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Tuesday 3rd February 2015

To whom it may concern,

BRENT COUNCIL RESPONSE TO THE AIRPORTS COMMISSION'S CALL FOR SUBMISSIONS REGARDING BUSINESS CASES AND SUSTAINABILITY ASSESSMENTS ON THREE OPTIONS TO EXPAND AIRPORT CAPACITY IN THE SOUTHEAST OF ENGLAND

Brent Council would like to thank the Airports Commission for its call for submissions regarding potential options for expansion of airport capacity in the southeast of England. We have examined the business case and sustainability assessment documents for all three options, including a new northwestern runway at Heathrow, an extended northern runway at Heathrow or a second runway at Gatwick.

Brent has been disappointed by the low standard of community engagement delivered by the Airports Commission as part of this consultation. The Airports Commission should have undertaken a substantially longer consultation period particularly as the consultation period coincided with the Christmas and New Year period. Brent also feels the Airports Commission should have undertaken consultation sessions with all local authorities in London and surrounding counties, and held a greater number of community sessions in a variety of locations, so they could gain a broader view of community opinion surrounding the three options presented. Furthermore, the documents published via the Airports Commission's website and the response format are so complex as to impede on the average person or organisation's ability to respond in a timely, informed and considered manner.

Notwithstanding these comments, Brent has prepared a response based on the eight questions put forward by the Airports Commission.

Q1: What conclusions, if any, do you draw in respect of the three short-listed options? In answering this question please take into account the Commission's consultation documents and any other information you consider relevant. The options are described in section three.

In assessing the three airport expansion options, it's important to note that Brent does not explicitly oppose any of the options, however given the potential for economic growth, increase in jobs and business within Brent and improving access by sustainable modes of transport, Brent's preference is that one of the Heathrow options are pursued.

Q2: 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.

Brent is concerned about the impacts of all schemes on air quality, both in respect to local emissions and the impact of increased air travel on climate change. Brent would like to see commensurate improvements in emissions requirements for aircraft serving the airport selected for a

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new runway to minimise the increase in emissions affecting local communities. Similar changes in restrictions may be required for the noisiest aircraft serving the selected airport.

Q3: Do you have any comments on how the Commission has carried out its appraisal? The appraisal process is summarised in section two.

Brent appreciates the level of transparency across the documentation provided, particularly where the Commission has undertaken independent reviews of the data and assumptions provided for the airport proponents as to the effect of their schemes on the economy and the environment. However, it is not clear how the Airports Commission will weigh up the various competing objectives and potential outcomes in order to produce a recommendation on which option should be delivered. The Airports Commission has failed to release any sort of multi-criteria analysis framework which could guide local authorities, residents and businesses on which issues are most important when assessing the various schemes on a strategic level.

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

In assessing additional demands for housing, the Commission has failed to address how local authorities may accommodate these demands over and above existing high population growth. In Brent's experience, meeting current demands for additional housing has been difficult, which will only be exacerbated by any of the expansion schemes. This challenge also places significant pressure on outer London boroughs in relation to preservation of green belt land.

The Commission also fails to consider where the additional housing requirement will be accommodated either within neighbouring local authorities or across Greater London. Localised increases in aircraft noise at either Heathrow or Gatwick will affect the ability of local authorities to deliver additional housing supply to the market. This could directly affect local authorities such as Brent, as vast areas of the borough will become significantly more accessible to both airports following completion of the Old Oak Common interchange and the Crossrail extension onto the West Coast Main Line.

An issue that has not been discussed by the Commission is how much additional business and warehousing space will be required in order to support increased air traffic movements at either Heathrow or Gatwick. Additional traffic and airlines will require greater warehouse and office capacity for freight warehousing and distribution, food preparation, cleaning and maintenance services. These services need to be located in close proximity to the airport, and it's not clear where the Airports Commission expects these services to be accommodated. The growth of these businesses and their required land take will affect the abilities of local authorities to deliver on already competing priorities to protect green belt land from development and deliver new housing supply to for population growth.

The Airports Commission has also failed to consider and assess the impact of upcoming or potential technological changes (e.g. lower emission planes or fuels, decreased business travel due to improving the quality and quantity of teleconferencing, etc.). These changes may affect travel patterns through London's airports or the profiles of passengers travelling, which may lead to different demands for travel.

Q5: 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?

Brent has outlined comments on some specific topics, as listed below:

- **Strategic fit analysis**
  - No specific comments on this report. In order to ensure our response is based on the same assumptions as the various reports, Brent has accepted the forecasts and other considerations outlined in the strategic fit analysis

- **Economy impact analysis**
  - All three options will generate significant additional jobs for London and the South East of England across an array of industries. We believe Brent will benefit in some way from any of the three options, however given Brent's proximity to Heathrow, the Borough will benefit significantly more through the implementation of one of the Heathrow options.

