

**Response to the Airports Commission Consultation on its Short-listed
Options for Additional Runway Capacity in the South-East of England**

**A report by the resident-led Hammersmith & Fulham Commission on
Airport Expansion**

28 January 2015

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1 MAIN REPORT

Conclusion

Based on the available evidence, we have concluded that the negative impacts on the London Borough of Hammersmith & Fulham (LBHF) of expansion at Heathrow would outweigh the positive impacts. On the one hand:

- LBHF would enjoy some economic benefits by way of inward investment and new jobs and apprenticeships; however, given other developments in the borough, these benefits are not essential to our prosperity.
- There would be an increased choice of flights and destinations for residents and visitors using Heathrow.

On the other hand:

- Residents would experience additional flights overhead and there could be flight paths where none exist now; additional noise would result.
- Traffic and public transport congestion would get worse.
- Air quality, already exceeding EU limits, would deteriorate further.
- The promoters' plans to mitigate noise and air quality impacts are highly speculative and rely on uncertain forecasts, as well as decisions much further down the line.
- Safety concerns would be heightened by a busier airspace overhead.
- Residents' health would be adversely impacted.
- Residents' quality of life would deteriorate, particularly for lower income groups.

Despite receiving at least two waves of mailshots from “Back Heathrow” during 2014, a majority of LBHF residents who responded to our request for feedback continue to oppose expansion at Heathrow, although this evidence is qualitative in nature.

Introduction

The Airports Commission (AC) was set up in November 2012 to recommend necessary steps to maintain the UK's status as Europe's most important aviation hub. It has concluded that there will need to be at least one additional runway capacity in the South East of England by 2030 and has shortlisted three options:

- One new runway to the north-west (NWR) of Heathrow's existing runways: the official proposal by Heathrow Airport Ltd (HAL).
- Extending Heathrow's northern runway to the west (ENR): a proposal by an independent group, Heathrow Hub (HH).
- One new runway at Gatwick.

The AC has performed an initial assessment of these proposals and has invited responses to a series of questions by 3 February 2015. This report is structured round those questions. The current public consultation is the last before the AC makes a recommendation to the government of the day in the summer of 2015.

Sir Howard Davies, the AC Chair, says in his introduction to the consultation document:

“It is particularly important for local residents and their representatives to understand more clearly what the proposals entail, and what their consequences might be for the local environment.”

With Council support, a group of seven LBHF residents formed a local commission, the Hammersmith & Fulham Commission on Airport Expansion (HFCAE), to assess the potential local impact of the two Heathrow expansion options. The Council's Community Safety, Environment and Residents' Services Policy and Accountability Committee (CSERS PAC) suggested terms of reference and agreed the provision of a secretariat comprised of three Council officers. The Council have not imposed any process or direction on the HFCAE and this report is separate from the Council's own response to the AC, although the Council may choose to draw on this report in its submission.

The HFCAE process

As a Commission we:

- Identified the main issues for residents should Heathrow expand.
- Studied the AC documentation on these issues and met regularly to analyse the evidence as a group.
- Wrote, on 21 November 2014, to HAL and HH, HACAN, West London Friends of the Earth (FoE), West London Business (WLB), Transport for London (TfL), the Civil Aviation Authority (CAA) and the London Chamber of Commerce & Industry (LCCI), seeking specific information about local impacts.
- Invited the organisations above to a one-day oral evidence hearing at the Town Hall on 10 December 2014.
- Invited comments from residents directly, and also via some 250 residents' associations, civic societies and community groups.
- Attended the AC's "Heathrow Area public drop-in" evening event on 3 December 2014.
- Reviewed the available evidence.

We are satisfied that, in the short time available to consider a huge quantity of complex material, we have examined the issues as thoroughly as any group of citizens could. We wrote to the AC about the inadequate time allowed for consultation on 27 November 2014.

More details of our process are at Annex 2.

Evidence

Resident responses

A large volume of feedback was received following the initial Council website article announcing the setting up of the HFCAE in early November 2014. Following a call for written evidence, submissions were subsequently made directly by residents and through residents' associations and amenity groups. All of this gave us an indication of the salient issues for residents, which were: noise; safety; traffic and public transport congestion ("surface access"); air quality; carbon emissions; economic impacts; and quality of life.

HAL commissioned market research by Populus Ltd for its own purposes, including ascertaining which arguments in favour of expansion play best with the public. Six out of

seven members of HFCAE believe that we cannot rely on the results as objective evidence since the questionnaire appears to have been designed to influence respondents in favour of expansion and to engender doubts about the position taken on the question by respondents' elected representatives.¹

Further details of residents' views are at Annex 1.

Expert witnesses

Representatives of HAL, HH, HACAN, FoE, WLB, LCCI and TfL sent in written submissions as requested. HAL, HACAN and TfL gave borough-specific answers to a greater or lesser degree while the others submitted more general material. With the exception of LCCI, these organisations also attended the hearing on 10 December and answered a range of detailed questions put to them by HFCAE on the two Heathrow expansion options.

AC Question 1: Conclusions in respect of the proposals

We draw the following conclusions.

Noise

The AC acknowledges that noise is overwhelmingly important to people in determining their views on airport expansion. Unsurprisingly, it is the most important issue to LBHF residents. The AC's own assessment of the noise impacts of both proposals would be "significantly adverse" compared to the position if no runway was built. In their – we consider optimistic – view, the NWR could be mitigated to "adverse" through various measures proposed by HAL. The AC also considers that overall noise under this option would be less than it is today, although this is not the case for the Heathrow Hub option. As we explain below, these projections are uncertain. Equally, in the view of many affected residents, the measures used give too much weight to the noise in decibels and insufficient weight to the number of flights.

The chief determinant of noise is the location of flight paths. However, as the AC and both the promoters admit, the flight paths included in the consultation are indicative and information about the precise position of flight paths under either proposal is not known. Nor will it be known when the AC makes its recommendation in summer 2015. Thereafter, extensive further consultation and deliberation across a myriad of interested bodies would need to be undertaken, including a complete recasting of flight paths across London in conjunction with the CAA. For the moment, a range of assumptions has been made about where flight paths might be located, in order to allow noise assessments to be included as part of the AC's work.

¹ Isobel Hill-Smith believes the Populus evidence should not be ignored. We were provided with information for the parliamentary constituency of Hammersmith, stating that 45% of people said they supported the proposal to expand Heathrow, while 30% of people were opposed and 25% were neutral. The poll was taken between July and September 2014 (<http://www.populus.co.uk/Poll/3395/>). The picture is more even when looking at strong views. 23% strongly supported, 20% strongly opposed and 56% of people were neutral or had mild views. This suggests that there is both significant support as well as significant opposition to a new runway. However, Heathrow affects Fulham much more than Hammersmith, as it lies under the two westerly approach paths. Fulham is part of a different parliamentary constituency that was not included in the poll. Therefore the Hammersmith evidence is unlikely to be representative of LBHF as a whole.

We think that the consultation cannot be meaningful without this level of detail. We note that the report by the House of Commons All-Party Parliamentary Group on Heathrow and the Wider Economy, published on 18 December 2014, also expresses concerns about the “lack of transparency in Heathrow’s proposals”, describing the absence of flight path information as “undemocratic”.

Despite the gaps in the information, we have to draw what conclusions we reasonably can. An additional or extended runway at Heathrow would lead to 700,000-740,000 annual arrivals/departures by 2050 compared to current capacity of 480,000. Westerly preference currently results in 77% of all arrivals flying over two paths across the borough, with around 92,000 flights on each approach path over LBHF. Without a change to flight paths, the proposals could increase arrivals to 180,000 for the northern runway under the Hub proposal and to around 95,000 for each of three paths under HAL’s proposal which includes a new approach path. This would certainly mean either an excessive increase in frequency on existing routes or additional flight paths over west London, subjecting new communities to serious noise disturbance. It is likely that at least one new departure flight path would also be over Hammersmith and/or Shepherds Bush, with a bigger population than now. At the oral evidence hearing on 10 December, Heathrow Hub referred to “a constant flow of arrivals” over the current northern runway.

Examining the information published by the AC, we also find that:

- The noise assessments are for large geographic areas making assessing borough and community level impacts impossible.
- The level of uncertainty on aspects of the proposals such as fleet mix, runway use and operational modes mean that the forecast noise impacts could be very different from actual impacts.
- Expansion would either increase impacts for those already affected by Heathrow or create impacts for communities not currently affected.
- Issues of noise concentration or dispersal have not been aired but it is clear that, for LBHF, this would mean trading the interests of one set of residents off against the interests of another. As a body of residents representative of all areas of the borough, we are not prepared to participate in this.
- Health impacts of additional noise would be significant since monetisation of extra heart attacks, hypertension and other issues such as annoyance, is calculated to cost up to £25bn to mitigate.

In a bid to reduce proposed noise levels and/or numbers of people affected by noise, the promoters have suggested various measures, such as quieter aircraft and curved approaches to descent. Our examinations have found that it is not possible to rely on fleet replacement to improve the arrivals noise climate to an acceptable level

To the extent that mitigations are possible, there is a strong argument that they should be delivered whether or not a new runway is built. HAL confirmed that some of their proposed noise improvements could be delivered without a new runway, including a change to westerly preference, a higher approach angle and new curved approaches with greater respite under the approach paths. Moreover, if expansion takes place, then it follows that the future benefit of a significantly quieter environment is snatched away even as it is presented to us. Whether expansion at Heathrow is taken forward or not, we recommend that the Council engages with HAL to secure those benefits and guard against deterioration in other ways through, for example, the possibility of mixed mode,

abandonment of runway alternation and more night flights.

Overall, the AC considers that both expansion options for Heathrow could well have 'significantly adverse' impacts in terms of noise issues, compared to the no build forecast. With mitigation, there is the potential to reduce impacts closer to 'adverse' for HAL's option. The HFCAE does not consider that causing adverse impacts, which have health implications for large communities of local residents, is acceptable. We are also concerned that LBHF might experience a relative worsening of noise performance compared to other areas assessed by the AC. Although there is insufficient precise evidence available on local impacts, in general terms the heavy concentration of arrivals paths over the borough under both proposals and the policy of westerly preference make it inevitable that residents would bear the brunt of the increase in arriving flights. It is therefore possible that noise would get worse in our borough even if noise is reduced overall.

