

**Response of the London Borough of Richmond upon Thames to  
the Department for Transport consultation  
'Adding capacity at Heathrow'**

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# **Response of the London Borough of Richmond upon Thames to the Department for Transport consultation 'Adding capacity at Heathrow'**

**Response date: by 27 February 2008**

## **Executive Summary**

The Government's proposals are at odds with its commitment to reduce carbon emissions. The Council's Community Plan and Corporate Plan hold protection of the environment as one of its core objectives. The Council also has an aim to be 'the Greenest Borough in London' and an exemplar for sustainability. Our priority to address climate change has been widely publicised with initiatives such as the CO<sub>2</sub> emissions related parking charges scheme. The Council's adopted Unitary Development Plan (UDP) states that *'Aircraft noise is a major source of disturbance in the Borough. The Council will continue to press for a reduction of aircraft noise through the introduction of quieter engines minimising the use of noisier aircraft and reduction of night flights. The Council will also oppose changes in operations at Heathrow and other airports and heliports which appear likely to worsen noise or other pollution in the Borough'* (TRN 28, 7.127). The Council is therefore most concerned at the proposal to increase capacity, as set out in the consultation document, which the Council believes, fails to address climate change issues, is environmentally damaging and unsustainable.

The main issues of concern in response to the DFT's consultation are:

- carbon emissions accelerating climate change will increase
- any economic benefits do not outweigh the true environmental costs
- tax rules favouring aviation provide false comparisons and encourage expansion faster than would be the case if there were a level playing field
- the loss of runway alternation and the loss of respite periods
- the introduction of mixed mode
- additional movements with the removal of the 480,000 movement cap
- no community benefit from less polluting aircraft because of increased number of flights
- reliance on the use of the 57dB LAeq noise contour cap despite evidence that it is significantly above the point at which annoyance is noted
- breach of air quality limits proposed to be circumvented by a “derogation”
- ending the Cranford Agreement
- building a third runway and 6<sup>th</sup> Terminal, increasing noise and pollution
- creation of new flight paths
- The destruction of 700+ properties
- A longer third runway than ever indicated, taking larger aircraft
- Much increased road traffic congestion
- Pressure to increase night flights
- Annoyance is increasing yet the research findings are ignored
- The impression created by Government that the decision to expand Heathrow has already been made
- The absence of a full Strategic Environmental Assessment

- The lack of a thorough assessment of the environmental impact, including on human health, on flora and fauna
- The potential effect on significant areas of regional, national and even international significance such as Kew Gardens, Richmond Park and the Wildlife and Wetlands Centre
- The lack of availability of the full consultation materials in languages other than English, making it impossible for many of those affected by the proposals to consider the impact
- The heavy emphasis in the consultation exercise upon some questions which fail to fairly set out the issues, to mention some of the key effects of the proposals taken as a whole or even to ask if people agree with the overall principle of expanding the airport.
- An additional development in West London with adverse impacts on commuting, housing and transport demand and development pressure.

The Council has consulted its residents at two public meetings and by way of surveys. The results are attached in Annexes C and D and show overwhelming opposition to the airport expansion.

In the Council's view, there are deficiencies in the consultation that merit its withdrawal. Without prejudice to the foregoing there is also an argument that the consultation period should be significantly extended, in order that consultees (including the Council) have sufficient time in which to digest the materials which have been issued and properly assess their soundness or otherwise.

The Council is concerned at the perpetuation of the demand-led 'predict and provide' policy in regard to air transport infrastructure. As regards Heathrow, the Council has seen a history of incremental expansion at Heathrow which is increasingly to the detriment of the area. The Council considers that the Government should develop a genuinely sustainable and coordinated transport policy in relation to aviation and to Heathrow in particular.

**Set out below are the questions that appear in the Consultation Document.**

**The Council's position then follows each question. There are several issues of concern to the Council for which there is no appropriate question, so these issues have been addressed as separate points following on from the response to Question 11.**

**Question 1. Do you agree or disagree with the proposals that a third runway at Heathrow, if built, should be supported by associated passenger terminal facilities? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?**

**Council response**

**The Council disagrees with the proposal for a third runway at Heathrow with associated passenger terminal facilities.**

The Council disagrees strongly with the current proposals to expand Heathrow, namely with a 3<sup>rd</sup> runway, with any associated new passenger terminal facilities,

with the land take required for both of these, and all the as yet unidentified associated surface access routes, and any other land to be used.

The number of houses to be demolished in the proposal has risen alarmingly to 700; it is not known what the final figure will be. The basic issue is that the whole purpose of expansion of the airport would provide additional capacity at Heathrow. The Council rejects the principle of expansion, for reasons that will be identified in this response.

Historically, T5 was approved as a result of claims that additional terminal capacity was needed, but on the basis of the clearest of assurances that no further runway would be required. It was later stated that an additional short runway was needed. It is now put to us that yet another terminal is required. This massive incremental growth comes at an unacceptable cost to the environment. An extra terminal would result in a worsening of noise and other pollution, which the Council is duty bound to resist, for the longer term environmental well-being of its community. Even though a new terminal in Sipson is some distance from the London Borough of Richmond upon Thames, the damaging effects of an expanded Heathrow will include this Borough, and therefore the Council resists the proposal for additional passenger terminal facilities.

Runway length – the proposed length of the 3rd runway has now grown from an original length of 2000m to 2500m, with an operational length from each direction of 2200m. This longer runway will radically affect the type of aircraft able to use it.

It would permit a greater number of larger and noisier aircraft using it than were consulted on in the previous consultations. The current consultation appears to be being carried out on the basis that the policy to develop a 3rd runway has already been established and that this consultation only relates to a 6th Terminal.

However, as the consultation now proposes a longer runway and a different fleet mix, the new runway proposal should be presented with a far more rigorous assessment and justification in this consultation, in accordance with the requirements of E.U. law.

Safety – The Council knows that the new flight paths are only indicative, but that will not reduce the fear that many people have, if a new flight path is to pass over them. The possibility of a crash is ever present for those who live under flight paths. The concern has been heightened by the serious crash of the Boeing 777 at Heathrow recently. Commonsense dictates that the greater the number of aircraft flying overhead, the greater the chance of one crashing. The purpose of this proposal is to increase air traffic, so it is inherent that there is also an increased risk. Public Safety Zones should have been shown in the documentation, but they were not.

Development and transport issues – further development of this scale with related direct and indirect employment will lead to further pressure on West London where there are issues of labour shortages, congestion and limited land availability.