- **Local economy impact analysis**
  - Brent strongly disagrees with the inadequate assessment areas defined in Table 7 of the Local economy impact assessment, which excludes boroughs such as Brent from assessments of Employment and Business impacts and Housing impacts. Brent provides a substantial opportunity for additional employment and housing growth for businesses and employees where jobs are based at, or supported by, access to Heathrow or Gatwick airports. While some of these missed opportunities have been quantified as part of the Economy Impacts Assessment, we do not feel that this is adequate for Brent or several other local authorities (including the London Boroughs of Hammersmith & Fulham, Kingston upon Thames and Wandsworth or Elmbridge Borough Council) for the Heathrow options. Furthermore, a similar assessment should have been completed for Kingston upon Thames, Sutton, Merton and Bromley in relation to the Gatwick option.
  - The local economy impact has also failed to assess how changes in the operation of airports may change in light of the outcomes of the Airports Commission. One such example is if freight becomes a significant growth market for Heathrow airport (either with or without an additional runway), how this may affect local land use and employment in local authorities surrounding the airport.

- **Surface access analysis**
  - In assessing surface transport access to Heathrow and Gatwick, the Airports Commission has failed to adequately explain how improvements in public transport mode shares to airports will be delivered over and above the existing base case scenarios. The Commission is relying on already committed projects, such as Crossrail, despite all projects providing additional capacity to Heathrow having already been identified as necessary by the 2020s in the London and South East Rail Utilisation Study. Furthermore, it's already expected that on current patronage growth forecasts, sections of Crossrail will exceed its capacity by 2031. Therefore, Brent does not feel it is sufficient for the Airports Commission to rely solely on this committed infrastructure.
  - An issue that has not been evaluated by the Airports Commission is how mode shares vary across the day. This is important as early morning or late night flights can limit opportunities for sustainable transport. The coincidence of peak travel times with peak commuting times can also cause excess strain on the transport network and force additional economic costs on travellers as they may have to plan for longer trips to the airport, while increases in road congestion may affect the effectiveness of road - air freight transfers.
  - There are several issues where the Commission's reports have raised significant concerns that represent considerable risks for delivery without identifying a solution. One such example is the capacity constraints on the Brighton Main Line, which will be over capacity in 2030 on background demand alone. This issue was identified without a solution, such as track amplification, being identified or costed.
  - The surface access analysis has not identified how freight is transported to airports or where it comes from. Furthermore, it has not considered how this may change in future or increases in air traffic movements could affect these travel patterns. A key area for consideration is the location and access of airline support businesses, such as catering, cleaning and maintenance services, which do not necessarily need to be located at the airport, but should be in close proximity to it.
  - Brent would also like to voice its opposition to the proposed Heathrow Airport Hub Station option on the Great Western Main Line (GWML). We see this proposal as an inferior

option to the Western Rail Access to Heathrow proposals and Old Oak Common Interchange. A Heathrow Airport Hub station would provide a less direct journey for passengers throughout London to Heathrow Airport, whilst also decreasing accessibility from much of Brent by claiming to eliminate the need for platforms on the GWML at Old Oak Common. On this particular point, Brent would concur with Transport for London's reservations and strongly encourage the Airports Commission to reject this proposal on the grounds of cost and accessibility.

- **Noise analysis**
  - It's clear that from the national assessment, the three options can largely be described as having the following impacts:
    - Gatwick Second Runway: roughly neutral impact compared to do-nothing scenario
    - Heathrow Northwest Runway: Significant decrease in population exposed to high levels of aircraft noise
    - Heathrow Extended Northern Runway: Significant increase in population exposed to high levels of aircraft noise.

    On the basis of the Airports Commission's stated objective for the noise appraisal module is *'To minimise and where possible reduce noise* impacts,' Brent does not see that the Heathrow Extended Northern Runway proposal can meet this objective.
  - In reviewing the Local Noise Assessment, it's clear that at present, the impact of aircraft noise on Brent is relatively small, especially when compared with other local authorities, such as Ealing, Hounslow, Richmond, Slough or Windsor and Maidenhead. However in reviewing potential new flight paths, particularly under the Heathrow-NWR-R (Respite) route paths, Brent will see an increase in the number of flights approaching or departing Heathrow over the borough, although the modelling shows that no part of the borough will exceed noise exposure levels under any of the modelled scenarios and timescales.
  - While in principle, Brent supports an examination of new flight paths to minimise localised excessive aircraft noise, we believe it's important to ensure local communities are consulted in a fair and transparent manner to ensure there is a clear understanding of the impacts.
  - One issue that has not been robustly appraised neither in the Noise analysis or the Surface Transport Assessment is the additional noise impact from surface transport networks arising from increased surface movements (including both public and private transport) to and from airports. This is an important issue which will affect local authorities throughout Greater London and should be considered by the Airports Commission alongside aircraft noise.

