



HILLINGDON

LONDON

Sir Howard Davies
Airports Commission
Sanctuary Buildings
20 Great Smith Street
London
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Ref: JT/03/02/15 Davies

3rd February 2015

Dear Sir Howard

2M RESPONSE TO THE AIRPORT COMMISSION'S CONSULTATION ON THE APPRAISAL OF SHORT LISTED AIRPORT EXPANSION OPTIONS

We welcome and thank you for the opportunity to respond to your Appraisal Framework consultation. The wealth of information that has been provided is testament to how much work has been undertaken by yourself and the Commission as a whole. However, whilst the Commission's appraisal process may be more comprehensive than any previous assessments to consider expansion at Heathrow, it still has not captured all the detrimental impacts that will be brought upon this part of west London and the communities to the west of the M25, by expanding Heathrow Airport.

As background information, on the 28th February 2014, we responded to your original consultation in relation to the Appraisal Framework. Our concerns at that time were:

- Lack of information about the trade off issues between objectives;
- Call for the inclusion of a specific health module;
- Call for the inclusion of a specific mitigation module.

In terms of the individual appraisal modules, our concerns were:

- Lack of clarity of the decision making process for the strategic case i.e. increasing hub capacity and/or increasing point to point capacity;



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- No definition or appraisal of a proper baseline, i.e. the current situation;
- No satisfactory level of scrutiny for all the surface access delivery elements;
- Noise criteria and appraisal process should allow for the sensitivities of the communities to be a part of the selection process and be backed up by a full and extensive social survey;
- There should be a full detailed assessment of the impacts on local air quality with suitable sensitivity tests and scrutiny built into the process to ensure there is confidence in the results that health limits will be met and maintained.

It is our opinion that these concerns have not been addressed and these remain serious flaws in the appraisal process as presented in this consultation. These concerns are addressed in our response below and we ask that the entirety of this letter is taken as our formal response to this consultation.

It should be noted that although the response focuses mainly on the information provided by the current Heathrow operator HAL, this should not be misinterpreted as any form of tacit approval for the Heathrow Hub proposal. Both proposals bring substantial disbenefits to local communities and therefore the choice of the exact runway location is irrelevant. As our response below demonstrates, this area of west London is simply not the right place for expansion.

Question 1 - What conclusions, if any, do you draw in respect of the three short listed options? In answering the question please take into account the Commission's consultation documents and any other information you consider relevant. The options are described in section three.

Uncertainty of economic gain versus the certainty of severe community harm

Heathrow Airport Limited (HAL) describe their expansion proposals as "*a once in a lifetime opportunity to transform our region*". We firmly believe expanding Heathrow will be at the expense of the health and wellbeing of the surrounding local communities, and these impacts have still not been adequately appraised to date, including in this consultation.

The "*prize of expansion*" according to HAL is up to £211 billion of economic growth, up to 180,000 new jobs across the UK and 70,000 jobs in the region. These results are presented by the Commission in the consultation documents as a range, for example for the North-west runway, 64,000 to 180,000 jobs by 2050 and GDP impacts between £112 - £211bn. In our opinion these figures mask huge uncertainties. It would be helpful if the Commission could make readily available, to critical peer review, the assumptions and methodology behind such uncertainties.

However, what we do know for certain, as presented in this consultation, is the detrimental impacts that expansion in this particular location would bring. It would cause the largest forced population relocation since World War 2, expose more people to aviation noise than the rest of the European hub airports combined and bring further detrimental impacts on health and wellbeing to an ever growing densely populated area. The expansion options at

Heathrow are also the most expensive to build, with the potential to impact further on the public purse by the need for Government to contribute towards surface access solutions and by passengers paying the higher costs to fly to and from it.

We need a different solution

All three main political parties have agreed with the sentiment of "no ifs, no buts no third runway". This decision was supported by the Minister at the time, 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)

Nothing has changed. There still needs to be another solution. Heathrow is a thriving, internationally respected hub airport; it is close to London; it will always have a market to serve. We should be looking for the best recommendation for the UK and also remember that this should include the best recommendation for the substantial numbers of communities that co-exist next to Heathrow airport.

