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***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.***

A: In relation to the two options for Heathrow, the review of the Commission's evidence, despite the amount of work done, simply confirms what is already known namely that expansion at Heathrow has economic benefits for the UK, although there is concern that these are overstated; it will provide international connectivity and will provides jobs for the surrounding community.

However it also brings about the largest environmental and community dis-benefits. The former Transport Secretary (Theresa Villiers said in 2012)

*Thousands live on a daily basis with a plane overhead every 90 seconds... not to mention the flights that wake them up at 4.30am. "The quality-of-life impact of a third runway, with up to 220,000 more flights over London every year, would be massive and there is no technological solution in sight to ensure planes become quiet enough quickly enough to make this burden in any way tolerable. So we need another solution" (Speech to Conference, 18<sup>th</sup> April 2012).....*

To expand at Heathrow under either of the shortlisted options (as is demonstrated in the Commission's own documents) will be to expose more people to noise than all the other hub airports in Europe combined. The 3<sup>rd</sup> runway option would bring about the largest forced population relocation since World War 2. It will see the destruction of whole communities around the airport both homes and schools whilst requiring around £5.7 billion of public funding.

An expanded Heathrow will compromise the health and well being of significantly more people than the Gatwick option in terms of increased noise and pollution. The Commission's appraisal process, whilst more comprehensive than previous assessments, has still not captured all the impacts that will be brought upon communities surrounding Heathrow Airport in the event of the airport expanding.

The claimed economic benefits to UK plc generated by all of the three shortlisted proposals are in LAANC's view implausibly high. It is particularly disappointing that the commission (via the DfT) has developed its own economic model which to date it has not been prepared to submit to peer review or independent scrutiny. The range of uncertainties in Commission's econometric modelling are so great that LAANC questions to what extent



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reliance can be placed on the outputs, for example benefit in respect of UK plc jobs (between 64,000 to 180,000 jobs by 2050) and positive GDP impacts (£112-£211bn) for a third runway at Heathrow.

Against the above uncertainties it is much easier to quantify the detrimental impacts of Heathrow expansion. These include:

- Demolition of around 1,000 homes and associated community facilities;
- Exposure of around 637,700 people to aviation noise to levels above World Health Organisation Guidelines by 2050, of these, 320,000 will be new people exposed to aviation noise;
- Detrimental impacts on health and well being on larger populations of people in terms of increased noise and pollution;
- Increased pressured on the impacted local authorities with the problem of finding suitable areas for displaced communities and new housing to accommodate the associated employment growth;
- Concentration of up to 54% of the total allowable UK aviation carbon emissions at a single location.
- Increased pressure on Transport systems leading to overcrowding on public transport serving the airport and congestion on road networks. The expansion options at Heathrow are also the most expensive to build. According to Transport for London (TfL) the cost could amount to £5.7 billion pounds. As well as the total costs of the road widening / tunnelling for the M25 funding has not been identified for the Heathrow western rail link connection. Likewise the Southern Rail Access is still at the design stage and is unfunded.

#### The Gatwick Position

It is clear from the evidence assessed by the Commission that that expansion of Gatwick can be delivered with a fraction of the noise and air quality impact of Heathrow. The Commission's own data shows that 18,200 people will be *newly* affected by significant levels of noise.

***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***

#### In terms of Environmental Impact – The current situation must be addressed

One of the biggest flaws in the appraisal process is not recognising the need to address the current adverse impacts the airport brings. Heathrow airport impacts on more people than the rest of the European hub airports combined, contributes to illegal levels of air pollution in the communities in close proximity to it as well as adding congestion on already over stretched road and public transport infrastructure. LAANC considers that current impacts are not adequately addressed; the current mitigation measures are not effective.



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As an example, Heathrow inflicts substantial noise impacts across west London yet when mitigation spending is compared across Europe, it is apparent Heathrow offers the least in terms of mitigation [Managing Aviation Noise, CAA, 2014, Table 8.1]). For example, Charles de Gaulle airport, Paris, provides community noise mitigation out to a larger contour area than Heathrow (the 55dBLden). This includes 170,000 people. Its annual spend on mitigation is 11.63m Euros. Heathrow has an annual spend of 7.7m Euros. The population within the Heathrow 55dBLden is 725,000 people. LAANC questions why Parisians get a better deal than Londoners. For HAL not to have addressed these issues until the final day of the consultation process is totally unacceptable and shows a lack of consideration to the surrounding communities.

