HILLINGDON
LONDON

Airports Commission Consultation
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Our Ref JT/29/01/15

29 January 2015

Dear Sir Howard

Hillingdon's response to the Airports Commission Consultation: Appraisal of short listed airport expansion options

We would like to thank you for the opportunity to respond to your consultation on the 'Appraisal of short listed airport expansion options'.

I would be pleased if you could please accept the comments in the enclosed Appendix as Hillingdon Council's response, which was agreed at the Council's Cabinet meeting on 22nd January 2015.

As part of Hillingdon's response, I would also be pleased if you could accept the attached report 'Equity Focused Review Report of the Airports Commission's Community Health Relevant Assessments' by Public Health by Design (January 2015), which is referred to in our response.

We would be happy to discuss our response documents with you, if you feel that would be helpful. Should you have any queries on this, please do contact me.

Yours sincerely

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INVESTOR IN PEOPLE

APPENDIX 1

Airports Commission Consultation

London Borough of Hillingdon response

QUESTIONS INVITING VIEWS AND CONCLUSIONS IN RESPECT OF THE THREE SHORT LISTED OPTIONS

General comment

1 The wealth of information provided with this consultation is testament to how much work has been undertaken by the Commission. A business case and sustainability appraisal has been provided for each option and this is accompanied by16 detailed technical reports, which in some cases such as the noise appraisal, run to over 600 pages.

2 However, despite all of this work the Council has serious concerns about the substantial detrimental impacts on the local communities and how these have been assessed. Appraisals of some important local impacts have not been provided and there is no indication how the magnitude of the local impacts will influence the decision making process in terms of any final recommendation.

3 The Council is clear that the best recommendation for the UK should also include the best recommendation for the substantial numbers of people that co-exist next to Heathrow.

Question 1

What conclusions, if any, do you draw in respect of the three short listed options? In answering the question please take into account the Commission's consultation documents and any other information you consider relevant. The options are described in section three.

1 The following response to this question refers to both of the short listed options for expansion at Heathrow.

2 The Commission has appraised each short-listed option under five different future aviation development scenarios. In terms of the Commission's economy impacts objective to maximise economic benefits and support the competitiveness of the UK economy, each of the short-listed options has been appraised as highly supportive. In the Council's opinion, where the short-listed options differ is in the magnitude of local impacts. The Council's consultation response highlights why the Council believes that the costs of these local impacts should be a) adequately captured and b) given sufficient weight, in deciding where future airport expansion is located. In its current form the Council does not believe the appraisal consultation has covered this adequately.

3 In relation to both of the short-listed options for Heathrow, the review of the Commission's evidence, despite the amount of work done, simply confirms what is already

known. Expansion at Heathrow has economic benefits for the UK, as it does at Gatwick; it provides international connectivity, as it does at Gatwick; it provides jobs, as it does at Gatwick; but, at the Heathrow location, it also brings about the largest environmental and community dis-benefits of the short-listed options.

4 The Council does not believe that the outputs from this appraisal make a robust case for expansion at Heathrow. The economic benefits of expansion are presented in a wide range of uncertainties, for example, increased jobs from 27,400 to 112,400 in 2030, passenger benefits from £10.3 - £42.0bn, which are all dependent upon future aviation models and future carbon scenarios. However, in regard to the local impacts, what is certain is that in choosing an option for expansion at Heathrow, as has been demonstrated in the Commission's documents, regardless of the future scenarios, will be to:

- expose more people, including significant numbers newly exposed, to aviation noise than all the other hub airports in Europe combined;
- bring about the largest amount of destruction in terms of lower quality of life, adverse community and place impacts as well as increased noise and air pollution (from airport operations and associated surface transport) and potentially increase health inequalities in terms of disproportionate distribution of these exposures;
- compromise the health and well being of more people in terms of increased noise and pollution;
- leave already pressured, surrounding local authorities with the problem, including costs, of providing suitable areas to accommodate the displaced communities and also the additional housing and community infrastructure associated with the new job-related growth arising from airport expansion and;
- concentrate up to 54% of the UK aviation emissions in relation to carbon at one location;
- bring about the largest increases in per passenger aviation charges;
- cost the most to build, with no assessment of how much will be required as a contribution from the public purse to aspects such as surface access provision.

5 The Council believes that the economic benefits of expanding at Heathrow, although substantial, requires a more thorough analysis. The appraisal consultation does not include a comprehensive assessment of all the local impacts and proposed mitigation measures across the appraisal modules. In addition, these have not been evaluated in terms of their feasibility, their costs or their effectiveness in achieving the appropriate mitigation. The Council believes that when all of this is taken into account, the option to expand at Heathrow must be dismissed.

6 The Council notes that the consultation document states (para 1.28) that it represents the Commission's initial assessment of the short-listed options. Responses will then inform what further consideration and analysis may be needed prior to

recommendations to Government. It is unclear whether there is any intention to re-consult on any further analysis.

7 If there is no further public scrutiny it will mean that the evidence the Commission bases its conclusions on for future aviation expansion will not have all been made available to potentially impacted stakeholders. The Council considers this to be unacceptable. Given that important information about local impacts is missing from this appraisal consultation, such as detailed air quality assessments; impacts on local roads; no definitive flightpaths hence no identification of noise impacts on specific communities; the Council believes that further dialogue and consultation with impacted stakeholders is crucial.

Question 2

Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in section three.

1 The comments below refer to the two short listed options to expand at Heathrow. Although the two options have been put forward by different proposers, the final airport, regardless of the option selected, is assumed to be operated by the current operator, Heathrow Airport Limited (HAL).

Addressing the current situation

2 The Council is clear that the current level of adverse environmental and health impacts, arising from the operation of the two runway airport, on the local communities around Heathrow is not acceptable. Mitigation measures for reducing noise, achieving air quality compliance, improving public transport access are only coupled with the option to expand at Heathrow. Local communities deserve the implantation of these measures now. Not to do so, shows a distinct lack of respect and responsibility for the detrimental impacts brought upon these communities now by the operation of the current airport.

3 The Commission's appraisal should acknowledge the current baseline of highly adverse impacts i.e. more people are exposed around Heathrow than across all of the European hubs combined, local air quality levels are already above health based limits, road and public transport networks already congested. The current detrimental impacts around Heathrow should be appropriately addressed before any airport expansion can be considered.

4 The current situation could be improved by widening the provision of mitigation measures to include issues excluded from any of the current mitigation proposals offered by Heathrow Airport Limited (HAL). For example, areas suffering from early morning flights; all adversely impacted educational establishments; compensation for loss of predictable respite; and compensation for loss of enjoyment of amenity including gardens.