No case made for expansion at Heathrow

The separate locations for expansion i.e. Gatwick and Heathrow, both provide substantial economic benefits; future aviation connectivity in terms of passenger numbers and destinations served, including to the emerging markets; and provide jobs to the surrounding areas. Yet Heathrow brings, by some margin, the highest magnitude of adverse impacts. To recommend such an option which knowingly inflicts the largest damage to local communities should not be supported.

In our opinion the appraisals, as presented in this consultation, do not make the case for expansion at Heathrow for either proposed option. In addition, with important information still missing from this consultation, or in some cases, inadequately addressed, any recommendation to take forward the option to expand at the Heathrow location would be one which is made on a flawed evidence base.

Question 2 - Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in section three

Failure to address the current situation around Heathrow

By not including an appraisal of the existing situation experienced by local communities, we believe that the Commission has provided 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. This has not been addressed in the consultation and is a significant flaw in the process.

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. It is our view that not to do so shows a distinct lack of respect and lack of responsibility for the detrimental impacts currently brought upon these people by the operation of the current airport.

Treat Londoners fairly

Heathrow inflicts substantial noise impacts across west London and areas to the west of the M25, yet when mitigation spending is compared across Europe, as in Managing Aviation Noise, CAA, 2014, Table 8.1, it is apparent that Heathrow offers the least in terms of noise mitigation. Charles de Gaulle airport, Paris, provides community noise mitigation for a larger contour area than Heathrow (the 55dB Lden noise contour). This contour encompasses 170,000 people. The CAA report indicates the airport's annual spend on mitigation is 11.63m euros. The population around Heathrow, within the 55dB Lden contour, is 725,000 people. The CAA report indicates that Heathrow has an annual spend of 7.7m euros. Our question is why do Londoners deserve a poorer deal than Parisians? Not to address these issues is totally unacceptable and shows a lack of consideration for the surrounding communities. If it costs too much to properly mitigate the impacts that an airport brings, then in our opinion this is a valid reason to dismiss that location for expansion.

Furthermore, the Commission's own document, Noise Discussion Paper 05, identified that Heathrow was the least noise efficient airport in the UK.

Ensure economic benefits for the local community

We are told by HAL that expansion at this location will give the best, and perhaps the last opportunity to connect all of Britain to global growth. "It is the only option to help Britain stay right at the heart of the global economy".

In addition the airport operator states they will ensure that those most impacted get the greatest benefits and are treated fairly. We would fully agree with this. The local communities who are adversely impacted should receive the greatest benefits from any claimed economic benefits of any aviation expansion proposals and measures must be introduced from the outset to ensure that this is the case.

Proper mitigation

A suite of mitigation schemes must be established, based upon best practice from other UK and European airports and to include aspects which are currently excluded by Heathrow such as, areas suffering from early morning flights; all adversely impacted educational establishments; compensation for loss of predictable respite; compensation for loss of enjoyment of amenity including gardens; measures to help ensure the air quality limits are met and maintained; adequate surface access provision so that non-airport users are not compromised on the surrounding roads and public transport networks. We can no longer accept hollow promises.

Night time ban

Heathrow refer to the night flights as being important commercially and state that they "will still play a part in a two runway or a three runway world". This particular aspect deserves additional attention. We firmly believe that the benefits in terms of reducing health impacts, improved sleep and restorative processes and improvements in worker productivity afforded by getting a good night's sleep have not been properly taken into account. It is our view that the Commission should have properly and independently appraised the impacts, both economic and social, of a ban on night flights.

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

And

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

These two questions have been answered together. The appraisal process has left unanswered key areas which require further investigation. Not to have identified and costed the appropriate solutions to all the problems that would emanate from expansion in such a densely populated area is unacceptable.

