



# HILLINGDON

LONDON

National Policy Statement  
New runway capacity and infrastructure at airports in  
the South East of England

Consultation

Response by the London Borough of Hillingdon

25 May 2017

## Table of Contents

	Page No
Foreword	3
1. Introduction	4
2. History	6
3. Referendum	7
4. Homes Lost - Directly or Indirectly	8
5. Compensation	9
6. Community Facilities	9
7. Employment	10
8. Accommodating Growth	10
9. Transport	15
10. Heathrow Expansion and HS2	18
11. Air Quality	19
12. Noise	24
13. Heritage	26
14. Land Contamination	28
15. Removal of Mitigation for Terminal 5	29
16. RAF Northolt	30
17. LBH's role a Local Planning Authority	30

## Foreword

### High Court Challenge

The London Borough of Hillingdon was part of a consortium of local authorities and others ["the claimants"] who commenced judicial review proceedings in relation to the Government's decision to favour airport expansion at Heathrow. The other authorities are the London Boroughs of Richmond and Wandsworth and the Royal Borough of Windsor and Maidenhead.

The claimants argued that the proposal included a flawed approach to air quality and that the decision was contrary to their legitimate expectations because the Government made repeated promises over a number of years that there would be no third runway at Heathrow and that the Government should have consulted with the four local authorities before making its decision.

The judicial review application was refused on the basis that the Planning Act 2008 precludes a judicial review claim being brought before the NPS has been published and adopted by the Government. However, Mr Justice Cranston said that "once the Secretary of State adopts and publishes an NPS, the court will have jurisdiction to entertain the challenges the claimants advance".

The London Borough of Hillingdon maintains that it was unlawful to decide in favour of Heathrow in October 2016 and therefore the basis of the draft NPS and the consultation is also unlawful.

The London Borough is committed to responding as fully to the consultation, both in its own right, and also as part of a separate four borough response, which includes the three local authorities referred to above. However this is **without prejudice** to its contention that the October 2016 decision was unlawful and that everything that has followed since is also unlawful and it reserves its right, as part of the consortium, to refer the matter back to the High Court once the Secretary of State has adopted and published an NPS.

## 1. Introduction

The London Borough of Hillingdon ["LBH"] is the borough which is most affected by the Government's proposal to expand Heathrow. Its residents, and particularly those in Harmondsworth and Heathrow villages, are already exposed to significant blight in terms of both air and noise pollution arising from Heathrow and this will be significantly exacerbated if a third runway is built.

LBH's residents have been living under the spectre of possible Heathrow expansion for a number of years. Their hopes have been falsely raised by promises made by previous Governments that expansion is off the agenda only for these promises to be unequivocally broken. There has been a marked lack of engagement and consultation with LBH itself and its residents and the October 2016 decision by the then Government to expand Heathrow has been as shocking as it has been unwelcome.

LBH is committed to doing everything possible to protect its borough and residents from the very significant blight which Heathrow expansion will bring. It has already been mentioned that LBH reserves its right to refer the December 2016 legal challenge back to the High Court, and also that it has submitted a joint response to the NPS consultation with the London Boroughs of Richmond and Wandsworth and the Royal Borough of Windsor and Maidenhead ["the four borough response"].

For the avoidance of doubt, LBH wishes to make it clear at the outset that it fully relies upon, and endorses, everything that has been said in the four borough response. However, it feels compelled, as the borough most affected by the Heathrow expansion proposal and also in its capacity as the local planning authority, to make a supplementary response to the consultation. LBH does not propose, in this response, to address each of the nine questions posed in the NPS consultation document on the basis that they have already been fully answered in the four borough response. LBH will instead highlight and expand upon those areas which gives it and its residents' greatest cause for concern and it will set them out in general terms. The four borough response has already touched upon the following concerns insofar as they relate to Hillingdon:

- The Government's preferred option for expansion will result in the direct loss of over 1000 homes. To put this into context, Hillingdon's annual target for new housing is 1600 per annum. The loss is extreme and is made worse by the lack of a plan to ensure that the homes directly lost as a result of the preferred scheme will be reprovided. There is also no assessment of how this loss relates to Hillingdon's annual target and there is also no proper regard given to the significant increase in the housing stock that will be required in Hillingdon resulting from in-migration to fill new jobs. The ability to accommodate this level of additional growth would conflict with the aims of the Council's local plan. It is extremely likely that LBH would struggle to meet the additional need given it is a growth not planned for. This has implications for education, health, and many other statutory functions of LBH.

- Airport expansion will trigger growth not previously identified nor planned for. Heathrow expansion has not been planned for strategically and, without the necessary plans in place, it will in particular saddle Hillingdon with unmanageable levels of growth. The current development plans for Hillingdon do not allow for Heathrow expansion. The draft NPS is inward looking, myopic and only interested in Heathrow airport. There is no consideration of its relationship with other plans and programmes, and no thought has been given as to the highly destructive planning framework that will be felt across the whole of Hillingdon.
- Airport expansion will result in a new development in Hillingdon, crossing differing authority boundaries and will require land take not set aside or safeguarded. However, the Appraisal of Sustainability ["AoS"] appears to ignore the wider implications of airport expansion at a local level.
- LBH is part of the West London Waste Authority which is contracted to supply annual tonnage to Lakeside EfW Plant which will be demolished as a consequence of Heathrow expansion. The AoS recognises the impacts of this and the harm it will cause but makes no attempt to assess the wider impacts, nor identify where a 'potential' alternative location could be. Nor does the AoS assess the implications for regional waste planning or the ramifications for the loss.
- There is a deficiency of unrestricted open space in the south of Hillingdon. Prospect Park and Cranford Park represent the limited offering for the communities immediately north of the runway and those that will remain with expansion. The preferred expansion option will dissect Prospect Park and at least halve its provision. Cranford Park will be at the end of an operational runway and its use will be significantly devalued or negated entirely. The loss of these two parks will have likely significant effects. Firstly, the loss of useable open space will dramatically increase the area of deficiency and will result in thousands of people with less or no access. This will have a significant detriment to the quality of life. Secondly, the NPS will clearly have a negative impact on the ability of LBH to deliver its open space plans and therefore is contrary to Hillingdon's Local Plan, both adopted and emerging.
- The Government has taken an irresponsible approach to some mitigation. For example, the AoS acknowledges that the loss of the War Memorial Recreation Ground in Sipson will lead to a negative impact on quality of life during construction but that re-provision of it will lead to a positive impact. However, no solution has been identified. The remaining properties in Sipson and Harmondsworth will be at the end of a runway. No useable open space could be reasonably expected. The reliance on an as yet unidentified and unassessed mitigation is contrary to planning proposals and would be widely condemned in the development of any other plans or programmes.
- The strength of LBH's feelings against proposed Heathrow expansion is exemplified by the fact that its Leader, Councillor Raymond Puddifoot,

prepared and submitted a witness statement in support of the December 2016 judicial review challenge. This statement, together with other legal documents relating to this challenge, are an important part of the four borough response to the NPS consultation. Relevant extracts from Councillor Puddifoot's statement will be referred to in this response where it is considered appropriate to do so.

It is proposed to set out this response under the following headings:

- History
- Referendum
- Homes Lost - Directly or Indirectly
- Compensation
- Community Facilities
- Employment
- Accommodating Growth
- Transport
- Heathrow Expansion and HS2
- Air Quality
- Noise
- Heritage
- Land Contamination
- Removal of Mitigation for Terminal 5
- RAF Northolt
- LBH's role as Local Planning Authority

## **2. History**

The witness statement from the Leader of LBH, Councillor Raymond Puddifoot, sets out in considerable detail the long history of planned Airport expansion in the South East, dating back to 1978. It is not proposed, in this document, to repeat this history but emphasis should be drawn to the following two statements made in 2009 and 2010.

On 21 October 2009, David Cameron gave a speech to a crowd in Christ's School in which he declared the Conservative Party's position against the possibility of expansion of Heathrow:

*"The third runway at Heathrow is not going ahead, no ifs, no buts.*

*Even if Labour win the next election because of the public pressure and the Conservatives not backing it, BAA is backing off already."*

In May 2010, the newly formed Coalition Government set out their programme for Government. This included a pledge under the heading "Energy and Climate Change" to cancel plans for the third runway:

*"We will cancel the third runway at Heathrow."*

Both LBH and its residents have fully relied upon these promises, with the latter planning their lives on the basis that Heathrow expansion would never occur. The Government's October 2016 decision, in conjunction, with the draft NPS, has had a devastating impact upon the residents, particularly as the draft NPS does not present a strong and compelling case for Heathrow expansion.

It is therefore most unfortunate that the option of expanding Gatwick has been discarded by the Government with no justifiable basis for doing so. Expanding Gatwick in its semi rural location presents an obvious solution. For example, the number of homes lost would be 20% when compared to Heathrow and noise impacts would be experienced by just 10% when compared to Heathrow. A detailed analysis of the comparisons between Heathrow and Gatwick is set out in the four borough response which Hillingdon fully supports and endorses.

### **3. Referendum**

Heathrow expansion amounts to the construction of a new terminal and third runway facilities which would be approximately the size of Gatwick Airport on land in the borough of Hillingdon, presenting an unprecedented environmental and social threat.

In 2013, LBH held its first ever referendum which was on the subject of Heathrow expansion. Everyone on LBH's electoral roll was sent a ballot paper and was asked to vote on two specific questions:

- Should a third runway be built at Heathrow? Yes/No
- Are you in favour of more flights into and out of Heathrow? Yes/No

Of the 205,634 residents balloted, 81,050 responded to the referendum representing a voter turnout of 39.41%. Of those who voted, 66% did not think that a third runway should be built at Heathrow and 66.3% were not in favour of more flights into and out of Heathrow. LBH had always been clear that that it was opposed to further expansion at Heathrow and this referendum showed that the majority of Hillingdon residents agreed with its policy position.

There is nothing to suggest that Hillingdon residents' feelings about expansion at Heathrow have changed since the 2013 referendum. If a new referendum was to be held in 2017, it is expected that the result would be just as emphatic, if not more so.

