

HILLINGDON'S RESPONSE TO THE AIRPORTS COMMISSION CONSULTATION: APPRAISAL OF SHORT-LISTED AIRPORT EXPANSION OPTIONS

Cabinet Member(s)	Councillor Ray Puddifoot MBE Councillor Keith Burrows
Cabinet Portfolio(s)	Leader of the Council Planning, Transportation and Recycling
Officer Contact(s)	Jales Tippell, Residents Services
Papers with report	Appendix 1 - Hillingdon's response to the Airports Commission's consultation on its appraisal of short listed airport expansion options that was published in November 2014 . Appendix 2 - 'Equity Focused Review Report of the Airports Commission's Community Health Relevant Assessments' by Public Health by Design published in January 2015 (to follow and to be circulated separately).

1. HEADLINE INFORMATION

Summary	This report provides information to the Cabinet on the Airports Commissions' consultation on its appraisal of short listed airport expansion options and seeks approval for the Council's response to the consultation.
Contribution to our plans and strategies	Putting our Residents First: <i>Our People; Our Built Environment; Our Natural Environment</i> Hillingdon's Local Development Framework: Core Strategy; Sustainable Community Strategy
Financial Cost	None directly from this report.
Relevant Policy Overview Committee	Residents' and Environmental Services
Ward(s) affected	All wards

2. RECOMMENDATIONS

That the Cabinet:

- 1) Notes the content of this report.**
- 2) Agrees the Council's response to the consultation as set out in Appendix 1 for submission to the Airports Commission by 3rd February 2015;**
- 3) Agrees that the 'Equity Focused Review Report of the Airports Commission's Community Health Relevant Assessments' by Public Health by Design be submitted to the Airports Commission by 3rd February 2015; *(to follow)***
- 4) Delegates authority to the Deputy Chief Executive and Corporate Director of Residents Services, in consultation with the Leader of the Council and the Cabinet Member for Planning, Transportation and Recycling, to:
 - a) make any minor technical changes required to the Council's response before submission; and/or**
 - b) make any changes required in the event of new information or evidence that may be received supporting the Council's case before submission.****
- 5) Instructs officers to continue to respond to consultations on the future of aviation strategy and potential airport expansion, including joint working with the 2M group and other relevant technical groupings.**

Reasons for recommendation

The consultation presents a detailed analysis of the proposals that were shortlisted by the Airports Commission in 2013, namely the two options for expansion at Heathrow Airport and one proposal for expansion at Gatwick Airport. The analysis looks across a comprehensive range of subjects, looking at the benefits and adverse impacts of each proposal. This includes analysis of the cost of each proposal, the effect on communities of noise, property loss and construction, and the economic benefits and environmental impacts. It invites public comment on the Commission's detailed consideration of each proposal.

The Commission insists that no decision has been made over the best option, i.e. it has not taken a view on which proposal strikes the most effective balance between the assessment criteria. Instead it provides an opportunity for the evidence to be examined, challenged and improved. The responses received to this consultation will directly inform the Commission's recommendation to the Government when it publishes its final report in the summer of 2015.

By responding to this consultation, the Council is adhering to its commitment to continue to lobby against any capacity increases at Heathrow and to maintain pressure on the relevant bodies to ensure that there are appropriate environmental constraints on aviation in place to bring about improvements in noise, air quality and public transport for Hillingdon residents. The consultation response is an opportunity to reaffirm the Council's position of no expansion at Heathrow and to ensure that the Commission is aware of the adverse impacts

on local communities which will result from any such proposals for expansion at Heathrow airport.

Alternative options considered / risk management

The Cabinet may influence the proposals by:

- 1 Agreeing to the proposed response in full, or in part, or;
- 2 Making any amendments to the response considered appropriate, or
- 3 Alternatively the Cabinet may choose to make no response to this consultation. This option would not allow the Council any opportunity to influence the final recommendation for the location of future airport expansion.

Policy Overview Committee comments

None at this stage.

3. INFORMATION

Background

1 On the 7th September 2012, the Coalition Government announced the creation of an independent Airports Commission (the Commission) to identify and recommend to government options for maintaining the UK's status as an international hub for aviation.