5 In addition, the measures to ensure that air quality limits are met and maintained should be set in place now. This should be accompanied with detailed analysis to ensure that there is sufficient surface access and public transport available to avoid other road

users and public transport users being compromised by the levels of airport related journeys on the surrounding transport networks.

Mitigating negative impacts/enhancing benefits of expansion

6 The Council considers that it is vital that mechanisms are put in place to ensure that the surrounding local communities benefit directly from the claimed economic benefits of any aviation expansion proposals. Measures must be identified, along with clear implementation controls, to ensure this occurs.

7 With either Heathrow expansion option mitigation must be provided to all newly impacted communities especially those newly exposed to over-flights. In relation to property compensation arising from the need to demolish properties, this must be set at a level to allow the affected communities to buy like for like properties. 8 The properties that will be lost in the Heathrow Villages are generally good quality family houses with gardens and such properties are likely to be difficult to find within the locality at an comparable price. This aspect has not been afforded any detailed scrutiny by either HAL or the Commission.

8 The properties that will be lost in the Heathrow Villages are generally good quality family houses with gardens and such properties are likely to be difficult to find within the locality at an comparable price. This aspect has not been afforded any detailed scrutiny by either HAL or the Commission.

9 For the impacted local authorities, such as Hillingdon, it should be made a priority to assist in identifying locations for, and ensuring adequate funding for, the re-provision of lost community facilities; loss of housing; and for the provision of new facilities to support the creation of the newly identified jobs that have been predicted to arise from expansion. If this proves to be undeliverable for whatever reason, this needs to be clarified before a recommendation is made for airport expansion at Heathrow.

10 Surface access and public transport networks must be designed, and adequate provision made, so as not to compromise non-airport users. Such proposals must be fully funded and in operation prior to expansion. As the situation currently stands, the southern rail access (SRA) scheme has been put forward by HAL as a key intervention for people to access the airport, yet this is not at any stage of detailed design and has no identified funding, which is not an acceptable situation.

11 The Commission should re-appraise the claimed economic dis-benefits which would arise from imposing a night ban at Heathrow. The benefits in terms of reducing health impacts, improved sleep and restorative processes and improvements in worker productivity afforded by getting a good nights' sleep should be properly taken into account, especially where the predicted flightpaths are over densely populated areas such as around west London.

QUESTIONS ON THE COMMISSION'S APPRAISAL AND OVERALL APPROACH.

Question 3

Do you have any comments on how the Commission has carried out its appraisal? The appraisal process is summarised in section two.

1 As stated in Question 2, the Council considers that not appraising the current unacceptable environmental and health impacts around the Heathrow area from the operation of the two runway airport situation represents a major flaw in the Airports Commission process. It provides a false baseline for the appraisal process with the assumption that all is currently acceptable and mitigation measures, such as they are, are effective.

2 The appraisal process has not yet completed assessments for key local impacts because these will be subject to further investigation. The lack of information on issues such as detailed air quality impacts; impacts on local roads including increases in freight traffic; details of the proposed flight paths; and confirmation of how any expansion proposal would be controlled in terms of any resulting environmental impacts; is considered to be unhelpful. The Council believes that not to have completed and presented all the appropriate assessments, and not to have identified and costed the appropriate solutions to all the problems that would emanate from expansion in such a densely populated area, renders this appraisal consultation as incomplete and therefore flawed.

Inadequate appraisal benchmarks

3 The sustainability assessment uses a benchmark approach with each impact described as positive, neutral or adverse. This appears a very crude approach and the Council believes that it would benefit from being reviewed in terms of also addressing the magnitude of the impacts. This is demonstrated in the following two examples.

Example - appraisal of noise impacts

4 The Heathrow North West Runway option appraisal for noise, with HAL's mitigation measures in place, is assessed as an adverse impact. This adverse impact equates to 580,500 people exposed to aviation noise in 2030 rising to 637,700 by 2050. The appraisal framework describes the term adverse as "notable" negative impacts. The Gatwick second runway option is also appraised as an adverse impact, unlikely to be able to be reduced to neutral impact by the proposers' mitigation measures. This adverse impact equates to 22,100 in 2030 rising to 24,600 in 2050.

5 The Council does not consider it acceptable that these two levels of substantial difference, in terms of the number of people impacted, should both be assessed as simply adverse. The Heathrow expansion options will expose over 25 times more people to aviation noise by 2050 than the Gatwick option. There needs to be another level within the appraisal assessments which puts a weighting upon the actual numbers of people exposed and should include additional weighting to the numbers who would be newly exposed. This should then be factored into the decision-making process.

Example - appraisal of carbon emissions

6 The Gatwick expansion option yields a total of 334.7 tCO_2 over a 60 year appraisal period. The consultation document puts this into context as the carbon emission from departing flights from Gatwick in 2050 representing 14.2% of the UK total carbon from aviation.

7 The Heathrow expansion options yield 1,353 tCO_2 (Heathrow North West) and 1,326 tCO_2 (Heathrow Extended Northern Runway). The consultation document puts this into context as the carbon emissions from departing flights from Heathrow in 2050 representing`54.6% (Heathrow North West) and 54.8% (Heathrow Extended Northern Runway) of the UK total carbon from aviation.

8 Despite the Heathrow options being four times higher in terms of carbon emissions than the Gatwick option, all three schemes are appraised as adverse.

Trade-offs between objectives

9 There is no information or methodology in terms of how the Airports Commission will determine the trade-off between the outcomes of the different appraisal modules. As an example, nationally there may be positive impacts yet locally there may be highly adverse impacts. The two separate expansion locations, i.e. Gatwick and Heathrow, differ in terms of the magnitude of the impacts on various issues. It would helpful if the Commission were to publish the methodology behind the decision making process that it intends to follow in relation to determining these trade-offs.

Assessing the benefits of no expansion

10 The Commission has presented little detailed analysis in the appraisal process in terms of identifying and costing the community benefits that would occur from no expansion. Without expansion around west London there would be benefits accrued to the local communities over time from the use of less noisy planes and proposed future operation procedures for noise mitigation; more chance of securing the health benefits associated with meeting air quality limits; no loss of current valued open space or loss of established communities.

11 In addition, the congested road and public transport networks, already predicted to be further stretched by growing population growth, will not be further compromised. This aspect and the magnitude of the potential benefits, should be taken into account when appraising the two different locations ie Heathrow and Gatwick.

