



HEATHROW
**COMMUNITY
ENGAGEMENT**
BOARD

HEATHROW AIRPORT EXPANSION:

SUMMARY OF CONSULTATION RESPONSES
AND FINDINGS FROM INDEPENDENT
RESEARCH

DECEMBER 2019



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FOREWORD

Heathrow Airport Limited (HAL) opened its statutory Airport Expansion Consultation (AEC) on 18 June 2019. The consultation closed on 13 September 2019. We understand that HAL received thousands of responses to the consultation, though the final figure is yet to be confirmed.

During the consultation period, the Heathrow Community Engagement Board (HCEB) worked with independent experts such as [YouGov](#) and [BritainThinks](#) to conduct surveys, focus groups and interviews with local residents about their attitudes to the proposed expansion of Heathrow Airport, and specific aspects of the plans.

We have sought views from [Temple Group](#), the specialist environmental consultancy we are working with on our sustainable communities project, on issues such as the Community Compensation Fund and the construction period. We have discussed the details of the consultation with our Strategic Advisory Groups (which include representatives from businesses, residents, groups and elected members), read responses from local authorities and sought views from HCEB's own dedicated Passenger Service Group (PSG) and Transport, Environment and Noise Group (TENAG).

We also asked experts from [Traverse](#) Ltd to conduct a detailed review of the consultation against current best practice, including the

legislation and guidance relating to the Development Consent Order (DCO) process used for Nationally Significant Infrastructure Projects (NSIPs).¹ In addition, [Collingwood Environmental Planning](#) has provided feedback to both the best practice review and aspects of the AEC.

We submitted a full report to HAL in September 2019, which included findings from all the independent research. The full report has now been published, alongside this report which provides a summary of those findings. We have also published the full reports of each piece of research.

Heathrow will be publishing its response to all the feedback to the consultation as part of its DCO submission and we look forward to reading this.

We would very much like to thank all those who we have worked with over the summer, including those residents and stakeholders who took time to speak to researchers about their experiences and views of Heathrow Airport Ltd and the AEC.

The Heathrow Community Engagement Board

December 2019

¹ Traverse, HCEB – Evaluation of the Airport Expansion Consultation, 31 October 2019.

COMMUNITY ENGAGEMENT COVERED IN THIS REPORT

Since we were set up in April 2018, the HCEB has undertaken a wide range of engagement activity with local communities – with a particular focus on those who live very close to the airport.

This has included appointing a Residents' Advisor who has run regular drop-in sessions in local villages and numerous surveys of local residents online, on social media and through the post.

We have also held regular meetings of our Strategic Advisory Groups which represent a diverse cross-section of the Heathrow community and our advisory group of experts in Transport, Environment and Noise.

However, in this report, we are focusing on engagement activity that relates directly to the AEC. This consisted of:

- An online survey, open to anyone. This was conducted by YouGov and publicised by HCEB. It was accessible from 12 August to 13 September. There were 198 responses in total;
- A survey of 750 people from five local authority areas close to Heathrow Airport. These are all existing members of the YouGov panel.² While the majority of these were surveyed online, YouGov also held 4 x 2.5-hour face-to-face workshops and 10 x 45-minute face-to-face depth interviews with panel members living in the five boroughs surrounding Heathrow;
- 49 face-to-face depth interviews, lasting 45 minutes each, with residents of 10 'hyper local' areas.

These were conducted by BritainThinks in September 2019. Of these, 26 interviewees were recruited via self-referral from the HCEB's flyer drop and 23 were from on-street recruitment;

- targeted outreach at existing community and business events in the five neighbouring local authorities; and
- Input from HCEB's PSG and TENAG.

In addition, HCEB has conducted a review of the published responses of local authorities to the AEC.

All of this input is complementary to the thousands of direct responses HAL has received to the AEC.

