Hounslow Council's response to the Airport Commission's consultation on their assessment of the three shortlisted airport expansion options for a new runway in the London and southeast area.

INTRODUCTION

Hounslow Council has a long held position that Heathrow should be better, not bigger. The Council disagree with both of the current proposals to expand Heathrow because of the noise and pollution the airport already causes and the effect this has on our community.

The Council does however, recognise the significant local and national benefits the airport brings in terms of the economy and employment. For this reason, the Council is working to build a better working relationship with Heathrow to maximise the benefits that the airport should be bringing to the Borough. Related to this is the development of a mitigation package should the Commission recommend one of the Heathrow expansion options.

The Council believe that the benefits of proximity to Heathrow need to be greater for the whole community. **The Council want Heathrow to be a better neighbour and be more responsive to residents' views.** The current mitigation package does not adequately address the problems the airport brings to our borough, particularly in relation to schools. Furthermore, **Hounslow Council is keen to maximise the economic and regeneration benefits of Heathrow, particularly to the western part of the borough, within the confines of sustainable development.**

The Council has engaged wholeheartedly with the Airports Commission's process and will continue to make the case for local residents. This response addresses the consultation questions directly. However, there are a number of areas where it is felt that additional information is required before a measured judgement can be taken.

Whilst we welcome the work undertaken on health we still have concerns regarding the health impacts of both a two runway and a three runway Heathrow. Recognising that these impacts may not necessarily be negative we remain concerned that the appraisal framework does not include a health module that would assess this aspect of the proposal in more detail. **We take this opportunity to again reiterate our request for a full health and social impact assessment.**

Hounslow Council is particularly concerned that the Commission has not issued a local air quality assessment for the Heathrow options. We have included comments on the work undertaken on air quality so far. However, as the health of our residents and the deliverability of any selected scheme could depend on the outcome of such an assessment, we are most disappointed that this has not been produced as part of this consultation. We feel that this is an error and it should be rectified. **We believe that it is necessary that we are consulted on**

a revised air quality assessment prior to a final recommendation being made.

Hounslow Council also believe it is necessary for the Commission to undertake a detailed freight impact assessment and local road network study for each of the shortlisted proposals in order to understand the actual impact of airport expansion on local communities.

In summary, the Council urges that if the decision is made to allow a third runway at Heathrow that those who take most of the pain should also share in the gain. In the balance of our submission we describe:-

- Increased spend on measures to counteract the impact of noise and air pollution through a share of air passenger duty.
- Operational measures for arriving and departing aircraft, including a ban on night flights
- Change to the administrative boundary so that the airport falls within Hounslow and wealth generated at the airport is invested back into the most affected communities.
- Support for the regeneration of Feltham and the West of the Borough to allow improved transport and infrastructure, growth of homes and measures to promote economic development and employment, so that the full economic benefit is delivered to local communities.

Q1: WHAT CONCLUSIONS, IF ANY, DO YOU DRAW IN RESPECT OF THE THREE SHORT-LISTED OPTIONS? IN ANSWERING THIS QUESTION, PLEASE TAKE INTO ACCOUNT THE COMMISSION'S CONSULTATION DOCUMENTS AND ANY OTHER INFORMATION YOU CONSIDER RELEVANT.

As stated above, a successful Heathrow Airport brings economic prosperity and employment into the London Borough of Hounslow. It also creates a significant noise and pollution impact.

An expanded Heathrow (both schemes) would take both the positive and negative aspects of Heathrow to further extremes with added economic and employment benefits and an increase in the number of people exposed to unacceptable levels of noise.

The Commission have stated within the Heathrow Business and Sustainability assessments that significant pressure will be placed on local authorities to address the knock on effects from the proposals to expand. For example, 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 Council believes that the proposals as formulated do not make the case for expansion at Heathrow as the appraisal process has left many questions unanswered and identified a number of uncertainties which still need to be addressed.