If it costs too much to properly mitigate the impacts an airport brings, then in our opinion this is a valid reason to dismiss the location for expansion.

For the Heathrow schemes the Commission's own documents show that by reference to international standards (World Health Organisation & EU) current levels of noise and air quality impacts are not acceptable. They also show that in terms of noise efficiency Heathrow is by far the most inefficient airport in the EU.

LAANC urges the Commission to realise that there is a need to adequately mitigate current impacts adequately before the future can be addressed. This must include the areas suffering from early morning flights, all educational establishments, compensation from loss of predictable respite, compensation for loss of enjoyment of amenity including gardens.

With this in mind LAANC expresses regret that HAL has chosen on the last full day of the consultation to announce (by way of a press release) yet another iteration of its noise mitigation proposals for an expanded Heathrow.

The lateness of the announcement would have been regrettable by itself but once again consultees find a lack of transparency and essential details have been provided by HAL. It is impossible for consultees to understand what HAL is offering as:

- The airport has not published any maps showing how its proposed 55dBLden zones are to be set out. Reference to noise contours produced by TfL in May 2014 showed that the extent of the 55dBLden contour in 2050 (77% westerly split) would stretch from Deptford in the east to Windsor and Maidenhead in the West. Areas of Surrey such as Egham and Staines would also be impacted. It is therefore surprising that the HAL offer appears to envisage a cut off at "Richmond in the east".
- It is unclear if for example people newly overflown would get more compensation than those currently impacted by aircraft noise. It is likely that those newly affected will be more annoyed for a number of years than those already overflown.
- What do HAL envisage as being the qualifying year for compensation – 2030, 2040 or 2050? If it's 2040 then there must be a concern that people in the predicted 55dB Lden contour for 2030 (R3 being operational) but outside the 2040 or 2050 target contour will get nothing?



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- There is no mention of compensation for loss of amenity to gardens and outdoor amenity areas – unlike Frankfurt. Thus the HAL claims that its latest offer of compensation puts Heathrow on a par with other EU hub airports, is not entirely accurate at best.
- In terms of the revised offer by HAL to fund the cost of full insulation within a future 60dB 16hr Leq contour (again it is not clear which would be the qualifying year) it needs to be remembered that the previous government put HAL on notice that a condition of Heathrow R3 would be that it would be required to provide noise mitigation down to the 63dB Leq16 hr contour – so the “new offer” maybe just one contour band better for the “full package2 than the existing policy requirement. It is noted that HAL says it has a range of noise compensation schemes that cover around 40,000 homes. However the CAA notes:

*“London Heathrow currently has a residential day scheme based on the 1994 69 dB Leq, 18h contour and a night scheme based on the 90 dB SEL noise footprint of the noisiest aircraft operating at night, as recommended by government. The night scheme is eligible to just over 40,000 dwellings, however uptake has been very low due to a funding contribution of 50% and perceived high costs of the single supplier”.*

- There is no response in the HAL announcement as to how it proposes to address these shortcomings.
- There is further ambiguity over the definition of the proposed 60dB contour area. Taken at face value the HAL offer indicates that the qualifying area will be defined by the use of the single or “worst” mode 16 hour daytime leq noise contour. If this is what HAL really mean then LAANC welcomes this approach. However no worst mode contours have been published either by HAL or the Commission to date so it is impossible for consultees to understand the true extent of the new fully funded compensation packages on offer.

LAANC does not believe that the noise impacts from an expanded Heathrow can be fully mitigated by double glazing and other building works alone and methods for providing compensation to residents who suffer loss of enjoyment to their gardens and amenity space will be required either through monetary payments or building works where possible.

#### Night Flights

The Heathrow options should both be contingent on the phased reduction of Night Flights (before 6am) and the maintenance of at least 8 hours respite per day for communities under a designated flight path.

#### Communities Newly Exposed to Noise

The issue of how to fairly treat those newly exposed to aircraft noise has not been adequately addressed by the Commission in its noise assessment framework. Recent experience from around both Gatwick and Heathrow during the summer of 2014 has shown how policy makers need to account for the fact that such individuals can be expected to be much more sensitive to aircraft noise (for a number of years) than to those already overflown.