There will potentially be adverse impacts in terms of the need to recruit from

further afield with adverse impact on sustainability objectives, increased housing demand exacerbating the problem of affordability and increased development pressure. There are particular issues around congestion of the road network, the limited capacity of public transport and the lack of orbital public transport links which mean that such a development is not sustainable.

**Question 2. Do you agree or disagree with the Government's view on the continuing validity of the environmental conditions? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?**

**Council response**

**The Council disagrees with the Government's view on the continuing validity of the environmental conditions.**

It is not exactly clear which 'environmental conditions' are being addressed. The text discusses the 57dBA Leq contours and ANASE, both of which relate to noise. There are then 'other' conditions relating to 'certain pollutants', which are not identified. The Council takes these to be a reference to E.U. laws relating to air pollution. As Question 3 relates to air quality, the Council will deal with this issue there.

The Council accepts that it was correct for a noise based condition to be applied in relation to the operation of Terminal 5. Importantly, the condition was combined

with a limit of 480,000 atms, the maximum number of air transport movements permitted in a year. The atm limit was introduced as a T5 planning condition to protect against excessive daytime noise. If the 480,000 movement limit is removed and not replaced by any other movement limit, the Council will be left with only the noise contour as a means of control. The T5 condition on movements was specifically introduced due to deficiencies with using the noise contour on its own, yet the latter is now what faces us. The 480,000 movement limit needs to remain. The retention of a clearly enforceable movement limit is of fundamental importance.

Whilst there were some perceived benefits in using the 57dBA Leq contour as a control, it was known at the Inquiry that the metric would have its limitations. That was why there was a call for the ANIS study basis to be re-evaluated and re-calibrated. The result of that study the Council now knows as ANASE. Even though some deficiencies were identified in ANASE, there are still some valid conclusions which should be acted upon by Government. One of the most important conclusions was that the sensitivity of people to aircraft noise has increased to the extent that it would **not** be safe to regard the 57dBA Leq contour as the onset of significant annoyance – the Council knows that many of our residents, and indeed those of many other local authorities, live well outside that contour and yet are very significantly annoyed by aircraft noise.

The Council therefore fundamentally questions the 'continuing validity of the environmental conditions' in relation to noise in these contour terms. Furthermore, the Council also knows that contours will be inadequate for assessing the disturbance from 'mixed mode' versus 'segregated mode'. The contours would be identical, if there were the same number of flights, but the experience of people on the ground would not be identical. It is our view that the loss of respite offered by mixed mode will cause far greater annoyance than a judgement based on the contours would suggest. In the Council's view runway alternation is vital to enabling people to have a sensible period of relief from the burden of aircraft noise, and also to enable them to, for example, make use of their gardens and other open space and to be able to talk with others without regular interruption. These are important human rights.

Likewise, people are also affected by TEAM, when both runways are used for landings between 0600-0700. This period is not included in the 16 hour daytime contours and neither are any night flights. The Council knows that night flights have their own set of controls, so they are presumably regarded by Government as being outside of the 'environmental conditions' intended for comment here, although that is not made clear for consultees. It appears, in that case, that night quota flights have been left out of this consultation altogether. However, the impact of day time noise cannot be considered without the substantial impact on residents from night time noise. It must be noted that if there is to be a 3<sup>rd</sup> runway, there will be inevitable commercial pressure from airlines for additional night slots

in order to complete their increasing global scheduling demands, or even for operational reasons due to fast tailwinds. The Council therefore fears a further significant future deterioration in terms of an increase in night flights, with the consequent effects on human health.

The issue of the 57dBA Leq contour is again relevant in relation to people included and not included in this consultation. Those outside the 57dBA Leq contour were not sent a summary or questionnaire (and many inside it never got one either). Many people may still not know that they are entitled to ask for one, meaning they are therefore excluded. Following the ANASE findings, people within the 50dBA Leq should have been given the chance to comment, as many of them are significantly annoyed by aircraft noise.

Environmental conditions will only be valid if they truly protect people from aircraft pollution of every type.

**Question 3. Do you agree or disagree with the Government's view on adding a third runway and being able to meet air quality limits without further measures? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?**

**Council response**

**The Council disagrees with the Government's view on adding a third runway.**

It was a requirement of the ATWP that a 3<sup>rd</sup> runway at Heathrow should **only** go ahead in the timescales envisaged if air quality could meet the necessary legal standards. How can reliance be placed on future designs that are not even on the design table yet? The Council is not confident that the pace of technical improvements will continue at the necessary pace for this to be true. This is a dangerous assumption on which to base such intrusive plans. If the standard is not met, the consultation paper gives the impression that a “derogation” would be sought to give more time for the compliance level to be reached. In other words, that it would be acknowledged that the legal standards were not met, and so a special request would be made to **change** the legal standards applying. This would make a mockery of the health based standards for Air Quality, and would be likely to detract further from the regard which the public have for policy making by Government. Furthermore, poor air quality will continue to impact on people’s health. In summary, the airport is trying to get permission to expand **beyond** its environmental capacity, at the expense of those working and living in London.

The consultation primarily focuses on the emissions from the airport operation and does not appear to include emissions from the local road network. Whilst the airport might not want to take responsibility for emissions produced outside its boundaries it is not appropriate or fair to ignore them. The air quality forecasts would not be so confident if these emissions were included. An expanding airport will obviously result in increasing emissions, both within the airport and also from traffic coming to and from the airport. Increasing congestion from traffic using the

airport will cause increasing congestion to the traffic trying to pass by. It is by no means clear that all of these emissions have been assessed. It is likely that further measures would need to be taken if a 3<sup>rd</sup> runway were to be built.

The questions fail to cover the issue of CO<sub>2</sub> emissions and climate change, yet it is discussed in the consultation document. It seems relevant to comment here. The document outlines a decrease in CO<sub>2</sub> emissions with mixed mode, yet an overall increase with the increase in the amount of traffic. This is highly significant. The Council regards as unsustainable the concept of buying in EU ETS credits so that the expansion can continue. CO<sub>2</sub> emissions would grow even more with a 3<sup>rd</sup> runway. Furthermore, the EU ETS scheme does not include climate change effect from non-CO<sub>2</sub> pollutants, such as NO<sub>x</sub>, so these would also increase with increasing traffic, and not be off-set elsewhere.

Local air quality: there will remain NO<sub>2</sub> exceedences of standards for these emissions, with or without airport development. This confirms the position that improvements are needed in the region, including all airport and all off-airport related emissions. The Council notes that no quantification will be undertaken to reflect additional NO<sub>2</sub> emissions of the expansion programmes until the post consultation Impact Assessment. The Council is of the view that **all** assessments should have been carried out for it to be a full and fair consultation.