The Council needs to be sure that all aspects of any airport expansion or changes of operating practice are properly mitigated before any recommendations are made.

Q2: 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.

Local communities including those within the London Borough of Hounslow have expressed a range of views on the acceptability of the arguments for Heathrow Airport's expansion. Many of the economic benefits (some £111–£211 billion according to the Commission's work) of a major international airport may not be realised by those without connection to the airport, particularly in the context of annoyance, reaction to aircraft noise, being woken up, being unable to learn or being unable to travel due to traffic congestion and overcrowded public transport. **It is suggested that to make such a runway proposal more acceptable these economic benefits need to be more visible and shared locally so that the benefit is more evident.**

The Council would expect to see a quality of life fund established and used to redress the disbenefits of living near Heathrow. Such a fund has been established in the region of Schiphol Airport and put simply this allows the redress of quality of life disbenefits.

A key economic benefit to Heathrow and driver for regeneration in Hounslow will be the southern rail access to the airport via Feltham. This has the potential to stimulate further regeneration in Feltham town centre, as well as unlock capacity for significant amounts of additional employment and residential development in the wider west of Hounslow Borough (particularly through the provision of a station around the Bedfont area as discussed below). In recognition of these regeneration opportunities, the Council has started work on a master plan for Feltham, and has also commissioned a comprehensive Green Belt Review to inform future planning policy and site allocations. The Council would expect any proposed expansion of Heathrow to fully engage with these proposals in order to maximise the potential economic and regeneration benefits of the airport within the confines of sustainable development. A key objective of this work would be increased access to higher skilled jobs and training for the borough's residents and increased housing provision for those benefiting from the regeneration of Feltham including potential airport employees.

The airport, as well as contributing directly and indirectly to the national and local economies also makes substantial contribution to the tax revenue paid to central Government in the form of Air Passenger Duty (APD). APD is not currently used to address the harm caused by airports. As the national economy experiences significant financial benefit from APD, the Council would expect some of this benefit to be channelled into rectifying the consequences of airport operation in the local area. **Therefore, Hounslow Council proposes that the Government should review airport taxation with a view to allocating part of the tax revenue collected to affected local authorities.** Beneficial infrastructure and amenity projects could then be developed and delivered which may go some way towards offsetting the damage done to the borough's

environment by the excessive level of aircraft noise regardless of whether or not expansion at Heathrow takes place.

Similarly, the CAA document, (CAP 1165) Managing Aviation Noise states that,

"one option would be to hypothecate receipts from a noise tax to fund the types of scheme that benefit local communities, for instance sustainable transport schemes, community centres, sports and recreation facilities and small business development funding, therefore directly benefitting those with the most to lose from airport expansion.

Such a tax would also reflect the environmental disbenefit of flying in ticket prices in a clearer way than current landing charges do, internalising noise impact for passengers more directly." (Page 62)

The document goes on to suggest that…

"Government should consider the potential for a future noise tax to incentivise airlines to procure and operate fleets in the most noise efficient fashion possible, if other methods are not successful, and to internalise noise impacts in consumer decision making.

Were it to be considered, the design of such a tax should, as the French one does, reflect the individual circumstances of different airports and their varying noise impacts - ensuring that impacts are proportionate and based on a clear cost/benefit analysis. If introduced, the CAA believes that it would be more equitable for revenues to benefit local communities, either directly via funding insulation measures or indirectly through supporting schemes which benefit the entire local area." (Page 63)

The Council support the above proposition by the CAA and would like the Commission to undertake some more detailed work about how such a tax might be implemented in the UK. The Council would expect the Commission to consider recommending that such hypothecation should occur as soon as possible, irrespective of the final decision concerning additional runway capacity so that the existing problems can be better addressed.

Heathrow pays business rates to the London Borough of Hillingdon. As the borough most affected by the impact of Heathrow's operation, the Council would like to see this arrangement re-evaluated. It is believed to be fundamentally fairer for the business rates to be allocated to Hounslow as the borough most affected by the impacts of airport operation so that additional mitigation could be funded.