Missing information

The consultation process is based upon an appraisal process where we are still waiting for important local impact analysis. We believe that it is a major flaw in this consultation not to have factored in sufficient time to provide important information on detailed local air quality assessment; identifying the impacts on the local roads; quantifying the impacts of the predicted increase in freight; and sufficient information on flightpaths. All of these issues impinge on the local communities. Communities, and those who represent them, must be able to understand the potential impacts on them. Without these vital pieces of local information this is simply not possible.

Ultimately a consultation is about residents and others being given consistent, reliable and fair information with which to make comparisons. 2M is seeking reassurance and clarification from the Commission that this will be forthcoming. As an example, it is unfair for promoters themselves to be remodelling noise contours during the consultation process and publicising these without the Commission extending the time for consultees and the Commission itself to review and comment on this new information. The same applies to the missing air quality and local roads information.

We formally request confirmation that all these aspects will be made available for public scrutiny before the Commission makes any final recommendation. As it stands this appraisal consultation is deeply flawed without them. We believe that the commitment to an open and transparent process, as made by the Commission from the outset of this process, is in danger of failure if key information is not open to those who stand to be impacted the most.

No information on trade-offs between modules

The Commission has referred to the need to trade-off the results from different appraisal modules, yet this consultation provides no information as to how this will be approached. How will the uncertainty of up to 70,000 jobs in the local region be judged against the certainty that over 600,000 people will be exposed to aviation noise, or 4,000 people moved from their homes?

The two options to expand at Heathrow airport expose over 25 times more people to aviation noise than expansion at Gatwick. Yet both these impacts are appraised in the consultation as having an “adverse impact”. This approach therefore clearly lacks precision of assessment and is totally inadequate when looking at such vast differences in the magnitude of impacts.

By not providing information on how the information from the different modules is to be traded off is unhelpful to consultees and does not represent an open and transparent approach. Without it, there is a danger that a recommendation will be made behind closed doors with no discernible audit trail in terms of decision pathway.

Health

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

The impact of your selected expansion proposals on the health of the surrounding communities should be properly identified now in order to inform the decision-making process. It will be too late to do this work once a recommendation has been narrowed down to one option. To make policy decisions without this work is in our view totally irresponsible in terms of community protection.

As a key member of the 2M group, Hillingdon Council commissioned an independent report to investigate the appraisal consultation from a health equity perspective. Its conclusion is clear in that it states that the Commission's appraisal would have benefitted from a further detailed assessment of the health and equity impacts of each potential new scheme. We attach this report and request that health is given a more in-depth appraisal before any final recommendation on the location for airport expansion is made.

Inadequate consideration of public safety

The Commission's appraisal does not properly consider the implications of public safety. It is unclear whether the Commission believes that the potential impacts of an aircraft coming down in the densely populated area of Heathrow has the same risks and impacts around Gatwick. It would seem irresponsible to take an airport which already flies hundreds of thousands of flights over the most densely populated part of Europe and to add more flights without addressing this issue. It should form an important part of the comparison process of appraising the different options.

Housing and infrastructure implications

There has been no consideration given as to how already pressured local authorities are expected to cope with providing accommodation for the influx of identified extra employees and associated infrastructure arising from an option to expand at Heathrow. For Heathrow expansion, this is predicted as around 70,000 new jobs in the region. In addition, no consideration has been given to where the displaced communities arising from the construction of the new runway will go. This will all require substantial land-take and appropriate funding yet has not been addressed. There simply is not sufficient land in the surrounding areas for the additional housing and community infrastructure required, without totally destroying the character of existing communities, neighbourhoods, open spaces, townscapes and landscapes.

Assessing the community benefits of no expansion

Heathrow refer to the negative impacts of no expansion as impacting on the economy of the local area in terms of fewer jobs. "Within 15 years it is estimated that this could mean 14,000 fewer people employed at Heathrow than today with no growth at the airport" (John Holland Kaye). What this type of analysis misses is the potential benefits that could be accrued to the local communities from aspects such as an improved environment and therefore improvements to health and well being.