Air Quality control mechanisms (Ch 3, 3.186) - The Council notes that BAA would need to regulate activity on the airport in the event of approaching the environmental limits. The difficulty here would be that some years are 'bad' years for, e.g., NO<sub>2</sub>. So to be sure of not breaching the limit in any year, sufficient headroom would need to be left for a 'bad' year, as otherwise the airport will be in breach. This is on top of the uncertainties in modelling which will make it difficult to stay the right side of the limit, especially as BAA wants to fill the headroom with extra capacity rather than share the benefits of clean air with the community.

Roads – Increasing congestion in the Heathrow area will impact on the roads of our Borough, as double the number of cars try to access the airport in 2030, with 53.4 million road users by then. With this quantity of traffic, there will be extremely serious traffic congestion and the air quality in the Borough will suffer.

**Question 4. Do you agree or disagree with the Government's view that adding a third runway is achievable within the noise contour limit of 127 sq km at the indicated levels of air traffic? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?**

**Council response**

**The Council disagrees with the Government's view regarding the noise contour limit of 127 sq km.**

The 127 sq km limit is an example of the airport operator being allowed some extra headroom in which to expand. This would result in an unacceptable worsening of noise. In our view residents of London should be deriving the benefit from any improvements in technology. It is indicated in the paper that by 2030 as many as 110,000 people would be removed from the 57db contour if no changes are made to current limits and operations. This is what the Government should aim to achieve for its citizens. On this point, the question of achievability is based on optimistic and speculative modeling, using quieter aircraft which have yet to be designed. The Council would therefore urge great caution in giving approval for a 3<sup>rd</sup> runway on such thin evidence that the contour can be met by an expanded fleet which may not be quieter. The Council does not wish to be faced with a situation where the 3<sup>rd</sup> runway goes ahead and the limit is not met, followed by another consultation, seeking to increase the size of the contour to 'contain' a further growth of the airport.

The contour year 2002 was an unhelpful year to choose, due to the skewed contours from the predominant use of the northern runway, which was also enhanced by some Concorde movements. This skewed nature makes for some fairly meaningless 'exposure changes' maps in ERCD Report 0705.

The Council is also concerned by the narrowing of the take-off swathes proposed. The narrow swathes appear to be designed to shrink the noise contours, by concentrating the aircraft over the same houses. The increased concentration of

aircraft down each route will be to the severe detriment of those affected. If the contours were not narrowed in this way, presumably the contour area would exceed the limit. This may prove the point that the noise levels are too high and should be reduced not concealed by making it worse for many people located under the new routes.

Success at meeting the noise contour restraints depends on the accuracy of the modelling of the future fleet, and may depend on aggressively retiring noisier aircraft. The Council is not convinced that people can have confidence that this will happen, nor that there will be adequate control mechanisms to make it happen. Given that the CAA have scaled things back to just meet the contour area limit, the margin of error means that it cannot be guaranteed that there will be compliance with the limit for most of the future cases.

There are assurances that the industry will have to pay its full environmental costs. The Council is doubtful that will ever be fully addressed or delivered, and few details are given.

Schools – Many schools in this borough will be overflowed, with an increasing loss of respite. Thus, schools which have westerly landings would lose their current alternation pattern of respite every other week (as the length of the school day means that they benefit weekly rather than daily). This would affect the planning of the day and the activities possible. Also, the proposed new easterly take off routes

over the Borough, both for mixed mode and for the 3rd runway routes, would also mean a loss of respite on the non-westerly days, for schools affected. So for some schools, they will lose both their westerly respite and their easterly respite, and be over flown ever single day. This would be to their severe detriment in terms of noise, through interference between speech and hearing. This will be especially serious during outdoor teaching activities. The value of programmed alternation is that it provides predictable periods of respite. Children will not have been able to peruse the full consultation materials and form a view, but their futures will be at risk.

The recent noise annoyance study (ANASE) found that the original noise survey (ANIS) did not account for the increasing numbers of aircraft adequately. ANASE found that there was a relationship between greater aircraft numbers and greater annoyance. This is a most important feature as Heathrow plans to expand yet further. ANASE also found that there is now a greater intolerance to aircraft noise. Unfortunately it did not establish annoyance in relation to segregated or mixed mode. Although not confirmed by ANASE, the Council does know from our residents over many years that very great value is placed on the respite that comes with runway alternation.

Noise burden – as technology is better able to fly aircraft down a more precise line, so it will then be to the detriment of those always overflown. It is important that the Government find ways to minimise this burden, rather than always concentrating

the noise on the same people. This may require artificial dispersion along the take off swathes. There should also be a study on other ways to share the burden and provide more periods of respite.

Noise contour area controls – in the White Paper The Future of Air Transport (2003) is an undertaking by the Government at para 11.52

*”to take all practical steps to prevent any deterioration in the noise climate at Heathrow, and to continue to do everything practicable to improve it over time”.*

People have a legitimate expectation that the Government will keep to its undertaking. As the contour area was 117km<sup>2</sup> in 2004 and the expansion limit set is 127 km<sup>2</sup>, this is not an improvement over time, but rather a filling of the headroom to enable expansion. The Government has the opportunity here to improve the noise climate of 110,000 residents by removing them from the 57dB LAeq contour through retaining current limits.

**Questions 5. Do you agree or disagree with the Government’s view that mixed-mode operations could be introduced within the noise limits set out in the White Paper? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?**

**Council response**

**The Council disagrees with the Government's views on mixed-mode operations in relation to noise.**

The adverse impact from mixed mode has much more to do with loss of respite than to do with any change in contours. The Council knows that for the same number of aircraft, the daily or seasonal Leq will not change. But the Council also knows that the purpose of mixed mode is to increase capacity. When this happens, this will potentially create a challenge to noise limits. Unfortunately the noise limits themselves do not represent real noise on the ground. The average mode Leq, in which all westerly and easterly movements are averaged together, presents the noise impact in a way which people do not hear. Even a worst mode all day flight path, when aircraft fly the same easterly or westerly route all day, still fails to represent how people truly hear the aircraft noise. Hence people will find themselves seriously affected by noise, even though they are outside the 57 dB LAeq contour (which implies that they do not suffer). Once again, this highlights the issue of those who have been left out of this consultation, yet who are seriously affected.