2 The Commission, chaired by Sir Howard Davies, was tasked with producing an Interim Report by the end of 2013 and a final report by summer 2015. The Interim Report was published in December 2013 and set out recommendations for immediate actions to improve the use of existing runway capacity. Following submissions by airport expansion proposers, the Interim Report went on to identify two potential sites for further analysis and assessment in order to respond to future increased runway capacity. One proposal was for expansion at Gatwick, the other was for expansion at Heathrow looking at two different runway expansion concepts. The Thames Estuary option (the Isle of Grain proposal) was identified as requiring further analysis to assess whether it should be added to the shortlist, but it was subsequently ruled out as an option in September 2014.

3 The Council submitted documents to the Airports Commission in relation to the calls for evidence on noise, utilisation of existing capacity and delivering new runway capacity. In addition, as a key member of the 2M group of local authorities, the Council has submitted responses directly to the Airports Commission on the short and medium term options identified by the Commission for implementation and in terms of the Commissions' choices of location for long term increases in runway capacity. All such responses have consistently raised the concerns of adverse impacts of any proposals to increase capacity at Heathrow airport on local residents. In addition, the Council has participated in responses from expert groupings such as Strategic Aviation Special Interest Group (SASIG) and the Local Authorities Aircraft Noise Council (LAANC).

The Airports Commission's consultation on its appraisal of short listed airport expansion options

4 The current consultation sets out the Commission's detailed analysis of those proposals that it shortlisted in 2013, namely the two options for expansion at Heathrow

Airport and one proposal at Gatwick Airport. It appraises each short-listed option against five potentially different future aviation scenarios, i.e. assessment of need; global growth; relative decline of Europe by increased strength of far and middle-eastern hubs; low cost is king; and global fragmentation. In addition two separate future carbon scenarios are appraised, i.e. carbon traded and carbon capped.

5 The appraisal looks across a number of different topics, looking at the benefits and impacts against each proposal. This includes analysis of the cost of each proposal; the effect on communities of noise, property loss and construction; and the economic benefits and environmental impacts.

6 The consultation is based upon a substantial suite of documents including an overarching consultation document, a sustainability assessment and business case report for each of the three schemes, plus a series of 16 detailed technical reports. The performance of each scheme on each of the assessment criteria is measured in relation to the baseline "do minimum" case in terms of the following 5 levels:

- **Highly supportive** - positive impacts are substantial, or substantially accelerate an improving trend, or substantially decelerate a declining trend;
- **Supportive** - positive impacts are notable, or accelerate an improving trend, or decelerate a declining trend;
- **Neutral** - no impacts or on balance, a neutral outcome occurs;
- **Adverse** - negative impacts are notable, or decelerate an improving trend, or accelerate a declining trend;
- **Highly adverse** - negative impacts are substantial, or substantially decelerate an improving trend, or substantially accelerate a declining trend.

7 The consultation, which ends on 3rd February 2015, poses 8 consultation questions grouped under four major headings:

- Views and conclusions in respect of the 3 shortlisted options
- Questions on the Commission's appraisal and overall approach
- Comments on specific areas of the Commission's appraisal
- Any other comments

Hillingdon's consultation response

8 Expansion at Heathrow was ruled out by the Coalition Government in 2010 after considering the merits and demerits of the evidence. This was confirmed in a speech by Theresa Villiers:

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

9 It is very disappointing that of the three short-listed options for the future of UK aviation, two out of these three are at Heathrow. Nothing has changed since 2010 to now make this a suitable location for expansion. Both Heathrow options will still require the demolition of communities, compromise health-based levels of air quality, and cause

widespread adverse impacts of aircraft noise pollution across more people than all of the other European hub airports put together.

10 The Council's response focuses on where it believes the Airports Commission has failed to adequately take into account the community impacts arising from either of the options to expand at Heathrow Airport. Whilst the majority of community impacts in Hillingdon arise from the Heathrow Airport Limited (HAL) option for the North West Runway, the extended northern runway (Heathrow Hub) option also brings adverse environmental and community impacts. Neither expansion option can therefore be supported due to the detrimental impacts on the surrounding communities.

