

HAMMERSMITH & FULHAM COUNCIL AIRPORTS COMMISSION CONSULTATION RESPONSE

At its meeting on 4 November 2014, Hammersmith & Fulham (H&F) Council's Community Safety, Environment and Residents' Services Policy and Accountability Committee agreed to the establishment of a resident-led H&F Commission on Airport Expansion. This local Commission was tasked with assessing the impact on H&F of the two Heathrow-based proposals for airport expansion as set out in the Airports Commission (AC) interim report of December 2013, and to provide a response to the AC's consultation on its final shortlisted options.

The HFCAE response has been submitted to the AC for consideration. H&F Council fully supports the comments and conclusions highlighted in this response, but is also submitting a separate response to the AC's consultation as outlined below to emphasise our concerns in key areas regarding the proposed Heathrow expansion options, the assessments undertaken and the AC's consultation process.

In summary, our key comments about the AC's consultation are as follows:

- Neither of the 2 Heathrow expansion options are supported.
- Heathrow's current operations already have impacts far beyond the immediate vicinity of the airport. The expansion proposals represent the most significant expansion plans ever put forward for the airport – potentially adding around a quarter of a million new flights and doubling the number of passengers Heathrow serves. The potential impacts of expansion are far-reaching.
- Although an expanded Heathrow could provide some benefits to H&F in terms of increased employment and travel opportunities, the council is concerned that expansion would also cause a number of potentially negative impacts for H&F including increasing aircraft noise, worsening air quality, public transport overcrowding and more congestion on the roads and overall, a detrimental impact for quality of life in the borough.
- The council considers that the environmental impacts that such large-scale expansion would bring to local residents have not been fully assessed in the Commission's or each scheme promoter's assessment studies. In some cases – e.g. air quality, noise, surface transport – it is clear that further work is still required to assess potential impacts.
- We are also concerned – as are residents – about safety issues, particularly with the large-scale increase in flight numbers that Heathrow expansion would bring.
- We are disappointed therefore that the Commission, appears to accept that the negative impacts of either Heathrow expansion scheme on affected communities such as H&F and the local environment are offset by the economic benefits.
- Inadequate information has been gathered and assessed at this stage and the Commission should not make any recommendations for expansion until further work has been carried out and consulted on.

Our detailed responses to the questions raised by the Commission are as follows:

Questions inviting views and conclusions in respect of the three short-listed options:

Q1: What conclusions, if any, do you draw in respect of the three short-listed options?

Response:

Local Economy Impacts

Neither option has independently differing impacts on H&F. Both options deliver to London higher airport capacity, increased direct airport employment and the potential for knock on benefits including increased tourism, both in numbers and higher tourist spending (especially from long haul destinations), together with additional potential, if H&F can harness it, for high tech and service business stimulation in the borough. However H&F does need to have a firm plan to pull benefits into the borough.

Heathrow Airport Limited (HAL) and West London Business estimate the additional benefits to West London of Heathrow expansion would be £30 billion in the period to 2085, although this benefit straddles several boroughs and it is questionable how much of this would accrue to H&F. However, it can be argued that H&F has sufficient significant inward investment not to be dependent on the economic benefits of Heathrow expansion.

45.5% of Heathrow staff (33,483 people) live in five Boroughs (Hounslow, Hillingdon, Ealing, Slough and Spelthorne). These are the priority areas in terms of employment, with Hammersmith & Fulham having only 457 employees (0.6%) at Heathrow. (Source - Heathrow On-Airport Employment Survey 2008/09). The majority of airport related jobs are low-skilled, low-paid jobs (74% of all direct airport employees).

It is estimated that an expanded Heathrow could increase jobs for local people, e.g. through its apprentice schemes but the benefits to H&F would be comparatively small (e.g. an estimated total of 111 apprenticeships for local people). These are welcome, but hardly significant in light of the other employment opportunities being created by other developments within the Borough.

While it is difficult to ascertain the overall level of economic benefit for Hammersmith & Fulham as a result of Heathrow expansion, it is considered that the potential economic benefits do not outweigh the adverse environmental impacts on the Borough that expansion is expected to cause, should it go ahead. Also, an expanded Heathrow could cause a reduction in quality of life due to the various impacts on noise and air quality, public transport over-crowding and road traffic congestion etc. These impacts could

deter businesses from locating in the Boroughs affected by Heathrow's operations.

Surface Access Impacts

On the evidence provided by the AC, the surface access effects on H&F are considered to be damaging. The case from Heathrow Airport Limited (HAL) that their scheme can be achieved while "accommodating the needs of other users of transport network such as commuters, intercity travellers and freight", as it would affect residents of Hammersmith & Fulham, is not credible. On the contrary, the scheme looks likely to produce serious deterioration in road traffic and conditions on the Piccadilly Line in and through H&F.

Despite being a key area in the A4 corridor road traffic gateway into London, and despite the Piccadilly Line being one of the area's main commuter link with central London as well as the key Underground link to/from Heathrow, the AC and its consultant's reports on surface access either do not assess impacts on Hammersmith & Fulham, or draw conclusions which are not apparently based on in-depth local research or modelling.