#### **4. Homes Lost - Directly or Indirectly**

783 homes will be directly lost to expansion. A further 289 are highlighted to be lost to accommodate a surface access scheme, the plans of which are not yet disclosed. By comparison, the reported amount of homes lost to building a high speed railway (HS2) from London to Birmingham is approximately half the 1072 lost to Heathrow Expansion.

LBH's annual target for new housing is 1600 per annum. This puts into context the level of destruction that will take place to accommodate Heathrow expansion.

Expansion will result in the complete loss of Longford Village, parts of Harmondsworth and other nearby villages. In addition, 3,750 homes would be affected by blight.

What the NPS does not include is the amount of properties immediately outside the directly impacted construction zone which will be subject to environmental harm. The indirectly impacted areas will result in the enforced movement of households, families and communities which the NPS has simply had insufficient regard to.

The NPS contains numbers for direct losses and fundamentally misses the important issue of what a home or a community is. Gatwick will result in the loss of just 205 homes with even far fewer indirectly impacted than is the case with Heathrow expansion. Yet the language in the accompanying evidence base to the NPS is:

*"Each scheme will result in the relocation of housing, which may have a negative effect on community viability."*

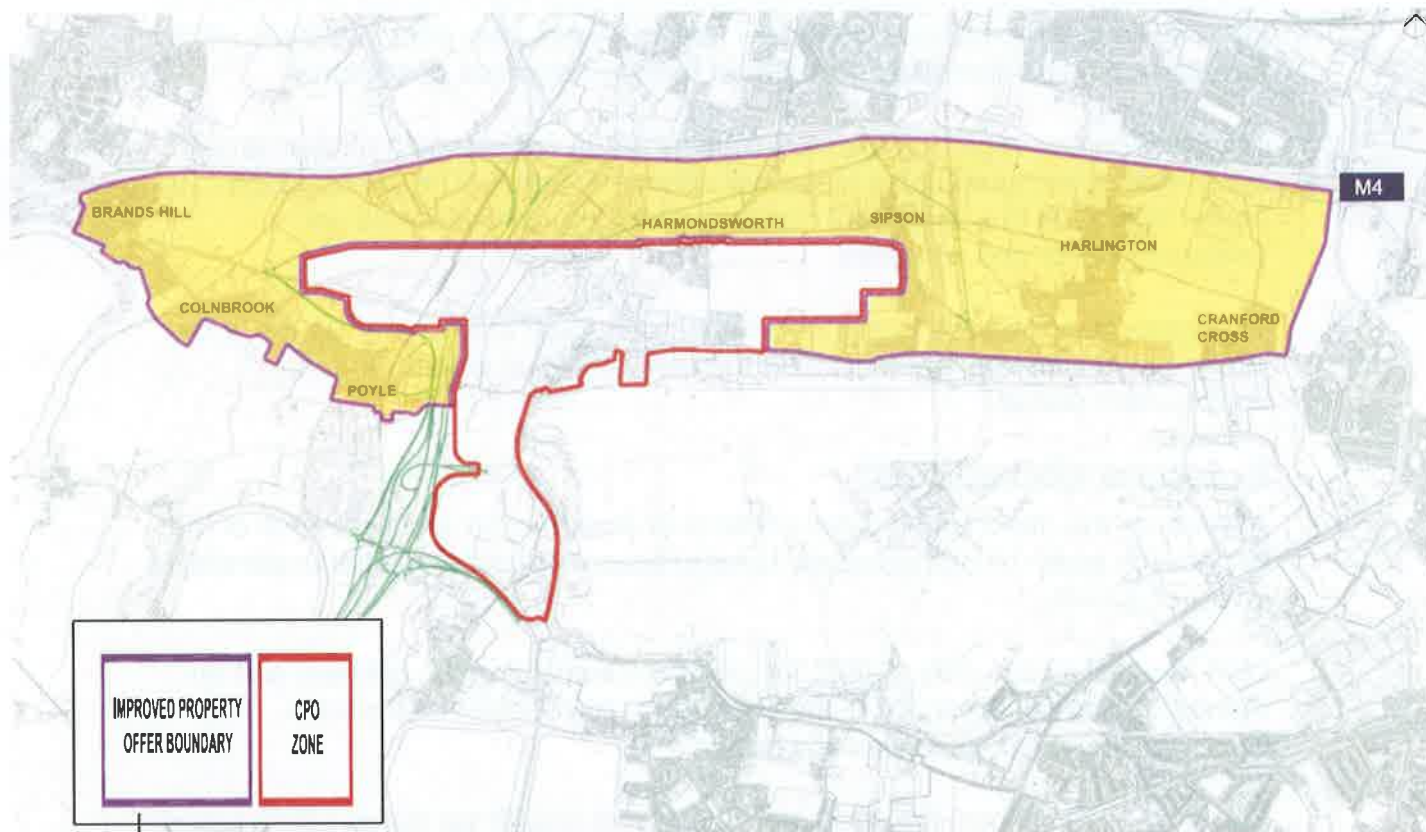
The map below illustrates the extent of harm that has not been assessed in the NPS. The map is taken from Heathrow Airport Limited's property compensation proposals webpage. It shows an area directly at risk and the homes to be compulsorily purchased (outlined in red) and then a much wider area where compensation is available to households.

It is implicit that the quality of life will be fundamentally compromised for those families and individuals that need to move homes. The relevant webpage states:

*"The wider property offer would cover approximately 3,750 homes in the towns of Poyle, Colnbrook, Brands Hill, Harmondsworth, Sipson, Harlington and Cranford Cross."*



In total, there will be nearly 5000 homes either destroyed or households left with a quality of life so blighted that the airport operators accept the need for compensation to be payable.



## **5. Compensation**

LBH notes that any compensation will only be available once planning consent is given. The estimated timeframe of two years for obtaining planning consent for Heathrow Airport Limited is entirely misleading for those who would be entitled to compensation. It is anticipated by LBH that this timeframe will be significantly longer with the consequence that this will cause huge uncertainty for affected households which is simply not acceptable.

## **6. Community Facilities**

Not every household or individual will wish to opt for the wider compensation package. They will have to contend with living in the vicinity of an expanded airport. In addition, there will be a lot of people and communities who fall outside of the compensation zones who rely on services provided within it.

Schools in Harmondsworth, Longford and Sipson will either be lost or subject to noise impacts that will adversely affect the cognitive learning ability of the children. Land within these zones provide some of the only district size open space to tens of thousands of people living in Hayes, West Drayton, Yiewsley and further afield. The impacts on these residents have not been given any weight at all and are not even considered in the NPS which is astonishing.

## **7. Employment**

There are many people living in Hillingdon who rely on businesses that will be lost to Heathrow expansion and therefore they face the prospect of losing their jobs. In time, an expanded Heathrow may generate new jobs, but there will be several years of uncertainty until a third runway becomes operational.

The NPS has no regard to the true impacts of the construction phase, simply implying that the operational stage will offset any harm. The construction period will result in a significant number of lost jobs which are as yet unaccounted for and uncostered.

The economic appraisal in the NPS does not appear to give any weight to the economic disbenefits, particularly in the context of lost jobs during the construction period.

## **8. Accommodating Growth**

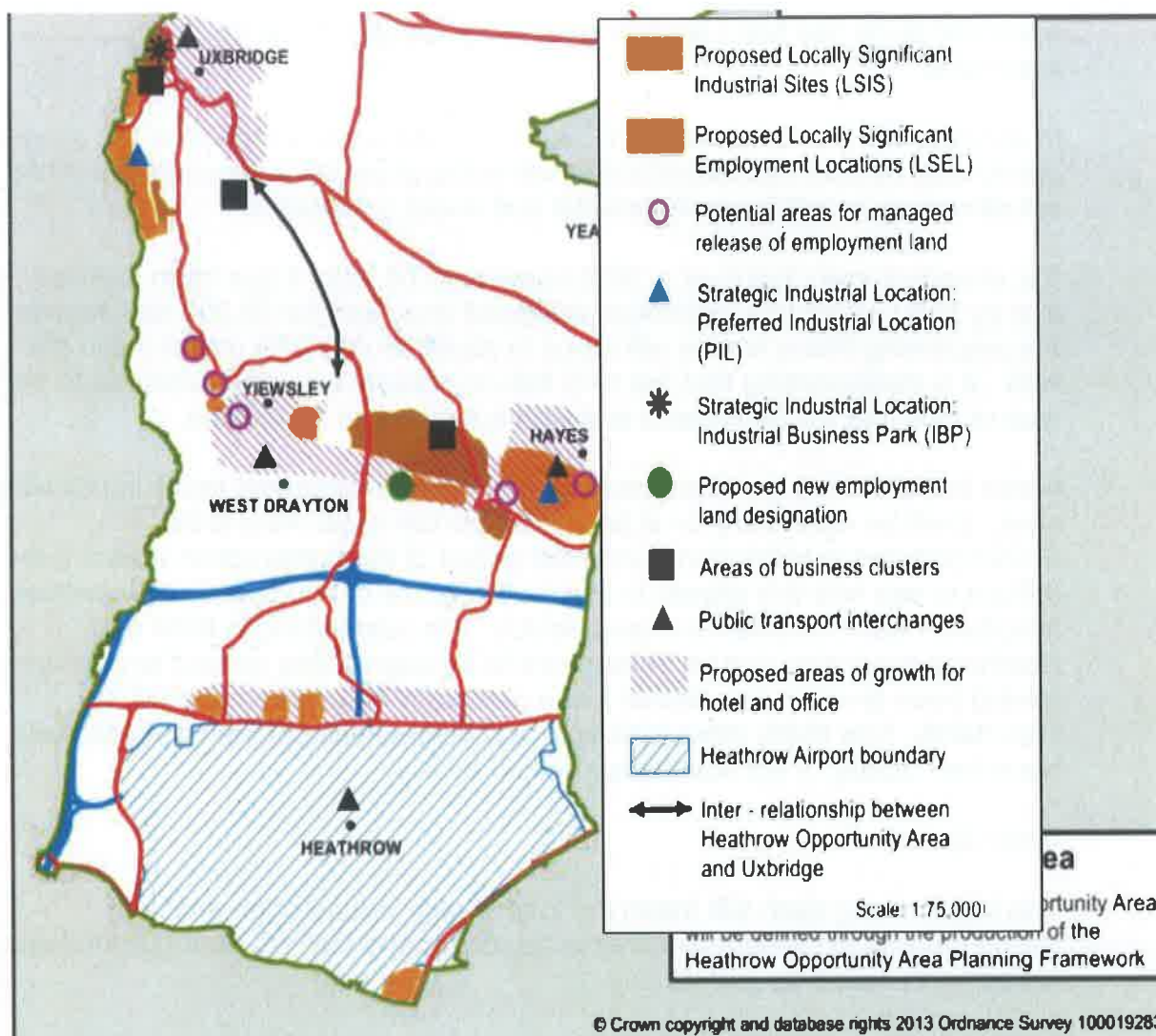
Apart from the direct and indirect impacts of construction and operation of the airport, the south of Hillingdon will have to accommodate potential unparalleled levels of growth.