Therefore, the Council would like to see a feasibility study commissioned that would investigate the implications and the appropriateness or otherwise of a change in the administrative arrangements of Heathrow. The Council consider that a boundary change, so as to incorporate Heathrow within the administrative area of Hounslow Council, may also be appropriate and should be investigated.

In the circumstances Heathrow is chosen for expansion, the following measures should also be considered in order to make the scheme more acceptable to local communities.

Insulation and Ventilation

Hounslow Council would expect the introduction of a fully funded noise insulation scheme for the community, based on best practice from UK and European airports, this includes:

- Noise insulation and appropriate ventilation for windows/roofs/doors for residential premises.

- Regular reporting of the progress of the implementation of the noise insulation/compensation scheme offered at Heathrow. This should include monitoring the quality of the installation.

- Assessment of the impact of aircraft noise in all schools in Hounslow and provision of additional support e.g. noise insulation, ventilation, cooling and absorptive material to achieve Department for Education (DfE) acoustic standards. The scheme should include provision for new build and refurbishments.

- Further measures should be developed to address the effect of aircraft noise on external learning environment in schools.

- Progress on how the scheme is performing should be reported regularly on an agreed cycle.

Operational Measures for Arriving and Departing Aircraft

Hounslow Council would expect the introduction of a suite of new measures to reduce the impact of noise on the local community. This would include

- **A ban on night flights (the Council is advised that this is more feasible with a third runway but we require this now with the existing two runway airport)**

- Scheme of runway alternation for a three runway Heathrow

- Investigation and implementation of steeper approaches

- Use of displaced landing thresholds

- A predictable and deliverable noise respite scheme with compensation for non-compliance, for example, compensation monies paid into a community fund which can be used to fund community projects and mitigation measures in the local area.

- Detailed consideration given to other noise management measures as outlined by the CAA within their document “Managing Aircraft Noise” CAP 1165.

Employment and Economic Development Measures

A suite of measures related to supporting the local economy and providing job opportunities for the local communities would be necessary. This would include:

- An aviation skills academy in Hounslow

- Funding towards an affordable business centre for SMEs in the west of the borough where businesses can receive support so that they remain competitive with other economies in the emerging global market, engage and bring networks together to build capacity, share knowledge, reduce their carbon footprint, obtain access to best practice research etc.

- Support for regeneration in Feltham and the West of the Borough to free up land for employment uses

Transport and Air Quality Measures

A suite of transport measures that would reduce congestion and ensure that air quality limit values are achieved and maintained should be introduced including:

- A programme of proactive measures to prevent the Piccadilly Line becoming overcrowded.

- An extension of the Heathrow Free Travel Zone Network across the London Borough of Hounslow. Through the recognised process of ‘trip banking’, this measure would help offset congestion caused by newly generated trips and also aid quality of life for residents impacted by proximity to the airport.

- The inclusion of the Heathrow Express into the TfL fare structure

- Instigation of an airport drop off charge for passengers travelling by road. (Hounslow Council retains serious concerns as to how an alternative congestion charging zone could work without simply increasing congestion on the road network serving the Authority).

- An emissions management plan as recommended in the Commission’s Technical Report 6 on Air Quality

- Putting in place conditions within surface access plans that will ensure that targets set for modal shift for passengers and staff are reviewed and any additional measures should be funded and implemented as and when required. These targets should be binding upon the airport and

linked to the intensity of aircraft operations – i.e. if mode shift targets are not being met the airport would need to reduce operations to mitigate.

- Support for regeneration in Feltham and the West of the Borough to allow house building to accommodate airport workers (linked to the Free Travel Save Network proposal)

Hounslow Council welcomes the recommendation in the Interim Report regarding the southern rail access to Heathrow. Within Heathrow's submission the scheme used for assessment resembles the previous design work for the unrealised Airtrack project with the link to the airport running through Staines. This scheme was opposed locally for a variety of reasons including the opposition to the extended level crossing down time as trains pass through the London Borough of Richmond. The funding was subsequently withdrawn following the Government's Comprehensive Spending Review in 2010.