With no further expansion at Heathrow, using the benchmark of 55dB Lden analysis from the consultation, 185,600 people could experience less noise by 2030 just from the predicted changes in aircraft fleet mix (Local noise assessment, Jacobs, November 2014, Table 4.5). Without the proposed expansion, there would be no loss of communities and no loss of valued open space. This important aspect is missing from the appraisal in terms of a being a benefit to all the surrounding communities.

Inadequate appraisal of mitigation

We have consistently requested the inclusion of a separate mitigation module into the appraisal process. This would have allowed the assessment of the cumulative impacts, including costs and also would have provided a mechanism by which the proposed mitigation measures could be assessed in terms of effectiveness and identified implementation mechanisms. This would have made the results of the Commission's appraisals for "with mitigation measures" scenario more robust. Without this level of detail, these measures exist simply as ideas on paper.

Heathrow talk about new operating procedures such as use of steeper approaches, displaced thresholds and curved flight paths, which will solve future noise problems. Many communities already suffer from operating procedures which are designed to provide noise mitigation, such as runway alternation which are not always able to be fully deployed. Why should communities believe this will be any different with expansion at Heathrow?

We believe that it is not an acceptable approach to take the HAL mitigation and compensation offers and assume they will a) work, b) be implemented in reality and c)

acceptable to the population impacted. Given the close proximity of the two Heathrow expansion options to substantial numbers of people, this deserves more scrutiny in the appraisal process.

The appraisal framework should have properly considered a robust evaluation of mitigation measures in terms of whether they offer adequate protection and whether they guarantee deliverable solutions.

Question 5 - Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?

And

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

These two questions have been answered together. We do not consider that the appraisal modules have been adequately addressed in key areas which impact on local communities. We have chosen to focus on a selection of the appraisal modules on which to make detailed comments. Absence of comment should not be taken as acceptance that the conclusions of the remaining modules are correct.

Using sound science responsibly

We have continually raised the issue that to base UK Government noise policy on calculating how the local community are "annoyed", based on the results of a social survey carried out more than 30 years, is totally unacceptable. As the 2M group we have raised this issue with Government and directly with the Commission on a number of occasions. This has included the commissioning of a detailed technical report. This concern has been recently reinforced by the publication of the All Party Parliamentary Group Noise Inquiry Report. It is our view that this aspect must be addressed.

To make any recommendation to expand at Heathrow, will be to knowingly inflict severe noise disturbance impacts over a vast area and introduce an extra 200,000 flights over the heads of hundreds of thousands of people. Such a decision must be based upon the best available scientifically sound information. To not do so is simply failing the local communities who will be impacted.

Pressures on housing and community infrastructure

There has been no consideration given to where all the displaced people will go, where the new schools will be built, and how it will be possible to compensate for the total destruction of communities. To recommend expansion at Heathrow with no plans as to where to accommodate displaced of people and communities and no plans to identify the funding needed to implement it all is inadequate.

The predicted increased employment from Heathrow expansion will clearly bring about further pressures for additional new housing and an associated demand for community

infrastructure. These have been identified but unfortunately the solution as to where it will all go has not been either identified or costed. These are not inconsequential numbers; 50 new primary schools and 6 new secondary schools alone are challenging let alone the additional 70,000 increases needed in housing and the total replacement of destroyed village communities. We believe that this aspect should have been included and costed within the appraisal process.

Provision of adequate surface access

We do not believe that the surface access elements of the proposals to expand at Heathrow have been properly evaluated. We have concerns that the full impact, the worse-case scenario of a full expanded Heathrow, has not been appraised. This is a totally unacceptable approach for any appraisal process.

The area around Heathrow is one of the busiest in the UK. Yet HAL have made the unrealistic claim that there will be no more traffic on the roads with airport expansion. The appraisal consultation has not provided the key information to allow consultees to be able to form a view as to whether this claim can be justified in any way. There has been no local roads modelling; no details have been given on the impacts of the proposals to increase freight traffic; and no details of the proposed congestion charge have been put forward. Yet despite this, consultees are expected to accept that these issues will all be satisfactorily resolved and this is completely unacceptable.