LBH has a statutory duty to plan for growth in a sustainable, efficient and fair manner giving equal regard to the economy, environment and people. The NPS significantly undermines this duty.

The map below shows the strategically planned growth set out in LBH's Local Plan. The aspiration has always been for the existing airport to operate better, not bigger. The planned growth for Hillingdon has been designed around this aspiration.

Consequently, the large economic and housing growth is directed towards Hayes and West Drayton which will benefit from the new Crossrail station. Strategic employment zones have been highlighted along Bath Road (A4) just north of the airport.

This strategic vision for Hillingdon has been democratically approved, adopted and remains of the utmost most significance when having regard to new development.



### *Housing and Employment Growth*

The NPS alludes to economic growth and new business opportunities as a consequence of Heathrow expansion. None of this has been mapped, or properly assessed so it is largely based on hope which is not a sensible foundation for strategic planning. It is not clear where this growth would go, how it could be serviced or what the impacts on other planned growth would be. It is fanciful to believe that Heathrow expansion will occur in isolation and everything that was going to happen before it was decided upon will remain unchanged through the construction phase and into operation.

There will be likely significant effects that have simply not been assessed. Of particular concern is the impact on housing and economic growth around the Crossrail station, and what new plans LBH will need to adopt to facilitate this growth.

As is set out in the four Borough response, it was anticipated that the AoS would assess the implications for other plans and programmes, such as the Local Plan but it has palpably failed to do so. The impact on democratically

approved plans has been entirely ignored by the urgency to deliver Heathrow expansion.

In addition, LBH, and indeed the Government, do not know whether the alleged growth can be accommodated either within the physical constraints of existing infrastructure, or within environmental and social constraints.

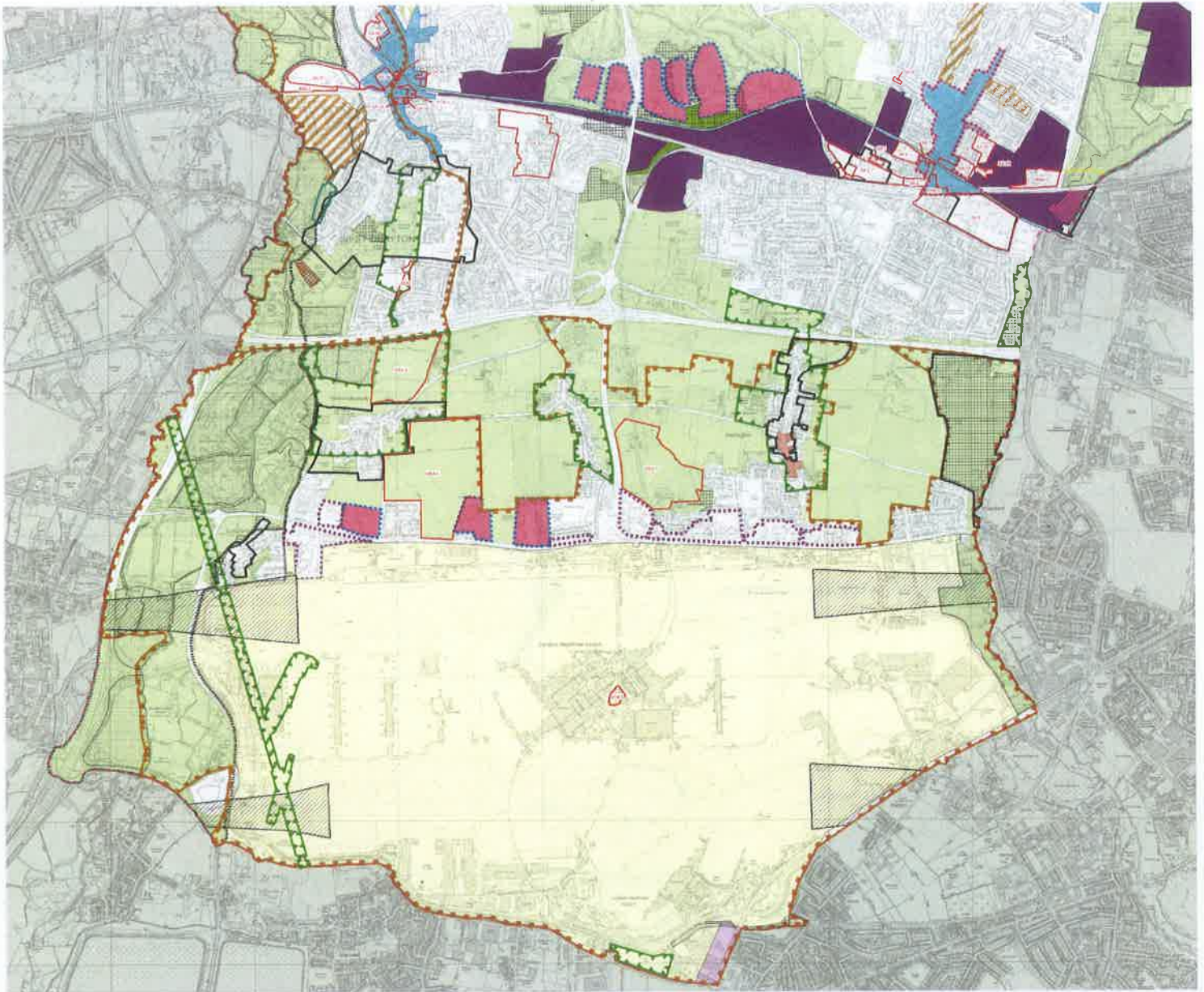
It is already known that over a 1000 homes will be lost. It has been claimed that by 2030, Heathrow expansion will result in a need for 70,000 new homes. Accompanying these homes will be up to about 75,000 jobs as set out in the AoS. It is disappointing that the NPS fails to present any information as to the type of jobs that will be created and where they are to be located.

Given that there will be widespread commercial development replacing existing sites, it will be necessary for at least a proportion of workers to be accommodated in Hillingdon during the period of the construction works, it is difficult to see how this growth is serviced in terms of education, care facilities, hospitals, health facilities and open space. It is astonishing to think that Heathrow expansion can be determined to be appropriate without any thought having been given as to whether it can physically be accommodated, or, importantly, how many other residents and communities within Hillingdon will have their quality of life adversely affected by it.

### *Open Space*

The impacts of growth will mean the loss of high valued open space in Hillingdon with significant constraints on other parts that will render them less attractive to residents and visitors.

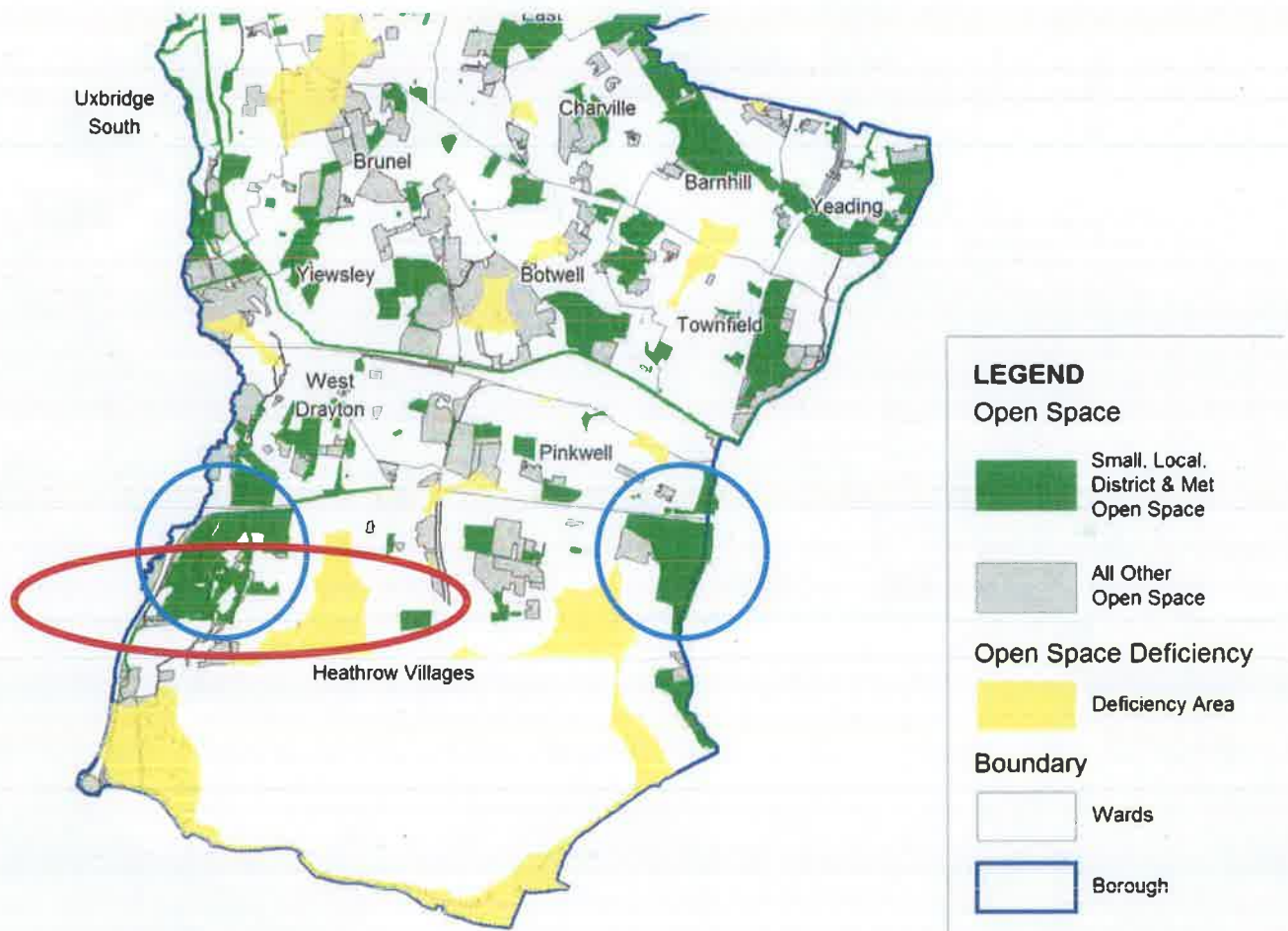
The map below is taken from LBH's emerging land use allocation plan and is informed by the Local Plan Part 1 and a series of technical reports. It clearly shows the Green Belt area interspersed with historic villages south of the main residential areas of Hayes, West Drayton and Yiewsley. It shows the planned housing and employment growth (pink and purple shading) around the Crossrail station but also of note is the extent of open space available (green shading). Only some of this open space is publicly available, thereby representing a relatively scarce resource in a densely populated area.