Road traffic:

- Despite the AC forecast of 1,500 extra cars at peak hour into London, HAL stated at the H&F hearing that there will be "no additional traffic" and Heathrow Hub (HH) stated there will be "negligible" extra traffic. No modelling has apparently been carried out to support this.
- Both HH and HAL have no analysis or modelling of road traffic into central London on the A4 corridor through Hammersmith, while acknowledging that this is the main road gateway into central London.
- Both promoters offered the prospect of congestion charging if the modal shift to public transport failed to materialise – which undermines their prediction of no traffic increase.
- The forecast reduction in % of passengers going to/from Heathrow by car will still mean an increase in absolute numbers on the A4 corridor, given the more-than-double predicted passenger numbers at Heathrow to a potential 149 million in 2050.
- Both promoters are relying on planned improvements to existing rail systems (Piccadilly line, Crossrail) and new rail projects (i.e. the Southern Rail Access & Western Rail Access Route to Heathrow) to provide an improved public transport offer which will lead passengers to switch to public transport.
- They predict a modal shift broadly resulting in 50% of passengers and Heathrow workers using public transport. They could not point to studies or research supporting how such a large-scale forecast modal shift could be achieved. Although TfL agrees that passengers do respond to an improved public transport offer, it states much transport behaviour is entrenched and achieving significant changes takes time.
- Neither promoter has modelled passenger numbers or road use into the 2040s when any expansion would be fully operational. HAL said it is

“difficult to model into the longer term”. This is a serious flaw in planning for such large scale expansion proposals.

- The provision of a 10,000 space car park at HH Station, and the fact that both promoters allow for the possibility of introducing congestion charging, shows a lack of confidence in the “no extra traffic growth” claim. In the absence of any modelling to support them these claims cannot be considered reliable and we have to assume, with TfL, that with an increase of airport passengers of over 100% by 2050, there will be very considerable extra loading on the A4 through Hammersmith. This will produce greatly increased congestion and pollution in Hammersmith along the A4 corridor and neighbouring roads.
- There is no forecast of increased Heathrow-related HGV traffic on the A4 corridor through Hammersmith, despite references to increased freight traffic at an expanded Heathrow.

The AC and the promoters simply do not look at the implications for inner west London or indeed the whole South East of England beyond 2030, yet are proposing a scheme where the full impact will not be felt till 2050. Their appraisal of road surface access implications for other users is therefore incomplete and essentially defective.

Underground:

- The Piccadilly Line is Hammersmith’s key link with Central London and outer west London. Its planned upgrade and Crossrail are designed to deal with “background growth” (i.e. forecast population growth of London residents and commuters) – but the promoters and the AC are appropriating these upgrades to meet Heathrow’s expansion.
- The AC acknowledges expansion and investment over and above the planned upgrades will be required to meet background growth AND Heathrow expansion. The promoters’ and Commission’s assumption that the infrastructure can meet demand is therefore unfounded.
- The AC reports flag up serious overcrowding on sections of the Piccadilly. We believe the tables showing capacity and crowding in the HH and AC assessments average out tube passenger numbers across trains to all Piccadilly Line destinations, not just to Heathrow. If the calculations were done for Heathrow trains only there would be even greater increased figures for overcrowding. The AC’s “*Volume capacity analysis 2030 Acton Town Earls Court*” already forecasts 342% hourly seated capacity.
- Luggage is a serious problem on Heathrow trains and reduces standing room. This has not been factored in to the capacity assessments. It needs to be modelled.
- It is not clear how the promoters or the AC have allowed for background growth in their modelling. TfL states that the AC has used Railplan v6 instead of the latest Railplan v7, so the figures used are out of date and need re-modelling.
- Forecasts for passenger numbers stop at 2030. To be credible there must be modelling of how rail traffic will operate when expansion is a full capacity in 2050.

Noise Impacts

From the information provided so far, it appears that aircraft noise impacts would increase over H&F under both expansion proposals. Aircraft noise over parts of the borough is already unacceptable for many residents and both proposals would make matters worse by increasing the frequency of flights.

Other key points in relation to the AC's noise assessments include:

- It is difficult to make proper, informed judgements and comments at this stage as one of the key factors that will determine noise impacts – flight path information – is only available in indicative form so far.
- The noise assessments are presented for a large geographic area and it is not possible to clearly see or assess impacts at borough or local community level. This makes it difficult to draw conclusions on the noise assessment information.
- The level of uncertainty on other key aspects of this option (in addition to flight paths) such as fleet mix and runway use means that the forecast noise impacts could be very different to actual impacts, should expansion proceed.
- The assessments show that this expansion option will increase noise impacts compared to the future noise environment that would exist if Heathrow continued to operate with 2 runways and 5 terminals and within its current operational limits.
- The proposed expansion means that the improvements in noise impacts, from which residents would have benefitted, will be lost.
- Even with optimistic assumptions, modelling work suggests that noise from an expanded Heathrow could still impact on over 700,000 people not only in the immediate vicinity of Heathrow but also some distance away, including residents in H&F, around 10 miles from the airport.
- Use of a range of noise metrics in the noise assessment is welcomed, but it still feels like the role that the number of aircraft movements plays in causing noise impacts is not properly represented or accounted for.
- Expansion will either increase impacts for those already affected by Heathrow operations or create impacts for communities not currently affected. The pros, cons and acceptability or otherwise of either of these two broad approaches – to concentrate noise or disperse it – have not been established
- Not enough is known about the impacts of aircraft noise on local communities adjacent to the airport and under flight paths and there is a need for more research before any decisions on expansion can be made. It is our contention that Heathrow is not a suitable site for further expansion because of a range of impacts, including noise
- It feels like noise mitigation measures are presented as only being possible if expansion is allowed to proceed, which is unfair. In reality many, if not all, of the measures could be introduced without expansion and provide noise benefits to those communities affected by current operations.