Identified rail measures such as Crossrail, the Piccadilly line upgrade, the Western rail link and the proposed HS2 link at Old Oak Common, are all measures which are already planned and intended to cope with the predicted increase in background population growth with the existing two runway Heathrow. The only other rail scheme that is being considered, i.e. the southern rail access, is currently not designed, not funded and in fact we believe if it goes ahead, it will be a necessary addition for the current two runway airport. None of these rail proposals pose any solution for airport expansion and to link them with an additional runway is wrong. To attempt to suggest that they will be sufficient to cope with the passengers and employees to support an additional runway is clearly flawed.

The delivery of proper surface access solutions have knock on implications for other aspects such as meeting air quality health limits. This inadequate appraisal of surface access provision is therefore totally unacceptable.

Air quality

There must be absolute confidence that the health limits can be met and thereafter maintained. If the promoters' assumptions, such as cleaner aircraft; cleaner road vehicles; and no more airport related traffic on the roads, do not materialise in reality, it will be the local communities who will suffer the adverse impacts. There could also be a negative economic impact if the runway were to be built, but then not legally allowed to operate at a satisfactory capacity. If these improvements in air quality do not occur in reality, this could become a constraint to the operation of the airport.

We repeat our request in relation to the missing information. The further detailed air quality assessment must be subjected to independent scrutiny, including all the assumptions used in the work, and made available for a full public consultation before it is used in making any final recommendations on airport expansion.

Noise

"The Commission's independent analysis has confirmed a third runway would lead to a positive impact for night flights noise in the future". (John Holland Kaye). The Commission's appraisal relies upon the information given them by HAL. The future noise problem appears to have been solved in this appraisal process by means of quieter planes and untested operating techniques for noise mitigation, which are currently unproven in terms of benefits and yet there are no published flightpaths to inform impacted communities as to how they may be affected by over-flights. All we do know for certain is that there will be an extra 200,000 flights overhead.

Relying on new aircraft to solve the future noise problem shows a total lack of understanding about how the communities perceive aircraft noise. We cannot accept that by making each aircraft slightly less noisy and doubling the number is a satisfactory noise mitigation measure. In addition, as the buying of new aircraft is not in the gift of the airport operator to even deliver, this simply becomes a promise based upon the future actions of others.

The Heathrow operator has the option of reducing the impacts of night noise by banning night flights yet it chooses not to. It claims the economic gains outweigh the negative impacts of all the communities who are woken up. The Commission should have appraised the option of no night flights. This would have validated whether the stance that economic benefits of night flights outweighs the environmental dis-benefits is even robust. The Commission have not provided an independent evaluation of the measures that are being proposed for reductions in noise, as experienced by local communities, in terms of their deliverability, their proven environmental gains, their proven implementation or their control mechanisms. Consultees are simply expected to accept the claims put forward by the airport operator with insufficient evidence provided by the Commission to show whether they will work in practice. We believe that this is totally unacceptable.

Quality of life

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

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

It is an unacceptable omission to not consider any impacts on children. Hillingdon Council commissioned an independent report 'Equity Focused Review Report of the Airports

Commission's Community Health Relevant Assessments' by Public Health by Design (January 2015) which confirmed that it is not acceptable to have a quality of life assessment which:

- does not include health and wellbeing impacts on children;
- states that air quality impacts are limited when there is clear evidence of air pollution affecting people's health, which reduces their capacity to lead full lives and hence impacts on their quality of life;
- states that night time noise has no impact on wellbeing yet there are studies showing that sleep disturbance can lead to stress and mental ill health;
- shows no link between place and people's interaction with the built environment and ignores the important link between open spaces and mental wellbeing.

In our view the Commission should have undertaken proper public health impact assessments of each option to ensure this aspect of quality of life was adequately addressed.