Question 4

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

Missing Information

1 The Council is concerned that the Airports Commission had not factored in sufficient time to ensure all necessary assessments were completed prior to consultation. The lack of information on issues such as detailed air quality impacts; impacts on local roads and the impacts of proposals to increase freight operations; details of proposed flight-paths; and confirmation of how any expansion proposal would be controlled in terms of any resulting environmental and health impacts, is considered unhelpful. Without this level of information it is considered difficult for communities, and those who represent them, to be able to give a proper considered response to this consultation.

2 In terms of the future model for aviation demand, for which the Commission has assessed against five scenarios and two different scenarios in regard to carbon i.e. carbon traded and carbon capped, it is unclear from this consultation how the results of this appraisal process will inform any final recommendation. The Council requests that more information about the decision-making process on this matter is made publicly available.

Health

3 The Council has taken every opportunity to request that the Airports Commission include health as a separate appraisal module. The existing health burden of the area surrounding Heathrow is already distinctly disadvantaged. These people are at further risk of inequitable exposure from environmental impacts such as increased noise and air pollution and associated adverse health effects from an expanded Heathrow. A full assessment of each short listed option on the health of the surrounding communities should have been part of the appraisal process to ensure that health impacts inform the decision-making process to select the best option. It will be too late to do this work once a recommendation has been narrowed down to one option.

4 A separate review report by Public Health by Design on how health aspects have been considered throughout the Airports Commission's Assessments has been commissioned by the Council and is attached to the response.

5 The report confirms the Council view that a more comprehensive Health Impact Assessment, in line with current international and national good practice, should have been included as standard at this point in the process. This approach should include the use of qualitative and quantitative assessment methods and consideration of physical health, mental health and wellbeing outcomes and indicators rather than just focusing on subjective wellbeing and aspects of community. Other modules such as quality of life, local economy, community, place, noise and air quality assessments would then feed into, and hence be a part of, an overall health impact assessment.

6 The Airport Commission's focus on the need to provide quantitative indicators of Quality of Life (i.e. a set of comparable metrics) has placed less value on a qualitative assessment approach and hence is in danger both of discounting good quality qualitative assessments and setting a precedent that only quantitative health impact assessment methods have value in the assessment of airport schemes nationally and locally. This runs counter to international good practice guidance advocated by the World Health Organization as well as past UK, England and devolved regions government guidance on the value of both qualitative and quantitative assessment of health and wellbeing impacts of policies and projects.

7 The Council believes the report by Public Health by Design confirms that the Commission have taken a flawed approach in terms of how it has appraised the impacts on health.

8 The report does note that on reviewing the original submissions by all three proposers, the Gatwick Quality of Life assessment is a better quality, more detailed assessment and much more in line with UK and international Health Impact Assessment good practice than the assessments accompanying the Heathrow submissions.

Housing and community infrastructure

9 The options short-listed for expansion at Heathrow have substantial negative impacts in terms of the loss of residential housing and community facilities. In addition, there will also be additional pressure for new housing and community infrastructure to accommodate the requirements arising from the predicted job growth. For example, the North West Runway option indicates a requirement for 29,800-70,800 in additional housing. This has significant implications for the surrounding local authorities who will have to find land on an unprecedented scale for both the re-housing of the communities that are being forced away and also the new housing and facilities needed as a result of the creation of the forecasted new jobs.

10 The Airports Commission appraisal has not provided a detailed assessment of the costs and the widespread implications of having to find land on the scale needed. This is a major flaw in the appraisal process. The Council does not consider that a recommendation to expand operations at Heathrow without properly identifying the solution to this problem is acceptable.

Cumulative impacts

11 The Council is concerned that there has been no proper cumulative approach to the impacts of the expansion options at Heathrow. For example, the north west runway option, in addition to community impacts and direct impacts of noise and air pollution; takes nearly 700 hectares of Green Belt; presents a major flood risk, even with mitigation; will require the relocation of a major energy from waste facility; destroys heritage assets; takes away valued open space to replace it with overflown open space; and, removes the “Green Lung” buffer from the current airport and the more densely populated areas of the borough. In terms of the Colne Valley it has devastating impacts on the southern Colne Valley at a time when the north of the Colne Valley is already scheduled to be compromised by the construction and operation of HS2. The full cumulative impacts of all the various 'specific impacts' should be properly accounted for in the appraisal process.

Mitigation

12 The Council has consistently requested the inclusion of a separate mitigation module into the appraisal process. This would have allowed the assessment of the cumulative impacts, including costs and it also would have provided a mechanism by which the proposed mitigation measures could have been assessed in terms of effectiveness and identified implementation mechanisms. This would have made the

results of the Commission's appraisals for "with mitigation measures" scenario more robust. Without this level of detail, these measures exist simply as ideas on paper.

13 As an example, the Commission has appraised the HAL offer for property compensation to local communities as capable of reducing the impacts from highly adverse to adverse. There is no detail provided by HAL or by the Commission as to whether the compensation is satisfactory or acceptable and no details are given on how the level of compensation has been calculated.

14 When asked at the Airports Commission's Heathrow Discussion Day on 3rd December as to how the level of compensation was calculated, the CEO of HAL replied that the compensation offer was three times the amount of mitigation offered with the previous third runway consultation. This does not represent an informed approach. If impacted communities cannot buy a like for like property in proximity to where they wish to be relocated, then the mitigation is insufficient. If impacted houses and community buildings such as schools do not receive sufficient noise insulation, then the mitigation is insufficient.

15 The Council is very concerned that there is limited information available as to how the Commission have taken into account the impacts of individual proposed mitigation measures across the modules; whether they are sufficient and offer adequate protection, where relevant; whether they deliver appropriate compensation to impacted communities; whether they are guaranteed deliverable solutions; and whether they can be fully implemented to the point of controls being placed upon the promoter to ensure the benefits happen in reality.

16 The Council does not believe it is acceptable to take the HAL mitigation and compensation offers and assume they will a) work, b) be implemented in reality and c) acceptable to the population impacted. Given the close proximity of the Heathrow expansion options to substantial numbers of people this deserves more scrutiny in the appraisal process.

17 The evaluation of mitigation measures should have been addressed within the appraisal framework. To have done so would have given impacted consultees more reassurance that the impacts would be dealt with properly. As it currently stands this is not the case.

<u>Inadequate consideration of public safety</u>

18 Insufficient attention has been given within the appraisal consultation to public safety. It is considered irresponsible not to have afforded this greater scrutiny given that the operation of Heathrow already puts hundreds of thousands of flights above one of the most densely populated areas of the UK. Any expansion will, especially in the current age of terrorism, simply increase the risk of an accident or incident impacting the lives of vast numbers of people on the ground. A scenario which examines the impacts arising from such an incident occurring should have been appraised in terms of the costs and potential human lives involved.