11 Details of the consultation questions and the full proposed Council responses are set out in Appendix 1. The Council have a number of significant issues which are summarised below.

Airports Commission consultation documentation

12 The wealth of information provided with this consultation is testament to how much work has been undertaken by the Commission. A business case and sustainability appraisal has been provided for each option and this is accompanied by 16 detailed technical reports, which in some cases such as the noise appraisal, run to over 600 pages. The addition of modules such as Quality of Life is a welcome addition and represents the first time this approach has been used when looking at expansion at Heathrow.

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

Failure to address the current situation around Heathrow

14 The starting point of the appraisal process should have been to properly assess the current situation around Heathrow, in terms of adverse environmental impacts, before recommending mitigation for adding further adverse impacts by expansion. This has not been addressed in the consultation and is a significant flaw in the process.

15 Mitigation measures for reducing noise, achieving air quality compliance and improving public transport access are only coupled with the option to expand at Heathrow. Local communities deserve the implementation of these measures now. Not to do so shows a distinct lack of respect and lack of responsibility for the detrimental impacts currently brought upon communities by the operation of the current airport.

16 Not including an appraisal of the existing situation experienced by local communities, provides a false baseline for the comparison of locations and options. It also assumes that all is currently acceptable and mitigation measures, such as they are, are effective. This is not the case.

Strategic case for Heathrow expansion not sound

17 The separate locations for expansion i.e. Gatwick and Heathrow, both provide substantial economic benefits; they both provide future aviation connectivity in terms of passenger numbers and destinations served, including to the emerging markets; and they both provide jobs to the surrounding areas. The Council firmly believes recommending an option to expand at a location which knowingly inflicts the largest damage to local communities should not be supported.

No guarantee of operational resilience

18 The current Heathrow two runway airport operates at a capacity level which provides no operational resilience. There is no evidence to suggest that a 3rd runway will solve this. Gatwick airport, at present, has only one runway which gives it no operational resilience in the event of circumstances such as poor weather conditions, debris on the runway, and other such situations outside of the control of the operator. It is unclear how the Commission will appraise this issue.

Missing information

19 The Airports Commission has not factored in sufficient time to ensure that all the necessary assessments were completed prior to consultation. This includes vital information in relation to local impacts:

- No detailed air quality assessments;
- No assessment of the impacts on local roads;
- No assessment of the impact of the proposed increases in freight;
- No details of proposed flight-paths;
- No details of appropriate controls which will ensure mitigation of the adverse impacts.

Without this level of information communities, and those who represent them, cannot give a proper considered response to this consultation.

20 The Commission should publish how it intends to provide the missing information and how it intends to ensure that this is made publicly available for comment prior to any final recommendation on the option for expansion. Failure to do so does not represent an open and transparent process and neither does it allow the opportunity for stakeholder engagement on key information which relates directly to them prior to any final decision being taken.

Inadequate Appraisal Process

a) No information on trade-off issues between modules

21 The Commission refers to the need to trade off the results from different modules. As an example, nationally there may be positive impacts yet locally there may be highly adverse impacts. There is no information or methodology in terms as to how the Airports Commission will determine the trade-off between the outcomes of the different appraisal modules. This does not represent an open transparent process.

22 The impacts on the local communities are represented in several of the appraisal modules including the specific modules of Community and Quality of Life. It is not proven

that community impacts considered as positive in terms of local employment in one appraisal module and community impacts considered as negative in terms of the appraisal of the noise module or loss of residential housing in another can be traded off against each other in terms of appraisal of impacts. The Council considers this to be a flaw in the approach to the appraisal of community impacts.

23 It is also unclear what weighting is to be put upon the difference in the magnitude of the impacts. For example, the two options to expand at Heathrow airport expose over 25 times more people to aviation noise than expansion at Gatwick. The appraisal describes both these impacts as adverse. This approach is not supported

b) No assessment of the benefits from no expansion

24 The Commission has presented little detailed analysis in the appraisal process in terms of identifying and costing the community benefits that would occur from no expansion. There would be benefits accrued to the local communities over time from the use of less noisy planes and proposed future operating procedures; more chance of securing the health benefits associated with meeting air quality limits; no loss of current valued open space or loss of established communities.