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#### Compensation

In relation to property compensation this must be set at a level to allow communities to buy or rent “like for like” properties. Scheme promoters must be required to fund the provision of lost community facilities. This aspect is currently lacking in both of the shortlisted Heathrow proposals.

#### Air Quality

At Heathrow measures to ensure the air quality limits are met and maintained should be set in place and monitored to ensure their effectiveness.

#### Surface Access

The identification of, and funded provision for, sufficient surface access and public transport to ensure other road users and public transport users are not compromised by the levels of airport related journeys on the surrounding transport networks must be in place before any option to expand is taken forward. There must be triggers in airports surface access plans which allow issues such as modal shift targets to be reviewed and additional measures funded and implemented where necessary.

### ***Question 3 - Do you have any comments on how the Commission has carried out its appraisal? The appraisal process is summarised in section two.***

A. LAANC acknowledges the amount of work that has clearly been done in the last couple of years to get to this point and it believes that the commission has undertaken a vigorous and searching examination of the noise debate. Although LAANC regrets that the Commission has seemingly not felt able to challenge the lynch pin of UK government noise policy (the 57decibel contour representing the benchmark for significant community annoyance) the Commission’s “score card” approach to noise can leave ministers in no doubt as to the noise impact of Heathrow airport both current and future even without further expansion. LAANC believes this is a step forward but urges the Commission in its final report to ministers to point out the inadequacy of current government policy on aircraft noise.

There do however appear to be a number of counter intuitive assessments in the Commission’s studies. For example in respect of the HAL proposal the project is rated by the Commission as having a “significant adverse” impact in terms of noise. This is not disputed. However what is unclear is how this impact is claimed to be downgraded to just “adverse impact” with the mitigation scheme proposed by HAL.

The above downgrade in terms of impact still equates to 580,500 people exposed in 2030 (55dBLden) rising to 637,700 by 2050. This is still more than any other EU Hub airport by a significant margin. Therefore it is LAANC’s view that the impact should remain as “significantly adverse” even with mitigation.



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The above is even more illogical when it is compared to the commission's results for Gatwick. The assessment level for noise impacts of a second runway at Gatwick is calculated to be an "adverse impact" which is unlikely to be reduced to "neutral impact" even with mitigation.

The result is even more difficult to understand when it is realised that the "adverse" Gatwick impact equates to 22,100 people within the 55dB Lden contour in 2030 rising to 24,600 in 2050. It is unclear how these two levels of substantially different impacts in terms of people affected by noise can potentially both be classified as the same - simply adverse.

#### Missing information

Local impact analysis in respect of the following issues is missing:

- the detailed air quality assessment;
- the detailed flight paths;
- full critical review of the surface access measures including detailed modelling on local roads and an impact assessment of the freight increases.

The issues of flight paths, noise contours, population counts and annoyance are all inextricably linked, yet there remain gaps in the assessment of how they interact and how they will develop in the future. It is inevitable that increasing the capacity at Heathrow will either increase the number of places overflowed or increase the number of planes flying overhead.

The two different Heathrow proposals have different impacts, but the fact remains that each of them would adversely impact over a wide area around the airport.

The wider context of the issue of flight paths is treated well in the 'Noise from Heathrow Airport' report from the 'All Party Parliamentary Group on Heathrow and the Wider Economy'. We therefore commend an assessment of that report, for the wider position on noise, and will bring forward some further issues of a more local nature.

LAANC requests the Commission to confirm that all the missing information will be made available for public scrutiny before the Commission makes its final recommendation. As it stands this appraisal consultation is deeply flawed without them. The commitment to an open and transparent process, as made by the Commission from the outset of this process, is in danger of failure if key information is not open to those who stand to be impacted the most.

#### Inadequate Weighting in Modules

LAANC questions the validity of an appraisal process, which determines impacts of a clearly different order of magnitude as being the same i.e. Heathrow expansion is appraised an adverse impact (a location which



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exposes over 600,000 people to aviation noise) as is Gatwick, a location which exposes 24,600 people to aviation noise,. The former location would see post expansion a concentration of 54% of all the UK's aviation carbon emissions in one place as opposed to Gatwick which would account for only 14.1% of the UK's future emission budget.

LAANC does not support this and suggest the use of more refined approach which accounts for the magnitude of the impacts in a more informed way.