The Council is also conscious of the Continuous Descent Approach (CDA) issue, although the effects of this would be away from our borough. Mixed mode would entail a loss of CDA, and therefore more noise under the southern approach path. This would be counter to the requirements of the ATWP, regarding provision of the benefits of environmental improvements.

The Council resists the introduction of mixed mode on **any** grounds. There clearly needs to be noise limits, but the current ones are most likely to be irrelevant, as the dB LAeq noise metric is meaningless for the purposes of this assessment. However, this said, the Council would not want noise levels to exceed any limits there are. The Council reminds the Government of its commitment to “bear down” on noise – which means improving the noise climate, and not simply allowing expansion within any headroom gained.

The Council is highly sceptical that if mixed mode is introduced the Government will stand firm to resist industry pressure and insist on its being only an interim measure. DfT has itself changed its mind as to whether it can or cannot be operated on the two existing runways as well as operating at the same time on a 3rd runway. Although CAA may be claiming that it is not technically possible at the moment, the Council believes that the technology will soon be there to resolve whatever difficulties there may be to make that feasible. When this happens, the Council fears it will be faced with a proposal for further growth, with both mixed mode and a 3rd runway, and then maybe a 4<sup>th</sup> runway, or more. However, just because something becomes *technically* feasible does not mean that it is either right or desirable. The Council is of the view that Heathrow will cause harm with either mixed mode or a 3<sup>rd</sup> runway, and they should not be permitted.

**Questions 6 (a,b,c) To what extent would you support the introduction of mixed-mode operations a) throughout the day b) limited to specific hours (if**

**so would you support mixed mode between 0600 and 1200 hours? Some other period? Please specify) c) within the current planning cap? ) i.e. with no extra capacity).**

**Council response**

**The Council does not support the introduction of mixed-mode operations at any time of day, for any length of time.**

The Council is opposed to the introduction of mixed-mode operations under either a), b), or c), although clearly it would be worse to have mixed mode all day, and would again be worse if movements increased above current levels. The Council notes the alleged benefits of 'flexibility and operational resilience' (para 3.113), but is aware of two problems with this. Firstly the operation headroom necessary for the flexibility would disappear the moment the increased capacity had filled.

Secondly, mixed mode of necessity requires the abolition of the Cranford Agreement, giving rise to problems in Cranford. And, in a vicious circle, the abolition of the Cranford Agreement would open the door to mixed mode, with its increase of air traffic (and other traffic) and loss of respite. This loss of respite would not only be for those suffering from the loss of landing path alternation, it would introduce a loss of respite for those under the newly re-aligned take-off routes necessitated by the mixed mode operation.

**Questions 6 (cont'd) If you support additional movements, in what periods of the day do you think they should be provided?**

**Council response**

**The Council does not support any additional movements.**

Each time of day is a sensitive time of day for somebody. Everybody needs their respite. Additional movements, whenever they occur, eat into that respite. Rather than expanding the airport, effort should be put into providing alternative transport modes for the nearer destinations and then longer haul routes can increase into the vacant slots and stay within the existing movement limits. There is no need for additional movements over the limits, by any means.

**Questions 6 (cont'd) What are your reasons for these answers? Are there any significant considerations you believe need to be taken into account? If so, what are they? Please provide evidence where you can (e.g. environmental impacts, business benefits)**

**Council response**

The Council is opposed to the introduction of mixed mode operations due to the increased disturbance and annoyance from loss of respite, from increasing movements and on behalf of those to be newly overflowed by aircraft on new take off routes. In consultation discussions with our residents, very few of them have been convinced that any of the alleged economic benefits outweigh the environmental noise disbenefits. In the Council's survey 'Heathrow expansion -

have your say' (Appendix D) the majority of people said they were in support of the Council's opposition to the expansion of Heathrow.

**Question 7. Do you agree or disagree with the Government's view that full mixed-mode could be introduced by 2015 and be compatible with compliance with the air quality limits in the vicinity of the airport? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?**

**Council response**

**The Council disagrees with the Government's view that full mixed-mode could be introduced by 2015 and be compatible with compliance with the air quality limits.**

The Council is opposed to the introduction of mixed mode operations by 2015. The EU air quality limits apply in 2010 and the Council would not wish to see a derogation issued to allow an expansion of operations which breaches the air quality limits from 2010.

It is interesting that this question is put as to whether the Council agrees that there would be compliance with the air quality limits in the vicinity of the airport when Table 12 shows that they would not comply. There would still be properties where NO<sub>2</sub> limits would be exceeded. The Council thinks it is wrong that an evaluation of

pollution from the surrounding road network has been excluded, and claimed to be compliant by conveniently ignoring the pollution that is there. If the Government is convinced that it can meet air quality limits, it is because the modeling is based on very optimistic assumptions about the emissions from future fleets. The Council is not convinced that all emissions in the Heathrow area will be so improved as to give the headroom to allow the expansion to take place. This raises the further issue of whether it is right for health based air quality limits to be eroded by expansion instead of retaining the benefit of lower emissions for the benefit of the community.

**Question 8. Do you agree or disagree with the Government's views on retaining westerly preference? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?**

**Council response**

**The Council does agree with the Government's views on retaining westerly preference.**

For every mode of operation there are winners and losers, and one of the overarching principles is to minimize the numbers of people overflowed. On that basis the Council supports retention of westerly preference as the alternative easterly preference would affect more people. For the same reason, the Council

opposes the expansion of Heathrow, as more people would be overflowed, and if there were easterly preference together with mixed mode or a 3<sup>rd</sup> runway, there would be an extra increase in the numbers overflowed. And again, mixed mode on an increased number of easterly flights would result in even further loss of respite to those under the easterly take off routes which would be required by mixed mode and a 3<sup>rd</sup> runway.

**Question 9. Do you agree or disagree with the Government's proposal to end the Cranford agreement? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?**

**Council response**

**The Council disagrees with the Government's proposal to end the Cranford agreement.**

The Cranford agreement was instituted for a reason which still stands, to protect the people of Cranford. In addition, its abolition would permit the introduction of mixed mode operations. The Council has explained above why it does not support mixed mode operations. In short, abolishing the Cranford agreement would result in a worse noise climate for many people. The Council therefore opposes it.