However, the Commission will be aware of the work the Council has been undertaking with the London Borough of Wandsworth on a revised scheme. This overcomes many of the difficulties experienced by Airtrack by taking trains round the Hounslow loop, and potentially linking them to the airport via a chord to Feltham. Such a scheme would provide significant benefits to the area, particularly if there is provision of a station on this chord in or around Bedfont which would unlock significant housing and employment growth in the vicinity. Moreover this version of the scheme would have the support of the London Borough of Hounslow and be much more likely to succeed as it aligns with the borough's regeneration plans for Feltham town centre as discussed earlier. Hounslow Council has commissioned further work (outline engineering options and business case) on the deliverability of this chord and station which will be available May/June 2015.

Q3: DO YOU HAVE ANY COMMENTS ON HOW THE COMMISSION HAS CARRIED OUT ITS APPRAISAL? THE APPRAISAL PROCESS IS SUMMARISED IN SECTION TWO.

The analysis produced by the Commission seems to be a welcome change from past policy formulation processes. The quality of work also appears to be of a high standard and Hounslow Council would like to take this opportunity to thank the Commission for its endeavours.

The Council also welcomes the serious and professional approach of the Commission in meeting with local authorities such as Hounslow to better understand the impact of airport operations on our communities.

However, the Council must reiterate its concern that a proper local air quality assessment has yet to be carried out. It is unclear whether the Commission intends to consult again once this work is completed. As stated above, the Council expects an opportunity to consider and comment on a completed air quality assessment. Given the uncertainty regarding the rate of growth of a three runway Heathrow, the Council would expect the Commission to model the impact of 740,000 ATMs in 2030 in terms of Air Quality for the purposes of this assessment.

The Council welcomes the range of forecasts assessed by the Commission. However, we have concerns that the growth in air traffic movements as identified by the Commission will be greater than forecast. This will mean that the worsening of the noise environment predicted to occur in 2040, would be experienced earlier. There is also concern regarding the pressure to utilise to the maximum, any additional capacity created by expansion.

The Council would expect to see the proposals modelled alongside the mitigation measures the promoters have each included so that an assessment can be made about the impact of each proposal and the suitability of the mitigation measures suggested.

Hounslow Council is concerned that there is no indication regarding the mechanism by which the different elements of the appraisal are weighted in the decision making process. For example, how will the Commission balance in the decision making process the considerable economic benefits of expansion, against the increases in population exposed to excessive levels of aircraft noise and the impact this has on health and well-being?

There are serious issues around the proposed surface access improvements, many of which are not fully planned, funded or indeed have yet to gain Parliamentary approval. There are also likely to be significant knock on impacts onto the local road and public transport networks from the expansion of Heathrow. For example, the Commission does not appear to have given appropriate consideration to the impact that expansion will have on key roads such as the A4. Furthermore, the Commission has only looked at surface access impacts until 2030 and the Council would expect the worst-case scenario until 2050 to be assessed.

Q4: IN YOUR VIEW, ARE THERE ANY RELEVANT FACTORS THAT HAVE NOT BEEN FULLY ADDRESSED BY THE COMMISSION TO DATE?

In previous consultation submissions to the Commission, Hounslow Council has consistently requested the inclusion of a separate mitigation module in the appraisal process. The Council believe that a separate module would provide an 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. This would have made the results of the Commission's appraisals for "with mitigation measures" scenario more robust.

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.

We also recommend that the Commission should assess the impact on the proposed mitigation measures in the event that technological improvements and quieter aircraft fail to deliver the expected reductions in noise. The Commission should consider whether the proposed mitigation would still be fit for purpose if the expected noise reductions do not occur.