#### Trade offs

We are still no clearer on what the Commission will take forward in terms of appraising the trade-offs between different objectives and appraisal modules. For example how will the uncertainty of up to 70,000 jobs in the local region be judged against the certainty that over 600,000 people will be exposed to aviation noise, or 4,000 people moved from their homes? LAANC considers it unhelpful to consultees that this information is not available, It would have helped make the process more open and transparent.

#### ***Question 4 - In your view, are there any relevant factors that have not been fully addressed by the Commission to date?***

#### Health

The existing health burden of the area surrounding Heathrow is already distinctly high. For example, in one borough close to Heathrow, Hillingdon, there are already 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 (based on data from the Quality and Outcomes Framework). These people are all at further risk for the adverse effects of noise and pollution from an expanded Heathrow.

Whilst appreciating the quantity of information provided by the Commission LAANC still has concerns that the health of communities affected by Heathrow operations is not being properly assessed. In over 344 pages of technical assessments the word health appears just 16 times. In Heathrow's north west runway main submission it is mentioned 7 times in 144 pages.

Although some attempt has been made by the Commission to monetise health impacts of noise, LAANC reiterate's its call for full Health Impact Assessments for each option prior to any decision making. This has not been factored into the assessment of each option and the results will be vital in understanding, and comparing, the implications for the expansion at two very different locations.

The impact of the Commission's selected expansion proposals on the health of the surrounding communities should be properly identified now in order to form part of the decision-making process so that the best option is ultimately recommended to ministers. It will be too late to do this work once a recommendation has been narrowed down to one option. To make policy decisions without this is irresponsible in terms of community protection.



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#### Housing implications

There has been no consideration given to how the already pressured local authorities around Heathrow are expected to cope with providing accommodation for the influx of identified extra employees and associated infrastructure arising from an option to expand at Heathrow. For Heathrow this amounts to around 70,000 new jobs in the region. No consideration appears to have given as to where the displaced communities will go. For the north west runway option will involve demolition of nearly 1,000 houses. Substantial land-take and appropriate funding will be required to relocate dispossessed communities.

Significant areas around Heathrow are in the Green Belt. This is protected by local planning policies as well as the NPPF. Neither the Commission nor Heathrow have consulted local planning authorities on this point. Heathrow expansion will not be deliverable without the co-operation of local authorities and not to have engaged with them prior to this appraisal is an error.

#### Assessing the community benefits of no expansion

HAL refers to the negative impacts of no further expansion as impacting on the economy of the local area in terms of fewer jobs... "Within 15 years it is estimated that this could mean 14,000 fewer people employed at Heathrow than today with no growth at the airport" (JHK page 7 Heathrow public access day). What this type of analysis misses out is the potential benefits that could accrue in a non expansion scenario to local communities from aspects such as an improved environment which can be predicted to bring improvements to health and well being.

As an example, using the analysis from the consultation in regard the noise appraisal, with no expansion, using the benchmark of 55dB<sub>Lden</sub>, 185, 600 people could experience less noise by 2030 just due to predicted changes in aircraft fleet mix (Local noise assessment, Jacobs, Nov 2014, Table 4.5). Without expansion there would be no loss of communities, no loss of valued open space. This aspect appears missing from the appraisal in terms of a being a costed benefit.

#### Inadequate appraisal of mitigation

A separate mitigation module has been requested to inform the appraisal process which has not been forthcoming. This is considered to be a serious omission. This would have allowed the assessment of the cumulative impacts, including costs and also would have provided a mechanism by which the proposed mitigation measures could be 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.

For example Heathrow refer to new operating procedures such as use of steeper approaches, displaced thresholds, curved flight paths, and claim these will "solve" the future noise problem. Many communities already





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suffer now from the imperfect application of operating procedures designed to provide noise mitigation, such as runway alternation. No confidence can be gained that this will be any different with expansion.

The appraisal has not presented sufficient information on aspects such as approved operating procedures by the appropriate regulators to reassure local communities that the new procedures can actually be delivered. This is simply an example of something the airport operator promises yet is not in its gift to deliver.

The appraisal has not given sufficient information to indicate 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, whether they deliver appropriate compensation to impacted communities, whether they are guaranteed deliverable solutions, whether they can be fully implemented to the point of controls being placed upon the promoter to ensure the benefits happen in reality.

It is not an acceptable approach 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.