Safety

This is an important concern for residents, who are well aware that the London airports system is the busiest hub in the world, with around 1 million flights serving 135 million passengers a year. They are uneasy about proposals which would entail further congestion in the air above them; and are unlikely to have been reassured by the Secretary of State for Transport's recent comment that NATS did very well coping with the computer problem on 12 December 2014 considering London is "the busiest airspace in Europe". If either of the Heathrow expansion options is built, this will add around another quarter of a million flights a year. In our view, making the airspace busier where it is most heavily concentrated, and where aircraft are required to fly over such densely populated areas, raises legitimate concerns about how the additional risks will be managed.

However, the AC gave safety little prominence. This appears to be because it is an aspect which will be worked through long after a recommendation is made and even after the planning inquiry, as part of the processes referred to earlier. We understand that, if there are trade-offs to be made, safety will (understandably) trump other issues. However, this adds to the already large uncertainty about how much weight would be given to other issues and how they would be traded off against safety concerns. In particular, safety is critical in determining flight paths and the use of runways and this also adds to uncertainties about noise impacts.

We therefore ask the AC to include a recommendation for an early assessment of the safety case, even if some matters are provisional. Residents need assurance that safety risks are being managed properly.

Surface access

On the basis of evidence provided by the AC, the effects of expansion on LBHF for road and public transport would be overwhelmingly negative.

Despite a wider offer of public transport to and from Heathrow by 2030, the Piccadilly Line would suffer severe overcrowding as it would continue to be heavily used by an increasing number of Heathrow passengers to and from Central London. The AC blames "background growth" (i.e. the forecast increase in London residents and commuters) for pressure on the Piccadilly Line and Crossrail: in fact, this growth is planned for by TfL, and HAL and HH effectively appropriate the planned upgrades to the rail and tube network to

accommodate Heathrow expansion. To add to over-capacity, no allowance is made for luggage occupancy, already an acute problem which further reduces standing room on Heathrow-bound trains.

On the roads, the AC gives no assessment of the impact on inner west London, other than a general forecast of 1500 extra cars in the morning peak hour going into Heathrow along the M4 from central London. The promoters asserted at the LBHF oral hearing that there would be “no” or “negligible” extra traffic along the A4 corridor through Hammersmith. Neither the promoters’ nor the AC’s claims have apparently been subject to in-depth modelling, and with the forecast increase in passenger numbers to 132-149 million by 2050 from today’s 72.3 million, common sense indicates car traffic will increase. An increase in “kiss and fly” car journeys from central London is acknowledged by the AC. The likely outcome is acute worsening congestion on the A4 through Hammersmith and severe pressure on local junctions including the Hammersmith gyratory, impacting on local residents, commuters and business traffic, and on air quality. There is a heavy reliance by the promoters on a dramatic predicted shift from road to public transport, reducing from 59% in 2013 to 45% in 2030 – but no assurance that this will be achieved.

For both Underground transport and road traffic, the AC fails to conduct modelling up to the period of full expansion in 2050, instead stopping at 2030. There is therefore no “worst case scenario”, which is a major omission in assessing effects on LBHF residents and workers.

There is an overall assumption on the part of the promoters that other authorities (Department for Transport, local councils, TfL) would pick up the surface transport issues and that, consequently, they are not a high priority for the promoters.

Air quality

This is another issue which is important for residents but on which we have almost no information. Given the traffic congestion in the borough, we already have our share of the 4,247 deaths attributable to small particles from vehicle exhausts across Greater London. The whole of LBHF is an Air Quality Management Area and already exceeds national air quality thresholds in many places.

Detailed air quality modelling has not been carried out by the promoters or the Commission. The AC acknowledges that it would have been preferable to carry out air quality dispersion modelling to assess the risks of exceedances of national air quality standards prior to consultation. LBHF is outside the AC's high level study area for air quality and detailed monitoring has not been carried out anywhere.

It is hard to avoid the conclusion that air pollution would increase with Heathrow expansion. On examining such information as is available in the AC documentation, we note that there is a low to likely risk of exceeding annual NO₂ European Union Limit Values on the A4 Bath Road and M4 in Hillingdon. These roads lead directly into and out of the A4 Great West Road running through the borough, adjoining which there are six schools and their playgrounds. We note that on 8 December 2014 the House of Commons Environmental Audit select committee recommended that schools, hospitals and care homes should not be built near main roads to reduce the tens of thousands of deaths being caused by the “invisible killer” of air pollution.

Road traffic to and from Heathrow contributes to the borough's poor air quality, although

TfL challenge the proposers' claims that pollution from aircraft is not an issue. We agree with this but have not been able to take this further in the time available.

The promoters do in fact acknowledge that air quality is a problem but rest their claims that expansion will not make it any worse on the assumptions about the modal shift to public transport and its capacity to cope, which were discussed in the Surface Access section above. We do not find these claims credible. Without mitigation measures, the AC considers that both Heathrow expansion proposals would have 'significantly adverse' impacts on air quality. Although mitigation measures could be introduced to reduce impacts, the AC notes that substantial and forceful measures may be required to reduce impacts, and even then, they would still be classified as 'adverse'.

Carbon emissions

On carbon emissions, the AC's assessment is that the UK could build one more runway without breaching its legal commitments in this field on condition that no other airport could expand significantly. If it were decided to build an extra runway at Gatwick therefore, this might in theory produce the certainty of no future expansion at Heathrow which has only existed as an illusion for residents over the years. However, the AC has also said that it could not rule out a fourth runway when matters are assessed further into the century.

It would be difficult to rely on any future commitment in this area: at the ticketed AC event on 3 December, to which no representative of the borough was invited, the CEO of Heathrow retracted HAL's promise not to push for a third runway, saying that it "should never have been made".

The AC considers that the carbon impact of Heathrow expansion is 'adverse'. However, it is noted that the only reason that it is not classified as 'highly adverse' is because expanding Heathrow as opposed to other airports shows a comparative saving in terms of carbon emissions. This is because Heathrow has a higher public transport modal share than many other airports. If it expands, some passengers are assumed to use Heathrow rather than other airports where their carbon emissions from surface transport would be higher. We contend that, if public transport access to other airports actually improved and if travellers to Heathrow made more journeys to/from the airport by car than expected, then the relative carbon impacts could well be higher than stated.

Quality of life

The AC mentioned the benefits of connectivity for individuals taking more flights for leisure purposes. LBHF is ninth in Heathrow's frequent fliers list. According to the CAA Passenger Survey data, there are 352,161 passenger journeys per year by residents of LBHF², as well as 405,500 journeys to or from LBHF by visitors. Many residents also use other London airports, sometimes for cost reasons, especially for short-haul flights. We would expect there to be growth in passenger journeys both by residents and by visitors if a new runway was built, but this could be affected by air fares. The average income of people who make international flights are £77,249 for businesses travellers and £53,566 for leisure travellers (CAA Passenger Survey Report 2013). In this regard, we were interested to note the promoters' comments that air fares might need to increase with expansion.

2 Compared with a population of 182,493 (2011 census).

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

- “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's assessment of quality of life impact puts people into three categories:

- 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 impacts will be negative.
- National – where any economic benefits are said to represent pure gain since there are no local negative impacts.

At 16km from Heathrow, our borough clearly falls into the middle category and, again, there is relatively little about the impacts on us. Moreover, there are several other London boroughs in a broadly analogous position to LBHF, i.e. outside the 5km radius but affected negatively by noise, traffic and air pollution and benefiting minimally from new inward investment and jobs.

The study recommended putting monetary values on various aspects of quality of life to build into the sustainability assessments of the options. Instead, the AC has rowed back from doing this. Whilst we are encouraged to see a Quality of Life Assessment included in the AC's assessment, we are concerned that it may not be pursued rigorously and also about the way positive and negative impacts are measured against each other, and in some cases are 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.

Communities where adverse impacts outweigh the benefits should not simply have their interests netted off against others who gain more than they lose under the proposals. Even if a proposal is strongly positive overall, there is a strong moral case to consider alternative approaches that better balance the positive and negative impacts for affected communities, such as LBHF. While we have found significant problems with both Heathrow proposals, if a new runway is to be built, policies that unfairly concentrate problems in one area should be changed to create a better balance of positive and negative impacts. In the case of LBHF, for example, this would require a change to the westerly preference policy that concentrates arriving noise over the borough, and concrete action to reduce traffic congestion and poor air quality.

Economy

It is most likely that there would be some economic benefits to the borough from Heathrow expansion (although one of the AC scenarios demonstrates negative business benefits with certain carbon emissions limitation policies). HAL and WLB estimate the additional benefits to west London of Heathrow expansion to be of the order of £30 billion in the period to 2085, although this benefit straddles several boroughs and it is questionable how much of this would accrue to LBHF. Both proposals are likely to deliver increased direct airport employment and the potential for consequential benefits. These include increased

tourism, both in numbers and higher tourist spending, together with additional potential, if LBHF can harness it, for high tech and service business stimulation in the borough. To secure this, Hammersmith & Fulham Council would need a firm plan to pull benefit into the borough.

The promoters would create new apprenticeships although they would not commit to targets for each borough, so direct benefits to LBHF are unclear.

There would also be new low-skilled jobs, which airports typically create. The promoters have said that such jobs would be paid at least at the London Living Wage, although we would be more confident if HAL were signed up as a Living Wage Foundation employer.

However, it can be argued that LBHF has sufficient significant inward investment not to be dependent on the economic benefits of Heathrow expansion. Examples include the White City Opportunity Area, which includes an international creative and scientific hub for Imperial College, the continued success of Westfield coupled with large developments by St James and Stanhope/BBC, the proposed Old Oak and Park Royal developments and the Earls Court redevelopment.

The above developments and population increases require some 13,000 additional homes by 2032 (LBHF Development Management Local Plan). We understand from TfL that the housing requirement for additional jobs created in boroughs closer to Heathrow might be difficult for them to meet, thus putting further pressure on our housing provision.

The AC concludes on balance that an expanded Heathrow would be “highly supportive” in promoting employment and economic growth nationally. The AC admits that this is dependent on future economic conditions. Or, as HH stated at the oral evidence hearing, “no-one really knows”.