Expansion of the airport will remove a vast area of this open space but importantly it will remove, or render virtually unusable, the public open spaces used for recreation. This is a significant concern as usable and accessible open space is in short supply in the south of Hillingdon. LBH's open space strategy acknowledges:

*"There is an insufficient quantity of accessible open space serving Yiewsley District Centre. Yiewsley Ward requires a further 40 hectares of open space to meet the overall quantity standard of which 12 hectares should be "recreational" open space to meet the recreational open space standard. In West Drayton Ward there is a shortfall of a similar magnitude for all open space, although there is sufficient "recreational" open space."*

Two of the vital areas of accessible and large open space are Prospect Park, provided as mitigation to Terminal 5, and Cranford Park. These are highlighted on the map below.



Prospect Park will be virtually removed with the remainder being in close proximity to an operational runway. Cranford Park will be at the end of the new runway and the noise levels are expected to be so severe that the value of this park will be almost entirely removed.

Expansion of Heathrow will leave people in West Drayton and Hayes, the new residents in the growth zone around the Crossrail station, and those left in Harmondsworth and the Heathrow villages with a severe shortage of open space. The scarcity of high quality, immediately accessible, usable open space in a growing London is a huge concern for planning for growth. In short, there would be a loss of 431 hectares of green belt land and the loss of 61 hectares of recreation or public open space.

No 'mitigation' is set out in the NPS. Based on Heathrow's vision, the people of these communities will have to at the very least take to the congested roads to access the suggested, but as yet unsecured, open spaces in Buckinghamshire.

#### *Minerals*

LBH is required, through the London Plan, to safeguard its minerals assets, another scarce resource in London. As can be seen from the extract below, Heathrow expansion will entirely remove the prospect of one minerals

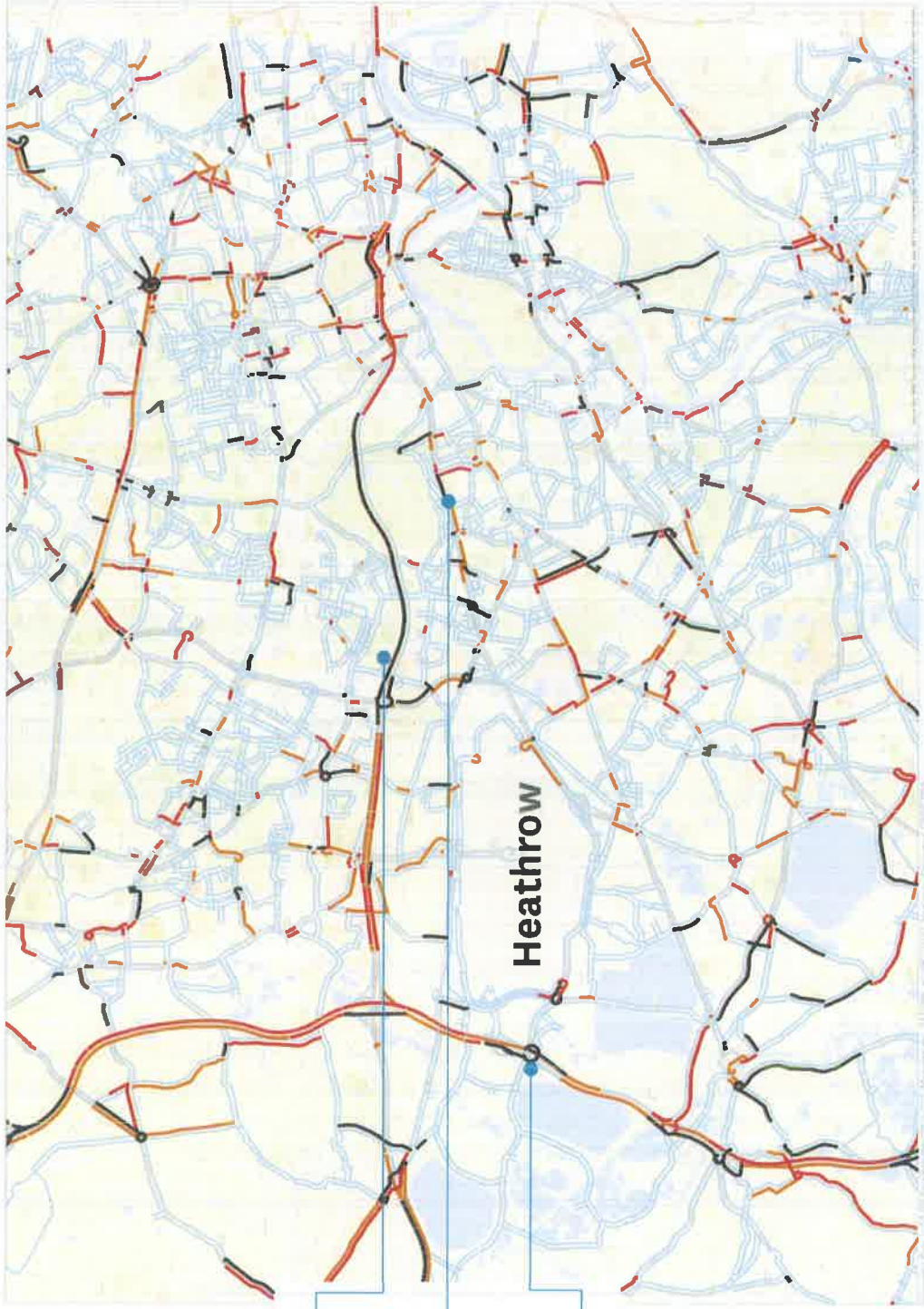
safeguarded site, and render the other two sterile by virtue of their proximity to an operating airport.



## **9. Transport**

Many key road and rail links in the region are expected to be close to capacity by 2030, with the situation much worse by 2040. The supporting local network is therefore intrinsically linked to the strategic road network. The map overleaf shows the expected future problems around West London.

Congestion on roads around Heathrow in 2040 · [without expansion](#) · Percentage volume over capacity



M4 forecast to be congested

A roads and local roads in Heathrow area forecast to be congested

M25 access to Heathrow forecast to be congested

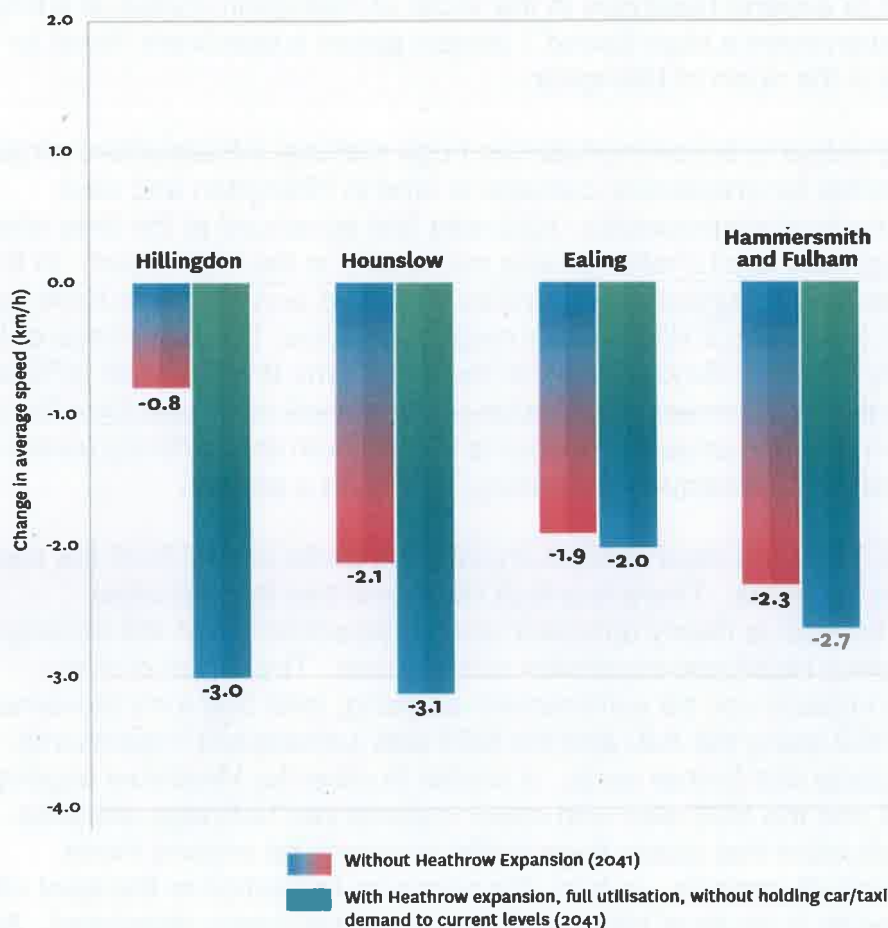


The road network is highly complex and very sensitive to increases. For example, the principal road corridor most affected by road traffic growth is the A4180 West End Road/Ruislip Road A312 Parkway corridor linking the A40 Polish War Memorial with the M4 junction 3. This is an important link providing north south connectivity on the eastern side of Hillingdon and access to Greenford, Uxbridge, Southall and Southall Gas Works development site and Hayes town centre.