QUESTIONS INVITING COMMENTS ON SPECIFIC AREAS OF THE COMMISSION'S APPRAISAL

Question 5

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?

1 The paragraphs below highlight the areas that the Council believes should have been afforded more attention within the identified appraisal modules in terms of process. The comments are made in relation to the options for expansion at Heathrow. Further comments on the results of each appraisal module are provided in the response to Question 6.

Economy impacts module

2 It is not clear how the Commission intends to use this appraisal module to form a decision on the likely future aviation scenario or what importance the Commission intend to give to elements such as the ability of the short-listed options to provide competition and the knock on benefits this may bring in terms of lowering fares and giving more choice to UK residents. More information about how the results from this appraisal module will influence the decision making process would have been helpful to consultees.

Local economy impacts module

3 There is no detail or account taken of how or where the local authorities are expected to provide the housing and associated infrastructure needed for the influx of expected job growth, and there is no information of where or how the communities and infrastructure displaced can be re-provided. Prior discussion with impacted local authorities to identify the feasibility of providing potential development sites would have improved this appraisal approach.

Surface access

4 The delivery of sufficient surface access provision, especially rail services, is identified as a risk to the delivery of positive outcomes for local communities and the local economy. It is identified that inadequate provision could reduce the result of this appraisal module to neutral. The inclusion of identified implementation mechanisms and defined funding streams for key transport interventions would have improved this appraisal approach. Without this detail the schemes are simply ideas on paper without any substance.

5 In addition, the Commission’s transport assessment only looks at the surface access implications for up to 103.6 million passengers at Heathrow in a timeframe to 2030. No assessment has been undertaken for the worse-case scenario ie 149 million passengers, the Commission estimation for a 3 runway Heathrow at capacity. This is an unacceptable approach and potentially underestimates the amount of surface access actually required to support expansion in this area.

6 The surface access process overview states that the Commission has taken the view that the surface access strategies put forward by the promoters were sufficiently credible so as to be taken forward in their totality for appraisal. This assumption appears to be rather naive. Whilst it is recognised that the Commission has used independent consultants, Jacobs, to appraise the work provided by the promoters, further information should be made publicly available to allow the assessment of the validity of the Jacobs model if this topic is to be openly and properly scrutinised.

7 The Council has grave concerns that the surface access element of the expansion options at Heathrow has not been fully appraised. There are no funding streams or implementation programmes for key interventions and the impacts resulting from the failure of the surface access delivery element will fall upon the already adversely impacted local communities in terms of congested roads and public transport networks and poor air pollution levels. More detailed information on this would have improved this appraisal approach.

Noise module

8 Whilst the appraisal has required the assessment of different noise metrics there is no explanation as to how the results will inform any decision making process or trigger any resulting mitigation measures. The appraisal module states that the indicative flight paths used for the noise modelling scenarios should "*not be taken as showing where future flight paths would in practice be located*". It is difficult to see how the Commission expect potentially impacted stakeholders to respond when this important level of detail has not been provided. The inclusion of this information would have strengthened this appraisal module.

Air quality module

9 The Council considers that not to have set aside sufficient time to have completed detailed air quality modelling as part of the appraisal module, to inform the assessment of local air quality impacts and associated health effects, is a serious omission. It is unclear how this topic can be appropriately assessed by consultees without this information and this is a flaw in this appraisal module. It is disappointing that there is no timescale provided for when this work will be completed and there should be a commitment given to ensure that it will be made available for public scrutiny.

Biodiversity module

10 The cumulative impacts of other infrastructure proposals have not been properly taken into account. For example, the North West Runway option will have a devastating impact on the southern section of the Colne Valley. The aim for runway operation to be available for 2026 would also coincide with the impacts from the proposed HS2 rail route in the north of the Colne Valley. Taken together the impacts in the Colne Valley would be significantly worse than presented in isolation in this report. This is a flaw in the approach to appraisal in this module.

Appraisal of community impacts

11 The impacts on local communities are represented in several of the appraisal modules including the specific modules of Community and Quality of Life. This approach makes it difficult to gain an overall assessment of all the impacts. The Council believes that the inclusion of a specific health appraisal module would have helped to achieve this in a more robust manner.

12 It is not proven that community impacts that are considered as being positive in terms of local employment in one appraisal module and community impacts that are considered as being negative in terms of the appraisal within the noise module, or loss of residential housing in the community module can be traded off against each other in terms of appraisal of impacts. This is considered to be a flaw in the approach to the appraisal of community impacts.

Question 6

Do you have any comments on the Commission's sustainability assessments, including methodology and results?

1 These comments focus on the short-listed options at Heathrow. Surface access, whilst informing the business case, also has implications for the local economy appraisal and therefore detailed comments on surface access have been provided under this question.

Economy Impacts

2 The conclusions of this appraisal module are the same for both expansion locations i.e. Gatwick and Heathrow. From a national economic benefit perspective the two locations for expansion are appraised as highly supportive under the "low cost is king" and "global growth" future aviation scenarios, in terms of maximising economic benefits and supporting the competitiveness of the UK economy, with a further appraisal of supportive under the other three aviation scenarios. In terms of GDP/GVA effects from investment in aviation capacity and connectivity, both expansion locations are appraised as highly supportive. No decision has been made as to which scenario will be adopted.

3 The economic impacts in terms of scale are also dependent upon whether the figures are based upon a carbon-traded forecast or a more stringent carbon capped scenario. No decision has been made as to which scenario will be adopted.

4 The Heathrow expansion location is identified as having its main strength in being able to provide a large route network with connectivity benefits likely to be the largest if the capacity is taken up by the hub carrier and its partners. Benefits from competition in this scenario are identified as likely to be limited.

5 The Gatwick expansion location is identified as having a main strength in providing competition and providing a second gateway into London. The Gatwick airport operator has supplied independent analysis to the Commission which indicates that the benefits of competition from expanding at Gatwick are between £7.7 billion to £10.4 billion by 2050.

6 The Council considers that it is difficult to make informed comments on the appraisal result of this module when there are so many uncertainties raised by the Commission on future aviation demand. What is apparent is that both locations for expansion meet the Commission's objectives in terms of maximising the benefits and supporting the competitiveness of the UK economy.

7 Given the large uncertainties involved, the Council believes that it is correct that the final recommendation for expansion is not based solely on the economic benefits. On this basis the Council supports the Commission's approach in the sustainability of assessment incorporating, and appraising, a wide range of impacts. However in order for consultees to provide an informed response, more information needs to be provided on how the Commission will judge impacts against each other.