AC Question 2: Ways in which the options could be improved

None of the suggestions below should be taken to mean that we think Heathrow expansion would be advantageous overall for LBHF.

General

We were struck with the complexity of the likely delivery process and suggest that a delivery authority somewhat on the lines of the Olympic Delivery Authority would need to be set up to manage the large number of different bodies and issues involved.

Noise

More work is needed by the developers to reduce noise impacts in the borough and to assess local noise impacts and the effect of mitigations suggested by the promoters. We have commented above on the fact that the local impacts are both unclear and uncertain, so the first step would be to produce proper local impact assessments. This would have to be done by the promoters, with help from an independent expert such as the CAA.

We also support the need identified by many people for a new noise annoyance study to better understand how the number of flights and the level of noise affects people.

This local assessment and updated noise survey would identify what is needed to mitigate

noise locally and to prioritise actions, some of which can be taken even if no new runway is built. It is already clear that the following measures would be necessary as part of a serious mitigation programme:

- Reducing noise impacts from arrivals (including use of increased angle of approach, inset landings and curved approaches that reduce concentrations along the centrelines).
- Protection of periods of respite for all residents.
- Replacing westerly preference with a more balanced preference.
- Phasing out night flights.
- Maximising the use of the least noisy aircraft.

It is clear that many noise mitigations cannot be delivered by the airport but rely on action by the Secretary of State, the CAA, NATS and airlines operating at the airport. It would be helpful if any recommendation on a new runway by the AC could be accompanied by a firm recommendation to Government to address the points raised in this section in its National Policy Statement and to review its policies on concentration, such as westerly preference, in particular.

Economy

More attention should be given to management of journeys by air across all of London Airports. For example, only 14% of flights to and from Heathrow are for business purposes. Some of the business benefits could be secured by Heathrow handling fewer leisure flights, or fewer point-to-point flights, enabling airports with spare capacity to handle those. It is notable that only Heathrow Airport, among London's airports, is full. Directing some traffic to other airports may or may not have an adverse impact on competition, but there could be significant overall benefits.

AC Question 3: How the AC carried out its appraisal

We welcome the AC's transparency on technical detail and also recognise that they have acknowledged the limits to the evidence they have presented. However, the more judgement is applied by the AC the more opaque the AC's process becomes. Assessment within the business cases and sustainability assessments is set out clearly enough but the AC's judgements are made against specific module criteria in a static and watertight manner. This tends to minimise the complexity of the judgement required and gives rise to a sense of spurious precision.

There is insufficient attempt to understand how variation in one module may have knock-on effects to others. This is critical since:

- Many modules show a wide range of possible results depending on assumptions made.
- A few modules need to be judged absolutely, e.g. safety and air quality, which both have a statutory basis. If there is little room to manoeuvre on these issues, there will be more compromise on other aspects, critically flight paths and noise.
- While costs have been adjusted for optimism bias, other aspects do not appear to have been adjusted in the same way, for example, noise mitigation or the projected shift from cars to public transport.

As the AC says: “The Commission recognises, however, that there will need to be trade-offs between these objectives. No scheme should be expected to meet fully all the objectives set” (Para 2.16 of the Consultation Document). We do not know the weighting of the respective objectives and how trade-offs will be made in coming to the final recommendation. When asked at the AC’s “Heathrow Area public drop-in” evening event on 3 December 2014, one official said that members of the AC would exercise their professional judgement.

AC Question 4: Factors not addressed by AC

We have already mentioned in the relevant sections above the greater and earlier attention safety should have had in the published documents by the CAA.

AC Question 5: How the AC's appraisal carried out on specific topics

We have already mentioned above that more specific local information is needed on all topics in the AC's appraisal framework for us to assess local impact.

In some areas basic work needs to have been done before consultation. The key areas here are the locations of flight paths, flight numbers, transport modelling and air quality modelling.

Noise

All findings from the Attitudes to Noise from Aviation Sources in England Report need to be taken into account, even though the Government did not fully accept this report. The report raises significant questions about the adequacy of noise contours as the main measure of the impact of aviation noise. While the use of a noise and number index is clearly helpful as a supplementary measure, it is difficult to see how the AC can draw firm conclusions about noise impacts without a new study. Reference should also be made to the World Health Organisation’s guidelines for community noise impacts.

The assessment needs to cover all impacts that need mitigating and how the costs are going to be met.

From 2050 for the remainder of the assessment period (calculated to be 35 years), health impacts are presumed to hold, but impacts (and associated costs) could increase.

Much more attention needs to be paid to presenting data on noise in a way which is more accessible to the public and also in consistent ways so that comparisons can be made between different scenarios and options.

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.

Surface Access and Air Quality

Reference has already been made to the need for detailed local modelling.

Quality of life

We have already mentioned above that we welcome this study. 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 LBHF falls within this category as well as several other inner London boroughs.

AC Question 6: The AC's Sustainability assessments

In the Sustainability Assessment, the Commission notes 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 LBHF 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 AC's assessments. It is important that wider impacts are included in the assessment because the only basis for excluding them is the outdated annoyance study.

AC Question 7: The AC's business cases

The comments made in answer to Question 3 apply here.

AC Question 8: Other comments on the AC's process

We wrote to the AC on the 27th November 2014 about the shortcomings of the current consultation process.

It is very difficult for the public to engage in the huge volume of information presented in highly technical ways over the minimum consultation period, particularly when it straddles Christmas. Most of the documentation is only available online, rendering it inaccessible to certain groups and more difficult for many to consider properly. At local level, the AC has not engaged with LBHF, who were not invited to the "Heathrow Public Discussion" daytime event on 3 December.

We do not think that the AC has created significant public awareness of their consultation. It only attracted a handful of people at the "Heathrow Area public drop-in" evening event on 3 December 2014, details of which were circulated 48 hours beforehand. The result is a public information vacuum which means that many people's awareness is limited to the case made for Heathrow expansion through the "Back Heathrow" campaign. "Back Heathrow" has undertaken a comprehensive publicity campaign, including at least two

direct mailshots to households in LBHF. (A smaller number of households received pro Gatwick expansion leaflets). At the oral evidence hearing, HAL refused to divulge the amount of funding it gives to “Back Heathrow” beyond the statement that it was “greater than £100,000”. This lack of transparency raises questions about the genuineness of “Back Heathrow” as a grass roots movement.

Even where LBHF residents have been aware of the consultation, they may feel that there is not enough information on how the proposals affect them, or that it is futile to respond. Repeated expansion proposals over the last decade have seen people respond again and again, resulting in consultation fatigue.

All this means that it has been challenging to fulfil Sir Howard Davies's aim, quoted at the beginning of this report, of understanding the impact of the different proposals on local communities. Without flight path details and traffic and air quality modelling evidence, we have been left to interpret models which are sensitive to underlying assumptions, and volatile to interactions between different aspects. It is important that trade-offs are not made and interests of communities netted off, rendering opaque the final thought processes. Accordingly we do not understand how the AC will have a sufficient evidential basis to make a final recommendation.

However, based on the available evidence, we consider that the overall effect of expansion at Heathrow on LBHF would be adverse under the most likely scenarios.

2 DETAILED CONSULTATION RESPONSE

This section answers in detail, by those themes relevant to LBHF, the questions posed by the Airports Commission (AC) in its consultation on the final shortlisted options for extra runway capacity in the South-East of England. The headings and questions used by the AC are included in italics. Time limitations have prevented us from investigating the following topics: biodiversity; water & flood risk; place; and environment.

2.1 Noise assessment

A. What conclusions do you draw about the shortlisted options?

4. Minimising and where possible reducing noise impacts

From the information provided so far, it appears that aircraft noise would increase over LBHF under both expansion proposals compared with what would happen if no runway is built, and this is clearly the case under the HH option. Aircraft noise over parts of the borough is already unacceptable for many residents and both proposals would make matters worse in terms of increasing the frequency of flights.

Flights are heavily concentrated over the two approach paths, with an average of 77% of arriving flights flying over the borough. A new runway would therefore increase the annual number of arriving flights over LBHF from about 185,000 (or 506/day) to about 285,000 (or 780/day). Without a change to flight paths, the proposals could increase arrivals to 180,000 for the northern runway under the HH proposal and to around 95,000 for each of three paths under HAL's proposal, which includes a new approach path. This would mean either an excessive increase in frequency on existing routes or additional flight paths over west London, subjecting new communities to serious noise disturbance.

Currently the only respite provided is the system of runway alternation. However, this does not operate in the early morning period from 6am-7am and in any case, many people live between the two approach paths and hear the aircraft on both. In the period before 6am, flights should operate equally from West and East, but it appears that this policy was never properly implemented by NATS and therefore most night flights also arrive over LBHF. As we discuss in the next section, the new opportunities to provide respite are largely speculative and cannot therefore be relied on when assessing the impact of the expansion proposals.

While it is true that aircraft continue to get quieter, and new quieter aircraft will progressively replace older noisier ones, much of the noise benefit is on departure rather than arrival, where the noise of air flowing over the airframe is a major component compared to engine noise. A paper by NATS providing Lmax data reported analysis by the CAA's Environmental Research & Consultancy Department. This showed that at a height of 2,000-3,000ft, a 400 seat 4 engine aircraft (a B744) would emit 77-71dB, compared with 78-72dB for a 500 seat 4 engine aircraft (An A380). This is a very small reduction for LBHF. Therefore it is not possible to rely on fleet replacement to improve the arrivals noise climate to an acceptable level.

Unless and until fewer flights use the current arrivals paths, it is considered that the impact of airport expansion on this borough is unacceptable. 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 benefited, 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 LBHF, around 10 miles from the airport.
- Use of a range of noise metrics in the noise assessment is welcomed, but the role that the sheer number of aircraft movements plays in causing noise impacts may still not properly represented or accounted for. A new noise annoyance study is needed to provide a proper basis for noise impact assessment.
- 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 there is no assurance that a range of impacts, including noise, have been mitigated to an acceptable level.
- Some noise mitigation measures are presented as only being possible if expansion is allowed to proceed. If they are feasible many, if not all, of the measures could be introduced without expansion and provide noise benefits to those communities affected by current operations.