Specific noise comments on HAL's proposal:

- Of the three main scenarios tested in the noise assessment, the 'minimise total impacts' and 'minimise new impacts' options show that parts of H&F are inside the 54dB day-time noise contour, including new areas not currently impacted.
- Although the 'respite' option shows no part of H&F in the daytime or night-time contours, there could still be flight paths over the borough – in fact, more than in the present day. We may be outside the contours but there could be significantly more flights over the borough. Impacts will therefore continue.
- Even in Heathrow's 'highly mitigated' scenarios, the noise impacts are still considered to be unacceptable.
- Expansion will reduce the amount of respite from noise that some communities (e.g. those under approach paths for the southern runway) benefit from as there will be increased use of mixed mode
- Health impacts of expansion are significant as assessed by the monetisation assessment which shows that annoyance, heart attacks, hypertension, sleep disturbance are calculated to cost £25 billion to mitigate. It is unclear if these impacts and their associated costs are considered to be acceptable, how the costs and impacts would be mitigated or who would do this.

Specific noise comments on HH's proposal:

- Of the two main scenarios tested in the noise assessment, the standard expansion scenario and the respite scenario both show that parts H&F are inside the 54dB contour for day and night-time noise, including new areas not currently impacted (in some scenarios).
- The noise impacts for this option are, if anything, worse than for the airport's own proposal. The impacts are therefore considered to be unacceptable.
- Expansion will reduce the amount of respite from noise that some communities (e.g. those under approach paths for the southern runway) benefit from as there will be increased use of mixed mode
- Health impacts of expansion are significant as assessed by the monetisation assessment which shows that annoyance, heart attacks, hypertension, sleep disturbance are calculated to cost £25 billion to mitigate. It is unclear if these impacts and their associated costs are considered to be acceptable, how the costs and impacts would be mitigated or who would do this.

Air Quality Impacts

Road traffic is the dominant emission source resulting from expansion at Heathrow to affect H&F. Many areas in London including H&F continue to exceed the Government's national air quality standards, particularly for

Nitrogen Dioxide (NO₂). H&F is already an AQMA (Air Quality Management Area) for NO₂ and also Particulate Matter (PM₁₀). There are 9 monitoring sites across the borough, 25% of which are at high risk of breaching legally binding EU limit values on NO₂. A small increase in traffic emissions could make the difference between complying and breaching these legally binding EU limits.

HAL and HH state that their proposals will have no or negligible impacts on road traffic. This is regarded as optimistic and unrealistic on many levels:

- The AC assessment only looks at the surface access impacts of 103.6 million airport passengers per annum (mppa) in 2030. No assessment is done of the 149 mppa that the Commission estimates to be the maximum throughput of HAL's proposal. We agree with TfL that *"not testing a worst case scenario underplays any potential impacts"*.
- We understand from TfL that the upgrades and additions to rail infrastructure have been implemented as a response to background demand and therefore will not have capacity to encompass further airport demand, with particular reference to the Piccadilly line and Crossrail, both of which will be over capacity.
- Population growth as a whole and in West London in particular needs to be factored into the transport models used to assess impacts of an expanded Heathrow.
- We agree with TfL's assertion that the shift in passenger behaviour predicted by the AC and HAL is *"optimistic considering the limited additional rail infrastructure....Little new infrastructure is envisaged by the Commission, placing greater strain on the Great Western mainline and Piccadilly line corridors."*

To use an example taken from TfL's submitted evidence: *"the Commission predicts a passenger mode shift to rail, from 28% in 2012 to 43% in 2030. If only one third of the predicted mode share is achieved, this could result in an additional 1,000 peak private car trips on the highway network, based on initial estimates using Commission data. This would be on top of the approximately 20,000 peak hour two-way airport related staff and passenger movements forecast at Heathrow in 2030 (as well as background demand)"*.

Neither the AC nor HAL have conducted detailed analysis of the impact of airport expansion on the A4 in H&F. We agree with TfL's statement that: *"it is imperative that more detailed analysis is carried out by the Commission to fully assess the demand impacts"*. It is our conclusion that HAL's expansion proposal at Heathrow risks the air quality EULVs being breached in our borough due to road traffic. In order to accept HAL's claim of "no additional road traffic" and their commitment to improve air quality as a result, we would require further extensive evidence to support the modal shift assumptions being made. We would also require detailed modeling and air quality monitoring on H&F main arterial roads such as the A4 and Hammersmith gyratory.

The European Court of Justice's has recently ruled that the UK must comply with NOx limit values "as soon as possible" and it is possible that the UK Government could be fined by the EU Commission for allowing exceedances of NO2 limit values to continue past the target dates. Therefore any exceedance of EU targets is deemed to be unacceptable – air quality impacts should be very high on the agenda for the AC and need to be fully considered as part of the current assessment work.

Government data shows that the average reduction in life expectancy of UK residents as a result of long-term exposure to PM2.5 is 6 months. It is also estimated that in 2008, 29,000 premature deaths in the UK were attributed to long-term exposure to PM2.5. This compares with 2,222 people killed in road traffic collisions. In London, it is estimated that in 2008 there were 4,267 deaths attributable to long-term exposure to small particles.