By 2030, even without Heathrow expansion, the M25 at peak times will again be over capacity as will be the A40 between the A406 Hanger Lane and A4180 Polish War Memorial junctions. Near Uxbridge town centre there will also be congestion from the A40 westbound off slip onto the B467 Harefield Road. This situation will be exacerbated with Heathrow expansion.

TFL has previously advised on the following expected impacts of Heathrow expansion on Hillingdon's road network.

Change in average borough-wide speeds in AM peak (vs today)



As stated in the four Borough Response, the NPS does not provide any assessment of Heathrow Airport's previously proposed mitigation. If this mitigation cannot be delivered, then clearly Heathrow expansion cannot be accommodated on the local road network.

Furthermore, the lack of detail in what was assessed as part of the NPS provides no confidence that the expected growth in Hillingdon, particularly around the Crossrail Station, combined with the planned growth for expansion, has even been considered at this stage.

Part of the 'Better not Bigger' vision is about solving existing problems relating to airport traffic. Despite attempts to improve a modal shift to public transport, as Heathrow has expanded (passenger wise), problems with car parking have increased. This has spilled over into residential areas and sites with different permitted land uses.

There is no comfort that Heathrow expansion will do anything but significantly exacerbate increasing congestion and road traffic, bringing grid lock to local areas. This is even before consideration is given to the traffic associated with housing growth, employment growth and freight transportation.

## **10. Heathrow Expansion and HS2**

The decision to expand Heathrow in the south of Hillingdon comes at a time when the Government's High Speed 2 project poses a significant threat to the quality of life in the north of Hillingdon.

LBH is being asked to accommodate two huge national infrastructure projects, each responsible for irreparable damage to land in Hillingdon and each devastating for local communities. HS2 was first advanced at the time when the 2010 Heathrow legal challenge was successful in the High Court. In that time, land has been blighted, communities disrupted and residents have had to contend with the onset of HS2 in their neighbourhoods. The first phase of HS2 coincidentally received Royal Assent at the same time that the draft NPS was launched by the Government. Hillingdon residents will now have to suffer a 10 year HS2 construction project. Residents in the south are perfectly aware of the very significant consequences arising from such a project.

Furthermore, there are clear direct cumulative impacts arising from the two infrastructure schemes. There is a high likelihood that the indicative programme for HS2 is overly optimistic and construction could still be ongoing at the time when Heathrow expansion commences. The threat of major construction impacts can be summarised as being; over 500 lorry movements per day for HS2 using the A40 and the M25 with subsequent impacts into Uxbridge, Ruislip and further north. A similar number for Heathrow expansion using the A4 and the M25 also with major impacts into Uxbridge will arise. This is clearly a situation that poses huge traffic concerns far beyond those envisaged for both projects. In turn, the concerns in relation to the level of congestion north to south of Hillingdon should not be readily dismissed. Any attempts to cleanse already dangerous levels of air quality will be greatly undermined, a concern amplified by the Government's latest Air Quality Plan. On the one hand the Government is burdening Hillingdon with two huge construction projects with all the traffic consequences they entail and on the other, putting the onus on LBH to manage issues of air quality.

A further consideration is that the limited information on flightpaths that is available shows that areas that will suffer significant levels of HS2 noise will be over flown by Heathrow related air traffic for the first time. Again, no regard has been given to these cumulative impacts.

The cumulative impacts should not be underestimated and it is not appropriate to simply dismiss them by virtue of their geographical scope. There is a 5 mile distance between the projects. The north is not isolated from the south and the borough of Hillingdon needs to be viewed as a whole. Both these projects will have a very significant impact upon Hillingdon and the lack of acknowledgement to this by the Government in the NPS is extremely disappointing.

## **11. Air Quality**

Air Quality is now recognised as a health crisis requiring urgent attention; the aspiration is for all Local Authorities to see a reduction in harmful emissions in their areas. It is not the aspiration to reduce air pollution so as to accommodate more polluting development. This is because of the increasing knowledge of the harm from pollutants:

*"The detrimental impacts of air pollution have been the subject of an increasing number of medical studies. What is clear is that the impacts can be harmful to everyone with often the most vulnerable being those most at risk of exposure" (Every Breath We Take, the lifelong impact of air pollution, Royal College of Physicians).*

Hillingdon communities are already disadvantaged in terms of adverse health impacts. There are over 7,000 people on GP registers for coronary heart disease; 3,500 registered as having chronic obstructive pulmonary disease; 15,000 on asthma registers; and 1,500 recorded as having heart failure.

Reducing air pollution is vital to improving the health and wellbeing of these communities. This needs to be secured now and levels consistently improved. The health impact of air quality is not characterised by a threshold effect so any increase in air pollution will have an impact on risk even though it may be below control limits. Studies have shown that even very modest increases in air pollution have a measurable effect on respiratory illnesses.

Expansion at Heathrow will exacerbate the impacts on the communities within Hillingdon and, according to the Government's own analysis, it brings an increase in pollution to over 120,000 people.

In particular for Hillingdon communities, the impacts of the construction of a runway at Heathrow, already assessed as bringing over 4,000 people to within 350m of the construction boundary, will be exacerbated by the impacts of the construction of the M4 Smart Motorway and the construction of HS2 (see paragraph 10). The government is supporting additional major infrastructure projects, all impacting on the same communities, yet no account has been

taken of this cumulative impact in any of the air quality assessments or appraisals.

### *Air Quality in Hillingdon*

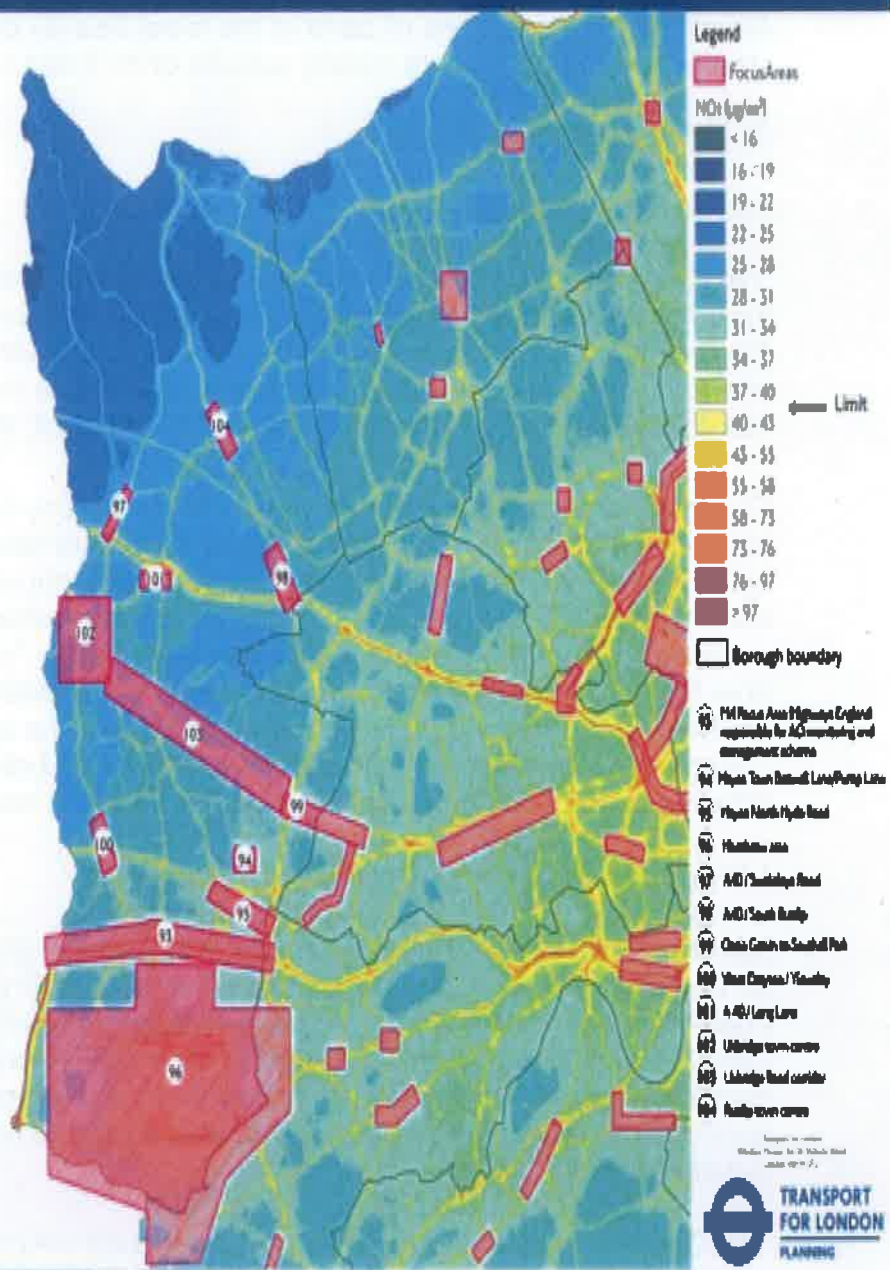
Heathrow Airport is home to one of the largest concentrations of employment in the United Kingdom and is the largest single traffic generator in the UK. As Hillingdon's largest single land user, it has a dominant presence and aircraft using Heathrow and the associated airport operations cause significant noise and air pollution in the region. As well as being home to Heathrow Airport, Hillingdon is crossed by the M4 and the A40 and bordered to the west by the M25 and to the east by the A312, attracting traffic into Hillingdon and encouraging traffic to pass through it. These roads generate a significant air pollution burden in Hillingdon.