Local economy impacts

8 The likely growth of local employment is presented as a range. For example, for HAL North West Runway option, the job growth is given as a range of between 47,400 and 112,400 in 2030 rising to between 64,000 and 180,000 in 2050. The direct jobs are described as predominately lower skilled. This range is very coarse and it is not clear how the Commission will use this information to influence its final recommendation i.e. low range, high range or an average.

9 The issues resulting from the need to provide the housing and associated infrastructure associated by the extra employment for expansion at Heathrow is suggested by the Commission as achievable. The analysis presented in the appraisal has averaged the numbers of additional housing needs across the 14 boroughs within the defined assessment area as between 2,100 and 5,100 homes per local authority over a 10 year period. No details are given as to how the Commission has concluded that this level of provision is achievable.

10 The additional housing requirements will need to be supported by the provision of additional social infrastructure such as schools, hospitals and leisure centres. It is suggested this amounts to the provision of 50 new primary schools (3.5 per local authority), 6 new secondary schools across the whole area, 2 additional health centres (14 GPs) and 2 primary care centres per local authority to 2030. No details are given as to how this will be provided.

11 There is no reference to the need to re-house the significant population that will be evicted due to the expansion options. For Hillingdon, the north-west runway option equates to a loss of nearly 1,000 houses plus associated community buildings such as schools. This provision will be required on top of the additional housing needs brought about by the projected increase in employment in the area.

12 There are no details of potential sites and no details of discussions with the 14 local authorities listed in the assessment area. As an example of the potential difficulties, the land available around Heathrow in Hillingdon is Metropolitan Green Belt and is heavily constrained for use as it is designated Flood Zone 3. The Council is already facing immense challenges in meeting its London plan requirements and recent new school development has unfortunately had to encroach onto significant green belt land.

13 It is also unclear whether the associated work journeys associated with accessing the airport from such a large assessment area have been properly taken into account. It is an omission that costs have not been apportioned to this and this could have significant implications for the local economic impact appraisal.

14 The Council believes that the Commission should consider if there are potential negative impacts associated with airport expansion in an area which is already economically buoyant. A full account of the dangers of overheating the local economy should be considered prior to any final recommendation on location.

Surface access

15 The local economy impacts appraisal is described as highly supportive and reduced to supportive if potential areas of constraint are realised. Whilst surface access is not a defined topic in the appraisal modules, it impacts across them and has implications for the business case. The provision of appropriate surface access is key to the local economy impacts appraisal and therefore any non-delivery is identified by the Commission as potentially reducing the appraisal of this module to neutral.

16 Both Heathrow expansion schemes have been assessed as having the same forecasts in terms of trip generation and the same surface access solutions in terms of rail have been identified. Although passengers and employees may be travelling to the same airport for the same purpose it is not clear whether the differences between the two schemes may actually lead to different effects on the surface access network. This has not been addressed.

17 For example, on the roads in the vicinity of the airport there are differences in terms of access points to the M25 and access to the A4. As the local roads modelling has not been provided it is not possible to assess the impacts of the differing schemes.

18 The Heathrow Hub scheme promoter has put forward an additional surface transport strategy. This focuses on the creation of a transport hub on the Great Western mainline in Iver, along with a 10,000 space car park. The additional trip generation that this could create in terms of access to the new hub has not been assessed within the Airports Commission consultation. This could have implications for Hillingdon with passengers and employees accessing the new transport hub and thereby putting additional pressure on the local road network in areas such as West Drayton and Yiewsley. This has not been assessed.

19 The Council is concerned that in relation to the strategies put forward by HAL, insufficient analysis has been given in terms of deliverability and there is insufficient information provided for consultees to appraise their adequacy.

20 The major rail schemes proposed in the surface access proposals for Heathrow are mainly ones that are already proposed to cope with background growth in the existing two runway Heathrow scenario. This includes the Piccadilly line upgrade, Crossrail, the Western Rail Access proposal and the prospect of an HS2 connection via Old Oak Common.

21 The only "new" rail access scheme, the Southern Rail Access (SRA) scheme, is a re-vamped version of the original AirTrack scheme which was proposed as a solution to improve rail access to the two runway airport. The Council notes that the AirTrack scheme ended up not being taken forward due to difficulties in design.

22 Although the SRA scheme has been appraised as being able to deliver 17% of airport travellers from the associated catchment area, it is not yet even at design stage and is currently un-funded. If this scheme is not delivered, this potentially impacts on the business case as well as the sustainability assessment.

23 The Commission has noted that there may be capacity issues on the Great Western Mainline beyond 2040 and that tensions may emerge between rail infrastructure serving airport users as opposed to non-airport users. No solution is offered although comment is made that plausible solutions are likely to exist and will be expensive. Regrettably this has not been appropriately costed. This is considered to be a serious flaw in the appraisal.

24 The lack of a local roads impact assessment for this appraisal consultation is also a serious omission, especially the lack of a freight impact analysis which has the potential to have further detrimental impacts on local air quality. The full impacts of the proposed potential congestion charge have not been detailed or assessed. In addition, the Commission states that despite the proposer's mitigation schemes, it cannot be ruled out that additional widening of the M4 may be needed.

25 Given the issues raised above, the Council has serious concerns that the surface access elements of the proposals to accompany expansion at Heathrow have been insufficiently appraised. The Council believes that the appraisal of the local economy impacts module is more likely to be reduced from supportive to neutral.

Air Quality

26 The Council believes that the lack of a detailed air quality assessment is a serious omission and restricts the ability of consultees to respond to this consultation. There are no timescales for when the detailed assessment will be available and no commitment has been made to consult further on this. The inputs to the air quality modelling need to be rigorously scrutinised to ensure the outputs are accurate to make an informed judgement as to the estimated changes in air pollution concentrations and likely future air quality levels. It must include the local roads modelling and the impacts of the freight increases which are also currently missing from this consultation. The importance of the detailed local air quality predictions is that they impinge on the potential future health of the local communities and have potential legal implications for local authorities if European air quality standards are not achieved and maintained.

27 In addition there could be serious implications for the future business case if the use of the new runway is restricted in order to ensure compliance with air quality limits or if restrictive control measures need to be put in place to achieve compliance. These implications need to be properly costed and accounted for.

28 The appraisal module states that HAL has produced several credible mitigation proposals to reduce the impact of both existing and future road access to the airport on

local air quality. Without a detailed air quality assessment it is not possible to assess whether such proposals are in fact credible in terms of achieving air quality compliance.

29 The Council requests that, prior to any final recommendation on options for expansion, there is further public consultation on the detailed air quality assessment including the methodology and assumptions used. The Commission appraisal which indicates a reduction from significantly adverse to adverse for local air quality cannot be currently supported given this lack of information.

