



Response by London Forum of Amenity and Civic Societies to Consultation on draft Heathrow expansion national policy statement

(The consultation questions are in italics; the answers are in normal type.)

What is your name? Michael Jubb

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Are you responding on behalf of an organisation? Yes

If yes:

- *What is the name of your organisation?*

London Forum of Amenity and Civic Societies

- *How many people does your organisation's response represent?*

London Forum represents over 100 civic and amenity societies across London, who have approximately 57,000 members in total.

To what extent do you agree or disagree with the assessment of the need for the proposed expansion of Heathrow Airport? Explain your answer.

We strongly disagree with the assessment of the need for the proposed expansion of Heathrow. Fundamentally this is because the expected costs of expansion, taking account of all the relevant costs, including environmental costs, greatly exceed the expected benefits, as is made quite clear in the Heathrow Economic Appraisal

Report (HEAR) which forms part of the consultation. This shows clearly that the net present value of the proposed expansion will be heavily negative, whether or not the costs of the expansion are passed on to the airlines by the applicants. The appraisal of sustainability and the health impact assessment, both also part of the consultation, also bring out the high environmental and health costs of expansion. It seems extraordinary to us, and unprecedented, for such a large capital investment to be supported by government when it has such a large negative economic assessment. We do not therefore consider that there is a need for the proposed expansion.

The government has proposed four tests which must be met for expansion to proceed. To what extent do you agree or disagree with how the government has set each of the 'four tests'? Explain your answer for each test:

- *Air quality*

The draft HENPS states that a deterioration in air quality is not in itself a reason for rejecting an application for Heathrow expansion provided the applicant has taken 'appropriate' steps to mitigate air quality impacts. The economic appraisal estimates that expansion will cause deterioration in air quality, and it appears highly likely that this will be borne out. Instead the HENPS should firmly rule out any deterioration in air quality due to expansion.

- *Noise*

The draft HENPS recognises that more people are already exposed to noise from Heathrow than from any other airport in the UK or EU. This should be a strong reason in itself for not supporting Heathrow expansion. The draft HENPS encourages applicants to take measures to mitigate noise impacts; but

only where 'reasonable'; and it does not rule out increases. In any event significantly more people and households than before are expected to be affected by aviation noise as a result of expansion; and the economic appraisal estimates the noise effects as highly negative overall. In our view, the HENPS should insist on an absolute and significant reduction in noise impacts and in households affected by noise. Including by banning all but very quiet aircraft from using the airport, taking account of expected further technological improvements in noisiness of aircraft.

Climate change mitigation

As with air pollution and noise, the draft HENPS says that increases in carbon emissions are not a reason in itself for refusing development consent; the Secretary of State will merely consider if the increases are 'reasonable'. The economic appraisal makes it clear that there are likely to be significant adverse effects on climate change from expansion. For this reason we do not consider that the proposed approach to mitigation is acceptable, as it is not likely to prevent significant adverse impacts.

- *Economic growth across the country*

The appraisal of sustainability appended to the consultation suggests that while there are likely to be beneficial effects to the local economy around Heathrow (before allowing for environmental offsets) the national economic benefits are uncertain and may partly reflect redistribution of activity rather than wholly additional growth. The economic appraisal suggests that the effects on national growth by the 2050s may well be only to provide an extra 0.4% of growth: this is very

small addition to growth, and in any case, as indicated, is subject to great uncertainty. So Heathrow expansion is wholly at odds with the government's ambition of spreading growth around the country and away from the south-east.

To what extent do you agree or disagree that the proposed mitigation measures for environmental impacts resulting from Heathrow expansion requirements are deliverable, effective and proportionate? Explain your answer.

As already indicated in the answers to earlier questions, the mitigation measures are much too weak. In particular, since the draft HENPS allows applicants in each case to argue that the mitigations that they propose are 'reasonable' and 'proportionate', without these concepts being more clearly defined, it is virtually certain that what would be agreed, on the basis of the current draft, would be nothing like sufficient to turn the net present value (NPV) of the expansion into a value that is no longer severely negative. The HENPS should instead lay down much more explicit criteria requiring the NPV of the expansion to be positive rather than negative.

Do you agree or disagree that the proposed ban on scheduled night flights for Heathrow following expansion should be defined based on the time a 'plane takes off or lands' instead of 'departure from and arrival to terminal'? Explain your answer.

We do not agree with changing the proposed ban on night flights in this way. This is because it would shorten the period at night when aircraft are not allowed to be in the air (and so making the most noise disturbance), since the period when the aircraft would be moving between stand and take-off/landing runway would no longer count as part of the banned period; consequently aircraft would be able to take off earlier and land later, causing even more increased noise disturbance from the expansion than otherwise.

To what extent do you agree or disagree with the proposed designation of Heathrow expansion as defined in the draft HENPS as Critical National Growth Infrastructure (CNGI)? Explain your answer.