**Question 10. Do you agree or disagree with the Government's views on continuing night-time rotation? What are your reasons? Are there any**

**significant considerations you believe need to be taken into account? If so, what are they?**

**Council response**

**The Council agrees with the Government's views on continuing night-time rotation, but it is not in operation.**

The Council does agree with this, however there seems to be no evidence that the rotation exists, so it will be hard for it to continue. BAA at Heathrow inform us that they operate westerly preference at night rather than rotation. That must mean that the borough still gets the bulk of night flights, which are a huge burden for our residents to bear. It is our policy that night flights should end. This has never been more necessary than now, with these proposals set to expand operations at Heathrow and to increase pressure for more night flights. Night flights have never been adequately justified on economic or any other grounds. The Council resists all night flight increases and wishes to see the existing ones ended. In the meantime, it would be good if there were a night-time rotation.

**Question 11. Do you agree or disagree with the Government's view on continuing runway alternation in the 0600 to 0700 period? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?**

**Council response**

**The Council agrees with the Government's view on continuing runway alternation in the 0600 to 0700 period, but it rarely happens.**

The Council resists the continuation of all night flights, and calls for a ban on all flights between 2300-0700.

The alleged runway alternation in the 0600 to 0700 period seems to operate rarely, if ever. In fact, the runways are so busy at that hour of the night, when many people wish to sleep, that both runways are used at the same time, operating TEAM.

Increased air traffic at Heathrow would make this worse, and make runway alternation even less likely.

**In this section is an assessment of some further issues which are not raised in the questions:-**

1. **Economics** –
2. The independent report by C.E. DELFT – entitled “The economics of Heathrow expansion”, criticises the methodology used by in the Government's Oxford Economic Forecasting (OEF) report. The C.E. DELFT report casts doubt upon the Government's estimate that expansion at Heathrow will bring economic benefits of £5 billion (over 70 years).
3. CE Delft found that: “To give a truer account of the impact of aviation on the national budget, the figures for taxes and charges paid by the aviation sector could have been set against the subsidies and other forms of

government support that are paid to the sector, something that the OEF report does not attempt.”

4. It is clearly important that the government should conduct a proper independent study into the economic impacts of airport expansion and that greater transparency in the consultation process is necessary for the public to have full confidence in the conclusions reached.
  5. All four prospective London Mayors oppose the expansion of Heathrow airport. They also all support economic growth for London. The two objectives are not inextricably linked. It seems that the expansion of Heathrow is in the economic interests of BAA but not of London or the UK generally.
- Business traveller - the consultation seeks to justify the importance of Heathrow to businessmen, implying that businessmen account for 40% all passengers. This is wrong as it is nearer 25%. Thus it is misleading to imply that Heathrow is the businessman's airport and therefore crucial to the UK economy, when in fact only 25% of the total number of passengers using Heathrow are businessmen.
  - Transfer passengers - the consultation document states that 65% of passengers arrive at Heathrow by surface access. This is another way of saying that 35% of all passengers therefore are transfer passengers. Whilst these may be of economic value to BAA and the airlines they are of little economic benefit to the UK.

6. People travelling abroad spend £18 billion more than visitors to the UK.

Climate change costs are quoted at £5 billion yet may be nearer £13 billion.

The Council believes that the consultation paper has over-stated the economic benefits of increasing capacity at Heathrow, and has understated the true cost of the adverse social and environmental impacts together with their uncertainties. The £9 billion tax breaks on fuel artificially lowers costs and so artificially increases demand to travel by air. Tax payers are paying for this increase in demand, and now there is this proposal to increase capacity.

#### **Assessment of Strategic Environmental Impact lacking**

7. Whilst Appendix B of the Consultation Document contains an Impact Assessment, the consultation does not contain an Environmental Impact Assessment, a Strategic Environmental Assessment nor a Health Impact Assessment. The Council believes that, for proposals of this magnitude, there should at least be a Strategic Environmental Assessment in line with the Government's own guidance.

#### **These responses are based on the Impact Assessment in Appendix B.**

8. Housing – the loss of Sipson village, community centre and school, with a loss of 700 properties, and probably more not yet identified, is most unwelcome. It will be severely disruptive for all the local communities and puts further stress on the local Borough's efforts to provide housing. Provision of substantial additional housing to accommodate the additional

workforce at Heathrow is not included in the London Plan nor any Local Development Frameworks in the vicinity of Heathrow.

9. Landscape – there will be significant local adverse impacts to Green Belt land and affecting several communities.
10. Biodiversity – there will be both local and more distant impacts with poor air quality from traffic generation.
11. Water – the Council notes the ‘high adverse’ impacts on ground water and water resources, with ‘low adverse’ on surface water and ‘flooding’. The Council should like further assessments and assurances that the flooding risks in association with climate change have been adequately assessed, in the light of recent flooding events, which may not have been taken fully into account in the appraisal.
12. Transport user and other benefits – it is claimed that the extra capacity will bring operational resilience in times of severe weather and benefit the welfare of customers with reduced delays, and attract additional passengers from tourism, with employment benefits, benefits to air lines and air freight other wider benefits. Whilst the attraction of the benefits is understood, it remains our concerns that the benefits are one sided, with all in favour on the airport operation side and none for the residents, who suffer the environmental down side of expansion.

## **The sustainable development assessment**

### **13. The Five Principles**

First principle - living within the environmental limits (5.2)

- It is wrong that air quality should be allowed to get worse than the base case, as any benefits should accrue to the people who suffer other impacts also, not just from poor air quality. Although no special mitigation measures are proposed on the road network to achieve compliance with a third runway, this is based on optimistic assumptions about the cleanness of future traffic fleets, so the Council proposes a precautionary approach against such assumptions.
- Carbon dioxide emission calculations have excluded the emissions from additional traffic on the road. It is important that all related emissions should be included. (see carbon assessment)

Second principle – ensuring a strong healthy and just society. (5.17)

- It seems that the removal of Sipson cannot be regarded as meeting their needs. The 3<sup>rd</sup> runway will not assist the development of social cohesion. As the assessment says, the impact is likely to be negative. Although Sipson is not local to Richmond, the Council is concerned about the severe impacts on these neighbours, and oppose this development proposal.
- Heritage – (5.27) the Council notes with dismay the proposed ‘high adverse’ impact on heritage, with loss of about 22% of the Harmondsworth Conservation area, including the loss of several listed buildings and important archaeological sites

- Surface access (5.28) The Council is concerned that much of the necessary work on the impacts of surface access has not been carried out at this stage, as the Council suspects that the more detailed plans will entail more land take and loss of properties and further, as yet unquantified impacts in terms of noise and air quality. The costs of the supporting surface access infrastructure do not appear to be included in the Economic case.
- Social inclusion (5.32) This seems to focus on Greater London and airport users visiting friends rather than the needs of local people.
- Promoting choice and opportunity (5.33). The opportunity to create new destinations is rather a poor point as the airlines, by their own commercial choice, have been cutting back on destinations to concentrate on fewer more profitable ones. Consequently, the Council is not convinced by the argument of the need for more routes. The other points all aim at ways to generate more growth, which will suit the airport operators but not its neighbours.