Air quality must therefore be given the weighting and gravitas it deserves in this consultation and the AC should be providing more detailed assessments and full details of any proposed mitigation schemes (with quantified benefits) to show the airport is not contributing to exceedances of national and EU targets.

Carbon Emissions Impacts

The potential costs of carbon could be significant to the point of affecting the total economic viability of expansion at Heathrow. To take account of the costs of climate change, the AC has used 2 sets of scenarios – 'carbon capped' and 'carbon-traded'. The way they have assessed the carbon-capped scenario is by assuming the cost of carbon, included in ticket prices, is raised to a sufficiently high level to constrain demand such that the CO2 emissions at 2050 do not exceed 2005 levels.

The Committee on Climate Change has said (para 2.41 of the main AC consultation document): *"It has not been possible to assess the transport economic efficiency, delays or wider economic impacts under a carbon-capped forecast. This is because carbon prices are much higher in each scheme option than the 'do minimum baseline, meaning the carbon policy component of the appraisal dominates capacity appraisal. This is particularly problematic as appropriate carbon policies have not been investigated in detail."*

It seems possible that, if the AC includes the cost of carbon in the economic appraisal, the net economic benefits could be much reduced, or possibly become negative. The AC intends to carry out further work to complete a fuller economic assessment of the case where UK emissions are constrained, i.e. 'capped'. This work will be available for the final report in summer 2015.

It is our opinion that the full assessment should have been carried out and made available as part of the current consultation.

Quality of Life Impacts

The AC commissioned a study of quality of life for those living near airports, which states that:

- “We can be confident that aircraft noise is bad for subjective well-being.”
- “Those living in noise contours but not close enough to airports to benefit from the potential advantages, for example in terms of access to employment opportunities, will be likely to suffer negative effects on their subjective well-being due to noise.”

The AC mentioned the benefits of connectivity for individuals taking more flights for leisure purposes. Hammersmith & Fulham is ninth in Heathrow's frequent fliers list. However many residents use other London airports, sometimes for cost reasons, which is unsurprising since average incomes of people who make international flights are £77,249 for business travellers and £53,566 for leisure travellers (CAA Passenger Survey Report 2013). In this regard, we were interested to note the proposers' comments that air fares might need to increase.

The study recommended putting monetary values on various aspects to build into the sustainability assessments of the options. However, instead, the AC rowed back from doing this and sought views in its consultation.

The AC's assessment of quality of life impact puts people into three categories, which they assess accordingly:

- Local within 5km – where the AC nets off the positive (mostly jobs) and negative effects to get an overall neutral rating
- Local outside 5km within flight path – which the AC fails to assess apart from saying that noise will be negative
- National – where any economic benefits represent pure gain since there are no local negative impacts

At 16km from Heathrow, H&F clearly falls into the middle category and, again, there is relatively little about the impacts on us. There are several other boroughs in a broadly analogous position to H&F, i.e. outside the 5km radius but affected negatively by noise, traffic and air pollution and benefiting minimally from new inward investment and jobs. Further information should have been provided to help determine the quality of life impacts.

Whilst we are encouraged to see a Quality of Life Assessment included in the AC's assessment – as this sort of analysis has never been done previously – we are concerned about the way positive and negative impacts are measured against each other, and in some cases judged to balance each other out. Further work is required to develop suitable assessments that can be used as part of the decision-making process that will inform the AC's final recommendations.

Q2: Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated?

Local Economy Impacts

The study area assessed for local impact was chosen as representative because '76% of the assessment area workforce lives there' (see Local Economy Impacts Assessment page 14). Whilst this may be the case, we consider that assessments should have been carried out over a wider area, or at least give some indication of potential economic impacts for those boroughs not in the immediate vicinity of the airport. .

Surface Access Impacts

On the basis of the AC's work so far it is hard to see how either Heathrow expansion option could be achieved without damaging impacts on residents and commuters in H&F as far as surface access issues are concerned. The following would at least ensure the likely impact on H&F could be more clearly assessed:

- Surface access appraisal and modelling must include the impact on the A4 corridor through Hammersmith to Earl's Court as this is the main road gateway from Heathrow to central London, and appraisal and modelling of the impact on the Piccadilly Line in the same area.
- In depth modelling must be carried out of A4 capacity now, in 2030 and in 2050 with background growth and with/ without Heathrow expansion.
- Forecasting is required of increased Heathrow related HGV traffic on the A4 corridor through Hammersmith.
- Assessment/ forecasting are required of how the key junctions at Hogarth, Hammersmith and Earl's Court will cope.
- Assessment should be carried out of the impact on traffic flow of tunnelling the A4 at Hammersmith ("Flyunder")
- Working with TfL, in depth modelling of passenger numbers on Heathrow-bound Piccadilly Line trains and detailed background growth forecasts must be carried out
- Forecast dispersal of passengers between the extended public transport offer into Central London must be modelled.
- Forecasts up to 2050, not just 2030 must be modelled.
- Details must be published of what additional upgrades could be carried out to Piccadilly line to accommodate Heathrow expansion numbers in line with Jacobs' statement that the planned upgrade will not be sufficient to meet Heathrow passenger numbers.
- Heathrow Express (HEX) ticketing should be brought into Oyster pricing, to enable HEX to be used to capacity and relieve Piccadilly Line and Crossrail.