Option (a) One new runway to the northwest (Heathrow's official proposal)

- Of the three main scenarios tested in the noise assessment, the 'minimise total impacts' and 'minimise new impacts' options show parts of LBHF inside the 54dB day-time noise contour, including new areas not currently impacted.
- Although the 'respite' option shows no part of LBHF 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 that are not captured by the contours.
- Even in Heathrow's 'highly mitigated' scenarios, the noise impacts are still considered to be uncertain and unacceptable.
- Expansion is likely to 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.
- We understand from HAL that 95% of people around the airport would have respite for at least 50% of the time under their proposals. However, HAL could not tell us whether any of the 5% who would not, live in LBHF.
- Health impacts of expansion would be significant as assessed by the monetisation assessment which shows that annoyance, heart attacks, hypertension, sleep

disturbance are calculated to cost up to £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.

Option (b) Extending the northern runway to the west (Independent proposal by organisation called Heathrow Hub)

- Of the two main scenarios tested in the noise assessment, the standard expansion scenario and the respite scenario both show that parts of LBHF 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 would reduce the amount of respite from noise that some communities (e.g. those under approach paths for the northern runway) benefit from as there would be increased use of mixed mode.
- Health impacts of expansion would be significant as assessed by the monetisation assessment which shows that annoyance, heart attacks, hypertension, sleep disturbance are calculated to cost up to £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.

B. How could the options be improved?

16. Minimising and where possible reducing 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 noise concentration 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.

More work is needed by the developers to reduce noise impacts in the borough and to assess local noise impacts and the effect of mitigations suggested by the proposers. We have commented above on the fact that the local impacts are both unclear and uncertain, so the first step would be to produce proper local impact assessments. This would have to be done by the proposers, with help from an independent expert such as the CAA.

We also support the need identified by many people for a new noise annoyance study to better understand how the number of flights and the level of noise affects people.

This local assessment and updated noise survey would identify what is needed to mitigate noise locally and to prioritise actions, some of which can be taken even if no new runway is built. It is already clear that some measures would be necessary as part of a serious mitigation programme.

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 whether or not a new runway is built. 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 the airport nor the AC can deliver them.

It would be helpful if any recommendation on a new runway by the AC could be accompanied by a firm recommendation to Government to address the points raised in this section in its National Policy Statement and to review its policies on concentration, such as westerly preference, in particular.

We discuss specific mitigations further below.

- Routing of all flight paths so that no aircraft movements occur over or close to LBHF 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.
- Heathrow should seek to minimise the noise impacts of the airport's operations through the adoption of measures that encourage the use of less noisy aircraft and penalise 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 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 LBHF and a fairer sharing of the noise burden.
- Night flights should not increase. Over time, they should be phased out or there should be a longer curfew.

Option (a) One new runway to the northwest (Heathrow's official proposal)

This expansion option is not supported. The Heathrow expansion option is already presented in a range of "highly mitigated" assessment scenarios, but we still consider that the noise impacts on LBHF are highly uncertain and probably unacceptable.

Option (b) Extending the northern runway to the west (Independent proposal by Heathrow Hub)

This expansion option is not supported. The Heathrow Hub expansion option is already presented with mitigation measures and respite options included (although the latter is not

included for all forecast years) but, despite major uncertainties, it is clear that the noise impacts on LBHF will be unacceptable.

C. Comments on the Airports Commission process

26. Relevant factors omitted

The AC 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 expansion, 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 up to £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 AC notes 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 LBHF 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 AC's assessments.

The AC is also urged to note the findings of the All Party Parliamentary Group on Noise from Heathrow Airport, published on 18 December 2014.

Option (a) One new runway to the northwest (Heathrow's official proposal)

There are some aspects of the promoter's scheme that should have been picked out and highlighted by the AC – 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.

Option (b) Extending the northern runway to the west (Independent proposal by organisation called Heathrow Hub)

The noise scenarios for the Hub option are not consistent with the assessment of the Heathrow Airport option. We would have expected consistency in the AC's assessments of both Heathrow proposals which would have helped to compare their relative impacts.

27. How appraisal of specific modules carried out

We welcome 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”, in general the results are presented throughout the document without appropriate caveats introducing a spurious accuracy to the 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. LBHF-specific information was requested in terms of noise impacts. The AC 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 to wait for more detailed information, thus significantly reducing the time available to review and comment on important aspects of the consultation.

28. Sustainability assessments

One of the aims of the Sustainability Assessment (SA) is to provide robust information on, inter alia, 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.

Option (a) One new runway to the northwest (Heathrow's official 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 AC, compared with the situation in which no runway is built, 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.

Option (b) Extending the northern runway to the west (Independent proposal by organisation called Heathrow Hub)

- 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 AC and would also result in a worse noise climate than today.
- Although the AC 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, we consider that the SA shows this proposal to be unviable.

2.2 Safety assessment

A. What conclusions do you draw about the shortlisted options?

Uncertainty as to how safety considerations would be implemented affects all other assumptions.

B. How could the options be improved?

Uncertainty as to how safety considerations would be implemented affects all other assumptions.

C. Comments on the Airports Commission process

26. Relevant factors omitted

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 LBHF residents, particularly with the large-scale increase in flight numbers that expansion would bring.

Many LBHF 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 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 would 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 would 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. We propose that the chosen developer makes an outline application for a safety licence and the CAA reviews this before the planning application is submitted, so the main parts of the safety case can be properly reviewed before planning permission is granted.

Option (a) One new runway to the northwest (Heathrow's official proposal)

- Safety mitigations would 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 would have to 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.

Option (b) Extending the northern runway to the west (Independent proposal by organisation called Heathrow Hub)

- 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 would also be needed because the new runway is slightly closer to the southern runway than international standards and would be offset.
- The safety of the air traffic control tower would need to be reassessed.
- The risks of ILS localizer interference, location and protection need to be reviewed.
- 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.

2.3 Surface access assessment

A. What conclusions do you draw about the shortlisted options?

3. Accommodating the needs of other users of transport networks, such as commuters, intercity travellers and freight

Option (a) One new runway to the northwest (Heathrow's official proposal) & Option (b) Extending the northern runway to the west (Independent proposal by organisation called Heathrow Hub)

On the evidence provided by the AC, the surface access effects on LBHF would be damaging. The cases from HAL and HH, that their schemes 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 LBHF, is not credible. On the contrary, both schemes look likely to produce serious deterioration in road traffic and conditions on the Piccadilly Line in and through LBHF.

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 either does not assess impacts on LBHF, or draws conclusions which are not apparently based on in-depth local research or modelling.

We have drawn out the following information from the AC and from our Oral Evidence Hearing on the AC's report, which shows the damaging impacts on LBHF:

Road traffic:

Despite the AC forecast of 1,500 extra cars at peak hour from London to Heathrow along the M4/A4 corridor, HAL stated at the LBHF hearing that there will be “no additional traffic” and HH stated there will be “negligible” extra traffic. No modelling has apparently been carried out to support this.

Neither HH nor HAL have detailed analyses 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 planned western rail access and proposed southern rail access routes to Heathrow) to provide an improved public transport offer that 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 change takes time.

Nether 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 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 Traffic

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 AC’s assumption that the infrastructure can meet demand is therefore unfounded.

The AC reports flag up serious overcrowding on sections of the Piccadilly Line. The AC’s “*Volume capacity analysis 2030 Acton Town Earls Court*” already forecasts 342% hourly seated capacity.

For the HH station option, the AC points out that, as the Piccadilly Line will go straight to the terminals rather than to the Hub station for onward transfer, it will continue to be more attractive for passengers from central London. Overcrowding on the Piccadilly line will therefore not be relieved.

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.

B. How could the options be improved?

15. Accommodating the needs of other users of transport networks, such as commuters, intercity travellers and freight

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 Hammersmith as far as surface access issues are concerned. The following would at least ensure the likely impact on LBHF 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 expanded public transport offers 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 the AC's 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 the AC says will continue to give increased traffic from Central London.

A Delivery Authority to coordinate the necessary public transport and road infrastructure projects should be given serious consideration.

2.4 Air quality assessment

A. What conclusions do you draw about the shortlisted options?

5. Improving air quality consistent with EU standards and local planning policy requirements

There are 2 sets of air quality limit values to consider: national mass emissions of Nitrogen Oxides (NO_x) and Particulate Matter (PM), and local air quality requirements. HH asserts that improving air quality and meeting EU standards and local air quality objectives is fundamental and that their scheme is required to comply as the UK is legally bound to meet these objectives. On this we agree.

To take the local air quality issue first, the AC and HAL assert that air pollution's impact on sensitive receptors (people and natural habitat) is increased by its proximity to the receptor - hence road traffic is the dominant emission source resulting from expansion at Heathrow to affect our borough. TfL agrees with this assumption but they add that they would challenge the assertion that airport emissions (from airplane engines, break and tyre wear, Auxiliary Power Units) do not affect air quality outside the airport perimeter.

Many areas in London including LBHF continue to exceed the national air quality standards. LBHF is already an AQMA (Air Quality Management Area). There are 9 monitoring sites across the borough, 25% of which are at high risk of being in breach of these legally binding EULVs (EU limit values).

As FoE stressed at our Oral Evidence Hearing, a small increase in traffic emissions could make the difference between complying and breaching the legally binding EU limits.

We do not agree with the HAL and HH statements to the effect that their proposals will have no or negligible impacts on road traffic and find this approach to be 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 AC 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.
- We take HACAN's comments that population growth as a whole and in West London in particular needs to be factored into the transport models.
- Friends of the Earth take a less optimistic approach and suggest that really the only way to change behaviour is to "force" people out of their cars with financial disincentives.
- TfL also believes that the shift in passenger behaviour predicted 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)”.

According to the AC, Pollution Climate Mapping (PCM) modelling indicates that there is a low to likely risk of the annual Nitrogen Dioxide (NO₂) EULVs being exceeded within the Heathrow study area in 2030. These high risk zones, including the A4 Bath Road and M4 in Hillingdon lead directly into and out of the A4 Great West Road that runs through our borough and beside which are 6 schools and their playgrounds. Therefore it is to be noted that neither the AC nor HAL have conducted detailed analysis of the impact of airport expansion on the A4 in LBHF. 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.”*

We conclude that HAL’s expansion proposal at Heathrow would be likely to result in 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 LBHF main arterial roads such as the A4 and Hammersmith gyratory.

