a third runway, the huge amount of additional operational pollution and surface movements, and the air quality issues associated with the wider transport issues related to the expansion. We agree fully with comments made by the London Borough of Hillingdon in their submission to this Consultation expressing concerns that the key data has not been assessed.
21. **Housing:** We do not believe that housing requirements have been analysed or proposals costed in the depth that is required. We agree with comments by the London Borough of Hillingdon in their submission. Additionally we do not believe that the wellbeing – or moral - costs for the trauma of eviction or seeing neighbourhoods ruined has been adequately addressed. This is a serious omission.
22. **Jobs and the economy:** We have noted the unrealistic range of elasticity in the economic values attributed to jobs created (27,400 to 112,000 in the period up to 2030). This assessment does not appear to be fit for purpose.
23. A more sophisticated analysis of the existing, buoyant, local economy should be undertaken. A surfeit of lower value economic jobs may upset the delicate economic balance that takes place within the various micro-economies of London. Additionally we do not feel that the full impact of economic migration has been taken into account. We think it is unrealistic to expect these jobs all to go to locals, or to UK nationals. Under EU treaties on freedom of movement and labour, we expect large scale economic migration to occur, which is likely to place undue strain on local services. This does not appear to have been quantified. The non-payment of tax from non UK and offshore labour bases also does not appear to have been assessed in reaching the stated figures.
24. We also do not believe the information from HAL that additional lower value jobs will solve London's projected future skills shortages or affect its deep lying strata of youth and familial unemployment which is a more complex economic and social phenomenon.

Question 2

Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in section three.

Addressing the current problems from Heathrow Airport

1. The Consultation in our view addresses uses the wrong policy baselines when considering options for expansion at Heathrow airport. Heathrow airport has created such a range of health and environmental disbenefits that Government should embark upon a course of active review of the airport's functions, with a time bound improvement plan tackling issues of noise pollution and air quality.
2. We feel that the attempts to create a case for expansion at Heathrow by creating a "composite" set of blight values from the two existing runways plus a third, which then magically reduce, are credible. Firstly, the existing situation should not be allowed to worsen at any point. Secondly, we do not believe the claims around technological advancements. Asking the population of London and the surrounding areas to take a Kierkegaardian leap of faith into a belief that aviation technology will improve dramatically is quite simply a ludicrous way to make public policy. We have noted for example the Terminal 5 Inquiry's view that noise values have in all likelihood plateaued and that not much further improvement is actually likely to occur.
3. It is our view that existing mitigations from transposed EU noise monitoring Directives are toothless. HAL's assessments contain few genuine commitments beyond promises to review. Government intervention is necessary.
4. We would also support calls for the operator at Heathrow Airport to widen their existing compensation criteria in the existing two runway operation, so that those affected by the 55dB Lden contours have claim to compensation, as at Nice airport, or at least at 57dB, as at London City. We understand that only those affected at or above 69dB are currently compensated, which seems grossly unfair given the rate of expansion at Heathrow in recent years and the disproportionate effect this has had on those who live in the affected noise contours.
5. In terms of the expansion compensation proposals at Heathrow outlined in this Consultation we find the opaque nature of presentation both bewildering and unedifying. Local housing stock is generally of high quality, particularly in the villages under threat with demolition, and replacements would be very difficult to find at existing pricing ranges.
6. Additionally, compensation for the two Heathrow proposals does not appear to take account of the upward pressure on housing in London and the surrounding area. Removal of housing at Heathrow will create an acute

pressure, exacerbating the effects of an already overcrowded housing marketplace making housing very difficult to find and incredibly difficult to afford.

7. It is important to realise that the impact of the devastating acts of eviction, demolition, community uproot, re-schooling is almost immeasurable. Similarly, those whose houses and communities are blighted or impacted by the loss of friends and colleagues would feel a tremendous loss of wellbeing.
8. The case proposed in the Consultation is not akin to a local authority making a small number of forced compulsory purchases of say one of two properties, where effects on individuals can be mitigated locally without too much pain (eg people can move round the corner). The expansion proposals for Heathrow are almost a kind of corporate ethnic cleansing, with great quantities of people who have lived in an area for many years forcibly removed, their entire communities dispersed, their heritage bulldozed and destroyed forever. We do not think it is possible to put a price on such an action on this scale.

Question 3

Do you have any comments on how the Commission has carried out its appraisal? The appraisal process is summarised in section two.

1. As set out in response to questions 1 and 2 we feel that a better process than the current shortlisting would be to completely re-evaluate policy to improve the environmental and wellbeing problems caused by aviation in the South East, particularly addressing the two runway operation at Heathrow. When this is complete then a separate analysis around additional runway capacity could be conducted. This is a significant issue and a serious proposal.
2. On a point of lesser detail we do not find comparator terminology to be precise enough. The headers “positive, neutral or adverse” do not assess qualitative and quantitative measures. The noise and air quality disbenefits of additional runway capacity around London and Gatwick is classed as “adverse” - equal horror to both sets of residents - but the scale of the problem in terms of sheer numbers at Heathrow would be of a different magnitude.

Question 4

In your view, are there any relevant factors that have not been fully addressed by the Commission to date?

- 1 Yes. We feel that the consultation is very short on key specifics on flight paths, air quality, local road plans, health, environmental impacts and compensation detail. It is very hard for those who would potentially be affected to understand and respond to this consultation.

- 2 In our opinion the consultation is wrong to proceed to a three option shortlist before some of these key issues were bottomed out in more detail. It is not democratic to leave this level of detail until after a decision has been made. The detail is vital. Too many lives would be blighted and ruined without early comprehension of what is being proposed.
- 3 To squeeze the immense range of disbenefits into a single module on wellbeing feels perverse. Health impacts, monetised appropriately, are clearly missing. As stated in Q2, there is little attempt to quantify the loss of place and pride, sense of community and families in the immediate area of most significant blight, but this blight will also stretch right across London and the surrounding areas under the flightpaths. There has been little attempt to quantify this.
- 4 We learned recently of the adobe pod that has been placed in a playground in a school in Hounslow to allow small numbers of children to play. To us this seems like dystopia personified: what monetisation could compensate for the lack of freedom afforded to those children?
5. We also feel that the two Heathrow expansion options do not aid UK resilience.

Question 5

Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?

- 1 We have outlined our key issues above. We agree with all comments made by the London Borough of Hillingdon in their submission on this section.

Question 6

Do you have any comments on the Commission's sustainability assessments, including methodology and results?

- 1 We have outlined our key issues above. We agree with all comments made by the London Borough of Hillingdon in their submission on this section.

Question 7

Do you have any comments on the Commission's business cases, including methodology and results?

- 1 We have outlined our key issues above. We agree with all comments made by the London Borough of Hillingdon in their submission on this section.

OTHER COMMENTS

Question 8

Do you have any other comments.

1 We have outlined our key issues above. We agree with all comments made by the London Borough of Hillingdon in their submission on this section.