- Research and forecasting is required into the effects on public transport in case of an early and successful modal shift to public transport – will rail be able to cope with forecast numbers.

In addition there should be investigation of more radical road traffic deterrents: e.g. early introduction of high-level congestion charging at the airport from the outset of expansion, and elimination of or extra charge for “kiss and drive” quick drop-off facilities, which Jacobs says will continue to give increased traffic from Central London.

Noise Impacts

The policy of concentrating arrivals noise over two approach paths along with the policy of Westerly preference has led to a major concentration of aircraft noise over the borough. This concentration over a relatively small area has blighted that area and led to very strong opposition to the airport, to night flights and to proposals for further expansion. These policies are based on circumstances that have changed over the years and should therefore be reviewed.

Westerly preference was designed to protect communities under departure routes, at a time when departure noise was a much greater problem than arrivals noise. That balance has changed as engine noise has reduced significantly and as many aircraft climb more quickly. Arriving aircraft still approach the airport at a 3 degree angle and, while there has been some reduction in arrivals noise, it is much less significant. Most complaints are now due to arriving aircraft rather than departing aircraft. This change has also led to a removal of the Cranford Arrangement. The time has come for a major review of Westerly Preference.

We would like to see some of the mitigation improvements suggested by HAL as part of their expansion package, such as a steeper approach angle, trialled and implemented to help reduce impacts of current operations. However, most of the HAL’s proposed noise mitigation improvements require a change in Government policy, major consultation, safety assessments and perhaps the support of international bodies. Therefore, none can be relied upon as neither airport, nor the Commission, can guarantee that they are delivered as outlined. We discuss specific mitigations further below.

- Routing of all flight paths so that no aircraft movements occur over or close to H&F so that there are no noise impact on residents would obviously improve on the current and forecast impacts. However, such a radical change to airspace use over London seems unlikely - and there is also the issue of how fair such a move would be for other boroughs in the vicinity of Heathrow - but even if such a measure was implemented, the expected impacts of expansion in other respects would still be such that this expansion option would not be supported.
- Heathrow should seek to minimise the noise impacts of the airport’s operations through the adoption of progressively tougher measures that

encourage the use of less noisy aircraft and penalise heavily the use of noisier aircraft.

- The use of an increased angle of descent should be trialled at Heathrow with a view to moving from a 3 degree angle to a 3.5 degree (or greater) angle for arrivals.
- Improved compliance with Continuous Descent Approach (CDA) should be encouraged and a report on non-compliance should examine the reasons. It is understood that safety cannot be compromised, but residents should be entitled to expect that good practice is followed whenever this is possible. An assessment should also be made of the point at which landing gear is lowered, as this contributes to noise impacts
- The move away from a “Westerly Preference” to an “Easterly preference”, “No Preference” or “Equal shares preference” in terms of operations should be assessed to see if this can provide benefits to communities under arrivals flight paths on the east side of the airport such as H&F.
- Night flights should not increase. Over time, they should be phased out or there should be a longer curfew.
- The airport should continue to operate within its current design as a 2 runway airport and comply with the 480,000 flight limit imposed as part of the T5 planning permission.

Air Quality Impacts

The omission of modelling/predictions for additional traffic on access routes such as the A4 Great West Road into central London is an issue that requires resolution. Increased traffic flows along this main arterial road would have a significant impact on the already elevated concentrations of NO_x and PM.

As we have established HAL’s key commitment in terms of air quality is “no new airport related air traffic”. This is a very optimistic statement and in order to achieve this we believe that the following measures should be implemented alongside expansion (should it proceed), and without expansion to mitigate the impacts of airport traffic/and airport related emissions on air quality at both a local and national level:

- New rail airport expansion specific infrastructure, for example connecting Heathrow on a mainline instead of a branch line.
- Introduce baggage check in points at mainline stations going direct to Heathrow so travellers with luggage are encouraged to use public transport instead of taxi or car.
- Incentives for modal shift to alternative means of transport, such as:
- Introduce a congestion charge for Heathrow traffic.
- Cut car parking spaces and raise car parking rates at Heathrow to disincentivise car users.
- Urban greening of the roadside environment
- Incentivise bus companies and taxis to use cleaner engines in the same way as cleaner aircraft are incentivised.
- Incentives for use of alternative fuel source vehicles.

- Reinforce the Mayors ultra-low emission zone.
- Impose a tariff for vehicles not conforming to new emissions standards at the airport including private cars
- Continue to incentivise cleaner aircraft, electric airside vehicles, vehicle pooling, revised shorter taxiing schedules etc
- Introduce steeper landing and take-off paths and curved approaches.

Quality of Life

We have already mentioned above that we welcome the Quality of Life assessment. However, without following through and assigning monetary values we do not understand how quality of life assessment will be brought into the AC's final judgement.

It is not clear what assessment is being given to a range of factors for communities living outside the 5km radius but within the flight path area as there is currently a blank in this box. The numbers of people in this category should be quantified. We consider H&F falls within this category as well as several other inner London boroughs.

The cut-off point of the 55dB in the technical paper probably only reflects the accepted use of this contour and is presumably shorthand for 55dB Leq. However many argue that it should be lower and also argue for measurement in dB Lden. Without this starting point we would presumably expected a graduated finding (cf. the marginal negative effect for additional dB's above 55) with annoyance starting at lower levels and having at least some effect on quality of life.