When questioned, HH said that they planned to carry out detailed local dispersion air quality assessments and that they would consider the Great West Road in LBHF as a potential site. However, they couldn’t guarantee that it would be selected for assessment.

The AC has published projected ‘with expansion’ mass emissions figures. We note that these are significantly higher than HAL’s submitted emissions inventory. The AC estimates that by 2050 NO_x would increase by 38%, PM₁₀ by 54.9% and PM_{2.5} by 50%.

According to the AC’s studies, the HAL proposal would not exceed the Gothenburg Protocol targets for NO_x in both 2025 and 2030. However, it is likely that target limits may tighten by 2030 and the airport would not be running at full capacity until 2050. HH did not submit a mass emissions inventory, and on a local level existing monitoring data was analysed instead. The National Atmospheric Emissions Inventory (NAEI) has been used. However, it is advisable that the 2010 London Atmospheric Emissions Inventory (LAEI) should be used in conjunction with the NAEI. The LAEI is more appropriate for the Heathrow area and provides a more detailed emission inventory.

UK PM_{2.5} emissions are expected to exceed the Gothenburg Protocol targets by 2030 with emissions associated with Heathrow airport activity representing 9% of the projected exceedance of the 2020 target (without mitigation). This compares to 4% for the Gatwick scheme. The principal source of PM_{2.5} is aircraft brake and tyre wear and use of Auxiliary Power Units.

We note the recent European Court of Justice’s ruling that the UK must comply with NO_x limit values “as soon as possible”. We think therefore that national mass emissions should be high on the agenda for the AC and need to be fully considered as part of the current assessment work.

The EU is already seeking to fine the Government for exceedances of limit values, therefore any exceedance of either EU or Gothenburg protocol targets is deemed to be

unacceptable. The AC would need to provide full details of any proposed mitigation scheme and quantify the benefits.

Option (a) One new runway to the northwest (Heathrow's official proposal)

HAL admit that air quality in the London context is a serious problem, but assert that although Heathrow-related traffic contributes, other traffic has impacts. We agree with this statement but regard Heathrow's contribution to the problem as significant and therefore it should be monitored, modelled and considered very carefully in the context of the proposed expansion scheme.

HAL's case for mitigating the impact of expansion and improving local air quality (including in LBHF) rests on a modal shift from cars to public transport for airport journeys. They claim that their expansion plan will bring no additional traffic to roads, including the A4 Great West Road (one of the main arterial roads into central London in LBHF) as the public transport infrastructure is set to improve and be upgraded. They suggest that Crossrail, the planned Piccadilly line upgrade and the new HS2 link into Old Oak Common – all of which have the go-ahead (bar HS2 which is considered likely) – and a proposed but as yet unplanned scheme linking Heathrow with south-west London, will motivate and ensure this shift in passenger behaviour.

When questioned at the Oral Evidence Hearing, HAL did not seem to consider national emissions an issue and claimed that PM limits were met. We asked them which mitigation measures they would be putting into practice without expansion and they listed the following measures:

- Landing charges that are already in place to encourage the cleanest fleet will continue
- Airside measures to incentivize cleaner vehicles and vehicle pooling
- New technologies including electric airside charging will continue
- HAL will continue to encourage TfL to invest in cleaner vehicles and work with taxis to reduce “empty” journeys.
- Steeper and curved flight paths

It is to be noted then that the majority of the proposed mitigation measures are already in place and few are reliant on expansion. We actively encourage the continuation of these mitigation measures with or without expansion. We also encourage additional mitigation measures that could be implemented. These are noted in Section B.

HAL have undertaken detailed dispersion modeling and forecasting that the AC has yet to undertake, and these results underpin their claims regarding improved air quality. Bearing in mind their mass emissions inventory is significantly underestimated according to the AC's independent studies, we conclude therefore that it is unhelpful that the AC's comparative data is not yet available and especially concerning that it will only be available after the public consultation process is closed.

Option (b) Extending the northern runway to the west (Independent proposal by Heathrow Hub)

HH's case for mitigating the impact of expansion and improving air quality locally (including in LBHF) rests on a significant modal shift from cars to public transport on airport journeys. They claim that their expansion proposal will bring negligible additional airport traffic to

roads, including the A4 Great West Road. This change in public transport mode share is underpinned by HH's surface access strategy, which they claim increases accessibility and reduces journey times to the airport, making rail an attractive alternative to the car. They allege that the number of interchanges is a determining factor in achieving mode transfer from private cars and taxis to rail, and that their strategy would give the majority of Heathrow passengers direct access to the airport or a maximum of one interchange.

This strategy relies heavily on the existing planned infrastructure upgrades already being implemented, namely Crossrail and the Piccadilly Line upgrades. HH confirm that they would like to see Heathrow served directly from the Great Western mainline but this is not currently a planned infrastructure improvement and therefore not to be included in their surface access strategy. We are particularly concerned as, according to HH, 51% of all surface access routes to Heathrow come from Greater London.

We are also concerned that HH includes "embedded mitigation" as one of their mitigation measures which is proposed to increase the modal shift of passengers travelling by public transport to/from the airport from 38% to 50%. We would need more detailed, modelling and assessment to substantiate this claim. Since being questioned on this at the Oral Evidence Hearing, HH has submitted written evidence to back their assumption. We do not find this evidence conclusive or convincing, as it repeats evidence already processed and received.

It is our conclusion that the HH expansion proposal at Heathrow will result in air quality EULVs being breached in LBHF due to road traffic, and we would require detailed evidence to disprove this.

In order to accept HH's claim of 'negligible additional road traffic' and their commitment to improved air quality as a result we would require further extensive evidence to support the modal shift assumptions being made. We would also require detailed modelling and air quality monitoring on LBHF main arterial roads such as the A4 and Hammersmith gyratory.

In line with the AC's conclusions, the stage 1 air quality assessment for both HAL and HH schemes is currently insufficient. They are considered inadequate for various reasons including:

- Predictions are based on a high-level DEFRA model used for reporting national air pollution statistics to the European Commission which omits many hotspots. Therefore it is not appropriate to determine whether they will exceed national objectives for NO₂ and PM. Sufficient input data to produce a detailed assessment is lacking. An appropriate dynamic traffic model is lacking and the promoters have not submitted detailed traffic modelling.
- Reference to the previous 2008 assessment does not allow sufficiently for uncertainties e.g. range of road traffic scenarios, meteorology and climate change, background air quality and atmospheric chemistry.
- There is a lack of validation/sensitivity testing and therefore no reliable relationship between monitoring projections and modelling predictions.
- There are no modelling/predictions for additional traffic on access routes to Heathrow, e.g. A4/M4, so no way of assessing local traffic impacts in LBHF. The A4/M4 corridor continues to be a major source of poor air quality with serious exceedances.

It is our conclusion that air quality must be given the weighting it deserves in this consultation. It is a basic human right to breathe clean air. Poor air quality can have

devastating effects on people's health and quality of life. 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 2009, 15,479 deaths partially or wholly attributable to alcohol in England in 2010 and 81,700 deaths wholly or partially attributable to smoking in 2010. In London, it is estimated that in 2008 there were 4,267 deaths attributable to long-term exposure to small particles. This figure is based upon an amalgamation of the average loss of life of those affected, of 11.5 years.

B. How could the options be improved?

17. Improving air quality consistent with EU standards and local planning policy requirements

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.

HAL's key commitment in terms of air quality is "no new airport related air traffic". This is a heroic statement and in order to achieve this we believe that the following measures may be needed with or without expansion, to mitigate the impacts of airport traffic/and airport related emissions on air quality at both a local and national level:

- New airport expansion-specific rail 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 introducing a congestion charge for Heathrow traffic; cutting car parking spaces and raising 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 Mayor's 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.

2.5 Carbon emissions assessment

A. What conclusions do you draw about the shortlisted options?

7. Minimising carbon emissions in airport construction and operation

Generally there is little information on carbon emissions relating to construction in the consultation document. The AC has not modelled the effects and impacts in their assessments and neither has HAL. Therefore the immediate conclusion to be drawn is that the information in this area is lacking and more assessment and modelling needs to be commissioned.

Friends of the Earth suggest that we cannot afford expansion in terms of expected increases in carbon emissions. We need to decrease not increase and obviously expansion means an increase in emissions. It is difficult to meet our CO2 objectives and if expansion goes ahead at Heathrow it will mean that expansion elsewhere must be curtailed.

The HH proposal incorporates a tunnel to divert the M25 under the extended runway. Presumably the carbon emissions relating to this infrastructure change should also be factored in.

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.”*

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.

2.6 Quality of life assessment

A. What conclusions do you draw about the shortlisted options?

11. Maintaining and where possible improving the quality of life for local residents and wider population

The AC has tried to understand how airport expansion might affect quality of life and, in the absence of any accepted method, commissioned a new study from consultants, PWC. PWC reviewed existing evidence in relation to a range of measures of well-being with the aim of understanding how these change in areas close to an airport as well as nationally.

Three recognised measures of quality of life are used:

- Desire satisfaction based on inferences from people's actual choices.
- The degree to which people's basic needs are met (e.g. health, literacy).
- People's reported well-being based on mental state.

All three show effects for aviation and the results below are significant for all three:

- Living within a daytime aircraft noise contour (over 55dB) is negatively associated with all subjective well-being measures: the presence of daytime aircraft noise is associated with lower life satisfaction, lower sense of worth, lower happiness; and increased anxiety.
- There is a marginal negative effect on all subjective wellbeing measures for every additional decibel from aircraft noise over the 55dB threshold
- Living within a night time aircraft noise contour is not associated with any statistically significant effect on subjective wellbeing
- Being within a high level aircraft noise contour is negatively associated with happiness and feeling relaxed at a specific time

The report states: "We can be confident that aircraft noise is bad for subjective well-being."

More tentative findings are that (any) employment creation associated with airport expansion is good for subjective wellbeing. The AC has tried to assess the effect on different segments of the population, and we identify LBHF (and other boroughs) in the following extract: "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 report recommends a monetisation method for the Airports Commission to use to assess expansion options. However, the discussion in the sustainability assessment starts with the caveat that the results of the quality of life work should be seen as providing an interesting and useful commentary on impacts, rather than a full assessment. It says that, given the novelty of this method, its suitability is to be determined as a measure and seeks consultees' views on this.