Biodiversity

The issue of the importance of high quality open space has been inadequately appraised. Places such as Richmond Park, Kew Gardens, Bushy Park are well valued areas in west London, as are, places like Runnymede and Windsor to the west of the airport. Whilst their direct loss will not occur with expansion at Heathrow, the high community value of the loss of the ability to enjoy such open space due to increased flight numbers has not been accounted for. Mitigation measures for such high quality open spaces are totally unrealistic unless the Commission considers that a future of large sound canopies over Kew is acceptable just to enable an airport to further expand in an unsuitable place. The loss of open space but also the ability to enjoy it, must be adequately accounted for in the appraisal process.

Community

The appraisal on community impacts is inadequate because the Commission have not evaluated where the displaced communities will go or whether the compensation offered is even sufficient. There is a figure of £550 million provided by the airport operator and yet there is no clarity as to how this figure was arrived at and what it actually covers in terms of allocation to residents and the allocation for community buildings.

The appraisal of the community impacts is also flawed because it does not evaluate whether the compensation is adequate to allow people to move to a like for like property, and to install measures against all noise and pollution impacts.

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

We consider the following should be appraised in terms of the overall business case:

Competition

We believe the benefits of competition should be properly appraised. The original BAA group was broken up by the Competition Commission for very good reason. It has created competition and allows more choice for the travelling public. We note that the Gatwick airport operator has supplied independent analysis to the Commission which indicates that the benefits of competition from expanding at Gatwick are between £7.7 billion to £10.4 billion by 2050. If the Commission recommends expansion at Heathrow it should publish why it believes the re-creation of this monopoly is in the best interests of the consumer.

There is also a potential benefit from increased resilience when an airport location is impacted by weather or unforeseen events, such as debris on the runway. Currently Gatwick, with only one runway, has no resilience against such circumstances. It is not clear what assessment the Commission has made of these issues.

UK wide considerations

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

Threats of no expansion

HAL has 'threatened' that no expansion at Heathrow will result in the provision of fewer destinations being served. Yet under two of the assessed scenarios i.e. assessment of need and global growth in a carbon capped forecast, the Commission's analysis suggest this pattern will repeat itself with fewer destinations by 2050 as the airport once again would reach capacity. (Heathrow NWR doc, table 1.4 page 16). It is clear that extra capacity may not result in increased connectivity because it is a function of aviation economics where airlines fly to the most lucrative destinations with greater frequency. In contrast Gatwick Airport, under the same carbon-capped forecast indicates increases in destinations across all five future aviation demand scenarios. Dependent upon the scenario, it is a hollow threat that only expansion at Heathrow will provide extra connectivity.

Heathrow suggest that expansion at Gatwick expansion will not work as it requires people to hub through a different airport in a different country. We are unclear of the evidence that suggests this would be a dis-benefit to the flying public.

The threat of fewer jobs needs careful analysis. The Commission states 14,000 fewer people will be employed without growth at Heathrow. It is not clear what account has been taken of the increasing use of technology with which we all now book online, print our own tickets and check in online. This will all happen regardless of expansion and it highlights the danger of continuing to rely on just one form of industry as the sole provider of jobs.

Funding of adequate surface access

We have concerns about the level of funding for the necessary surface access provision to make the area around Heathrow function in an expanded scenario. It is still very unclear as to who will fund the necessary motorway widening and tunnelling, road re-alignments, congestion charge, and the provision of adequate rail and tube services. If the surface access measures prove to be inadequate, there is no mechanism in place to ensure that this is resolved. It would be helpful to know if these costs have been taken into account in the business case.

The costs of providing the identified surface access proposals differ in magnitude between the two airport locations with the costs identified for Heathrow being approximately seven times that of the cost of surface access provision at Gatwick. The Commission has not offered any comment as to the appropriate share between private and public sectors in terms of financing the provision. This is a potential public sector cost which should be properly considered in terms of the business case.