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

c) Inadequate appraisal of proposed mitigation

26 The Council does not that consider it is acceptable to take the proposers offers of mitigation and compensation and assume they will a) work, b) be implemented in reality and c) acceptable to the population impacted. Given the close proximity of the Heathrow expansion options to substantial numbers of people this deserves more scrutiny. To assume the mitigation will work and remove the negative impacts fully, without any proof behind the assumption, provides an ill-informed true comparison of the impact of the different options.

d) No cumulative assessment

27 There has been no proper cumulative appraisal of all the impacts arising from the short listed options. This is not an acceptable environmental assessment approach.

e) Failure to demonstrate economic benefits for the local community

28 The local communities who are adversely impacted should receive the greatest benefits from any claimed economic benefits of any aviation expansion proposals. The Commission should consider how such measures could be put in place. This has not been addressed in the consultation.

f) Health

29 The existing health burden of the area surrounding Heathrow is already distinctly disadvantaged and these people are all at further risk from the adverse health impacts associated with increased noise and pollution from an expanded Heathrow.

30 Whilst the quality of life appraisal module is a welcome addition, it does not adequately cover aspects such as health which is an important omission. The Commission's appraisal that the negative impacts and positive impacts can be simply combined to give an overall appraisal of neutral is not supported.

31 The Council commissioned an independent critique on the Commission's approach to health. The resulting report, 'Equity Focused Review Report of the Airports Commission's Community Health Relevant Assessments' by Public Health by Design, confirms the Council view that the distributional impacts and health equity/inequality issues have not been appropriately considered. Health Impact Assessments of each short listed option on the health of the surrounding communities should have been part of the appraisal process. This report will be sent to the Airport Commission and forms an integral part of the Council's consultation response.

g) Community

32 The direct community impacts in Hillingdon result from the Heathrow North West runway option which includes demolition of around 1,000 properties in the Borough and leaves large parts of the remaining communities of Harmondsworth and Sipson up against the new airport boundary. In addition, there is a loss of valued recreation land, open space and employment land.

33 With no plan for where people will be re-housed or where lost facilities will be relocated and no detailed evaluation as to whether the compensation offered is sufficient, the Council considers that this should remain a highly adverse impact.

34 The total loss of Longford would be very significant in terms of heritage loss and there is no mitigation possible which would reduce the impact from one of being significantly adverse. The impact on the remnant of Harmondsworth would be so severe in terms of loss of tranquillity and removal of its historic hinterland that it may not be sustainable in the longer term. The appraisal result which assumes reduction from significantly adverse impact to adverse is not supported.

h) Housing and infrastructure implications

35 Both the Heathrow expansion options have substantial negative impacts in terms of the loss of residential housing and community facilities, which will all require to be re-provided. There has been no proper assessment of the costs and the widespread implications of having to find land on the scale needed for the predicted employment growth. A recommendation to expand at Heathrow without properly identifying the solution to this problem is not acceptable.

36 No account has been taken of the potential negative impacts associated with expansion in an area which is already economically buoyant. An account of the implications and associated costs of overheating the local economy should be considered prior to any final recommendation on location.

i) Surface access

37 The Commission's transport assessment only looks at the surface access impacts of 103.6 million passengers at Heathrow in 2030. No assessment has been done for the 149

million passengers the Commission estimate to be the maximum potential throughput of a 3-runway Heathrow. This does not test the worse-case scenario and potentially underestimates the amount of surface access actually required to support expansion in this area.

38 The surface access elements of the two Heathrow proposals identified as supporting expansion (such as Crossrail, the Western Rail link, the Piccadilly line upgrade rail link and the proposed HS2 link at Old Oak Common) are all intended to cope with the predicted increase in background population growth with a two runway Heathrow. These have not been designed to cope with the increased passenger and employee demand that an extra runway would bring. The only new scheme suggested, Southern Rail Access, is not even at the design stage and there is no recognised funding.