We think it is excellent that the AC has attempted to address quality of life. They have provided evidence to support a negative association between airport noise and quality of life which we endorse. However, it is disappointing that the AC have not followed this work

through, including the assignment of monetary values as recommended. Instead, the sustainability assessment says that the Quality of Life module is a commentary rather than an assessment. We cannot therefore see what the basis for any recommendation is. Our concern is that the AC will rely on subjective judgements and undervalue quality of life considerations.

We were interested to see that the “summary” of the consultants’ report in the sustainability assessment introduces new points, including:

- The negative effect of daytime aircraft noise is greater for people living in social housing. This is an important finding for LBHF residents living in social housing under flight paths.
- The benefits of connectivity for individuals with the opportunity of more flights for leisure purposes, most obviously holidays, and keeping in contact with friends and relatives abroad. There is no mention of the significantly increased fares which might be necessary.

We are doubtful about the following aspects of the Quality of Life sustainability assessment:

- The AC's overall assessment is that locally, the impact with respect to noise alone is expected to be HIGHLY ADVERSE and Local Economy alone to be HIGHLY SUPPORTIVE. However, these two impacts combined, along with all other impacts included locally, leads to an overall impact of NEUTRAL. We do not think it is legitimate to trade very different benefits off against adverse impacts in this simplistic way, which tends to minimise the salience of the issues.
- Similarly it is not clear how the Quality of Life module will be weighted as against other objectives when it comes to “inevitable trade-offs” between modules mentioned at Para 2.16 of the Consultation Document.
- It is not clear what assessment is being given to a range of factors for communities living outside the 5k radius but within the flight path area as there is currently a blank in this part of the table.
- The technical report talks about “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”. There seems to be a close relationship between those and the communities within the flight path area but outside the 5k radius. What work has been done to determine the numbers of people included in this category? There seems likely to be a sizeable number of people who are disproportionately negatively affected, notably by noise, without significant balancing benefits, notably of increased employment, which appear to be small for those outside the 5k radius.
- The cut-off point of the 55dB in the technical paper may reflect 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 an effect on quality of life. We would prefer to see this reflected in the overall Quality of Life assessment.
- 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 these

health effects, such as the association between aircraft noise and cardiovascular disease evidenced in the British Medical Journal (BMJ 2013; 347: f5432), whose study area included LBHF.

12. Reducing or avoiding disproportionate impacts on any social group

Nearly one third of LBHF households (31.1%) rent their home from a social housing landlord, which is higher than the London and England & Wales averages at 24.1% and 17.6% respectively. This is therefore an important segment of borough residents. Greater concentrations of social housing are found in the north of the borough, particularly Shepherds Bush (LBHF Borough Profile 2014).

In our view residents living in social housing in LBHF under flight paths would be disproportionately impacted by Heathrow expansion as follows:

- We mentioned in the Quality of Life section the finding that the negative effect of day time aircraft noise is greater for people living in social housing.
- We mentioned in the Economy section the average incomes of people who fly and the possibility of fares increasing as a consequence of expansion. Residents in social housing will tend to have lower incomes and therefore benefit less from the increased choice of flights and destinations at Heathrow which would result from expansion.
- We mentioned in the Noise section the possibility of new flight paths being created over parts of the borough not currently affected. One such part is Shepherds Bush.
- Against this there is the prospect of a small number of new jobs which we mentioned in the Economy section, but we do not think this compensates for the disadvantages described above.

B. How could the options be improved?

23. Maintaining and where possible improving the quality of life for local residents and wider population

We believe that the quality of life assessment should include monetary values as recommended by the Ac's consultants.

The weighting given to quality of life as against other factors should be made explicit.

2.7 Economy assessment

A. What conclusions do you draw about the shortlisted options?

1. Promoting employment and economic growth in the local area and surrounding region

Option (a) One new runway to the northwest (Heathrow's official proposal) & Option (b) Extending the northern runway to the west (Independent proposal by organisation called Heathrow Hub)

Neither option has independently differing impacts on LBHF. 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 LBHF can harness it, for high tech and service business stimulation in the borough. However LBHF would need to have a firm plan to pull benefits into the borough.

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 LBHF. However, it can be argued that LBHF has sufficient significant inward investment not to be dependent on the economic benefits of Heathrow expansion. Examples include the White City Opportunity Area, which includes an international creative hub for Imperial College, the continued success of Westfield coupled with large developments by St James and Stanhope/BBC, the proposed Old Oak and Park Royal developments and the Earls Court redevelopment.

It is estimated that LBHF needs 13,000 additional homes and 25,000 new jobs by 2032 (LBHF Development Management Local Plan). There could be some marginal benefits from Heathrow expansion in achieving these targets but Friends of the Earth put forward the view that if carbon policies are included in the economic appraisal the benefits are likely to be negative.

HAL has successfully set up an apprentice scheme particularly focussing on the five Boroughs that are closest to the airport and would welcome LBHF involvement. However of the 10,000 new apprenticeships they plan to create, they could not commit to targets for each Borough. According to the Ipsos MORI employment survey of Heathrow in 2013/14, this found 839 employees out of 75,780 airport staff are resident in LBHF, which is 1.11% of the workforce. This means that an expanded Heathrow could benefit LBHF by creating 111 apprenticeships for local people. This would be welcome, but hardly significant in light of the other benefits which are coming from developments within the Borough.

A survey of Heathrow staff in 2008/09 showed that 45.5% of Heathrow staff – 33,483 people live in the five boroughs (Hounslow, Hillingdon, Ealing, Slough and Spelthorne). This is the priority area with LBHF having only 457 employees (0.6%) (Source - Heathrow On-Airport Employment Survey 2008/09).

HACAN made an important point that more passengers terminate in London than any other world city and that it is the city itself which is the hub, not its various transport terminals. The increase in capacity would not be about bringing more people to London, but maintaining Heathrow Airport's position as the leading airport interchange in northern Europe and maximising profits for HAL's owners.

It is our contention that business in LBHF is generated more by local activity than by expanding Heathrow, which itself would generate more business in the immediate vicinity of the airport but will have no significant impact for LBHF.

Air Quality in the business and economic context:

According to West London Business (WLB), there are 3 main factors for businesses relocating to West London:

- Access to international markets.
- Access to skills base.
- Quality of life.

With the above in mind air quality is essential to quality of life and therefore, if congestion on the roads and overcrowding on public transport deteriorates, then so does local air quality and with it quality of life. Many of the people employed by businesses located in West London are also residents and therefore pollution levels and associated air quality will be of concern to them.

WLB has confirmed that it is in favour of expansion at Heathrow, as long as this is within acceptable environmental limits and is sustainable. Our findings on surface access, air quality and carbon emissions show that the promoters have not demonstrated that this is achievable.

Carbon emissions in the business and economic context:

FoE suggested at the oral evidence hearing on 10 December that 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.”*

The implication is that, if the AC includes the cost of carbon in the economic appraisal, the net economic benefits may become negative. It would then be very difficult to justify a new runway at either Heathrow or Gatwick.

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.

2. *Producing positive outcomes for local communities and the local economy from any*

surface access that may be required to support the proposal

Option (a) One new runway to the northwest (Heathrow's official proposal) & Option (b) Extending the northern runway to the west (Independent proposal by organisation called Heathrow Hub)

Airports create low-skilled, low-paid jobs (74% of all direct airport employees). Even though new jobs would be created by either of the expansion options, it appears very unlikely that much, if any, of this new employment would go to borough residents unless LBHF makes strong links with the airport and invests in building appropriate skills in unemployed borough residents. But do we really want a plan to build a low-skilled low-paid workforce in the borough? New rail links (Crossrail, new western and southern access) will make it easier for people to commute to the airport to work from further away. The option of faster access away from Heathrow through these new rail routes may diminish traffic travelling to and through the borough by Underground.

Both Heathrow Hub (HH) and HAL at the 10 December Oral Evidence Hearing confirmed that the new jobs would be paid at least the London Living wage, which is currently £9.15 per hour. We would be more confident of this if HAL signed up as a Living Wage Foundation employer.

The increased choice of flights and destinations which expansion would bring is less likely to benefit residents on low incomes in LBHF, as the average wage for business travellers taking international flights is £77,249 and that for leisure travellers is £53,656 (Source - CAA Passenger Survey Report 2013). Air fares could also rise in the future to help pay for the construction of an expanded Heathrow and operating costs of the airlines.

The predicted increase in London's population to 10 million by 2036, and 850,000 new jobs mostly in the east of London, further suggests that LBHF needs to nurture business to locate in the borough by offering best-in-class office space, communications and facilities.

B. How could the options be improved?

13. Promoting employment and economic growth in the local area and surrounding region

The territory 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 a fact, there seems no statistical validity for this figure of 76%. Whilst it would certainly complicate the study by widening the territorial area, might it not be more rational to study impact on a straight "distance measured" from Heathrow, i.e. a circle centred on Heathrow, with a radius perhaps in the centre of West Berkshire and described through London and the Home Counties? Was this considered?

14. Producing positive outcomes for local communities and the local economy from any surface access that may be required to support the proposal

Page 115 of the Local Economy Impacts Assessment (LEIA) states "The expansion of Heathrow could provide opportunities for unemployed local residents to take up new roles... HAL has also highlighted that they plan to recruit and upskill local workers through programmes such as Heathrow Academy. This being said, any increased employment pressure within the area "may force the airport to consider further schemes in order to gain the workforce they require."

Positive outcomes for local communities will primarily be achieved through employment. The Urban Partnership Group, based in LBHF, understands the challenges of working with low- or no-skilled people and employers to get unemployed people work-ready and support them in the early months and years of employment. Firm commitments must be agreed by all parties to ensure that the maximum positive outcomes can be captured by those members of the community who have, otherwise, the least opportunities to benefit. Particularly we would be talking here about single parents, older people who live alone and those who have been out of the jobs market for a considerable period of time. The LEIA page 115 statement quoted above indicates that employers can opt out of this.