We do not agree that the Heathrow expansion should be designated as 'critical national growth infrastructure'. This is because, in the words of the draft HENPS, it means that there would be a presumption in favour of granting consent, and that it would be unlikely that consent will be refused on the basis of residual impacts. In other words, even if the residual impacts were highly negative and, very likely, still led to a negative overall NPV, consent would almost certainly be granted. This would be completely against normal principles of investment not proceeding where the economic appraisal of it is highly negative.

To what extent do you agree or disagree that the compensation for affected residents is fair? Explain your answer.

We do not consider that the proposed compensation is remotely adequate. The economic appraisal estimates that the NPV of the cost of noise impacts alone will be around minus £1.6bn. But the government is only proposing a combination of statutory compensation plus a modest additional amount for home acquisition, moving costs and noise insulation, which would in practice apply only to those living within a short distance from the expanded airport; and that an additional community compensation fund should total only around £50mn per year. These sums would be of orders of magnitude less than the annualised costs of the total noise impacts on all households affected.

That is nothing like sufficient to compensate all those households who would be affected by the expansion, which, as the maps accompanying the consultation show, will cover a huge swathe of households extending many miles east and west of the airport. Including into large parts of inner London. Moreover, for reasons that are not explained, the consultation rejects the proposal by the

Airports Commission in 2015 for a noise levy to be paid by passengers, which would accord with the 'polluter pays' principle.

We therefore consider that the community compensation package should be far more generous and aim to cover all the adverse environmental impacts on residents.

To what extent do you agree or disagree with the requirements for surface access, including the passenger mode share targets, and the surface access vision document? Please also provide any further comments you may have on surface access.

The proposed targets are

- At least 50% when annual terminal passenger capacity is 116m or more;
- At least 55% when annual terminal passenger capacity is 130m or more:

50% public transport share is comparable to what Schiphol airport is already achieving. Given a) that a very high proportion of passengers using Heathrow originate from within London and therefore will have good access to public transport, and b) that Heathrow is, unusually for a European airport, well within the London boundaries, we believe that more ambitious modal share targets should be proposed.

The draft HENPS states that all necessary public transport improvements should be funded by the applicants. We believe that this should be strongly adhered to, in order to prevent leakage into costs to public finances.

The proposed and higher modal share targets could well lead to greater congestion on the public and road transport network. The applicants should be expected to spell out these congestion impacts and to fund any additional investment in order to ensure that congestion is no higher than at present.

The construction period is certain to produce major disruption to the existing road network, especially to the M25. The draft HENPS does not state explicitly that the necessary costs of alleviating this disruption should be borne by the applicants, but should do so

To what extent do you agree or disagree that the Making Best Use policy should be updated? What, if anything, would you like to be considered in any update to the Making Best Use policy? Explain your answer.

No specific comments on this aspect.

To what extent do you agree or disagree that the draft HENPS provides an effective framework for decision making on development consent applications? Explain your answer.

The draft HENPS states that in the Government's view the question for the Secretary of State is whether any application complies with the HENPS, and not whether expansion is needed at all which it says has already been decided. But this consultation – and in particular the economic appraisal – has failed to demonstrate that there is any scheme of expansion of Heathrow that is economically justified in terms of the balance of costs over benefits. Accordingly we strongly believe that there has been no case established for Heathrow expansion and that the kind of scheme promoted in this consultation should not be carried out.

Do you have any comments on any of the additional supporting documents, including the [Appraisal of Sustainability \(AoS\)](#), [Habitats Regulations Assessment \(HRA\)](#), [Equality Impact Assessment \(EqIA\)](#) and [Health Impact Analysis \(HIA\)](#)?

The answers to this question have already been covered by our previous answers

The Public Sector Equality Duty (PSED) requires public bodies to consider the needs of people in relation to characteristics protected by the Equality Act 2010. Development applications must demonstrate due

consideration for the PSED and wider obligations under the Act. Do you agree that the draft HENPS takes due regard for its legal obligations under the PSED? Explain your answer.

The answers to this question have already been covered by our previous answers.

What, if any, additional comments do you have on the draft HENPS?

a) The proposed expansion would result in the loss of a very large area in and adjacent to London which could otherwise be used to provide a large number of additional homes to help solve London's housing shortage. This is a further important reason for objecting to the proposals.

b) The Airports Commission's 2015 report assessed the case for Heathrow expansion against expansion of other airports in the South East, including Gatwick, where the alternative proposal was for a second Gatwick runway. The Airports Commission did not consider that Gatwick expansion would be needed. except conceivably in the much longer term, if Heathrow expansion went ahead. But the Government has already recently approved a second runway at Gatwick; and so on the basis proposed by the Airports Commission a third runway at Heathrow should not now be necessary. This consultation completely fails to explain why it has departed so radically from the Airports Commission's approach.

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