#### Ground Noise

There appear to be a number of errors and deficiencies in the commission's assessment of Ground Noise in respect of all three proposals. For example the use of the 57dB 16 Leq standard for the assessment of Ground Noise is without precedent in both the Heathrow Terminal 5 inquiry and the subsequent Stansted "G1" planning inquiry. LAANC believes that it is plain wrong to assume that the WHO standard of 55dBLeq16hr has equivalence with UK air noise standard of 57dBLeq16hr. Page 8 of the Jacobs (Noise Local Assessment) correctly points out that WHO recommends a guideline value of 50dB16Leq in order to prevent "moderate" community annoyance.

The UK HS2 Sustainability Statement (ERM/TEMPLE – July 2013) also recognises that the WHO 50dB standard can be taken as representing the onset of community annoyance. ....

*"4.9.6. The World Health Organisation, in its 1999 Noise Guidelines<sup>14</sup> report in 2000 states "to protect the majority of people from being moderately annoyed during the daytime, the outdoor sound level should not exceed 50 dB LAeq".*

*4.9.7. This been taken as an indicator of the onset of annoyance and, therefore, a Noticeable Noise Increase for HS2 AoS purposes is defined as having a total rail noise level of greater than or equal to 50 dB LAeq 06:00 – 24:00 with an increase in rail noise of at least 3 dB LAeq 06:00 – 24:00. At receiver locations where predicted existing rail noise levels are low or there is no rail traffic (assumed at 45 dB LAeq, 18hr), a predicted HS2 noise level of 50 dB LAeq, 18hr or above would result in a Noticeable Noise Increase as per this definition.*

The current approach by the commission also discounts the additional impact and adverse community reaction that can be expected from communities newly exposed to ground noise. The commission's simplified assessment



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also fails to take account of predictable tonal components that can be expected and for which a “penalty” should be applied in a similar vein to that adopted in BS 4142:2014.

There appears to be a typographical error in the Jacobs (local noise assessment) report at 4.16 which directs consultees to Table 4.97 for the results of the Heathrow NWR ground noise assessment. Table 4.97 is in fact a table showing 2050: “Do minimum” Heathrow air noise contours in terms of Lden. Table 4.99 appears to be the Ground Noise assessment results for the north west runway. It is unclear how the results have been arrived at. For example the 2030 do minimum situation appears to show an increase in numbers of people affected for the do minimum scenario while the 2030 “T” scenarios show a decrease in numbers within a 57dBleq contour.

So far as the Heathrow schemes are concerned it is considered that the Commission’s approach has the effect of underestimating the numbers of people that would be materially affected by ground noise from the HAL proposals and hence the overall cost of mitigation for the scheme.

***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?***

- Baseline - the current situation in terms of health, noise and pollution are not acceptable now around Heathrow. The commission has not challenged this situation. Not addressing the current impacts is an omission.
- Mitigation module - to address all the mitigation costs in one appraisal.

Fight paths - The commission’s consultation contains no accurate proposed flight paths. Without accurate flight paths it is not possible for consultees to understand how they may be affected under the various scenarios proposed.

***Question 6 - Do you have any comments on the Commission's sustainability assessments, including methodology and results?***

Surface Access: It is unclear how surface access has been appraised, is it in sufficient depth to be able to say it is accurate? It is unclear if the commission has reassessed the surface access needs at Heathrow compared to the 2010 proposals for a third runway at Heathrow which were successfully challenged by way of Judicial Review as being wholly inadequate. Nothing new appears to be on the table now. The consultation documentation suggests tensions may arise as early as 2023 in terms of ensuring adequate capacity for commuters alongside ambitions to increase rail mode share to Heathrow



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If the surface access provision is not sufficient (according to the commission's appraisal framework) the local economy impacts could move from supportive to neutral. This could in turn affect the overall ranking of the respective three shortlisted options.

Air Quality - no detailed assessment of Heathrow Air Quality has been provided. There must be absolute confidence that the health based limits can be met and thereafter maintained. The further detailed air quality assessment must be subject to independent scrutiny, including all the assumptions used in the work, and made available for a full public consultation before it is used in making any final recommendations on airport expansion.

Freight Impact Assessment - No freight assessment has been provided.