2.8 General Comments

C. Comments on the Airports Commission process

25. How the appraisal was carried out overall

It is not clear how the AC'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 AC makes its recommendations. At the public drop in session on 3 December 2014, we were informed verbally that there are no weightings to be applied and that the (Airports) 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 HAL and HH, that they will continue to submit new information to the AC to support their proposals for expansion. The AC 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 promoters). Yet it would appear that none of this new information will be available for consultees to see, challenge and comment on prior to the AC 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 AC and its recommendations.

29. Business Cases

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 focused 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 a 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. More should be done to ensure there is a positive balance of benefits against costs for particular communities as well as for the proposal as a whole.

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 two are to be considered together in terms of forming a ‘total scheme’ impact assessment. The AC 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 would bring substantial adverse environmental impacts, this does not 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, an expanded Heathrow is forecast to be operating at its capacity of 740,000 movements across all but 1 scenario. In some scenarios, capacity would be 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 AC’s assessment.

D. Other comments

30. 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 AC’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 or not started until the New Year. The AC does not need to report on final recommendations until summer 2015, so there is no need to rush through the consultation process now.

The HFCAE wrote to the AC on 27 November to ask for an extension to the consultation period but this was rejected. We also wrote to the AC on 21 November to request LBHF-specific noise data so we could better understand the potential local impacts of the expansion proposals. We were informed on 15 December that this local information was not available.

The bulk of the 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 the very limited information available in hard copy was provided.

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

Only 1 day was set aside by the AC for its stakeholder event at Heathrow. We received no information about the ticket-only daytime 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 AC 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 HFCAE 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 48 hours beforehand and the postcode for the hotel venue was wrong. The AC 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 AC 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 AC 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 AC has been distributed to the areas that could potentially be impacted by the expansion options under consideration. Residents have been, however, receiving numerous flyers, leaflets etc. from the Heathrow-funded "Back Heathrow" campaign on the 3rd runway proposals. (A smaller number of households received pro Gatwick expansion leaflets). 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 Hammersmith & Fulham Council. 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.

ANNEX 1: RESIDENTS' VIEWS

The evidence we have about residents' views on Heathrow expansion is largely qualitative in nature. Comments by residents on the initial website news page (see 'A' below), and subsequently responses to the call for written evidence (see 'B' and 'C' below), have enabled us to identify the salient issues.

While these also show a majority against Heathrow expansion, we cannot draw firm conclusions about the overall weight of resident opinion that will be consistent with what we have said elsewhere. We had neither the time nor the resources to commission a quantitative survey; however, it is worth noting the results of the 2008 Council consultation exercise about the most recent previous proposal for a new runway at Heathrow.

Out of a total of 4,039 responses, an overwhelming majority of 3,765 respondents (93%) objected to further expansion at Heathrow, with just 227 (6%) being in favour. The remaining 1% expressed no clear opinion. The main reason people objected at that time to further expansion was the increase in noise impacts - 3,688 people highlighted noise as a concern. Almost as many people (3,507) also rated increased air pollution as a reason for their opposition. Strain on the roads and Underground was of concern for 2,998 people. The majority of respondents were concerned about all of these issues and many also expressed concern about other impacts including: nightflights; climate change and safety issues. We believe these results and the issues raised are still broadly relevant.

HAL commissioned market research by Populus Ltd for its own purposes, including ascertaining which arguments in favour of expansion play best with the public. Six out of seven members of HFCAE believe that we cannot rely on the results as objective evidence since the questionnaire appears to have been designed to influence respondents in favour of expansion and to engender doubts about the position taken on the question by respondents' elected representatives³.

An important factor at work is the information environment over the timescale of the AC. The AC's public consultation has been poorly publicised, and LBHF is not included in the target boroughs, who were invited to the "Heathrow Public Discussion" event on 3 December. We found a lack of awareness that this consultation was taking place, although we were assured by officials at the "Heathrow Public Drop-in" evening event on 3 December that the consultation was for the general public and not a technical consultation. Despite this assurance, we consider this to be the most technically complex consultation ever undertaken on airport expansion, which we fear has discouraged people from checking proposals and considering the potential impacts for their quality of life.

During the same period, and into a virtual information vacuum, "Back Heathrow" – funded by Heathrow – has undertaken a regular and comprehensive direct mail and local press campaign, presenting arguments exclusively for expansion. As far as we know, this was

³ Isobel Hill-Smith believes that a poll commissioned by HAL from Populus is also relevant as an indicator of local attitudes. We were provided with information for the parliamentary constituency of Hammersmith, stating that 45% of people said they supported the proposal to expand Heathrow, while 30% of people were opposed and 25% were neutral. The poll is a snapshot of opinion, taken between July and September 2014 (<http://www.populus.co.uk/Poll/3395/>). The picture is more even when looking at strong views. 23% strongly supported, 20% strongly opposed and 56% of people were neutral or had mild views. This suggests that there is both significant support as well as significant opposition to a new runway. However, Heathrow affects Fulham much more than Hammersmith, as it lies under the two westerly approach paths. Fulham is part of a different parliamentary constituency that was not included in the poll. Therefore the Hammersmith evidence is unlikely to be representative of LBHF as a whole.

the main source of information on the expansion debate that residents received during the AC's consultation. (A smaller number of households received pro Gatwick expansion leaflets). "Back Heathrow" has failed to provide precise details of the numbers of borough households targeted.

None of the organisations campaigning against Heathrow expansion has had a fraction of the resources to achieve this sort of coverage – or indeed any mailshots at all apart from the newsletters regularly sent to members of established organisations such as HACAN and Friends of the Earth. Consequently, it feels as if the consultation and the accompanying "debate" on expansion have been weighted in favour of the pro-expansion lobby.

A: www.lbhf.gov.uk – “Have Your Say on Heathrow” – Analysis of Comments

Total of comments – 186

Against Heathrow expansion – **101** (or 54.3%)

For Heathrow expansion – **59** (or 31.7%)

Neutral or incidental comments – **26** (or 14.0%)

Thematic analysis

Where comments have more than one theme, these have all been recorded.

• **Against:**

Pollution - noise (including effects on sleep)	70
Expand Gatwick instead	18
Build new airport e.g. "Boris Island" instead	18
Airport in densely-populated area	15
Security/safety risk	13
Expand elsewhere instead/balanced regional development	12
Detrimental to health/quality of life	8
Pollution - general	6
Pollution - air quality	6
Inadequate road capacity	3
Inadequate public transport capacity	2
Detrimental to house prices	2
Carbon emissions	2
Wrong reasons for expansion	1
Deliver expanded capacity by other means, e.g. HS2	1

• **For:**

Good for the economy/jobs/competitiveness	25
Noise not an issue/planes becoming quieter	16
Added travelling convenience	7
SE England needs hub airport	6
Objectors are NIMBYs/incomers	6
Environmental safeguards/mitigation must be incorporated	5
More capacity required at Heathrow	5
Depend on Heathrow for livelihood	3
Insulation for homes must be provided	3
Increases attractiveness of borough	2
Lack of suitable capacity/infrastructure elsewhere	2
Benefits outweigh negatives	2
Night flights should not be allowed	1

- **Neutral/incidental comments:**

Noise is a problem from Heathrow	4
Capacity issues solved by moving short-haul flights elsewhere	3
Capacity issues solved by investing in high-speed rail network	3
Capacity issues solved by better slot management	2
Heathrow not run for benefit of UK/London	2
Review westerly preference to reduce noise issue	2
Why should convenience take precedence over quality of life?	2
Noise not an issue/can be reduced by using quieter planes	2
Security/safety risk	1
Heathrow most accessible airport from LBHF	1
New hub airport should be served by HS2	1
A third runway would increase noise in Hammersmith	1
Landing taxes should be given to boroughs as compensation	1
Ban night-time flying	1
NIMBYs should move somewhere quieter	1
Heathrow major asset for west London	1
Expand Doncaster Airport instead due to better transport links	1
What plans does Heathrow have to improve public transport?	1

B: Call for written evidence – Thematic analysis of residents’ written submissions

Total submissions – 113

Against Heathrow expansion – **65** (or 57.5%)

For Heathrow expansion – **41** (or 36.3%)

[For Heathrow Hub specifically – 6 (or 5.3%)]

[For HAL specifically – 1 (or 0.9%)]

Neutral or incidental comments – **6** (or 5.3%)

Not in scope – 1 (or 0.9%)

Individual submissions - 107

Group/organisation submissions - 6

Friends of Margravine Cemetery (113 members)

Hammersmith Society (2,000 members including affiliated associations)

Margravine Gardens and St Dunstons Road Residents Association (200)

Piper Residents’ Association (75)

Peterborough Road & Area Residents' Association

Ravenscourt Action Group

Thematic analysis

Where submissions have more than one theme, these have all been recorded.

• Against:

Pollution - noise (including effects on sleep)	41
More traffic/inadequate road capacity	18
Flights start too early/finish too late	17
Increase in number of flights/aircraft movements	14
Detrimental to health/quality of life	12
Expand Gatwick instead	10
Inadequate public transport capacity	10
Security/safety risk	9
Airport in densely-populated area	8
Pollution – general	8
Pollution - air quality	7
Alter landing patterns/remove westerly preference	6
Build new airport e.g. "Boris Island" instead	4
Expand elsewhere instead/balanced regional development	4
Wrong reasons for expansion	2
Deliver expanded capacity by other means, e.g. HS2	2
No additional benefit to economy from extra hub traffic	1
No compensation for overflying	1
Carbon emissions/climate change	1
Contrary to London Plan	1
Disruption and destruction required for expansion	1

- **For:**

Good for the economy/jobs/competitiveness	20
Noise not an issue/planes becoming quieter	14
Added travelling convenience	12
More capacity required at Heathrow	6
London needs a hub airport	6
Lack of suitable capacity/infrastructure elsewhere	5
Expansion requires limits on pollution	3
Increases attractiveness of borough	3
In the national interest	2
Investment in transport networks required	2
Supply chain dependence on existing set-up	2
Environmental safeguards/mitigation must be incorporated	1
Reduce noise through changing angle of approach	1
Depend on Heathrow for livelihood	1
Clarity required on future of airspace utilisation	1
Benefits outweigh negatives	1
Night flights should not be allowed	1

- **For Heathrow Hub specifically:**

Minimises cost of airport expansion	3
Protects economic competitiveness	2
Makes most of existing transport infrastructure	2
Avoids significant expansion of noise footprint	2
Least disruptive of all three options	2
Allows early-morning noise mitigation	2

- **Neutral/incidental comments:**

Noise is a problem from Heathrow	1
Demand for air travel steadily increasing	1
Regional economy benefits by Heathrow's presence	1
Current plans for one additional runway too short-term/simplistic	1
Stacking of planes will increase with expansion	1
Why should convenience take precedence over quality of life?	1
Helicopter flights should be banned over west London	1

C: Call for written evidence – publicity poster



The poster features a background of a satellite map of Heathrow Airport with several airplane silhouettes flying over it. The text is centered and reads: "Have your say on Heathrow Airport expansion". Below this, it states: "The resident-led H&F Commission is looking into the local impact of proposals to expand Heathrow. If you live in Hammersmith & Fulham and have views on a possible third runway, you can write in and have your say." It then provides contact information: "Written evidence should be sent to the Commission c/o Tom Conniffe by email to Tom.Conniffe@lbhf.gov.uk or by post to Room 39, Hammersmith Town Hall, King Street, London W6 9JU." Finally, it says: "Please make sure you include your name and address in order for your evidence to be considered. The deadline is 13 December." In the top right corner, there is a logo for "h&f hammersmith & fulham" with the text "Supported by" above it.