Air quality

If the assumptions to solve air pollution issues do not occur in reality, the new airport infrastructure will be heavily constrained in terms of its use and its ability to realise its full capacity. Has the Commission assessed the economic impacts in the event that the expanded airport can only be partially used?

Financial and commercial case

The 2M group notes that the costs for providing capacity at Heathrow are higher than that at Gatwick and that this will involve higher costs per passenger. It is not clear what consideration the Commission has given in terms of the costs of higher charges on the flying public in its economic assessment.

Question 8 - Do you have any other comments?

Flawed consultation

We do not consider that any final recommendations can be made until all the additional assessments that are currently missing have been provided and subjected to proper public consultation. There is merit in the view that it may have been better for the Commission to have delayed the consultation until all the material was available.

Given the community reaction to new flightpaths over places like Teddington, we consider that it was a flawed approach to proceed to consult without the provision of detailed flight paths to enable people to assess how, or whether, they are impacted. It would be helpful to know how the Commission will assess the consultation responses when the consultees are not in a position of knowing how they will be impacted.

Given the pivotal nature of the airspace issue, we believe that in recommending an option to expand at Heathrow, the Commission is in danger of proceeding with one that might not actually be deliverable.

Community engagement

The apology from HAL at the Discussion Day on 3rd December 2014 that they should never have said they would not ask for a third runway is simply not good enough. This is not the only aspect where they have betrayed the communities' trust. There have been no offers of decent mitigation, no offers to insulate homes and schools to appropriate levels and no measures to ensure that air quality levels will be met.

It would appear that now with the promise of expansion, or the fear of not getting expansion, offers of mitigation on homes and schools are suddenly deliverable. This shows the lack of respect that the airport shows to its surrounding communities. Nothing has changed. The communities deserve these measures now. This is an unacceptable approach and the total distrust and anger of the impacted local communities totally understandable.

The recent activities of HAL and its PR machine is another example and in particular the funding by HAL of the Back Heathrow campaign, which demonstrates that neither HAL nor their incredibly dubious survey results can be taken seriously. At the Discussion Day on 3rd December, Zac Goldsmith MP challenged the claims that Back Heathrow was a grass roots community group. Community members who have received the polling question cards from Back Heathrow have reported the total bias in the questions. We would urge you to disregard the information from Back Heathrow from being anything other than an extended PR exercise on behalf of HAL because they do not represent an independent assessment of the community view.

Back Heathrow claim that 50,000 people in the areas around Heathrow support expansion. They have forgotten the results of the transparent, democratic referenda process in two of the boroughs (Hillingdon and Richmond) which showed 100,000 people do not support expansion.

The recent poll by Wandsworth Council, on the Commission's airport expansion proposals, has recorded the highest ever community response to an online opinion poll with the majority against Heathrow expansion. Similar patterns of opposition were voiced at public meetings held in Putney by Justine Greening MP. The poll results from the Royal Borough of Windsor and Maidenhead also demonstrated a net opposition (+35%) for both Heathrow developments and a net support for the Gatwick proposal across all the electorate wards. These results, like most neighbouring boroughs clearly support the position that Heathrow airport can be better, without expanding. With HAL refusing to rule out a future fourth runway, and refusing to give guarantees that expansion would not take away the current respite arrangements, it is no surprise that residents have affirmed their consistent opposition to Heathrow expansion.

Once again we would like to thank you for the opportunity to submit our views to you and we would be happy to discuss these issues further if you feel that would be helpful. Should you have any queries on this, please do contact me.

Yours sincerely

A handwritten signature in black ink, reading "Ray Puddifoot". The signature is written in a cursive style with a long horizontal flourish at the end.

**Councillor Ray Puddifoot MBE
Leader of Hillingdon Council**

On behalf of the Leaders of Hillingdon, Richmond, Wandsworth and Windsor and Maidenhead

Enc: Equity Focused Review Report of the Airports Commission's Community Health Relevant Assessments by Public Health by Design (January 2015)