In 2003, an Air Quality Management Area (AQMA) was declared in Hillingdon in regard to exceedance of the annual mean objective for nitrogen dioxide (NO<sub>2</sub>). Air quality problems in Hillingdon continue to be most severe around Heathrow Airport and the major road network that goes through it.

Air quality monitoring is carried out in a number of locations; the ratified results for 2016 show that at locations both on-airport and close to the major road network in the Hillingdon, the levels of pollution continue to be above the recognised limits set for health.

In December 2016, in association with the Greater London Authority, a number of Focus Areas have been identified across Hillingdon, highlighting specific locations where air quality improvements are required. A map showing these Focus Areas is set out overleaf.

# Focus Areas LAEI 2013 in Hillingdon



London Atmospheric Emissions Inventory (LAEI) 2013



Whilst LBH has an active air quality action plan in place to develop measures to work towards reducing levels of air pollution, the operation of an International Airport and the presence of parts of the most heavily congested parts of the strategic road network are clearly outside of its direct control.

#### *The draft NPS consultation*

The draft NPS states:

*"Heathrow Airport will need to undertake an assessment of its project, to be included as part of its environmental statement, demonstrating to the SoS that the construction and operation of the new capacity will not affect the UK's ability to comply with legal air quality requirements. Failure to demonstrate this will result in refusal of development consent."(Para 6.23, draft NPS)*

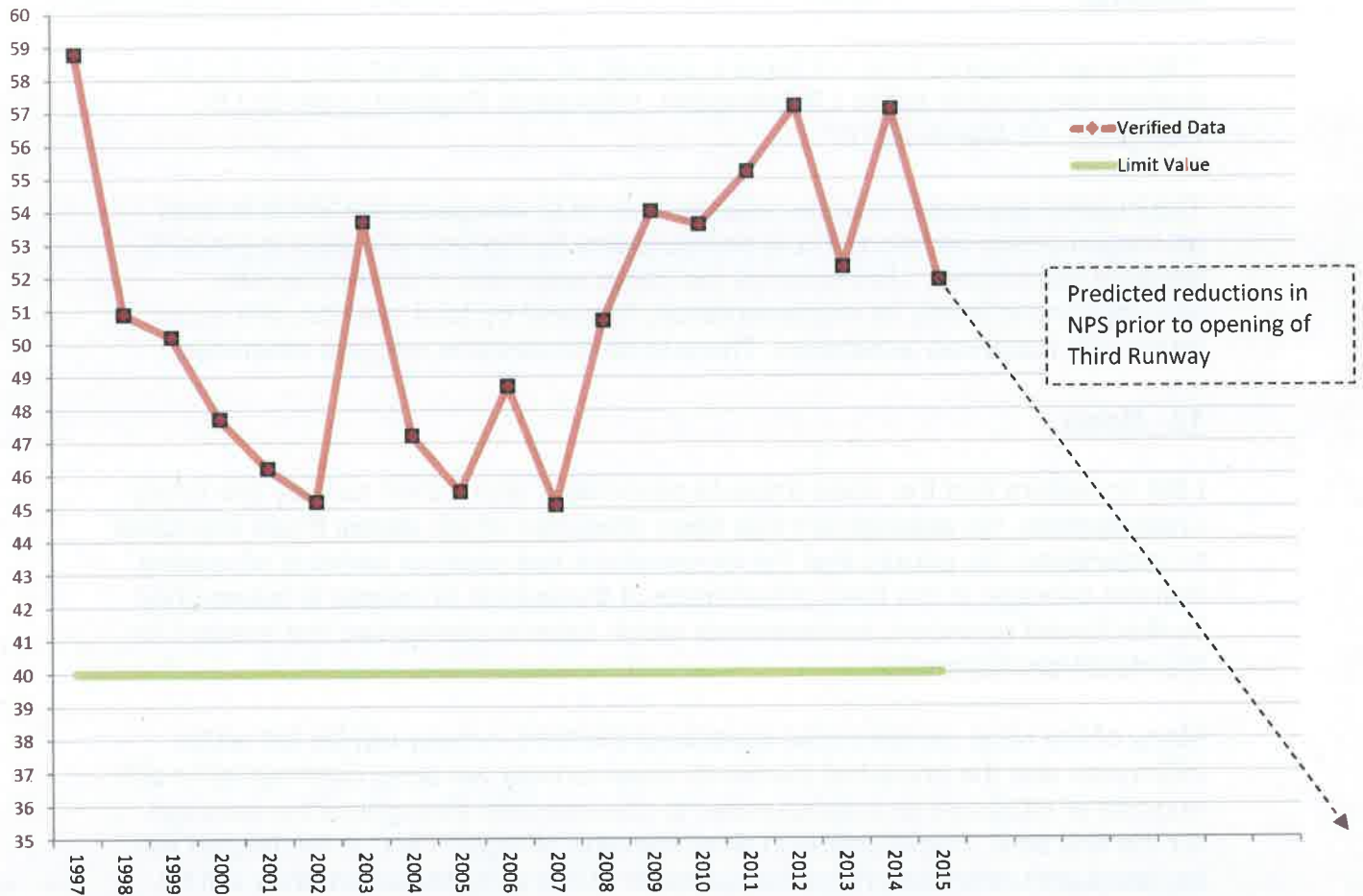
The four borough response includes a critique of the consultation and the technical documents relating to air quality. What is clear is that there is no current evidence that such a condition as set out above can be met. For the communities who have lived under the shadow of potential Heathrow expansion for years, a shadow that was lifted by the "no ifs no buts" promise, is now firmly back. It is totally unacceptable to put forward a development which, on the evidence provided, is clearly going to fail. The blight on these communities needs to be stopped now. LBH firmly believes the Heathrow scheme option should be rejected now for all these reasons.

#### *LBH's concerns with over-optimistic assumptions*

LBH has recent experience of the use of over-optimistic assumptions on future air quality levels. This has been used by Highways England to support the implementation of the Smart Motorway Management Scheme via a Development Consent Order. LBH and its residents will be left with a development, for which the justification for its implementation, has been accompanied by optimistic assumptions in regard to pollution levels. This is detailed below.

The Department for Food and Rural Affairs (DEFRA) has an automatic monitoring station (London Borough of Hillingdon) alongside the M4. The data below is what has been recorded at the site for the last 18 years.

## NO<sub>2</sub> Concentrations (µg/m<sup>3</sup>) at the London Hillingdon monitoring site



Plainly, these reductions over a relative short space of time are highly optimistic. The predictions were heavily criticised at the Smart Motorway Public Inquiry, leading to the Secretary of State for Transport stating:

*"Given the importance of ambient air quality for the local authorities and residents where Air Quality Management Areas ("AQMA's") are located, the Secretary of State has given very careful consideration to this issue. He accepts firstly that the inevitable element of uncertainty inherent in traffic forecasting has the potential to affect the air quality assessment, which relies on the outcome of traffic modelling. He accepts also that the continuing uncertainty about actual emission levels from Euro 6/VI diesel vehicles in real life driving conditions is another element of uncertainty in the applicant's air quality assessment which could justify a cautionary approach."*

It is highly appropriate to take a cautionary approach to an environmental impact that has such serious health implications, yet the Department for Transport is less than cautionary in its approach to Heathrow expansion. The approach adopted to justify Heathrow Expansion is misplaced particularly since the air quality reductions are so dependent on action which has not been identified or costed within the draft NPS. As an example, of inaction, it is obvious there are air pollution problems today, caused by the operation of the

M4 as it passes through Hillingdon, yet Highways England have confirmed the following:

*"Highways England does not have a specific air quality action plan for the M4 that we can provide to the LB Hillingdon. (Highways England Letter to LB Hillingdon, 16 March 2017)"*

The hopeful approach to huge reductions in NO<sub>2</sub> alongside the M4 is in itself an inappropriate decision; this is compounded by the lack of a plan in place to facilitate reductions. LBH believes the same approach of over-optimistic assumptions to justify its implementation, followed by total inaction, will occur again with Heathrow expansion. There is no evidence to suggest otherwise.

## **12. Noise**

LBH considers that the noise impacts associated with a third runway are totally unacceptable. No assessment has been produced which allows those impacted to understand the priority that the Government has given in terms of accepting that the damage to the lives of hundreds of thousands of people is outweighed by the flawed economic assessments which have accompanied the support for the Heathrow expansion.

Many of the most severe noise impacts of the third runway will be felt within Hillingdon and the impact of the North West runway will bring detrimental health impacts of exposure to aviation noise to communities throughout the borough for the first time. Communities in what remains of Sipson and in Harlington will be faced with relentless noise from aircraft at low altitudes where they will be either departing or taking off.

Assessing noise has historically resulted in harmful impacts to Hillingdon residents that go unmitigated. Whilst this is a benefit for the airport operators, it results in a significant loss of health for thousands of residents.

Assessment requirements have failed to adequately protect residents for a number of years. When Terminal 5 was advanced in the 1990s, it was done so on the back of outdated evidence from the early 1980s. This set the level of the 'onset of community annoyance' at 57dB laeq 16hr. During the inquiry, the assessment criteria struggled to stand up to scrutiny:

*"This brings me on to another criticism of LAeq. It was pointed out that the original study which led to its adoption had taken place in 1982 at a time when Heathrow had been handling some 220,000 movements a year. It is now handling over 440,000 movements (para 8.2.56) and people's perceptions of noise may well have changed in the 18 years since the ANIS report was produced. (21.3.35, Terminal 5, Inspector's Report)"*

Furthermore, the matter of onset of annoyance was also questioned. The expert witness for the Department did not attempt to hide the deficiencies of LAeq measures in general and the LAeq 16hour in particular. He accepted that the relationship between LAeq and community annoyance was statistically



weak and that the ANIS report had not found a rapid increase in disturbance at 57dB LAeq as the press notice issued at the time had suggested.

Nonetheless, despite these obvious deficiencies the government set noise assessment criteria that failed to respond. In 2013, the Aviation Policy Framework (APF) still set the 57dB LAeq 16hr as the onset of community annoyance. This was the criteria used in assessing the ending of the Cranford Agreement which the Inspector's Report concluded:

*"... it seems to me that, notwithstanding that the Government's endorsement of the APF is fairly recent, there must be some serious question marks over the continuing reliance on 57dBA LAeq, 16 hour as the approximate onset of significant community annoyance."*

The AoS staggeringly reverts to the APF. This means that the NPS is based on a policy document that was informed by evidence from the early 1980s.