Supported by

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Have your say on Heathrow Airport expansion

The resident-led H&F Commission is looking into the local impact of proposals to expand Heathrow. If you live in Hammersmith & Fulham and have views on a possible third runway, you can write in and have your say.

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The deadline is 13 December.

ANNEX 2: LBHF COMMISSION PROCESS, MEMBERSHIP AND CHRONOLOGY

This annex sets out the process by which the LBHF Commission on Airport Expansion (HFCAE) was established, went about its work and reported.

4 November 2014: Launch of the LBHF Commission (HFCAE)

A group of LBHF residents formed a local commission, the LBHF Commission on Airport Expansion (HFCAE), to assess the impact on LBHF 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. This was launched on 11 November 2014 with a deadline for responses of 3 February 2015. The Council provided support, under the aegis of the Community Safety, Environment and Residents' Services Policy and Accountability Committee (CSERS PAC), with terms of reference and a secretariat comprised of three Council officers.

A long-standing resident of the borough, Christina Smyth, agreed to chair the HFCAE. The Chair identified, through stakeholder consultation, six other long-term residents of LBHF, active in community affairs, with particular areas of knowledge and skills germane to the task. The HFCAE members are:

- *Christina Smyth (Chair)*

Christina has lived in the borough for 32 years. Formerly a senior civil servant, she now works with a charity supporting West London families in need. She has chaired the Safer Neighbourhood Police Panel for Hammersmith Broadway Ward, served on the Brackenbury Residents' Association Committee and sings with the Addison Singers.

- *Stephen Claypole*

Stephen is Chair of the Hammersmith Mall Residents' Association (HAMRA). He is a former senior editor of BBC News and Current Affairs and is currently President of the international TV production company DMA-Media Ltd.

- *Natasha Gabb*

Natasha is a member of HAMRA. She has lived in the borough since 1998, working as a project manager in the construction industry, and is now occupied as a mother of a young family.

- *Isobel Hill-Smith*

Isobel is Honorary Treasurer of The Fulham Society and has lived in Fulham for 31 years. She retired recently from British Airways, where she worked on a range of government policy and regulatory matters.

- *Andy Sharpe*

Andy is Secretary of the Wormholt and White City Neighbourhood Forum. He has been a local resident for 24 years and works for a local regeneration agency based in the borough.

- *Victoria Timberlake*

Victoria is a member of the Board of Representatives of HAMRA and edits its newsletter. She has lived in the borough for 30 years.

- *Melanie Whitlock*

Melanie is past Chair of the Hammersmith Society and has lived in Hammersmith for 35 years.

HFCAE was supported by the following Council officials, with the understanding that the resident members were independent of the Council and any other Council officers who were subsequently invited to give advice:

- Tom Conniffe, Principal Policy & Strategy Officer – Clerk to the Commission
- Paul Baker, Senior Environment Policy & Projects Officer
- Dan Hodges, Communications Officer

Five stages were identified to the evidential examination process, which were designed to answer the questions set by AC in its consultation. These stages were:

- review of all existing written evidence
- call for further written evidence
- oral evidence hearing
- discussion of findings with CSERS PAC
- submission and publication of findings

HFCAE worked to a deadline of 31 December 2014 to produce a near-final draft for discussion at the January 2015 meeting of the Council's CSERS PAC. This allowed sufficient time to inform the Council's own submission to the AC consultation and to refine the HFCAE report in time to meet the AC's 3 February 2015 deadline. The Council allocated a budget of £7,250 to cover staff resources and other sundry overheads.

11 November 2014: HFCAE Meeting 1

Due to time constraints, HFCAE decided to focus on the following seven topics of major interest to residents within the Appraisal and Consultation Framework: noise; safety; traffic and public transport congestion; air quality; carbon emissions; economy; and quality of life. HFCAE judged that items including biodiversity, water and flood risks, while important, were less relevant to our borough, as was the AC's third final shortlisted proposal for a second runway at Gatwick. The Council published a news page on HFCAE and its work, including a mechanism for resident views on the potential Heathrow expansion. It also started using its Twitter account to publicise HFCAE's call for evidence.

18 November: HFCAE Meeting 2

A video was added to the news page on the Council website, which strongly encouraged people to respond with their views. In order for written evidence to be considered, a name and address were required of both email and hard copy responses. A downloadable and printable publicity poster was also included. (See Annex 1)

It was agreed to send letters calling for written evidence to the Council's list of 250 residents' associations, civic societies and community groups, along with a copy of the poster shown in Annex 1. A deadline of 13 December 2014 was set for responses.

- **Expert Evidence**

Five of the major topics HFCAE identified were allocated to individual members of the committee, who in turn 'paired up' where necessary with relevant experts from within the Council. Members were to review evidence from the report, examine other expert evidence, consult with the relevant experts and, as a Commission, issue letters to nominated organisations calling for their evidence of impacts on the borough of the two shortlisted Heathrow-based options.

- Surface access: Melanie Whitlock – with Chris Bainbridge, LBHF Head of Transport Policy and Network Management
- Air Quality: Natasha Gabb – with Dr Davene Chatter-Singh, LBHF Environmental Quality Officer
- Local Economy: Andy Sharpe – with Kim Dero, LBHF Head of Economic Development, Learning and Skills
- Noise and safety: Isobel Hill Smith – with Paul Baker, LBHF Senior Environmental Policy and Projects Officer
- Quality of Life: Christina Smyth

- **Oral Evidence Hearing**

HFCAE invited the following witnesses to the oral evidence hearing on 10 December: Heathrow Airports Limited, Heathrow Hub, HACAN, West London Friends of the Earth, West London Business, TfL, LBHF Chamber of Commerce and the CAA. Draft letters inviting each organisation were circulated to and approved by HFCAE members.

21 November - Letters issued to expert witnesses with a 3 December deadline for supporting information to be submitted.

21 November - Letters issued to residents' associations, civic societies and community groups with a 13 December deadline for responses.

26 November: HFCAE Meeting 3

The AC's 3 December "Heathrow Public Discussion" event was raised, along with the fact that no invitations had been sent to LBHF Council or its representatives. This was checked afterwards and no invitations had been received.

Andy Sharpe drafted a letter to the AC, outlining shortcomings of consultation and communications, including inadequacy of consultation period and lack of high-level air quality modelling preventing the Airports Commission from examining the issue robustly.

1 December - Christina Smyth sent above letter.

1 December – HFCAE members circulated topic papers to other committee members.

3 December 2014: HFCAE Meeting 4

HFCAE members reviewed topic evidence and shared their questions covering areas and issues for which further clarification was required. HFCAE sent these to the secretariat by 6 December for collation and circulation.

Posters calling for written evidence were circulated to all libraries in the borough as well as posted by the Town Hall entrance.

Christina Smyth attended the AC's "Heathrow Public Drop-in" evening session with just a

handful of other members of public in attendance. In a room with capacity for 400 she raised the following concerns with the large number of officials in attendance.

- 1 There was to be no overt weighting of modules for airport expansion.
- 2 The AC report was judged to be 'transparent' even though the air quality model was incomplete and final statistics would be published *after* the response deadline.
- 3 The Populus survey was deemed accurate and sufficient even though the Commissioner responding to her query had not seen the interview script.

9 December: HFCAE Meeting 5

HFCAE finalised details of oral evidence hearing and questions.

10 December: HFCAE Meeting 6 - Oral evidence hearing

The oral evidence hearing started at 9.30am sharp (see the attached timetable). Witnesses were questioned by HFCAE members and asked to submit further information for clarification as required.

13 December - Deadline of receipt of residents' views direct or via local organisations.

15 December – HFCAE members submitted revised evidence papers plus completed entries for relevant sections of the Airports Commission's Appraisal Framework.

18 December – Chair circulated draft 1 of Executive Summary

Secretariat circulated draft 1 of detailed report and thematic analysis.

30 December - Commission members circulate comments on Draft 1

31 December - Chair and Secretariat prepare draft 2 for PAC

31 December - Draft 2 submitted to PAC Secretariat

7 January 2015: HFCAE Meeting 7

Briefing for HAL meeting with members of Council

13 January - Draft 2 before CSERS PAC and HAL meeting with members of Council

Weekly meetings scheduled throughout remainder of January.

30 January - Final report signed off by HFCAE and submitted to Airports Commission for their 3 February 2015 deadline.

D: Oral evidence hearing timetable

Hammersmith & Fulham Commission on Airport Expansion

Oral Evidence Hearing

10 December 2014 – Small Hall, Hammersmith Town Hall

Timetable

0930-1030	Heathrow Airport Ltd
1030-1035	Summation
1035-1135	Heathrow Hub
1135-1140	Summation
1140-1155	Break
1155-1235	HACAN
1235-1240	Summation
1240-1320	LBHF Friends of the Earth
1320-1325	Summation
1325-1400	Lunch
1400-1440	West London Business
1440-1445	Summation
1445-1545	Transport for London
1545-1550	Summation
1550-1605	Break
1605-1645	Deliberations
1700	Room handover