The physical health effects of noise are only represented in a very limited fashion in the datasets used. The association between noise and health conditions cannot be scored anywhere else in the Appraisal Framework. More weight should be given to the negative health effects, such as strokes, heart disease and hypertension, on which there is supporting academic evidence.

Questions on the Commission's appraisal and overall approach

Q3: Do you have any comments on how the Commission has carried out its appraisal?

It is not clear how the Commission's findings for each module are to be assessed against each other, how interactions and knock on effects between modules are being modelled or if any weightings will be applied in any final assessment before the Commission makes its recommendations. At the stakeholder event, we were informed verbally that there are no weightings to be applied and that the Commissioners would use their professional judgement. There is therefore a danger that there will be a lack of transparency in terms of how positive and negative impacts and costs and

benefits, particularly in relation to measuring economic growth versus environmental impacts will be balanced.

It seems clear, as indicated by comments made by both Heathrow Airport and Heathrow Hub, that new information will be submitted by them to the Commission to support their proposals for expansion. The Commission itself, will also need to produce additional assessments of the expansion proposals (e.g. in relation to carrying out more air quality modelling work and assessing newly submitted evidence by the scheme proposers). Yet it would appear that all of this new information will not be available for consultees to see, challenge and comment on prior to the Commission making a final recommendation for airport expansion. If this approach is taken it damages the consultation process and will impact on the credibility of the Commission and its recommendations.

Q4: In your view, are there any relevant factors that have not been fully addressed by the Commission to date?

Noise Impacts

- The Commission acknowledges that people's response to noise is not just about sound volume and tonal frequency but also determined by its duration, regularity and the time of day it occurs. It is useful that "regularity" of noise events is recognised as an important factor in terms of response to noise as both Heathrow options result in a very large increase in aircraft movements (around 250,000 extra compared to current levels). However, the use of N60 and N70 to try to measure the impacts of movements needs to be supplemented with further metrics with reference to the results from a new social survey to try to improve the relationship between the technical assessment results to people's actual response on the ground to aircraft noise.
- The ANASE (Attitudes to Noise from Aviation Sources in England) Report is referenced, but only in relation to indicating support for LAeq method of measuring noise impacts and annoyance. The study was recently updated and its other findings in terms of annoyance response (at lower levels of noise that normally modelled by noise contours) and in relation to regularity of noise events should have also been factored into account in the noise assessment work. A new noise annoyance study is needed urgently to inform any planning inquiry.
- No reference has been made to the World Health Organisation's guidelines for community noise impacts which include recommendations on noise level limits on issues such as preventing adverse health effects from night noise. Given the timescales being looked at for the expansion scenarios, these guidelines should be referenced and taken into account.
- Although health issues are covered in the respect that a monetisation assessment has been carried out by the AC, the implications of causing potentially £25 billion worth of health impacts, including heart attacks, strokes, sleep deprivation etc have not been acknowledged, discussed or justified in any detail, should this expansion option proceed.

- It is also not clear if the assessment covers all impacts that need mitigating – e.g. insulation of properties (houses, schools etc) which in themselves would most likely represent significant costs. How are these costs going to be met – i.e. who is paying for the health costs caused by expansion?
- From 2050 for the remainder of the assessment period (calculated to be 35 years), health impacts are presumed to hold – but couldn't impacts (and associated costs) increase? This could have been clarified.
- In the Sustainability Assessment, the Commission note that "It is well understood that people who live beyond an airport's noise contours can often be irritated and upset by the overflight of planes. And an expanded Heathrow would lead to more planes overflying the capital". Despite this recognition, the issue of the impacts on communities such as H&F which are often on the outer edge or beyond the noise contours presented in noise assessments is not well covered or accounted for in the Commission's assessments.
- The Commission is also urged to note the findings of the All Party Parliamentary Group on Noise from Heathrow Airport, published on 18th December 2014.
- There are some aspects of the HAL scheme that should have been picked out and highlighted by the Commission –e.g. the potential increasing use of mixed mode type operations with associated knock on effects in terms of a reduction in the amount of respite time that communities would receive – which would appear to be particularly significant for those under the southern runway flight path approaches.
- The noise assessment scenarios for the HH option are not consistent with the assessment of the Heathrow airport option. We would have expected consistency in the Commission's assessments of both Heathrow proposals which would have helped to compare their relative impacts.

Safety

It is disappointing that a key issue such as safety was not highlighted as a stand-alone issue for comment as part of the consultation. Safety is an issue that concerns H&F residents, particularly with the large-scale increase in flight numbers that expansion would bring.

Many H&F residents are concerned about safety risks. While we accept that the likelihood of an accident is small, it is difficult for most people to understand the size of the risk. However, the impact of an accident involving an aircraft flying over London is clear: it would be devastating.

We do not believe that the risks for approaching aircraft, however small, should be so heavily concentrated over densely populated West London because the impact would be so large. Any significant increase in flights should therefore prompt a review of westerly preference, for safety as well as noise reasons.

We are concerned that the CAA will not assess safety until very late in the process, even after planning permission has been granted for one of the

schemes. While it is reassuring to hear that safety will be assessed fully, the CAA paper states that safety mitigations might compromise some noise respite options. It is unacceptable for safety to be reviewed so late in the process.