Noise

30 The Commission has provided a noise scorecard in terms of appraisal outputs but no information on how these assessments will be used in terms of the decision making process on the location for airport expansion. It is unclear, for example, how much weight the Commission intends to give to recommending an option which would see the exposure of 637,700 people to aviation noise by 2050.

31 Improvements in future aviation technologies are identified as helping to deliver improvements in aviation noise to local communities. This shows a lack of understanding in how community noise is perceived. These will not be discernible improvements to local communities given that they will simply be overflown by larger numbers of aircraft for longer periods of time.

32 The appraisal module has not included defined flight paths. The noise mitigation measures suggested by HAL, and accepted by the Commission as reducing the potential impact from significant adverse to adverse, include as yet untested new approaches such as curved landing paths, steeper approaches and displaced runway thresholds.

33 HAL makes reference to the provision of respite with expansion yet this cannot be guaranteed. Management of airspace is not in the airport operator's gift to deliver. Without cast iron guarantees from the regulators, such as the CAA and NATS, that all the proposed mitigation procedures can be delivered with predictable periods of respite, the reduction in the impact of noise as appraised in this module from significantly adverse to adverse with mitigation, is little more than a guess, based on wishful thinking.

34 This was highlighted in the recent Airports Commission's Heathrow Public Discussion Day on 3rd December 2014. The CEO of Heathrow confirmed that in terms of control the operator is limited to "influencing" and "incentivising"; it is the regulators who effectively control the airspace and operating procedures. For impacted communities to "influence" and" incentivise" to bring about change is not the same as a guarantee. It is unclear how the Commission has accounted for the inability of HAL to deliver the mitigation measures it has proposed in its appraisal of this module.

35 The Council has serious concerns in relation to how the Commission has appraised the potential noise impacts of an expanded Heathrow. It concludes that the impacts are similar in terms to the impacts around Gatwick and yet this makes little sense because the magnitude of the impacts are vastly different. The Council does not therefore support the reduction from significantly adverse impact to adverse as defined in this appraisal module.

Biodiversity

36 Both Heathrow options are likely to require appropriate assessment under the Habitats Directive due to the likely significant effects on European Protected Sites. This is the same process that was influential in dismissing the Thames Estuary option. One of the important requirements of appropriate assessment is whether there are 'reasonable alternatives'. Gatwick would potentially appear to be a reasonable alternative when assessed on these terms however without a clear methodology in terms of how the Commission will assess trade-offs between appraisal modules it is unclear how this information will be used in the decision-making process. This is unhelpful to consultees.

37 Both options for expansion at Heathrow will have devastating impacts on the southern section of the Colne Valley. The aim for runway operation to be available for 2026 would coincide with the impacts arising from the proposed HS2 route in the north of the Colne Valley. Taken together the impacts in the Colne Valley would be significantly worse than presented in isolation in this report.

38 The North West Runway option, specifically, will also result in the loss of approximately 40 hectares of the Lower Colne Valley, which is a site of importance for nature conservation for London, not just Hillingdon. A further 35 hectares of this site would also be sterilized by virtue of bordering the new airport boundary, thus damaging a total of 75 hectares. This is in combination with more than a further 50 hectares loss of land in Hillingdon as a result of the proposed HS2 route.

39 The indirect impacts from the combined noise impacts will sterilise far wider areas both around Heathrow and the HS2 route. Once again, the cumulative impacts in the Colne Valley will be far more significant than that which is given credence in the airport assessments. The North West Runway option appears to result in the loss of the recently opened state of the art Colnbrook energy from waste facility. This is instrumental in managing waste for a number of local authorities. There are no identified plans or timescales for when this will be addressed in terms of relocation.

40 The Council considers that the appraisal framework has failed to demonstrate that all the cumulative impacts from the proposed expansion schemes for Heathrow have been properly assessed, costed and fully mitigated in terms of biodiversity. The reduction from adverse impact to neutral as defined in this appraisal module is not supported.

Carbon

41 The crude nature of the appraisal has been highlighted in the answer to question 3. There is no clear logic in a methodology that allows an impact to be four times higher than another and yet the conclusion is that they have the same impact i.e. adverse. With no local roads or freight impact assessments having been carried out and a lack of clarity over the surface access schemes, it is not possible to adequately understand the carbon emission impacts from the provision of surface transportation. Furthermore no account appears to have been taken of the carbon emissions associated with the re-housing of the substantial displaced communities or the provision of the housing and infrastructure required for the anticipated growth in jobs.

42 Given the scale of the carbon emissions related to the development at Heathrow, and that not all potential carbon sources in terms of the development in relation to Heathrow have been accounted for, the appraisal of the impact as adverse impact is not supported and the Council believes this should be appraised as highly adverse.

Water and flood risk

43 The appraisal module recognises that the proposed airfield expansion in the Heathrow area would increase the severity of an extant flood risk to properties in the vicinity. The Commission states that appropriate mitigating actions are possible and would need to be developed at the detailed design stage. This is a substantial risk to the delivery of the proposal.

44 There are insufficient details provided by HAL to reassure consultees that all the risks, especially groundwater flood risk, have been fully addressed. There are no detailed mitigation plans at this point in time. The Council does not feel there is sufficient information provided to support the Commission's assumption that its appraisal can be reduced from adverse impact to neutral, especially on aspects such as flood risk.

Place

45 The comments below relate only to the north-west runway option for expansion at Heathrow.

Longford

46 HAL has assessed Longford as a small collection of statutorily listed buildings which could be recorded, partially salvaged or even re-erected in some form. This was deemed to be sufficient mitigation to reduce the impact of total demolition from significantly adverse to moderate. Whilst the Commission's assessment has appreciated that this level of residual impact was 'still significant', it did not go far enough in recognising the scale of the loss that would be incurred by total demolition.

47 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.

Harmondsworth

48 HAL has 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. Whilst the Commission's assessment has appreciated 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.

49 Archaeological excavations in and around Harmondsworth village have shown that there was once a thriving Saxon settlement here 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 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.

50 The HAL 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.

51 The reduction from significantly adverse impact to adverse as defined in this appraisal module is therefore not supported.

Quality of life

52 Whilst the quality of life appraisal module is a welcome addition it does not provide a comprehensive assessment of local health and wellbeing impacts which is a serious omission. The lack of a full health impact assessment has important implications and to make an important policy decision on where airport expansion is best located without fully and appropriately taking the health and wellbeing of local communities into account is considered to be a flawed approach.