#### Night Flights

LAANC does not support the assertion that the "*Commission's independent analysis has confirmed a third runway would lead to a positive impact for night flights noise in the future*". The Commission's appraisal relies upon the information provided by HAL. The rotation (for respite) referred to has been in place for a number of years at Heathrow has been consistently but poorly delivered due to overriding safety concerns, with the result that most night flights still arrive over west London.

The Commission should appraise the option of no night flights. This would validate whether the stance that economic benefits of night flights outweigh the environmental dis-benefits is even robust. The appraisal should be based upon up to date environmental and social impacts and as such should be based upon a refreshed social survey of people's attitudes to the aircraft noise as it is today, as opposed to relying on what people thought 30+ years ago which is the basis of current government thinking.

HAL state (JHK page 28) "*we can maximise respite for people, we can minimise new people affected by noise*". Once again we ask that this needs to be done now. How can the Commission endorse a new more elaborate respite plan without further guarantee from CAA and NATS that the proposed mitigation measures can be delivered. Current measures are not even adhered to now with two runways and a three runway system will be even more complex. HAL cannot guarantee respite will be preserved and protected into the future, as it is not in their gift to deliver this.

It is insulting to local communities to hear that there are available mitigation measures but they will only be enacted if Heathrow get expansion. We are told of new aircraft which will solve the noise problem. This shows a total lack of understanding in regard to how the communities perceive aircraft noise. Making each aircraft slightly less noisy but allowing an additional 200,000+ is not a noise mitigation measure. As the buying of new aircraft is not in the gift of the airport operator this becomes simply a promise based upon the future actions of others.



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In regard to the proposed mitigation measure we read with concern the recent CAA report (Managing Aviation) which includes the following comments:

- In the future when new types of aircraft are introduced, the noise improvements may not be as significant as with previous generations of aircraft (p 29).
- displaced thresholds could have other impacts on capacity, resilience, air quality – there is a need to consider the cost effectiveness against alternative measures (P41).
- 3.2 degree approaches provide small additional benefits and interferes with other noise abatement techniques (p43).

Yet these are aspects that HAL have relied on as solving the noise problem. Quieter planes, untested techniques for noise mitigation currently unproven in terms of benefits, no published flight paths to inform the communities as to how they may be impacted - all we do know for certain is that there will be a significant increase in the number of flights.

#### Water and flood risk

Mitigation measures for flooding - many surrounding areas were deeply impacted by floods of 2014. What assessment has been done on potential effect on flood zones in the area? How will any mitigation packages fit into Government's proposed flood alleviation scheme and what are the costs?

#### Quality of life

The Quality of Life appraisal approach does not adequately cover the aspect of health. It would be of great concern if this assessment was used to inform any policy decisions on the best location for airport expansion. For example:

*"any effect on children is omitted since our analysis is based on data only for adults which means that we do not know the impact on children. If children are like adults, this means that we will underestimate the costs associated with airport noise on local communities. Linked to this is the possible long-term effect on children's educational attainment"* .page 41, Quality of Life Assessment, Airports Commission

This is an unacceptable omission. It is not acceptable to have a quality of life assessment which:

- does not include impacts on children;
- states that air quality impacts are 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;
- states that night time noise has no impact on wellbeing yet there are studies showing that sleep disturbance can lead to stress and mental ill health;
- shows no link between place, and people's interaction with the built environment, the important link between open spaces and mental wellbeing not considered.



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#### Community

It is unclear how the commission intends to ensure accountability for the compensation required around Heathrow for moving so many people with no plans for where they will actually go (all schemes). Currently there is no evaluation of whether the compensation offered will even be adequate? How did HAL determine the figure of £550million for the compensation package?

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

The documents refer at Heathrow to 783 properties being demolished and an extra 289 homes have already been mentioned in relation to potential demolition for surface access. The figures are likely to be much higher in the end for the R3 HAL proposal. The Commission acknowledge there will be no community cohesion left. Is the 25% uplift on property prices that are being offered sufficient for people to buy a comparable home within the neighbouring areas, such as at Iver, so that they can remain in the local area?

How will controls be placed upon HAL? For example if the Commission sets noise limits, who will stop the airport flying if these are exceeded? If the Commission sets air quality limits will it halt the road network or cancel flights if these are exceeded? How will the Commission ensure that the health of the local communities is protected? If one person has a job but their neighbour has exacerbated poor health conditions due to pollution and noise is this an acceptable trade off? All of these issues impact on the local communities.