Third principle – achieving a sustainable economy.(5.34)

- It is good to have a healthy local economy based on current activity levels at Heathrow. However, it is another thing to generate greater economic activity (5.39) than can be sustained and result in overheating the local economy. This aspect concerns us.

Fourth principle – promoting good governance (5.46)

- This seeks the support of the community, including asking for views via the consultation. The Council too has sought the views of the community in two surveys of our residents. The first was an exit poll carried out at the first DfT exhibition venue, at the Wetlands Centre in Barnes. The detailed response results are at Annex C. In summary, two findings were that 84% of respondents opposed the expansion of Heathrow by building a third runway, with 73% strongly opposing it. In addition, on the economic case, 81% thought that London did not need a third runway if it is to continue to prosper as a world city.
- The second survey was the 'Heathrow expansion - have your say' (Appendix D) in which the great majority of people said they were in support of the Council's opposition to the expansion of Heathrow. Whilst most people knew of the Government plans to expand Heathrow, only about half knew that there was a consultation. The Council is most concerned that very many of the residents who will be severely affected by the proposals may still be unaware of the consultation and have therefore been disenfranchised. The 57 dB LAeq contour significantly under represents all the people affected, who should have been consulted, especially considering the findings of the ANASE survey, that there are many people significantly annoyed by aircraft noise at levels well below 57 dB LAeq. The Council's survey findings emphasise this point.

Fifth principle – using sound science responsibly (5.47)

- The Fig 3.4 air quality graph of NO<sub>2</sub> trends from 1993 to 2007 shows little reduction in NO<sub>2</sub> over those years, but does show a projected drop by 2010.(Figure 3.4 'Demonstrating Confidence in the PSDH Air Quality Work')  
The Council knows that the other future NO<sub>2</sub> calculations are based on optimistic assumptions involving reduced emissions from increased flight numbers. It is our view that the predictions are over optimistic. The Council does not wish to see BAA applying for derogations to allow them to expand ahead of their capability. More than that, the Council wants to see any air quality improvements retained for the benefit of the community.
13. Carbon assessment - The consultation makes the comment that *'As a share of emissions, aviation and transport are both likely to account for greater shares in the future as they continue to experience strong demand growth'* (6.2) Additional CO<sub>2</sub> emissions from traffic associated with air traffic have not been included (2.24), so the assessment is incomplete. The comment is also made that *'Although we have shown that there will be an increase in the emissions with additional capacity at Heathrow we remain committed to ensuring that aviation reflects the full costs of its climate change emissions'* (6.12). The Council remains concerned that in real terms there will be an increase in emissions, yet the environmental costs are purported to be met by means of emissions trading instead of regulating demand.
14. Health Impact Assessment (7.1). The Council believes that an HIA should have been carried out. The Council appreciates that one would be needed

with any planning application but that means it is not available now to respondents, as they seek to influence the outcome of this consultation (assuming that the decision on the outcome has not already been made).

**GLOSSARY**

ANASE – Attitudes to Noise from Aviation Sources in England

ANIS – Aircraft Noise Index Study

ATM – Air Traffic Movement

TEAM – Tactically Enhanced Arrivals Measure

ETS – Emissions Trading Scheme

ERCD – Environmental Research and Consultancy Department – part of CAA, the Civil Aviation Authority

ATWP – (White Paper) *The Future of Air Transport* White Paper published December 2003

CAA – Civil Aviation Authority

CDA – Continuous Descent Approach – a procedure intended to minimise noise of arriving aircraft by avoiding noisy sections of level flight.

Cranford agreement – A ministerial verbal statement of best endeavours that the northern runway would not be used for take-offs to the east

dB LAeq – noise level in decibels, weighted to match the hearing range of the human ear and assessed over a period – here over a 16 hour day, for 92 summer days.

SEA – Strategic Environmental Assessment

EIA – Environmental Impact Assessment

NOx – combined nitrogen dioxide (NO<sub>2</sub>) and nitric oxide (NO)

**Survey Results – Barnes Wetlands exit poll from 7<sup>th</sup> December 2007  
regarding the Heathrow Expansion Consultation  
(Same day as the DfT Wetlands Exhibition)**

Summary Findings

Methodological Overview

No official estimates were taken of the footfall for the exhibition but we would estimate that between 250 and 300 people went along to the exhibition. TRU interviewed 158 people who attended the consultation. This means that our sample is both representative and robust. We interviewed more than half the people attending the consultation and this gives a statistical reliability to the findings of  $\pm 5\%$ . By this we mean that the true results for the overall population attending this event will lie within five per cent higher or lower than our actual sample findings.

Findings

About half (51%) the people attending said that the exhibition told them what they needed to know about the proposed third runway. Those that felt the consultation was not helpful tended to say that government officials were not able to answer their questions, especially around issue of night flights and the appropriateness of Heathrow for a third runway, given the demands on transport infrastructure in that area already.

Indeed, there was a strong feeling that the government had already made up its mind to build a third runway at Heathrow regardless of the outcome of consultation. 94% of people thought the government had already made up its mind on this issue. There was more agreement on this question than any other. Participants also overwhelmingly (87%) felt that the government would not take into account the views of local residents in making its final decision on Heathrow.

Participants were concerned about how the new runway would impact on their daily lives. Almost seven in ten (68%) said that their lives would personally suffer if a third runway was built at Heathrow. People were especially concerned about constant air traffic in their area all day long. Eighty-five per cent of participants said that their lives would suffer if aircraft were able to land all day, without the current break at 3pm.

More than eight in ten participants questioned whether London needed a third runway to continue to prosper as a world city. Indeed, the large majority (86%) thought a new runway at Heathrow would contribute to global warming and damage

the environment.

There was very little support for the third runway from people attending the consultation, with fewer than one in ten (7%) supporting the proposals and a similar proportion undecided (8%). Significantly, more than eight in ten people were opposed to the new runway. Most of these people (87%) were strongly opposed to the runway.

#### Profile of participants

The consultation attracted an even split of men and women. About half were aged 50 to 64, with a further third of participants being aged over 65+. The consultation did not successfully engage younger people to give their views about the future of Heathrow. Most of those attending were retired and these people, by and large, were private individuals. We spoke to fewer than 20 people who were part of any group opposed to a third runway at Heathrow.