Specific comments on HAL proposal:

- Safety mitigations will be needed because the new runway is closer to an existing runway than the international recommendations and it is also to be offset. This will affect the way adjacent runways are operated;
- The safety of the air traffic control tower would need to be reassessed;
- Car parking within the airport public safety zone must be reviewed;
- A complete review of the entire air traffic operation would need to be assessed, including existing mitigations, the relationship with RAF Northolt, missed approach procedures, and helicopter crossings.
- Significant airspace changes would be needed. Existing departure routes would need to be redesigned. A case might need to be made to extend controlled airspace. Possible conflicts with other airports would need to be assessed. Airspace changes alone could take 5-7 years to implement.

Specific comments on HH proposal:

- The design is a “novel concept without any pre-existing standards or experience globally”. The CAA is “open minded”;
- A particular concern is the risk between missed approaches and departures;
- Safety mitigations will also be needed because the new runway is slightly closer to the southern runway than international standards and is offset;
- The safety of the air traffic control tower would need to be reassessed;
- The risks of ILS localizer interference, location and protection needs review;
- Approach lighting could be an issue as it has to be on the airfield;
- Aircraft waiting to depart would be within the safety zone, contrary to policy.
- Significant air traffic and airspace redesign would be needed, as with the other Heathrow option, but with greater safety issues due to the new design

Q5: Do you have any comments on how the Commission has carried out its appraisal of specific topics, including methodology and results?

Noise Impacts

- H&F welcomes the use of broader metrics than the traditional 57dB Leq contour. Use of a variety of measures gives an improved assessment of the impact (e.g. by using the metric incorporating flight numbers) although further refinement of the metrics is required so that

they more closely align with the community impacts they are supposed to represent.

- The sheer range of scenarios tested produces a mass of data and maps which are very difficult to assess and the modelling results are not always presented in a way that makes comparisons easy.
- Some data is not presented as clearly as it could or should have been. There is also sometimes an issue with inconsistencies in terms of the way information is presented which makes assessment and comparisons difficult. As an example, see the monetisation section of the Noise Assessment. Information that could have been tabulated to aid assessment of various impacts and scenarios has been presented in text. Within subsections of the assessment (e.g. those on hypertension and heart attack impacts) different approaches are taken to presenting data for the 3 scenario years of 2030, 2040 and 2050 and the 3 sensitivity scenarios of low, medium and high costs.
- Although a warning is given in the noise assessment report to the effect that “there is a risk that the results are accorded a level of accuracy and precision that is inappropriate for the level of assessment undertaken”, it feels like results are presented throughout the document without appropriate caveats so there is a risk that greater certainty will be attached to these findings.
- Modelling assumptions such as flight paths, number of movements, fleet mix etc that are critical to determining the outputs of the noise model are ambitious and/or indicative which means that very little faith can be placed in the final results. Just as a range of scenarios have been tested in some respects of the assessments, further sensitivity tests could have been carried out on these critical inputs.
- In many respects, the noise assessment results have not been presented in a clear and easily understandable manner
- Multiple scenarios and sensitivity tests have been carried out in some parts of the assessment which have produced huge amounts of data and information but this is not always provided down to the level required to make informed judgements on potential impacts. For example, the noise assessment results are presented for the Heathrow study area only and it is very difficult to determine local impacts from the maps and tables provided. Councils and communities need local information in order to respond properly to the consultation. H&F specific information has been requested in terms of noise impacts (not yet received after 2 weeks). The Commission gives itself 20 working days to respond to queries sent in to it. Potentially this is 1 month out of the 3 month consultation period that we have to wait for more detailed information – thus significantly reducing the time available to review and comment on important aspects of the consultation.

Q6: Do you have any comments on the Commission's sustainability assessments, including methodology and results?

One of the aims of the Sustainability Assessment (SA) is to provide robust information on, amongst other matters, the environmental impacts of the proposed expansion options. The issues and omissions highlighted above suggest that the SA cannot be regarded as robust in terms of noise impacts.

Specific Comments on HAL proposal

- The SA highlights that in terms of the 'do minimum' and 'do something' scenarios for 2030, 2040 and 2050 (lower end, carbon capped) that "higher numbers of people are forecast to fall within the 57 DB day noise contour and to experience 50 or more 70dB overflights in a day". However, "fewer people are forecast to fall into the 54dB day noise contour, the 48dB night noise contour, the 55Lden 24-hr contour and to experience 25 or more 60dB overflights during the night".
- These impacts are considered to be "significantly adverse" by the Commission, although they consider that further mitigation measures could be implemented to reduce impacts to 'adverse'.
- From a noise perspective, even with high levels of mitigation, it is considered that the SA shows that noise impacts remain as adverse which is unacceptable.

Specific comments on HH proposal:

- The SA highlights that in terms of the 'do minimum' and 'do something' scenarios for 2030, 2040 and 2050 (lower end, carbon capped) that "higher numbers of people are forecast to fall within the noise footprint of the airport across every type of noise measurement. Both the 54LAeq and 55Lden show growth of over 25% in the 'do something' scenario". These impacts are clearly "significantly adverse" as acknowledged by the Commission.
- Although the Commission considers that further mitigation measures could be implemented to reduce impacts to 'adverse', "the effects of such mitigations would have to be extremely significant" to be able to achieve this.
- From a noise perspective, it is considered that the SA shows this proposal to be unviable.

Q7: Do you have any comments on the Commission's business cases, including methodology and results?