- **Air quality analysis**
  - It's clear from the Air Quality assessment that an increase in Nitrous Oxide (NO_x) and Particulate Matter (PM) will happen regardless of which option is selected, however the impact of increased air pollution will be greatest for either of the Heathrow options.
  - Measures used for visualising the additional NO_x and PM emissions caused by each of the schemes as shown in the assessment figures (Tonnes/year) is a poor measure as it's inconsistent with standard measures used by most governments and agencies ($\mu g/m^3$). The effect of this is to decrease understanding of the net impacts of the proposed schemes.
  - A key consideration which we do not feel has been robustly explored is the additional air pollution (NO_x and PM) to be generated by surface transport following completion of one of the schemes or modelling of various scenarios which may represent the potential economic and environmental realities of future transport decision-making.
  - Brent is thoroughly concerned by the impact of all schemes on NO_x and PM emissions along the A406 North Circular Road. This road is already the Borough's greatest air quality challenge, and any option will exacerbate this issue, while no mitigation measures have been proposed by any proponent.

- **Biodiversity analysis**
  - No specific comments on this report

- **Carbon analysis**
  - We believe an important consideration that was raised is that surface access emissions will remain the second largest source of CO_2 within each of the proposed schemes. While reducing carbon emissions from air travel should be a priority, surface access is a policy area where governments and proponents have an ability to implement a broad range of potential interventions to reduce emissions. Furthermore, it's noted that due to the airport's location within London and greater proportion of passenger transfers between flights, the Heathrow options will result in lower surface access emissions than Gatwick.

- **Water and flood risk analysis**
  - No specific comments on this report

- **Place analysis**
  - The place analysis contains some important considerations that should be taken into account in assessing the three airport expansion options. Key to these include:
    - Land take, where the Heathrow options will take a substantial area of high-grade agricultural land (200.6 hectares for the northwest runway option and 96.1 hectares for the extended northern runway). This land take on productive land impacts on agriculture industry's ability to produce within close proximity to the population, thus increasing emissions and exacerbating air pollution through increased freight distances.
    - Heritage impacts, where despite the Heathrow northwest runway affecting the setting of the most designated heritage assets, the Gatwick Airport second runway will affect the greatest number of heritage assets through its land take. In this measure, the Heathrow extended northern runway clearly has the lowest impact.
  - A gap in the waste assessment is looking at potential changes in passenger and airline profiles that may increase potential waste per passenger. It's clear that Heathrow generates substantially more waste per passenger, though this is largely attributable to the full service airlines which service Heathrow compared to low cost airlines at Gatwick. The impact of any change in this nexus has not been assessed by the Airports Commission, and could lead to significant changes in the assessment.

- **Quality of life analysis**
  - The outcomes of the 'mappiness' (momentary happiness) survey are interesting in that they recognise the impact of aircraft noise on happiness and relaxation, particularly during daytime. Further to this study, while it would limit the sample size, it would certainly be interesting to see if there were any statistical differences between the airports assessed (Heathrow, Gatwick and Stansted), as this would have assisted the Airports Commission in making a more informed judgement on the acceptability of impacts caused by each scheme.

- **Community analysis**
  - No specific comments on this report

- **Cost and commercial viability analysis**
  - No specific comments on this report

- **Operational efficiency analysis**
  - No specific comments on this report

- **Operational risk analysis**
  - No specific comments on this report

- **Delivery analysis**
  - No specific comments on this report

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

We believe the sustainability assessments were somewhat inconsistent, with different assumptions used for each proposal, which makes direct comparison between assessments very difficult. Notwithstanding this criticism, it's clear from the results of these assessments that on the criteria measured, the Heathrow Extended Northern Runway project holds the worst balance between improved economic impacts and detrimental community impacts (i.e. noise, air quality and quality of life). The comparison is therefore between the Gatwick second runway and the Heathrow Northwest Runway. Gatwick clearly has lower community impacts; however, Heathrow will generate greater economic impacts, with Gatwick being highly dependent on changes to employment locations and business investment in the surrounding local area, which is highly uncertain. On this basis, and the substantially increased benefits to Brent, Brent Council's clear preference is for the Heathrow Northwest Runway.

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

Brent has no specific comments on the Commission's business cases.

Q8: Do you have any other comments?

While Gatwick provides the greatest opportunity for increases in freight operations, this opportunity is restrained by the growth of low cost carriers at this airport and by the limited road access and the airport's location relative to the largest industry areas in London, such as Park Royal, which is significantly closer to Heathrow.

Looking at the ability of the proposals to develop a 'hub', it's clear that Gatwick will continue to serve mainly point-to-point services, with limited hub operation, while Heathrow will continue to operate as a hub connecting short-haul domestic and European flights with long-haul flights across the globe. This is partially highlighted in the Delivery analysis, where Gatwick's limited capacity for Code F aircraft is outlined as a strategic risk for Gatwick Airport.

Thank you for your consideration of these comments.

Yours sincerely,

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