The Commission should monetise the cost of congestion on local road networks. This would reveal the true cost of an expanded Heathrow on local roads. Additionally, an appropriate passenger drop off charge (with local residents and business exempted) might provide an additional source of revenue to contribute to a quality of life fund akin to that operated at Schiphol.

The impact of airport expansion on the health and well-being of local communities and the commensurate costs to local health and education services has not been adequately addressed. Hounslow Council would like to see a comprehensive Health and social impact assessment undertaken, the results published and incorporated into the Commission’s final report. The Council would welcome the opportunity to comment on these findings.

The Council note that there needs to be a full equalities impact assessment of the proposed schemes.

This further work would enable communities and those that represent them to better understand the potential impacts placed on them as a result of expanding the airport.

Q5: 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?

It is difficult for the Council to understand how the Commission can claim that the impacts of either of the Heathrow proposals are broadly neutral when weighing up noise, air quality and surface access issues against the economic benefits of living in an area with access to the job market. Clarity on this matter in the final report would be welcomed by the Council.

Noise

The Commission have based their noise assessment on indicative flight paths that may or may not be adopted. The work undertaken by the airport indicates that communities in the east of the borough may be newly overflown. The Council recognises the difficulty the promoters of schemes and the Commission face when assessing the new development and understand the use of indicative flight paths. However, communities are naturally concerned about the future noise climate and would like to understand what will happen. The Council would expect that communities be given the opportunity to comment on new flight paths at the earliest opportunity.

As expressed in our response to the Appraisal Framework, 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.

Hounslow Council believes it is necessary that mitigation measures form part of the Airport Commission's recommendations. It is disappointing that none have been included thus far in the analysis, given the serious level of community disturbance and annoyance already caused by aircraft noise.

The Council is of the view that the disturbance to communities by night flights outweighs the economic benefit. Should the Commission be minded to recommend a Heathrow option for airport expansion this should be predicated on a night flight ban. The Council believes that it is necessary that the Commission should appraise the proposals with a night flight ban in place as a sensitivity test.

Surface Access

Hounslow Council would welcome the publication of a full assessment of the impact of Heathrow expansion on public transport and the existing local road network along with the modelling data used for the proposed new southern link road accompanying the Heathrow north west runway proposal. It is currently unclear what disruption would be caused by the construction of this link road and the potential knock-on impact upon local services.

The Council notes that the connection to HS2 is not part of the current hybrid bill for Phase 1 and therefore is not yet funded or guaranteed of being delivered.

The Council understands that the Piccadilly Line will be full at peak times with a third runway even with the planned signalling and rolling stock upgrade. This means that any improvements that local people see from the upgrade could soon be eroded by passenger journeys to and from the airport. It should also be noted that the Piccadilly Line plays a significant role in the wider sub-regional economy by providing people with access to jobs in Hounslow's town centres and key employment locations such as the Golden Mile. Again, the benefits of Piccadilly Line improvements in enhancing this accessibility should not be diluted.

Hounslow Council recognises the detailed work that the Commission has undertaken with regard to surface access yet remains confused as to apparent contradictions within the Commission's conclusions. The Commission states that the Piccadilly Line will be full shortly after the upgrade is completed by 2026. Therefore, it seems strange for the Commission to conclude that the surface access provisions in both Heathrow expansion proposals will be adequate to cope with increased passenger numbers and the expanded population of London

Additionally, TfL state that Crossrail will be full within one year of opening and that this is the case without factoring in the additional journeys that may be generated by a third runway at Heathrow. The Council believe it necessary that the Commission should recommend that the Government commit to undertaking a thorough assessment of the ridership of Crossrail and the impact that a potential third runway at Heathrow would have upon its operations.

The Council believe that the risk of the planned surface access improvements not being delivered is higher than that assumed by the Commission, and we offer 'Airtrack' as historical evidence to support this contention. It is essential that the scheme promoters work with Government to deliver these improvements.