## Full Survey results of Barnes Wetlands exit poll from 7<sup>th</sup> December 2007

<b>Q1 Here are some statements that people have made about proposals for the Heathrow Expansion. Please could you tell us to what extent you agree or disagree with each of the following statements?</b>							
	<b>No. of respondents (Base)</b>	<b>Strongly agree</b>	<b>Tend to agree</b>	<b>Neither agree nor disagree</b>	<b>Tend to disagree</b>	<b>Strongly disagree</b>	<b>Don't know</b>
<b>The exhibition today told me what I needed to know about the proposed third runway</b>	158	9%	42%	9%	23%	16%	1%
<b>London needs a third runway if it is to continue prospering as a world city</b>	156	4%	8%	5%	10%	71%	2%
<b>A third runway for Heathrow will damage the environment and contribute to global warming</b>	158	73%	13%	6%	3%	4%	1%
<b>The government will take account of local residents' views when making the final decision on whether Heathrow Airport should expand</b>	157	3%	3%	3%	24%	63%	4%
<b>My quality of life will personally suffer if there was a third runway built at Heathrow Airport</b>	158	58%	10%	11%	11%	5%	5%
<b>My quality of life would suffer if aircraft were allowed to land all day long without a break at 3pm</b>	157	73%	12%	3%	6%	4%	2%
<b>The government has already made up its mind to build a third runway, regardless of the outcome of this consultation</b>	158	69%	25%	2%	1%	1%	2%

<b>Q2 To what extent, if at all, do you support or oppose the expansion of Heathrow airport by building a third runway? Base: 158</b>					
<b>Strongly support</b>	<b>Tend to support</b>	<b>Neither support nor oppose</b>	<b>Tend to oppose</b>	<b>Strongly oppose</b>	<b>Don't know</b>
3%	4%	8%	11%	73%	1%

**Q3 Are you? Base:158**

**Q4 Are you? Base:154**

<b>Male</b>	<b>Female</b>
49%	51%

<b>Under 18</b>	<b>18-29</b>	<b>30-49</b>	<b>50-64</b>	<b>65+</b>
0%	1%	15%	49%	35%

<b>Q5 Are you? Base:158</b>	
<b>In full-time work</b>	<b>In part-time work</b>
22%	15%
<b>Retired</b>	<b>Other</b>
54%	8%

<b>Q6 Do you? Base:158</b>				
<b>Work for an organisation based at Heathrow Airport</b>	<b>Work for an organisation opposed to the expansion of Heathrow Airport</b>	<b>Work for central government</b>	<b>Work for local government</b>	<b>None of these</b>
0%	13%	2%	3%	82%

<b>Q7 Do you live in any of the following council areas? Base:158</b>						
<b>Ealing</b>	<b>Hammersmith and Fulham</b>	<b>Hillingdon</b>	<b>Hounslow</b>	<b>Kensington and Chelsea</b>	<b>Merton</b>	<b>Richmond upon Thames</b>
1%	11%	0%	5%	0%	0%	56%
<b>Wandsworth</b>	<b>Slough</b>	<b>South Bucks</b>	<b>Spelthorne</b>	<b>Windsor and Maidenhead</b>	<b>Other PLEASE WRITE IN</b>	
23%	0%	0%	0%	0%	4%	

### Response to the Proposals from Residents

**The London borough of Richmond upon Thames held two public meetings, in order to help residents during the consultation process, and also to hear their views, to feed into the Council's consultation response. In addition, the Council received many comments, on the expansion of Heathrow, from the Council's survey response forms. This Annex contains some of the comments made by residents at both the meetings and in the responses. (The full survey statistics are in Annex D and the full comments are in Annex E).**

A straw poll of those present at the Richmond venue on the 18<sup>th</sup> January and again in Twickenham on 12<sup>th</sup> February, asked whether people were opposed to the expansion of Heathrow. Everyone in the room was against expansion, other than the two speakers representing BAA.

Here are some of the comments made by residents, in relation to the proposed expansion of Heathrow.

- That aircraft landing over central London was a disaster waiting to happen.
- That doubling the number of planes meant double the danger to residents.
- That planes were arriving at 4.30am or earlier. The resident pointed out the effects on the economy resulting from people being tired, and also moving out of the area.
- That the level of debate needed to be raised, including posing questions such as why aviation in the UK needed to expand; and if so why in the south east; and if in the south east, why at Heathrow, which they said was big enough already. The resident went on to say that the service at Heathrow at present was poor, and said that in general, if something was already too big, it shouldn't be made any bigger.

- A School teacher from Kew said that children at her school could not properly use the outdoor space, due to the noise from the flights. She went on to say that children were a lost voice and that they needed to be represented.
- That fear of a crash should be at the top of the agenda.
- That the Government were fully committed to aviation, and that Government targets to reduce CO<sub>2</sub> were in total conflict with this.
- That climate change was global, and that the worst offenders were long haul flights. They said that both long and short haul flights needed to be reduced.
- That this was a social issue and that 750 homes were being demolished near Heathrow.
- Asked whether the financial cost of disrupting the sleep of 2m people could be quantified.
- Amsterdam may serve more airports than Heathrow, but London's economy hasn't collapsed as a result of this.
- Environmental benefits such as improved trains etc should not be lost by the building of another huge new airport facility.
- Expansion at Heathrow will result in an increased carbon footprint equivalent to that of a country the size of Kenya.
- Airports do not operate according to normal business rules. Airline companies don't pay for their own infrastructure i.e. they don't pay to land their planes. In contrast, train companies pay Network Rail to maintain the tracks.
- Much development in very London-centric – why do we need an airport hub in London?
- A hub simply means a way of increasing transit passengers (currently 20%), who will spend money shopping. Terminal 5 in a big shopping centre; one of the biggest in the region. The impact on London economically is minimal.
- If Heathrow expands, residents should be paid every penny of compensation due to them. (Twickenham)