#### ***Question 7- Do you have any comments on the Commission's business cases, including methodology and results?***

Deliverability: Concerns regarding the risks associated with delivery of the Heathrow options re potential show-stoppers. For example:

Local airspace design - given the recent adverse community response with regard to the recent flight path changes trials both around Heathrow and Gatwick, the Heathrow 3<sup>rd</sup> runway proposal may be particularly hard to deliver due to large swathes of people who will be impacted by changes.

Management of flood risk – It is unclear how the risks associated with both Heathrow projects can be mitigated to an acceptable level.

Rail links - the Commission's own risk assessment document suggests tensions may emerge between rail infrastructure serving airport users as opposed to non-airport uses. This needs to be addressed as lack of



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appropriate provision will impact negatively on other aspects of the Commission's appraisal modules including local economy impacts;

Air quality - Without a robust assessment to demonstrate otherwise it must be assumed that there is a significant risk (with both of the Heathrow proposals) that they could be built but not able to be used without exceeding EU air quality limits.

Costs of proper mitigation - if the costs of mitigation are not fully realised for the Heathrow projects there is a danger that the business case for each will be significantly overstated to the point where a flawed decision becomes likely in the final reckoning.

LAANC believes the following should be appraised in terms of the overall business case:

#### Operational Efficiency of the London Airports System

There is a potential benefit in terms of increased resilience to the London airport system by having 2No. two runway airports serving the capital . It is not clear what assessment the Commission has made of this.

#### No expansion implications – (HAL)

The threat of no expansion from HAL is the provision of fewer destinations. Yet under two of the assessed scenarios i.e. assessment of need and global growth in a carbon capped forecast, the Commission's analysis suggests this pattern will repeat itself with fewer destinations by 2050 as the airport once again is at capacity. (Heathrow NWR doc, table 1.4 page 16). Extra capacity may not solve this problem; it is a function of aviation economics where airlines fly to the most lucrative destinations with greater frequency. In contrast Gatwick Airport, under the same carbon-capped forecast indicates increases in destinations across all five future aviation demand scenarios. LAANC believes that the assertion made by HAL that only expansion at Heathrow will provide extra connectivity is not supportable by the evidence base.

Heathrow suggests that expansion at Gatwick won't work as it requires people to hub through a different airport in a different country. (page 7) We are not aware of any evidence that suggests this would necessarily be a disbenefit to the flying public. There may be a disbenefit to an airport operator who has chosen the hub model as its sole operation but this does not necessarily translate into a disbenefit for UK plc.

#### Financial and commercial case

LAANC notes 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.



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### **Question 8 - Do you have any other comments?**

The Commission will be aware that one of the reasons that the old BAA monopoly was broken up by government was that the monopoly situation that had been created was acting to the detriment of the consumer both in the terms of price and choice. The effect of expanding Heathrow will be to reproduce the previous monopoly situation for London's airports. The liberalisation of the London airports system has seen Gatwick respond to the challenge in offering an improved airport experience for customers. It is considered that the Gatwick proposal is deliverable at minimal cost to the public purse and without the high levels of risk that surround both of the Heathrow options.

LAANC notes that GAL 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.

#### UK wide implications for expanding Heathrow

When taken together with the outputs from the carbon appraisal, to expand at Heathrow would concentrate over 50% of the UK's aviation carbon emissions in just one location. In a carbon capped future this could sterilise growth at other UK airports.

#### Trust

There is a history of broken promises from Heathrow airport concerning expansion and it can be predicted with some certainty that if the airport is granted permission to build a third runway it will be full as soon as it is constructed and the airport will be clamouring for a fourth.

There is no community trust between Heathrow Airport and surrounding communities. This has been brought home to LAANC members during the consultation process, including the Open Discussion Day. There has been no offer of adequate mitigation, no offer to insulate homes and schools to appropriate levels, no measures offered to ensure air quality levels will be met.

However as late as 2<sup>nd</sup> February 2015 with the prospect of losing the expansion prize, offers of mitigation for homes and schools are suddenly deliverable by HAL. This sort of business practice demonstrates the deep historic lack of concern that Heathrow Airport shows to the communities it affects.

Trust is essential, "no ifs no buts" no third runway, all politicians should stand by this.

ENDS

LAANC Submission to APC

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