

Response to Mayor of London's Consultation on the New London Plan

02 March 2018

The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years.

Consequently, this response addresses the issues of direct relevance to the proposed expansion of Heathrow, which the Coalition opposes.

Policy H1 - Increasing Housing Supply

The proposed expansion at Heathrow will require significant increases in demand for housing, community services and infrastructure at a time when local authorities around the airport are already struggling to meet current housing demands.

Additionally, there will need to be new housing for the 3,750 displaced people that will lose their homes or have them rendered uninhabitable should expansion take place. The Government has failed to assess what impact this may have nationally to the regions or sectors.

The provision of the housing and community infrastructure required in what is already a densely populated area is left to local authorities to deal with complete disregard of how this can be achieved and what its impact might be on the character of local neighbourhoods. This is not a sustainable solution.

The Airports Commission report stated that 70,400 more houses, 5,000 in every Borough across the area, would be needed for the potential new employees, which adds even more pressure to local authorities and makes achieving the housing targets set in the draft London Plan even less likely.

The ICAO's balanced approach advises against building housing under flight paths in order to minimise the numbers impacted by aircraft noise. This inevitably reduces the land available for construction, particularly in those boroughs closest to the airport. However, local authorities currently have no certainty where flight paths will be should a third runway be built at Heathrow which has resulted in significant difficulties in identifying potential sites for future development.

Local authorities under the existing flight paths already face significantly higher costs (up to 10% in many areas) in constructing homes and public buildings to higher building standards to mitigate the impact of aircraft noise from Heathrow. The proposed expansion would result in an additional 700 planes in the skies over

London every day thus increasing further the environmental, health and financial burdens on already constrained local authority budgets.

Policy SI1 – Air Quality

It is not a surprise that the largest Air Quality Focus Area in this plan is the one located around Heathrow. Indeed, the Airports Commission Report showed that, without mitigation, Heathrow expansion would lead to the Bath Road having the worst NO₂ concentrations in Greater London.

The updated drafted National Policy Statement on Airports accepts that without effective mitigation that expansion at Heathrow will result in both an increase in congestion and emissions.

The Government has failed to demonstrate that Heathrow expansion can be consistent with legal obligations on air quality. In particular, it is unclear why any airport expansion should start before air quality has been consistently met at all nearby sites.

The Mayor should ask that government demonstrate how it intends on meeting legally binding air quality targets. This should include the setting of specific decarbonisation targets for non-transport sectors of the economy that will be required if expansion at Heathrow takes place.

The latest aviation demand forecasts predict that a third runway will fill up more quickly than originally expected. This will lead to a greater impact on air quality in the first few years of the runway being in use. The draft Airports NPS does not include any proposal to mitigate this fact.

The Air Quality Re-Appraisal Report Table 1.1, indicates a risk that the Heathrow third runway could delay compliance with limit values. The commentary box explains:

- The risk is higher the earlier the assumed year of opening;
- The risk of impact on compliance is high up to 2029 and exists even if the Government's 2017 Plan actions are fully implemented.

If air quality limits are to be met then it will rely on measures to be implemented by the Mayor of London. Such measures have been designed to improve the public health of Londoners, not for the benefits to be undermined by increased pollution from an expanded Heathrow.

The updated NPS assumes that air pollution will not increase as a result of expansion at Heathrow as long as both the Air Quality Plan and the Clean Growth Strategy are implemented fully and effectively.

Yet, it is beyond doubt that expansion would worsen pollution compared with a no-expansion future. Indeed, the revised NPS itself states that the proposal for a northwest runway at Heathrow has a 'high risk' of exceeding legal limits for air quality.

Worryingly, the Government's Air Quality Plan still does not refer to Heathrow expansion despite a recommendation from the Environmental Audit Select Committee that it be directly addressed. Further, full and effective implementation of Government plans does not have a robust and successful history on which one can support such an assumption with any confidence.

The revised NPS and Appraisal of Sustainability make clear that the Government has no intention of pursuing a carbon capped scenario but rather will allow expansion on a carbon traded basis. To succeed would require a significant rise in the price of carbon that is currently not part of Government policy.

The revised NPS also fails to model the impacts of the construction of a new runway on legal air quality limits.

The revised NPS has not accurately reflected the risk posed by expansion to the continued breach of the UK's air quality legislation. The Government's air quality plan has been successfully challenged in the High Court on three separate occasions. Further, no effective enforcement has been proposed should air quality improvements not materialise as the Government expects.

The Mayor should call upon central government to follow his lead in addressing London's air pollution crisis. It is simply not good enough for central government to seek to pass the buck to local government that does not have the resource, finances or capacity to address a problem that does not respect borough boundaries.

Policy SI2 – Minimising Greenhouse Gas Emissions

Policy SI2 states that development in London should be zero carbon. This provides another reason why the Mayor is right to oppose expansion at Heathrow.