53 Hillingdon is 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. Expansion will exacerbate the impacts on these people. The lack of a proper inclusive approach on health impacts is illustrated in the independent Health report commissioned by Hillingdon which has noted, for example:

- a quality of life assessment which does not include health and wellbeing impacts on children;
- air quality impacts stated as limited when there is clear evidence of air pollution affecting people's health which reduces their capacity to lead full lives and hence impacts on their quality of life;

- night time noise is stated to have no impact on wellbeing yet there are studies showing that sleep disturbance can lead to stress and mental ill health;
- place, and people's interaction with the built environment, the important link between open spaces and mental wellbeing are not considered;
- no detailed consideration of the implications of the loss of, and likely difficulty in re-placing and re-generating; social capital and community cohesion though the loss of community facilities; loss of people therefore making any unaffected community facilities less viable; the relocation of households and impacts on inequalities.

54 There is an attempt to trade off the positive impacts against the negative impacts, for example, the positive impacts of living near airports from aspects such as improved transport infrastructure and access to jobs are traded off against the negative impacts of noise, pollution and amenity loss. However the trade offs are not helpful, in part because the positives may not fall on the same set of people as the negatives. The inequalities element of a full Health Impact Assessment would help to identify these issues.

55 As an example the impacts of noise are suggested in the Quality of Life as having a greater impact on those living in social housing. Yet there is no proper analysis or assessment of the social and health equity implications of this and no discussion as to how these are factored into the quantification of the changes in wellbeing or their monetisation into wellbeing costs and benefits.

56 The data base of Mappiness is not robust enough to quantitatively estimate the wellbeing effects or to use the resulting estimates to value compensation, mitigation and enhancement measures. Quality of life is a composite indicator where each element is important in providing a comprehensive assessment. This assessment has not done this.

57 The Commission's appraisal that the negative impacts and positive impacts can be simply combined to give an overall appraisal of neutral in regards to quality of life is not supported. More information is available on this issue in the report commissioned by the Council and attached to this consultation response.

<u>Community analysis</u>

58 The appraisal acknowledges the significant devastation to the villages in Hillingdon resulting from the HAL Heathrow North West runway option which includes demolition of 783 properties, with the potential for the loss of another 245 due to new surface access alignments. Large parts of the remaining communities of Harmondsworth and Sipson will be left up against the new airport boundary. In addition there is a loss of valued recreation land and open space of up to 48 hectares and loss of 49 hectares of employment land.

59 The Commission has recognised that the HAL approach to mitigation is more about rebuilding communities as opposed to maintaining existing community cohesion. In the village communities, some of which have existed for over 1,000 years, the appraisal states it is difficult to see how any existing community cohesion can be maintained. It is unclear what level of importance the Commission has afforded this impact.

60 The final appraisal suggests that the mitigation plan proposed by Heathrow can mitigate this impact from highly adverse to a level of adverse. It is unclear how this can be

achieved. There is no plan for where people will be re-housed or where lost facilities will be relocated. Without this detail it is unclear how the Commission has appraised a reduction in the impacts to adverse.

61 The lack of appraisal of the impacts of such a substantial land take has not been properly examined. It is not acceptable for this to be left to a promise from the airport operator at the Airports Commission's Heathrow Discussion Day on 3rd December that *"they will want to work with local developers to find new housing areas*" (page 25 transcript).

62 It is a major flaw in the appraisal process for the Commission not to have assessed the costs and widespread implications of having to find land for new homes on the unprecedented scale needed; for providing like for like residential properties; and also schools and other community buildings in close proximity. The Council considers that a recommendation to expand at Heathrow Airport without properly identifying the solution to this problem is not acceptable.

63 The reduction from highly adverse impact to adverse as defined in this appraisal module is not supported.

Question 7

Do you have any comments on the Commission's business cases, including methodology and results?

1 The business case is informed by the strategic case, economic case, financial and commercial case and management case. The Council has highlighted below where it has further concerns or where more information is required.

Strategic case

2 As previously discussed this appraisal consultation has provided a range of future aviation demand scenarios, two different carbon impacted scenarios and a range of associated outcomes. The separate locations for expansion i.e. Gatwick and Heathrow, both provide substantial economic benefits; they both provide jobs to their surrounding areas; and they both provide future aviation connectivity in terms of passenger numbers and destinations served, including to the emerging markets.

3 Expansion at Heathrow, under either proposal, is identified as having its main strength in being able to provide a large route network with the greatest connectivity benefits if the capacity is taken up by the hub carrier and its partners. Benefits from competition in this scenario are identified as likely to be limited.

4 Expansion at Gatwick, is identified as providing competition and a second gateway into London. This would provide a 2+2 runway future solution, which may have better flexibility in terms of route competition and providing future flexibility in terms of airline business models, as opposed to a 3+1 runway solution with expansion at Heathrow.

5 We note that the Gatwick airport operator has supplied independent analysis to the Commission which indicates that the benefits of competition from expanding at Gatwick are between £7.7 billion to £10.4 billion by 2050.

6 We believe the benefits of competition should be properly appraised. The original BAA group was broken up by the Competition Commission for very good reason. It has created competition and allows more choice for the travelling public. If the Commission recommend expansion at Heathrow it needs to publish why it believes the re-creation of this monopoly to provide a 3+1 runway solution for the UK future aviation connectivity is in the best interests of the consumer.

7 In terms of providing a future operationally resilient airport operation, the Commissions' consultation has not provided evidence to show that the addition of a third runway at Heathrow will improve this. The current Heathrow two runway airport is run at capacity, which provides no operational resilience. The Commissions' assessment has indicated a faster rate of growth than the airport operator, with the airport being again close to capacity within a short time of opening.

8 If the future capacity levels have to be capped to ensure operational resilience then the business case should be amended accordingly. If the airport is not subjected to such a cap, the same situation of no operational resilience will simply occur again in the future.

9 Gatwick airport, at present, has only one runway which gives it no operational resilience in the event of circumstances such as poor weather conditions, debris on the runway, and other such situations outside of the control of the operator. It is unclear how the Commission will appraise this issue.

10 The Council firmly believes that, given the above, recommending an option to expand which knowingly inflicts the largest damage to local communities should not be supported.

Economic Case

11 The Council has provided detailed comments on the economic case in responses to questions 5 and 6. In addition, the Council has the following points which it believes the Commission should consider in regards to the economic case.

12 The Council does not believe that the assessment of carbon emissions has been properly considered in terms of its wider implications. To choose an option to expand at Heathrow would be to concentrate over half of the UK's aviation carbon emissions in one airport. Should future carbon reductions or emission constraints be needed, this could have wider implications for other airports. This should be properly considered.

13 The costs of providing the identified surface access proposals differ in magnitude between the two airport locations with the costs identified for Heathrow being approximately seven times that of the cost of surface access provision at Gatwick. The Commission has not offered any comment as to the appropriate share between private and public sectors in terms of financing the provision. This is a potential public sector cost

which may differ in magnitude between the two airport locations and should be properly considered in terms of the business case.