The Council believe that ambitions on mode share need to be balanced against the objectives set out in cost and affordability. At Heathrow where the surrounding roads and public transport networks are already congested and air quality is already poor, it is essential that mode share targets be set at a level designed to achieve real reductions in access to the airport by car.

Surface access transport models have inherent weaknesses and the input assumptions used may need to be robustly challenged. As the outputs will inform the assessment of other topics such as environmental impact, the Commission needs to publish how it intends to ensure there is a suitable level of scrutiny applied to the model inputs and outputs and assumptions used.

TfL state that within the Commission's assessment of analysis the peak hour used is 0700-0800. This appears to be based on peak hour airport related activity and is different from what is conventionally taken to be the AM Peak for

London's surface access networks. The Commission needs to demonstrate that it is capturing the period when combined airport plus background demand is at its highest.

Hounslow Council considers that the Commission should undertake further modelling for the demand for rail and highway for 2030 and beyond prior to evaluating the long-term transport impacts of the Heathrow proposals. Furthermore, the Commission should highlight the limitations of the demand forecasting undertaken should any of the underlying future transport assumptions not be realised and outline what the implications will be.

There seems to be a lot of focus on rail, but it would be useful to explicitly address bus/coach movements/networks and explore the potential/constraints for these to be enhanced and support the increased numbers of passengers and workers anticipated under the three proposals. For example, there is no mention of reflecting the current bus/coach network in the base case. This is an issue when more travellers arrive at Heathrow by bus/coach (13%) than by heavy rail (10%).

The role of travel demand management in managing the impact of surface access and encouraging modal shift is not mentioned and could play an important role. For example, there is no note of the complex role that the parking stock at Gatwick and Heathrow plays in modal split and trip generation, but also in encouraging 'park and fly' rather than 'kiss and ride' (the latter generates two additional vehicle movements for every journey compared to the former). Techniques to manage trip generation and influence modal choice (e.g. increasing car occupancy through car sharing / passenger drop off charge etc.) should also be assessed in relation to the two sites.

The businesses in Hounslow engage in markets and supply chains which reach far beyond the borough's boundaries. In many instance, this reach is international with proximity to Heathrow a key factor in helping businesses to export.

Hounslow Council is concerned about the increase in potential additional freight movements identified by the scheme promoters, which will result in increased noise and worsening of the local air quality on the surrounding road network. The Heathrow NWR option proposes a reconfiguration of the local road network by introducing an additional link road, which could potentially put increased development pressure on Feltham. **The Council would expect to see a full freight impact assessment of each proposal published and would welcome the opportunity to comment on this before recommendations are made**.

Air Quality

A range of sensitivity tests on key assumptions such as emissions for future road vehicles, future aircraft technologies, and delivery of surface access provision not currently funded, should all be included to ensure there is a precautionary element built into the modelling process. As an example "reasonable adjustments to account for future improvements" leaves the definition to the proposers. This is unacceptable unless appropriate experts have agreed the definition of reasonable.

Appropriate account needs to be taken of the specific locational circumstances of the short listed options. As an example, the roads around Heathrow are already at, or near, capacity and there is currently non-compliance with the air quality standard in this area. In these specific circumstances, screening out roads as suggested will not be appropriate.

It also appears that impacts on emissions during the construction phase of any new runway have not been fully considered.

Further explanation is required on why dispersion modelling was not undertaken as part of this assessment process, as this would have enabled the Commission to monetise the cost of setting-up Health Centres, GPs clinics to care for the vulnerable and elderly through earlier intervention, schools and housing, possibly by recommending to the Government that treasury spend a significant proportion of Air Passenger Duty on local communities as outlined above.

Planning

For Hounslow Council, the potential development of a third runway at Heathrow Airport will cause considerable planning issues especially when coupled with an increasing population. Statutory and planning policies prevent development such as the construction of housing within the Public Safety Zone or overly close to areas of certain noise exposure levels such as those generated by operations at Heathrow. The development of a third runway at Heathrow would result in the need to provide significant additional noise insulation and mitigation to an increasingly large number of households. In addition, the Council believe that it would be sensible for the Commission to examine the data provided by the GLA as part of its sensitivity tests around population growth.