39 The cost of surface access provision to support expansion proposals at Heathrow is four times higher than that at Gatwick. There is no information as to how the costs will be apportioned between the airport operator and the public purse.

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

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

j) Inadequate consideration of public safety issues

42 Insufficient attention has been given within the appraisal consultation to public safety issues. It is considered irresponsible not to have afforded this greater scrutiny given that the operation of Heathrow already puts hundreds of thousands of flights above one of the most densely populated areas of the UK. An assessment of the potential impacts arising from an accident or terrorist incident should have been appraised in terms of the costs and potential human lives involved.

k) Inadequate assessment of impact on RAF Northolt

43 With the North West Runway option, the Council has noted the potential impacts on RAF Northolt of expansion in terms of needing to cease commercial operations. A recent decision by central Government has included the need for RAF Northolt to increase the commercial side of the airfield in order to remain a viable military airfield. It is unclear how the Commission have taken this into account.

Conclusion

44 The Council believes that, the economic benefits of expanding at Heathrow, although substantial, requires a more thorough analysis. The Council has identified flaws in the Appraisal Framework with gaps in the provision of vital information in terms of local impacts and the effectiveness of proposed mitigation measures such as surface access provision. The Council believes that when all of this is taken into account, the option to expand at Heathrow must be dismissed.

45 It should be noted that officers are preparing a joint submission with 2M Councils on the Airports Commission's consultation. They are also providing input for the London Council's response.

Financial Implications

There are no direct financial implications arising from the recommendations of the report beyond the use of existing officers time to compile and research responses to consultations.

There is no specific budget to address concerns or undertake activities arising from such consultations. Therefore if further resources are required in the future, for example to contribute towards local campaigns or joint activities through 2M, a funding source would need to be identified.

4. EFFECT ON RESIDENTS, SERVICE USERS & COMMUNITIES

What will be the effect of the recommendation?

By responding to this consultation the Council is adhering to its commitment to seek protection for residents from the negative social and environmental impacts associated with capacity increases and/or changes in operational procedures, such as mixed mode, at Heathrow airport.

Consultation Carried Out or Required

There are no external consultations required on the contents of this report. Relevant officers from within the Council have contributed to the consultation response.

In addition, officers will be contributing to the 2M consultation response and the response of other relevant technical groupings such as SASIG to ensure a consistent approach.

5. CORPORATE IMPLICATIONS

Corporate Finance

Corporate Finance has reviewed this report and confirms that there are no direct budgetary implications arising from the recommendations included above. As noted within this report, there is no specific budgetary provision to support local campaigns or joint activities through 2M, The Council does however hold unallocated priority growth and general contingency budgets which would provide a potential source of funding for such expenditure.

As indicated within the report, the broader impact of changes at Heathrow Airport on the Council's finances are monitored and where material captured through the Council's Medium Term Financial Forecast.

Legal

The Airports Commission has been set up as a temporary public body for the purpose of carrying out an examination of the need for extra airport capacity in the UK and to make a recommendation to the Government. The Airports Commission's consultation presents an analysis of their shortlisted proposals that are intended to improve the use of existing runway capacity and seeks the views of the public on these proposals. This report seeks approval for a proposed response to this draft document.

The Airports Commission must when undertaking this consultation ensure the details provided within the consultation are still at a formative stage, give sufficient reasons to permit the consultee (i.e. the Council or residents) to make a meaningful response and they must allow adequate time for consideration and response. The results of the consultation must then be conscientiously taken into account by the Airports Commission in finalising any proposals, including those which do not accord with their own proposals.

Fairness and natural justice require that there must be no predetermination by the Airports Commission of a particular decision which goes beyond a legitimate predisposition to a certain conclusion.

Corporate Property and Construction

There are no direct Corporate Property and Construction implications arising from the recommendations of the report. The report does not seek to comment specifically on Council owned property impacted by the options, however it is noted that the Council owns a number of properties which would be affected, including Green Spaces, housing and community buildings.

6. BACKGROUND PAPERS

[Airports Commission Consultation document, November 2014.](#)