

Ealing Council
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THE AIRPORTS COMMISSION CONSULTATION ON THE SHORT-LISTED OPTIONS - EALING COUNCILS' RESPONSE

Introduction

Ealing Council provides the following submission having consulted across the range of Council services.

Heathrow Airport brings considerable benefits to Ealing in terms of employment and commercial investment, and the authority strongly supports the airports retention and development. More however must be done to mitigate the negative impact of the airport, particularly in respect of noise and reducing the amount of car traffic.

A significant proportion of the population of the London Borough of Ealing suffer the effects of aircraft noise and we acknowledge that communities are naturally concerned about the future noise climate

We recognise these adverse effects, and therefore we continue to seek to mitigate any further risks to residents and businesses arising from future decisions about the UK's airspace.

The Council has engaged wholeheartedly in the Airports Commission's ongoing consultations, and welcomes any future opportunity to respond, or to provide more specific information that may assist the Commission in this process.

Consultation Questions

This response addresses a number of the consultation questions directly.

The commission asks

What conclusions, if any, do you draw in respect of the three short-listed options?

The Council needs to be sure that all aspects of any airport expansion or changes of operating practice are properly mitigated before any final recommendations are made in May 2015. The appraisal process has left many questions unanswered,

and identified a number of uncertainties which still need to be addressed, for example the absence of a full health and social impact assessment.

The Commission have stated within the Business and Sustainability assessments that significant pressure will be placed on local authorities to address the knock on effects from the proposals for Heathrow. The Commission indicates that there will be an increase in housing demand, requirements for more infrastructure such as schools, GP surgeries, hospitals as well as further congestion on local road networks and on public transport links.

The Commission asks

Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated?

We fully support the London Councils comments that each airport operator should be subject to tougher requirements on their impacts on local communities. We would like to see increased fines for the noisiest aircraft, increased restrictions on their use, and a ban on all night-flights (to replace the current restricted period).

It is felt that BAA and the aviation industry in general have a duty to reduce the noise impact it has on the community. Should one of the Heathrow options be successful, the Council believes that further steps should be taken, particularly in relation to mitigation for households subject to medium to high levels of noise from the airports operations. Those who receive an adverse effect should receive advice and assistance with the costs of acoustic insulation, we therefore call for a review of the current provisions for insulation schemes.

Ealing supports neighbouring London Authorities in their call for an increased spend on measures to counteract the impact of noise and air pollution through a share of air passenger duty.

The Commission asks

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

Surface Access

Consideration of the local and national benefits have been demonstrated in the Commission's assessment of integration with public transport and High Speed rail. However there needs to be much more analysis by the commission into demand for surface access to airports, especially Heathrow.

Ealing considers that a lack of weight has been given to surface access issues. This really is a significant issue for the borough. For example, there have been reports of Piccadilly Line users not being able to board up to 3 consecutive trains towards central London in the morning peak hours. These trains carry large

numbers of arriving long haul passengers, plus their luggage, in addition to commuters, and are full when reaching Northfields Station.

Any airport growth or expansion at Heathrow, in addition to London's expanding population will see a worsening of the situation unless properly addressed.

The Council would like to see a programme of proactive measures to prevent the Piccadilly Line becoming overcrowded.

Ealing is also in receipt of reports of 'fly-parking' near Northfields Station, this is where airport passengers park their cars in local streets. There is a need for resources to tackle this issue at present, let alone if there was any growth/expansion.

The appraisal process is lacking a separate mitigation module. A separate module is necessary to provide a robust assessment of not only the cumulative impacts but also the associated costs. The module would also provide a mechanism to assess the effectiveness of the proposed mitigation measures and how they should be best implemented.

The Council would expect the Commission to publish a comparative assessment of the mitigation measures including noise, air quality, congestion on local roads and public transport, biodiversity etc. offered by each of the three shortlisted schemes. These could then be compared against other international airports to ensure that the local communities are offered the necessary mitigation.

The work undertaken by the airport indicates that communities in the east of the borough may be newly overflowed. The Council requests that the noise assessments take into account World Health Organisation (WHO) and European standards. The 'worst' mode contours should be produced alongside the existing contours to enable consultees to have a more realistic understanding of the actual noise impact they will experience at any particular time.

The Commission asks

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?

People; Quality of Life, Community

The impact of night flights on overflowed communities is not specifically considered by the Commission. We are disappointed that the Commission accepts negative impacts of the scheme on affected communities and the environment as being sufficiently offset by the economic benefits. The Council is of the view that the disturbance to communities caused by night flights outweighs the economic benefit.

The Council recognises the positive and negative effects of the boroughs proximity to Heathrow, we value the employment and economic prosperity the airport provides, however the council also acknowledges that many local people have

little or no stake in the operation of Heathrow, and therefore do not see any positive outcomes as a result of their geographical proximity.

The commissions quality of life analysis finding of 'broadly neutral' is disappointing, while improvements at a national level are considered likely, the positive impacts on local communities will not be seen to balance out the negative by all concerned. Clarity on this matter in the final report would be welcomed by the Council.

The appraisal framework does not include a health module, an aspect of the proposal that needs to be considered in more detail. We take this opportunity to request a full health and social impact assessment for each of the short listed options.

Environment and Strategic Fit

Ealing would like the Commission to consider the wider transport policy. Encouraging more use of sustainable transport such as rail (as current Government policy dictates) would be more favourable than encouraging more short-haul regional flights.

Better surface transport access to all airports may help to facilitate increased passenger numbers. Further, connections delivered by HS2 and other rail investments (Northern Hub, electrification) are likely to increase the attractiveness and environmental benefits of rail travel.

Ealing is concerned about all of the environmental impacts produced by Heathrow, any increase in traffic flow to and from the airport is also likely to have an impact on the boroughs air quality, and our commitment as an air quality exemplar borough. A comprehensive local, and wider air quality assessment for the Heathrow options is requested, to assess the impact on all relevant receptors, and as a minimum to include the impact on transport routes to the west of the borough.