Financial and commercial case

14 The Council notes that the costs for providing capacity at Heathrow are higher than that at Gatwick and that this will involve higher costs per passenger. It is not clear what consideration the Commission has given in terms of the costs of higher charges on the flying public in its economic assessment.

Management case

15 A number of concerns have been raised by the Commission in terms of the delivery of the expansion proposals at Heathrow. The Council has additional concerns in relation these issues which are detailed below.

16 The Council is concerned that the business case has underestimated the costs that may be imposed upon the surrounding local authorities and the local communities by the options to expand at Heathrow. These impacts are described in Question 6, in regards to the local economy impact module.

17 The Council notes that the provision of appropriate surface access is key to the local economy impacts in terms of realising local benefits and that any non-delivery could see this appraisal result reduced to neutral. The Council has concerns that the surface access proposals for roads and public transport access have been insufficiently appraised in terms of their deliverability, their costs and their implementation and funding. These impacts are set out in the response to Question 6 and they will have implications for the business case.

Air quality challenges

18 The lack of a detailed air quality assessment in this appraisal consultation, along with other omissions such as the local roads modelling and the freight impacts assessment are all serious flaws in the appraisal. It means that the full impacts of expansion on local air quality levels and associated health effects have not yet been calculated. There is a distinct possibility that the airport infrastructure could be built and yet its capacity potential may not be realised due to constraints caused by increasing levels of air pollution.

19 The three areas identified by the Commission as main risks relate to air quality are a) fleet turnover does not deliver the expected reduction in emissions, b) modal shift towards public transport does not occur to the extent expected, c) European rules are tightened. None of these are in the direct control of the airport operator and therefore these remain high risks that lead to the inability of Heathrow to fully utilise the additional capacity that is assumed. This should be taken into account.

20 The Commission must ensure that account is taken of the implications on the economic impacts of a partially used runway. This consequence must be factored into the decision-making process for recommending an option for airport expansion.

Management of flood risk

21 The Commission acknowledges that the proposed airfield expansion would increase the severity of an extant flood risk to properties in the vicinity of the Heathrow site. Given the recent severe flooding experienced in the area close to Heathrow this is an issue of great concern to local communities.

22 The Commission states that appropriate mitigating actions are possible and would need to be developed at the detailed design stage. This assumption is a substantial risk to the delivery of the proposal because it may not necessarily be achieved without huge costs both financially, and to the community. There are insufficient detailed mitigation plans provided to reassure consultees that all the risks, especially groundwater flood risk, have been fully addressed. The appropriate solutions have not yet been identified or costed. This has implications for the business case.

Construction

23 The construction costs associated with the provision of expansion at Heathrow, for example tunnelling the M25, widening parts of the surrounding motorway network, re-routing the A4, construction of a large integrated transport hub in Iver, will all be major construction projects for which the impacts may be felt over a wide area. Given the significant construction period that will be required, consideration needs to be given to the detrimental impacts on other road users and the potential for surrounding local road networks to be negatively impacted. This should be costed and accounted for in the business case.

Lakeside Energy from Waste Plant

24 The impacts of removing and then replacing the Lakeside Energy from Waste Plant, do not appear to have been appraised in any detail. It is unclear if a suitable location has been identified and if not, it may prove extremely challenging to find a suitable site for this facility. This could result in adverse local impacts both in terms of its relocation site and the potential impacts on customers travelling to a different location. This is an aspect that does not have a solution; where the outcomes are unknown; and where the local impacts have not yet been identified. This should be accounted for in the business case.

RAF Northolt

25 The Council has noted the potential impacts on RAF Northolt. It is aware of a recent decision by central Government which included the need for RAF Northolt to increase the commercial side of the airfield in order to remain a viable military airfield. It is unclear how the Commission has taken this into account. This may have implications for the business case.

OTHER COMMENTS

Question 8

Do you have any other comments.

Flawed consultation

1 The Commission has produced a vast amount of information. It has stated in the Chair's Foreword to the consultation document that "*it is particularly important for local residents and their representatives to understand more clearly what the proposals entail, and what their consequences might be for the local environment*". Unfortunately, this consultation has failed to do this.

2 There is a wealth of missing information, all of which relates to understanding the detrimental local impacts. There is no evaluation process presented for consultees to consider and try to understand as to how the Commission has assessed the effectiveness of mitigation proposals. There is no discussion or commitment to hold further public consultation on the missing information. This does not represent an open and transparent process and neither does it allow the opportunity for stakeholder engagement on key information which relates directly to them prior to any final decision being taken.

3 The Council has identified flaws in the Appraisal Framework with gaps in the provision of vital information which would have aided a more informed response. It is crucial that the Commission publishes how it intends to plug the gaps on information such as detailed air quality assessment, local roads modelling, freight impacts, flightpath details and how it intends to ensure this is made publicly available for comment prior to any final recommendation being made on the best option for airport expansion.

Community Engagement

4 The Commission notes that aspects such as local airspace design are likely to be contentious given the large population affected by noise from Heathrow. This has been demonstrated by the recent flightpath changes trials which resulted in the trials being halted earlier than expected due to large community protests. This issue has still been insufficiently addressed by HAL and by the Commission. Potentially impacted communities are still unaware of the flightpaths which may impact on their lives. The creation of an Independent Noise Authority to help community engagement will be too late once the recommendation for expansion has already been made.

5 The resulting impacts on local communities, including the demolition and loss of community cohesion, have not been adequately appraised. No evaluation has been made as to the levels of compensation required to ensure the people are adequately compensated and will be able to find acceptable places to live in an area of their choice. The CEO of HAL at the Airports Commission's Heathrow Discussion Day on 3rd December 2014 referred to the economic benefits and the creation of jobs arising from the proposal as the "prize of expansion". The Council believes this is totally at the expense of the surrounding local communities and unacceptable.

Legal Framework

6 The Council believes that the Commission, when recommending a final option for airport expansion, should ensure there is a means by which the claims and projections of the promoter can be held to account. This includes ensuring that the wider community

around the airport does benefit directly from the claimed economic benefits arising from expansion.

7 Given the close proximity of both the Heathrow expansion options to large densely populated areas, any failure in key aspects such as adequate surface access and public transport provision; appropriate measures to improve and maintain compliance with air quality; measures to reduce noise, will all impact directly on the local communities. Controls and implementation mechanisms need to be identified. Promises made by HAL, that are not in the gift of the airport operator to even deliver, are considered to be simply hollow promises.