At the very least, the NPS would be expected to reflect the recently published Survey of Noise Attitudes which clearly states that the onset of community annoyance is 54dB LAeq 16hr. Reverting back to highly questionable approaches shows a lack of responsibility for the impacts of noise on thousands of people and the consequent significant nuisance that they will have to suffer.

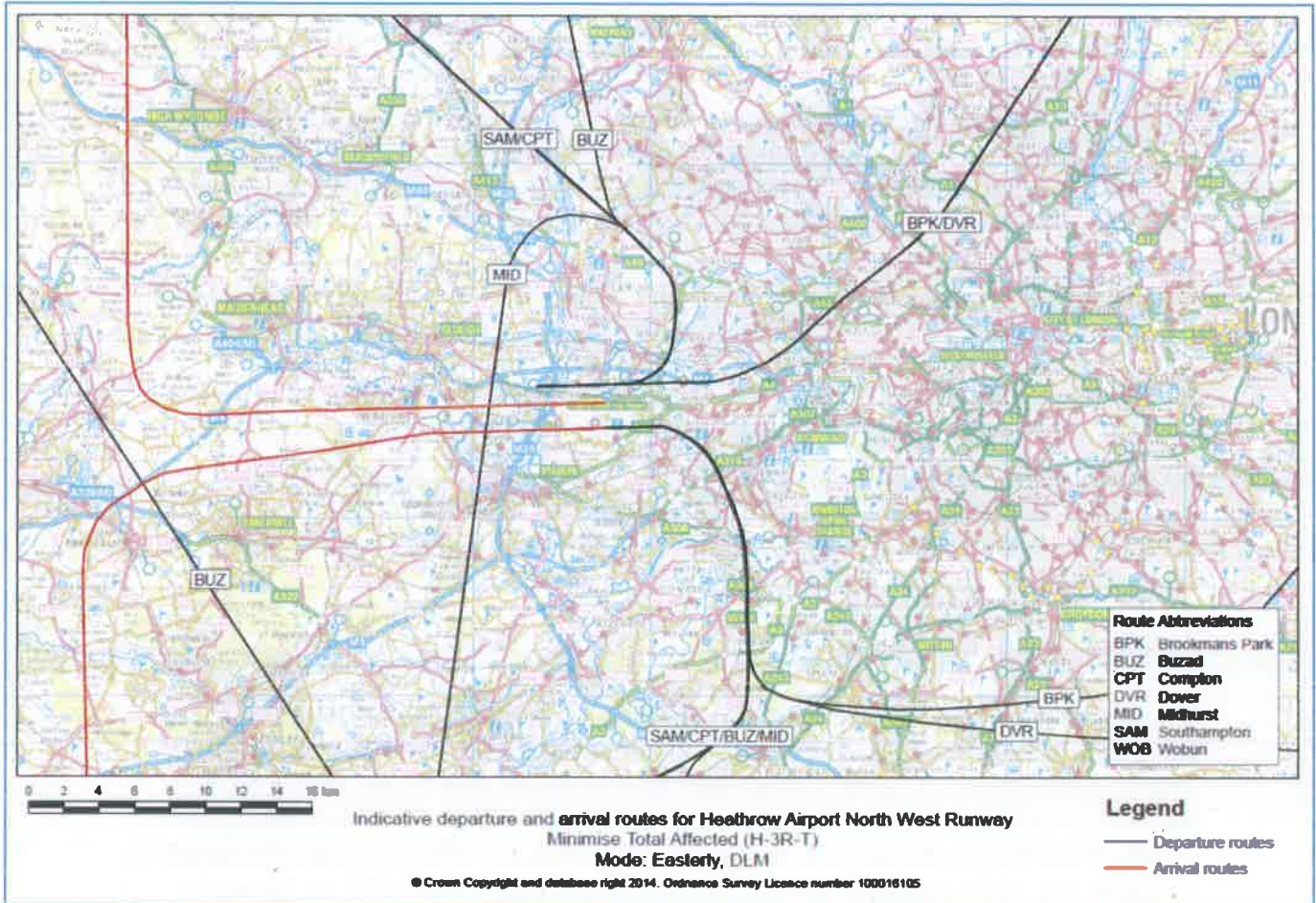
### *Schools*

Equally concerning is the impact on schools. The NPS recognises that there will be over 300 schools impacted by noise levels that could impair learning. These schools are a) simply identified as a number and b) not linked to a student population. Over the course of 60 years of the airport operating (in reality it will be much longer), the amount of children who could be impacted by noise in the 300+ schools cannot simply be ignored. The NPS provides no details of the schools, but based on an average size school, it could be expected that 70 children leave and join each year. Over the course of the 60 years, over 1million pupils would have been exposed to noise levels that could be detrimental to their education. The NPS makes no attempt whatsoever to assess and quantify this very significant impact.

The northwest runway will be capable of being used by all aircraft types including the large wide-bodied aircraft. The most severe new noise impacts for Hillingdon will arise from aircraft landing and departing from this runway along with impacts from ground noise for the communities living close to the new airport boundary.

No flightpaths have been produced to enable LBH to understand, with any accuracy, as to where the newly impacted communities will be. However, the indicative flightpaths used by the Airports Commission show that these could bring overflying aircraft to areas of north of Hillingdon for the first time. There is no information as to how the new third runway will operate. The current two runways allow for a half day of respite, but there is no clear

information if respite will be provided with the operation of the third runway, or how long any respite periods will be. The only clarity provided by the consultation documents is that if respite is provided, it will be of shorter duration than that experienced by the surrounding communities who are currently impacted by the two runways.

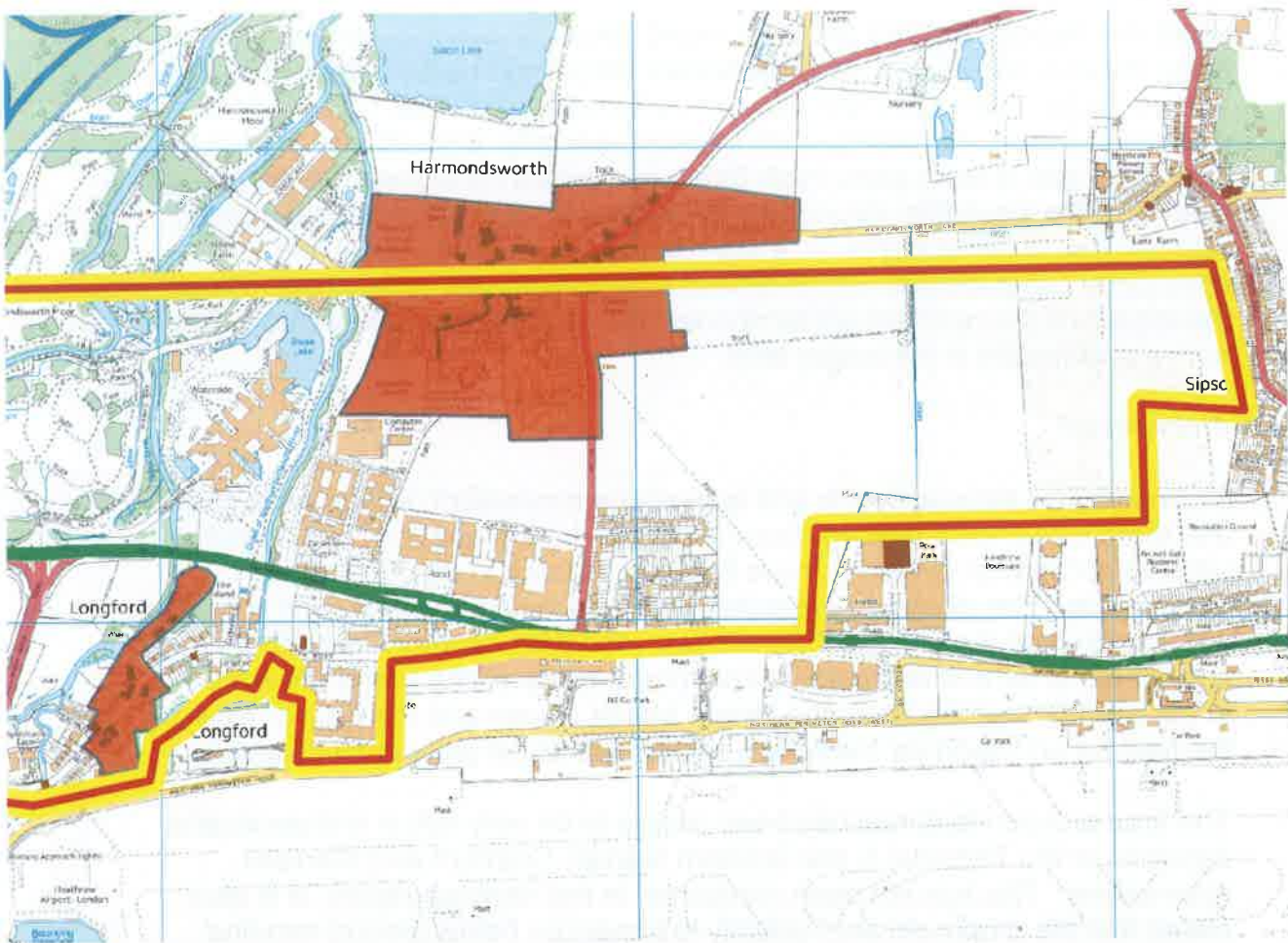


### *New Road Noise*

Furthermore, the NPS concentrates on aircraft noise. No assessment has been made of the noise impacts arising from the redirection of roads to accommodate the new runway; this could bring a significant new source of noise to communities already suffering from aviation noise.

### **13. Heritage**

The villages of Longford and Harmondsworth have a rich heritage and there are many listed structures and assets. The map below shows the impacts on two conservation areas and large amount of listed structures which Longford and Harmondsworth are known for. These heritage assets will be lost forever.