A separate Business Case and Sustainability Assessment have been carried out for both of the Heathrow expansion options. The Business Case consists of the following:

- Strategic case
- Economic case

- Financial & Commercial Case
- Management Case

It is not immediately clear, but it seems that environmental impact issues are covered under the strategic case assessment, albeit very briefly. The strategic fit assessments carried out are very focussed on meeting the expected demand for aviation services, improving the passenger experience and maximising benefits to the economy. There is little if any reference to environmental impacts, health impacts or community impact issues.

The Strategic Case does not precisely follow the HM Treasury Green Book format, but it at the same time replicates much of the function of the strategic case implied by the Green Book. It is unclear which aspects of the assessment are not in line with Government's guidance, neither is it explained why the assessment has deviated from it.

There is concern that significant and adverse impacts for a range of critical issues such as noise, air quality, carbon emissions etc will be deemed to be acceptable without full and proper assessment of their costs and impacts.

The Business Case also needs to take into account the issue of how national economic benefits are assessed against local negative impacts – there is concern that, if expansion goes ahead, there is an imbalance between the groups that benefit from a larger Heathrow and those communities that have to bear the brunt of the negative social and environmental impacts.

The Business Case assessments clearly present figures for the costs associated with capacity constraints – i.e. the costs associated with not expanding Heathrow, but there does not appear to be any similarly presented figures on costs associated with expansion.

It is not clear how the 2 are to be considered together in terms of forming a 'total scheme' impact assessment. The Commission appears to be reserving judgement at this stage on how all the relevant factors will be assessed in determining their final recommendations. It is concerning that the Business Case/Sustainability Assessment report states that even if the schemes show lots of adverse environmental impacts then that doesn't mean a scheme is not suitable. There needs to be more transparency on the process of how all of the costs and benefits will be weighed up.

The Business Case assessment states that high levels of unmet demand for travel from Heathrow would see traffic movements increase rapidly if expansion takes place. By 2040, the airport is forecast to be operating at its capacity of 740,000 movements across all but 1 scenario. In some scenarios, capacity is reached sooner. This suggests that within around 10-15 years of having a 3rd Runway we can expect Heathrow to already be pressing for a 4th Runway. This issue needs to be acknowledged and discussed in the Commission's assessment.

Q8: Other Comments

Given the sheer volume of information produced, the consultation period of 12 weeks is inadequate. The volume of consultation information provided makes it extremely difficult for local authorities, resident and community groups to adequately assess and report on the Commission's work before making any consultation response.

Also, holding the consultation over the Christmas and New Year period does not encourage people to engage fully with the consultation process when they are clearly going to be busy with other arrangements.

The consultation should have either been extended through to early 2015 or not started until the New Year. The Airports Commission do not need to report on their final recommendations until summer 2015, so there is no need to rush through the consultation process now.

Consultation information only appears to be available online. This is not regarded as adequate in terms of engaging as fully as possible with the communities who could potentially be impacted by the expansion options under consideration. Information should be provided in hard copy. It was only after a number of requests that hard copy documents were provided.

Feedback from some resident representatives in the borough suggest that there is not widespread awareness about the Commission's current consultation. We expect this is linked to the limited availability of information that the Commission has made public.

Only 1 day was set aside by the Commission for its stakeholder event at Heathrow. We received no information about the ticket only event on 3 December. By the time we had found out that tickets were being distributed it seems that it was too late to receive an invite. Despite contacting the Commission about ticket availability we did not receive any response. In addition to the ticket-only event there was a single event, open to the public without invitation, held at a Heathrow hotel on the evening of 3 December. We do not consider that such a low level of engagement with local communities is acceptable.

A representative of our own residents Commission attended the evening event and noted the extremely poor turnout. The purpose of this event appears to have been to raise awareness, but we doubt that it achieved this aim. Details of the event were circulated at a very late stage and the postcode for the hotel venue was wrong. The Commission should have made better efforts to publicise the event much earlier, should not have limited it to a single event and should have hosted additional events closer to other affected communities, not just in the immediate vicinity of the airport.

There is a danger that the Commission is repeating the mistakes of the airport in terms of poor engagement with communities who may not be in the immediate vicinity of the airport but who are impacted and will continue to be

impacted by expansion at Heathrow if this is what the Commission proposes in its final report.

There appear to be gaps in some of the information presented in the consultation, - e.g. full information is not presented on potential air quality impacts as further air quality modelling assessments still need to be carried out. There is also concern about the dearth of information on how traffic and public transport impacts in the borough would be addressed. The consultation should not begin until all required assessments have been completed and are available for review.

No consultation information from the Commission has been distributed to the areas that could potentially be impacted by the expansion options under consideration. Residents are however, receiving numerous flyers, leaflets etc from Heathrow (via its "Back Heathrow" campaign) on its 3rd runway proposals. There are concerns that the main contact that residents are receiving on the issue of Heathrow expansion are not presenting issues in a balanced and independent way – i.e. presenting down-sizing or closure of the airport as the alternative to allowing expansion to proceed.

A number of consultations have been undertaken in relation to expansion proposals and operational changes at Heathrow over the last 10 years. Many people will have responded consistently to these (as has H&F council) to say that we do not support expansion or changes that increase environmental impacts such as noise. There is a danger of "consultation fatigue" for people on the issue of Heathrow expansion who feel that they are continually being consulted on issues but not being listened to.