If expansion at Heathrow takes place, emissions from aviation would constitute around 25% of total UK emissions by 2050. This will require significant reductions and restrictions in other sectors of the economy, including the complete decarbonisation of the transport.

Heathrow airport, already responsible for half the total emissions from UK aviation, must not be allowed to expand until the Government has an answer on how to tackle the sector's CO₂.

The Committee on Climate Change has said that allowing aviation emissions to overshoot the limit (as would be inevitable with a new runway) would imply other sectors making cuts beyond the limit of what is feasible.

The revised Airports NPS states that any one of the three shortlisted airport expansion schemes could be delivered within the UK's climate change obligations. It is simply not credible to suggest that the Government has presented evidence to support such a statement.

The revised NPS includes a significant reduction in CO2 emissions per passenger compared to previous Government forecasts in 2013, yet it does not provide any evidence to explain why the current predictions are accurate and the previous ones were incorrect.

There has also been an assumption made in the modelling about an increase in larger aircraft carrying more passengers and thus a consequent decline in air traffic movements. However, once again there has been no evidence or commentary to support the assumption that larger aircraft will be operational nor a strategy created to mitigate the impacts that failure to deliver larger aircraft would have on carbon emissions.

The revised NPS appears to rely on the effective implementation of the Government's Clean Growth strategy to address this situation, despite the fact that the strategy said that the Government "*has not reached a final view on the appropriate level of aviation emissions in 2050.*" At time of writing, the Government still has no climate change policy for aviation.

Even if the emission forecasts in the revised NPS are accurate, there will still be an exceedence of the 37.5Mt limit by at least 2.4Mt. The revised NPS and associated documentation do not proposed any measures to tackle this exceedence.

The Clean Growth Strategy effectively admits that it's not possible to meet the Committee on Climate Change's recommendation for keeping aircraft emissions within the limits of the Climate Change Act while building a third runway, but seems to have no answer on how it will account for this.

Policy SI17 – Protecting London's Waterways

The proposal to expand Heathrow will impact waterways in the surrounding areas yet the exact details and impact remain unknown.

The Environment Agency (EA) has not yet made a detailed assessment of the effect of proposals to expand Heathrow Airport on waterways. Further, they will not be able to undertake such an assessment until HAL submit their application for a Development Consent Order, which is expected by the end of 2019.

Such uncertainty risks undermining efforts by the Mayor to protect London's waterways and is indicative of Heathrow's approach to the impact of airport operations on local communities.

Policy T8 - Aviation

We welcome the Mayor's clear position to oppose expansion at Heathrow. Both the Mayoral Election in 2016 and General Election in 2017 demonstrated that Londoners and London politicians are unequivocally opposed to expansion at Heathrow.

The proposed expansion would result in significant numbers of new people being exposed to new noise in direct contravention with paragraph 10.8.5 of the draft plan. We have outlined our concerns about the negative impacts expansion at Heathrow will have on air quality, housing and climate change targets in comments on earlier chapters. We support the statements made in paragraphs 10.8.6, 10.8.8 and 10.8.9.

The Government has clearly not fully taken into account the impact aircraft will have on people and communities that are newly overflown. The lack of information around detailed flight paths associated with a third runway at Heathrow is a significant flaw that undermines the credibility of the expansion proposals.

Analysis from the CAA, obtained via a Freedom of Information request, shows that **more than 420,000** people, who are already impacted over the 54 dB LAeq 'significance threshold', will receive 3 dB of extra noise – **equivalent to doubling of the number of flights experienced daily.**

Further, a summary of the monetised health costs states that **972,957 households will incur an increase in daytime noise** by 2060. This would mean that, based on the CAA's average dwelling occupancy, **2,238,000 people will experience increased noise with a third runway.**

There is also uncertainty about whether or not flight paths should be concentrated, which would result in a significant increase of the noise pollution endured by many communities.

There is insufficient information in the Airports NPS on the length of the respite period that communities will experience should a third runway become operational. Consequently, significant numbers of people will experience a reduction in their respite but the lack of flight path information means it is not possible to estimate how many will be affected.

It is as significant concern that no research has been undertaken in relation to the health and quality of life impacts arising from the very substantial reduction in respite or the use of concentrated flight paths that will be associated with Heathrow expansion

The Airports NPS has failed to use any metric that tests the real level of annoyance of people on the ground. Areas such as Ealing and Teddington fall outside of the annual noise contours despite being overflown about a third of the time in an average year. Government should include a metric that reflects the noise pollution experienced in these communities.

Changes to airspace and approach paths mean that larger 'quieter' aircraft may be flying lower over many communities. This has the potential to significantly worsen the noise level experience by Londoners in many parts of the city. It would be beneficial if the Mayor could ask the government to produce an assessment of the impact of aircraft noise from flights lower than 3,000m.

The Mayor should ask central government to introduce noise mitigation measures tailored specifically for aircraft noise. Assessment, appraisal and resultant compensation for local communities should reflect the reality of the noise pollution endured based on accurate information.