

London Forum of Amenity and Civic Societies

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**Heathrow Expansion Consultation response – London Forum of Amenity and Civic Societies**

1. This is a response on behalf of the London Forum of Amenity and Civic Societies to Heathrow's consultation document, issued in June 2019.
2. The London Forum represents over 100 amenity and civic societies across London. It is taking a strong interest in aviation policy, not least because of the plans to expand Heathrow, and the environmental impacts of aviation especially across large parts of London.
3. The London Forum continues to oppose strongly, for environmental and sustainability reasons, the proposed expansion of Heathrow through a third runway and other changes; it has made these views clear in responses to other consultations that have been issued by both Government and Heathrow.
- 4. The main point in our response is that, the measures suggested by Heathrow in this consultation go nowhere near removing the huge environmental costs of the proposed new runway. Consequently they do not remotely support the case for the new runway going ahead.**
5. More specifically, on **noise**, the consultation, and the associated preliminary environmental impact report (PEIR), suggest that there will still be a major increase, both in noisy air traffic movements, and in people affected by noise, compared with the present. The proposed period of night restriction is very short, with overflying from early morning arrivals likely to start well before 5.30am ; and there will be a significant reduction in respite periods. The consultation suggests nothing to contradict this.
6. On **air quality and congestion**, it is far from clear that the proposed ultra-low emission zone around the airport, combined with the parking charge regime suggested, will be enough to bring pollution, and traffic levels, down to acceptable levels given the likely increase in traffic and aircraft movements – we note that to date targets for reducing private car use in journeys to the airport have not been achieved. The proposed increase in air freight from the airport is likely to exacerbate this in the form of significant increases in lorry movements.

7. On **climate change**, the proposals do not show how emissions from aircraft will be reduced sufficiently for the airport expansion not to make it more difficult to meet the Paris agreement targets for reducing climate change emissions; or for there not to be an increase in climate change emissions from increased air traffic movements.
8. On **surface transport access**, we are very concerned that there is no detail about the likely financial contribution from the airport to the large amount of investment needed in surface transport. Consequently we assume that a very high proportion of the total expenditure needed will fall to the taxpayer under these plans. This seems quite unacceptable, given that it is airport users who will benefit from the expansion, not the wider public. We believe that the plans need to show clearly that the airport, and through them airlines and their customers, will pay for all the surface transport investment deriving from the proposed airport expansion.
9. The document also sets out proposals for '**early growth**' – in other words a proposed increase in air traffic in advance of the completion of the new runway. We are very opposed to such 'early growth', which was not allowed for, or evaluated, in the review carried out by the Airports Commission. Not only would it bring forward the negative environmental impacts from airport expansion; but also these impacts would be compounded by the adverse impacts (in relation to noise, air pollution and congestion in particular) from construction of the runway occurring at the same time.
10. While we welcome some of the specific measures set out in the document, including on landscape and encouraging a reduction in car travel to and from the airport, and an increase in walking and cycling in the vicinity of the airport, it is clear that these measures will go nowhere near offsetting the very considerable negative environmental impacts from the proposed expansion.
- 11. For these principal reasons, we continue to be strongly opposed both to the construction of the third runway, and to the proposals for 'early growth' in air traffic before the expansion is completed.**

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