Quality of Life

Hounslow Council would like to take this opportunity to thank the Commission for assessing the quality of life impacts arising from the airport expansion proposals, as this is something that we have requested for many years. However, the Council believes that more work is still needed to fully understand the impact of airport expansion, including specific assessments on the following:

- Impact of the expansion plans on children’s education and their indoor and outdoor learning environment;

- Impact of air pollution on people's health and wellbeing as it is evident that poor air quality reduces people's quality of life;
- Consider the impact of noise on health and wellbeing as research shows sleep disturbance can lead to stress and mental ill health; and
- Consider the loss of quiet outdoor amenity space which is valued by communities as tranquil spaces and this has not been accounted for.

Community

It is unclear what compensation is available for residents and what is available for community buildings such as schools and residential care homes in terms of insulation, cooling and ventilation. This needs to be clarified.

Employment

If Heathrow were to expand, Hounslow Council would expect to see further training opportunities offered to local people, particularly in relation to upgrading the skills of the community.

The Council would also welcome the recommendation of a mechanism whereby a minimum level of the new jobs are created and offered to local people.

The Council would also welcome further information on the types of employment available (and clarification as to whether this is part time, full time or zero hours), the skill set required for the proposed jobs (low skilled and or high skilled) and the different pay grades at which the proposed jobs that are suggested by the scheme promoters will be marketed at. This will enable the Council as well as the Commission to assess the quality of the employment that is generated and the proposed uptake by the various social groups (young, unemployed and deprived) living near the proposed development.

Q6: DO YOU HAVE ANY COMMENTS ON THE COMMISSION'S SUSTAINABILITY ASSESSMENTS, INCLUDING METHODOLOGY AND RESULTS?

Hounslow Council has a number of questions that it would like answered regarding the sustainability assessments:

1. Will the Commission publish the proposed plans which indicate where the additional housing and associated infrastructure that local authorities will be expected to accommodate as a result of the increase in jobs created/available will be located?

2. It would be interesting to know the view of the Commission regarding the future direction of the EU's Emissions Trading Scheme.

There appears to be a possibility that, should a third runway be constructed at Heathrow, the operator will be unable to utilise it fully due to the constrained emissions environment or indeed the continued breaches of air quality limits. Furthermore, Hounslow Council require further clarification on the use of the criteria that the Commission has used to appraise specific topics. It is debatable whether this wording is appropriate for communities to be able to understand the real impacts and compare the different options.

Q7: DO YOU HAVE ANY COMMENTS ON THE COMMISSION'S BUSINESS CASES, INCLUDING METHODOLOGY AND RESULTS?

What guarantees can the Commission or the scheme promoters provide that the economic benefits will be properly shared with local communities who will carry the environmental burdens of expansion?

Has the loss of productivity from more communities having their sleep or education disrupted been monetised as a cost of the proposals?

How much will the public sector be expected to contribute for each of the three proposals?

Q8: DO YOU HAVE ANY OTHER COMMENTS?

It is vital for local communities to understand how the economic benefits of airport expansion will be balanced against the negative environmental impacts. It is not clear at this stage whether economic growth in terms of jobs is considered to be more important than protecting the quality of life experienced by those living close to an airport.

Hounslow Council is of the view that there is a significant risk that the Commission's final recommendations could be undermined if a sufficiently thorough and robust assessment of the potential impacts and necessary mitigation measures is not carried out. Therefore, Government must ensure that there is a legally binding mechanism by which the promoter can be held to account should their hypothetical projections not be delivered in reality. This should be applied to:

- Adequate surface access provision;
- Adequate public transport provision;
- Improving air quality; and
- Noise impact reduction.

It is vital to ensure that local communities, including the wider community around an airport, benefit directly from the claimed economic benefits of any aviation expansion proposals.

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