The importance of Longford Village in heritage terms is much greater than a small collection of listed buildings. Longford is believed to have developed as a small, early Saxon settlement (5th - 7th century AD) around the site of the ford on the River Colne. This was an important crossing point for travellers on the Old Bath Road, the key east/west route in Roman/Saxon and Mediaeval Britain, linking London and Bristol. In the 18th century, the village became an important stop on the coaching route on the Old Bath Road. The fifteen or so listed and locally listed buildings, and other buildings of townscape merit, make up a charming, and relatively unspoilt village on and around an island in the River Colne. Its total loss would therefore be very significant, and there is no mitigation possible which would reduce the impact from 'significantly adverse'.

Heathrow Airports Limited has previously assessed Harmondsworth as losing three garden walls and a house which they considered could be recorded and its materials stored for re-erection. The chief impact on the small surviving section of the village was held to be that of noise from the runway. The assessment in the NPS accepts that the proposal would have a significant impact on the listed buildings and conservation area, and the loss to their setting and tranquillity, the number of heritage assets to be totally demolished has been under represented, and the impact of the proposals on the surviving section of the village has been considerably down played.

Heathrow Airport Limited's proposal would place the airport's perimeter fence along the rear of the High Street frontages, divorcing this from the rest of the village, its through routes and much of its historic hinterland. This would lead to a complete loss of Harmondsworth's historic integrity. It would also lead to the loss of the role of the historic High Street at the heart of a living community, so leading to the inevitable redundancy of its Church, pub, shops and probably also the loss of its residents i.e. a significant loss in social capital and community cohesion that will be difficult if not impossible, to recreate. Thus, the impact on the remnant of Harmondsworth would be so severe that it may not be sustainable in the longer term.

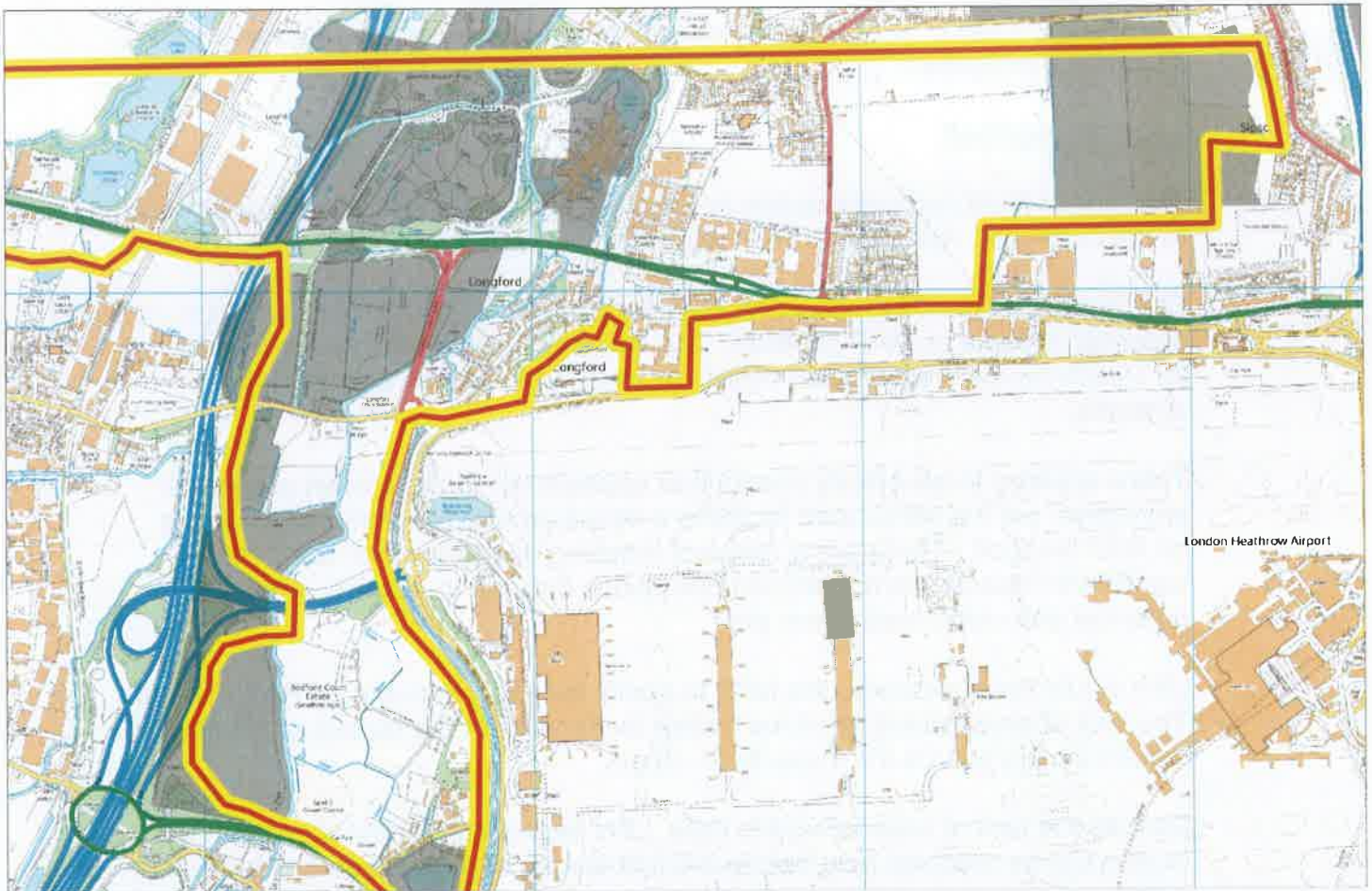
### *Archaeology*

Archaeological excavations in and around Harmondsworth village have shown that there was once a thriving Saxon settlement there and the finds, together with the occupation evidence, have been considered to be of national significance. The village was mentioned in the Domesday Book, and a Priory was constructed there in the 12th century. The 15th century Great Barn is considered to be one of the finest and most complete tithe barns still standing in the country, and the Barn, the former Manor House and the Church were at the heart of an important mediaeval settlement, which grew up at its gates.

The area around Heathrow has been proven to be very rich in archaeological deposits, at the Terminal 5, the Western Market, Cranford and Stanwell excavations. This has not been mentioned in the Heritage report. It is also stated that the proposals are 'unlikely to impact on below ground remains'. This seems extraordinary, particularly when it is considered that much of the land take area is undisturbed, and prehistoric remains (as found in the three areas above) have been relatively close to the surface.

### **14. Land Contamination**

The NPS makes no reference to the poor quality of land below the area identified by Heathrow Airport Limited for the third runway. The map below shows a range of former landfill sites that will need to be managed and cleaned up to make way for airport expansion.



Several of these landfill sites received a variety of wastes, including asbestos and other highly contaminative materials, and are known to be gassing to the extent that there is a need for active controls, such as flaring.

The extent of land remediation has not been acknowledged in the NPS. The cost of clearing up hundreds of hectares of contaminated material, whilst providing safeguards to important groundwater below would be exceptional. No account appears to have been taken of this.

LBH is not convinced that this issue has been properly considered and it has simply been dismissed as a matter to be sorted out at a late stage. The implications for waste, finding suitable receptor sites, protecting groundwater only add to a vast range of problems not addressed in the NPS.

### **15. Removal of Mitigation for Terminal 5**

LBH is concerned that Heathrow Airport Limited's rhetoric, surrounding its proposals, include simply relocating mitigation (for example Prospect Park) which is designed to offset Terminal 5 harm.

Any further expansion of Heathrow should not include the relocation of this mitigation within the provision of its future proposals. LBH would expect the

proposed 2:1 ration of biodiversity mitigation not to include the re-provision of Terminal 5 mitigation.

## **16. RAF Northolt**

The lack of flight path information or airspace design places a significant threat to the continued operation of RAF Northolt.

The ineffective planning requirements set out in the NPS do not provide for potential impacts on RAF Northolt. The indicative flight paths previously set out for Heathrow expansion cross directly across RAF Northolt's immediate airspace.

There appears to be a likely impact that appears not to have been assessed anywhere, yet the NPS could facilitate a development that materially impacts on RAF Northolt. There are a range of resulting scenarios that could have significant impacts, from restricted operations through to closure, and even potential redevelopment of the site.

LBH would have expected the NPS to clarify the likely impacts on RAF Northolt. The lack of assessment provides further evidence that the pursuit of Heathrow expansion disregards the impacts on others.

Despite the lack of assessment to date, LBH expects the implications for RAF Northolt to be resolved long before the first stages of a development consent order.

If Heathrow expansion results in the closure of RAF Northolt, the ensuing Environmental Impact Assessment must assess the likely impacts and potential long term consequences for this important site.

## **17. LBH's role as Local Planning Authority**

LBH's planning role is particularly affected by the Government's decision to expand Heathrow. There is a statutory requirement, under Section 15 of the Planning and Compulsory Purchase Act 2004, as amended by the Localism Act 2011, on LBH to prepare a Local Development Scheme. It is essentially a project plan which identifies the documents which need to be prepared, together with an indicative timetable for preparation, including milestones to be achieved. The Scheme must be made publicly available and kept up to date. This enables members of the public and stakeholders to find out about planning policies in their area, the status of those policies and the details of, and timescales for, the production of all relevant documents.

A key element of the Local Development Scheme for LBH is the Local Plan Part 1: Strategic Policies which it adopted in November 2012. LBH has consulted upon, and is currently preparing for, a submission to Examination in Public in relation to the Local Plan, Part 2.

It is important to note that the Local Plan Part 1 sets the vision for growth that informs Part 2. Therefore, LBH's planning policy is not predicated on expansion of Heathrow and it does not consider the implications of accommodating such growth. The potential for a third runway at Heathrow is not, and has not historically been, a material planning consideration in LBH's development consent process and therefore, there has not been any planning blight in this respect.

The NPS ignores Hillingdon's long standing, publically developed and democratically adopted local plans. Instead, the NPS is effectively forcing a proposal on the borough of Hillingdon without any regard to the existing planning framework; a proposal that would fundamentally undermine what the plans are trying to achieve.



**Raj Alagh**  
**Borough Solicitor**  
**25 May 2017**