- The noise levels in 2002 (which current noise limits are based on) were taken in a period when Concorde was still flying.
- If airport expansion is to take place, it should happen in other parts of the country, for example in the Midlands.
- The 57 Leq noise level measurement includes periods when there are no flights – this is wrong. Frequency is what matters.
- The answer to the environmental problem is not carbon trading.
- Train travel should be made cheaper and easier.
- The government should be working with the rail companies to reduce the pressure on Heathrow from flights.
- What will happen to Heathrow when oil prices rise and people stop flying?
- It is insane to build a huge airport in a densely populated area.
- Advances in technology should go towards reducing demand for flying, not increasing it. (Twickenham)
- New and improved rail links will simply allow more planes to take off.
- The £9b subsidy saving should be used to create high speed rail links.
- Has BAA taken into account insuring and compensating people to re-build their lives if there is a crash?
- Why are the Government riding roughshod over the democratically expressed views of people, including railroading through the planning law changes?
- I am totally against any abandonment of the current runway alternation. This is a quality of life issue.
- The Government should make proper strategic decisions about the transport infrastructure rather than simply increasing the size of Heathrow incrementally.
- Heathrow Expansion is totally unnecessary and will not benefit the economy (e.g. many homes will be lost when the new runway is built). The new runway will increase the number of flights. This in turn will accelerate climate change, and also allow more cheap imported food into Britain,

- especially fruit and vegetables. In turn more farmers and small green grocers will disappear in the UK.
- Quality of life is already diminished with noisy nights especially early morning and into the night. Brief respite when alternative runway is used
  - I am unconvinced by the economic argument, especially in light of the Stern Report into the economic effect of climate change.
  - Abandonment of using alternate runways would be intolerable for Richmond Borough residents. Cheaper railways would eliminate the need for many internal flights, therefore no Heathrow Expansion necessary. Environmental disaster with expansion, certain.
  - End to runway alternation would be HELL. Could never sit peacefully outside and the flight path is very close
  - Mixed mode would remove the respite that alternation affords and has always existed
  - The number of aircraft movements associated with road traffic and noise pollution have all reached unacceptable levels.
  - We are very much opposed to expansion not only on local but also national and global environmental grounds.
  - Expansion of Heathrow is incompatible with governments supposed climate change priority. Abandoning runway alternation for a marginal increase in capacity is unacceptable
  - The end to alternation is a disaster and we will move out of the town if it is approved
  - Summertime flights in this are already horrifically disturbing. It is against our human rights to be bombarded with these levels of noise on a constant basis, now that my windows have to be kept closed all night even in very hot weather.
  - No amount of economic prosperity can compensate for the detrimental affect of increased noise and pollution on our children especially. We are 100% against this proposal.

- The government should invest in a fast (high speed) train network rather than build more runways.
- Abandoning alternation is outrageous. Proportion of travellers just passing through is outrageous, increased hazards for those living below flights is outrageous. Seriously detrimental to health and quality of life
- Quality of life would be unbearable if runway alternation is removed, and greatly worse if Heathrow was expanded.
- Its very worrying that short term economic benefit of a few companies is more important than the lives of millions of people.
- Fewer flights, no more blight.
- Am totally against removal of present alternation. Have lived under East Sheen flight path for 40 years and it is still intolerable, despite promises of better and quieter aircraft, and no further expansion! Hope this will not be another fruitless consultation.
- I massively support the Council's opposition to the plans for Heathrow.
- The most important thing to protect is the full alternation of runways and not to allow this to be diluted in any way. Alternation is the only thing that gives us any respite, and it should be protected at ALL costs. No halfway proposal should be allowed
- The 'consultation' is a sham. I am greatly concerned about added misery of noise and air pollution resulting from proposed ending of runway alternation, living directly under final approach to northern runway and increased possibility of accidents
- Having lived under the flight path for over 10 years, I cannot believe the government is proposing to remove the alternation - the only welcome relief from an otherwise frustrating, sole destroying noise.
- Runway Alternation is a vital respite from the 90 second landing pattern!
- Landing planes over the UK's most densely populated area is not an intelligent solution. Think long term!
- Increased flights and the end to runway alternation would make life in the borough unbearable. It is already impossible to have an uninterrupted

conversation in the garden at certain times of the day and places like Kew Gardens would also be ruined.

- I find the government's consultation process meaningless- they are comparing noise data with when Concorde was still flying, they have an unproven business case, and they have not adequately explored alternatives such as building a new airport
- I do not agree to ending (alternation of runways) as it does give some relief when the other one is in use. Also a third runway and definitely a sixth terminal is a positive No NO.

## Annex D

### **Results of the Council's survey: 'Heathrow expansion - have your say'. Report and statistics**

**85,000 survey forms were distributed across the Borough. Responses made on these forms and on the Council's website came to nearly 10,000. This is a very high response rate. Annex E has the complete set of comments received in the survey.**

**These were the questions asked on the leaflet (with a modified version on the web site):-**

1. Before receiving this leaflet were you aware of the Government's proposals to expand Heathrow?
2. Before receiving this leaflet were you aware of the Government's consultation on these proposals?
3. Do you support the Council's opposition to the expansion of Heathrow?

Each of the three questions had three possible responses, i.e. 'yes', 'no' or to leave it blank, which was recorded as 'non-stated'.

Following is a summary of the survey results so far. The final results will be submitted to DfT soon after 27<sup>th</sup> February.

The total number of responses received was 9405, of which 906 were submitted on the Council's web site and the remaining 8499 were completed on the leaflet forms distributed. Database checks have been made to avoid any double entries.

The results indicate that most people (89%) **were** aware of the Government's proposals to expand Heathrow, however only about half of the people (52%) said they knew about the consultation.

In addition, the majority of people (89%) said they were in support of the Council's opposition to the expansion of Heathrow.

Further assessment of the responses may reveal a picture of exactly which were the areas of the borough where the consultation was not known. The lack of knowledge may well mean that the number of responses to the consultation will be fewer than should be the case, and that therefore the Government has failed to reach many who will be affected by the proposal, yet who should have been consulted.

The responses in support of the Council also reflect that the respondents wish to register their individual opposition to the expansion of Heathrow, and these should therefore be included as responses to the consultation itself.

## Statistical summary

Responses to paper and web site questions:	Yes	Yes %	No	No%	Non-stated	Non-stated %
1. Aware of the proposal to expand	8359	89	1023	11	23	<1%
2. Aware of consultation	4889	52	4460	47	56	1%
3. Do you support Council in opposition to expansion?	8379	89	978	10	48	1%

(Note: In Question 3 a few people responded 'No' when they intended to say 'Yes', when expressing their support of the Council, in its opposition to expansion. It is clear that their true intention was to say 'Yes' from the text comments they supplied. If these misallocated responses were included, it would increase the majority 'Yes' response by a small amount)

## Conclusion

The survey results indicate that, in the view of the majority, there should not be expansion at Heathrow. The Secretary of State needs to take these results into consideration, along with the point that some people who might have wished to express a view on the expansion, have not done so, as they were not consulted.