² See <https://yougov.co.uk/about/our-panel/>

PRINCIPLES OF BEST PRACTICE

We wanted to assure ourselves that the AEC was carried out in line with current best practice for public consultations, particularly those in relation to large infrastructure projects. We therefore asked Traverse to review the AEC against best practice principles.

These best practice principles necessarily reflect the legislative requirements in some areas. Where best practice and the legislative requirements diverge, the law does not prevent best practice from being undertaken **in addition to** any statutory obligations.³ HAL has consistently stated in both public communications and in conversations with HCEB that it wishes to go beyond the legal minimum. Traverse have reviewed its actions accordingly.

This section explains the principles, then details how well the AEC fulfilled them. It also includes relevant findings from the YouGov focus groups (consisting of people living in the five boroughs surrounding Heathrow) about the consultation process.

PRINCIPLE 1 – CONSULTEES SHOULD BE ABLE TO SHAPE THE PROPOSALS

This principle establishes a requirement that it should be possible to amend or change proposals being consulted on. As such, the promoter of any consultation should remain

genuinely open to change or alternative proposals.

How well did the AEC meet this principle?

It is too early to comment on whether the views expressed as part of the AEC have been taken into account by HAL in finalising its proposals. For this reason, Traverse assessed the extent to which HAL demonstrated that it was were genuinely open to considering views in shaping proposals throughout the different stages of consultation.

Firstly, HAL published a summary document following previous consultations, that outlined how it intended to take feedback into account in its proposals.

Secondly, the consultation documents for the AEC did not **explicitly** rule out the possibility of considering any proposals, which is important.

However, Traverse also noted that:

- The phrasing and presentation of both the consultation document and the feedback form may have guided some respondents away from proposing alternative options to the current proposals. This was reflected strongly in resident feedback.
- There was little reference in any of the online summaries or videos to alternative options or how they had been, or would be, considered. The Preliminary Environmental Information Report (PIER) and the non-technical summary of it

³ The principles outlined in this section draw upon existing guidance for consultations, best practice examples, case law examples and on the statutory requirements. Key sources used in the composition of these principles include the current government principles for consultation (which were published by the Cabinet Office in 2018) and guidance on the pre-application process (published by Department for Communities and Local Government in 2015), the

Gunning principles (which arose from the 1985 Gunning vs. London Borough of Brent case) and the Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (the Aarhus Convention 1998). We also drew on the 1st Pillar: Access to information of Aarhus and the 2nd Pillar "Public Participation in Decision Making".

outlined the original proposals and the process that was used for evaluating and shortlisting them. This offered a degree of historical transparency. There was also some discussion of the process of evaluating proposals and developing the preferred plans included in the Masterplan Scheme Development Manual and the Updated Scheme Development Report.

Two-thirds of the YouGov panel members surveyed believed that expansion was inevitable, and a similar number believed that the consultation responses would have no impact on Heathrow's plans.⁴

Views were fairly evenly divided on whether HAL has sought out the opinions of local residents: around two-fifths (40%) of YouGov panel members believed that HAL had done so, but 37% said that HAL had not. There was a similar division of views when it came to attitudes to the proposed expansion, with nearly half (48%) of the YouGov panel members saying that the Government should rethink its plans.

PRINCIPLE 2 – ENOUGH INFORMATION SHOULD BE PROVIDED TO INFORM CONSULTEES' VIEWS

The information provided for a consultation should be sufficiently detailed for a 'reasonable person' to gather the information that they need to make a judgement on the proposals. Consultees must have a reasonable understanding of the proposals and the rationale behind them, as well as the key factors underpinning their decision-making process.

How well did the AEC meet this principle?

A very large volume of information was provided by HAL to accompany the AEC. Just over half of panel respondents (52%) felt that the information included helped them to understand more about the proposed expansion. However, the majority of the open survey respondents, who were much more likely to be previously engaged, disagreed. Both groups felt the information provided was biased (53% for the panel and 76% for the open survey.⁵)

Some areas of the consultation were felt to lack detail, despite the overall volume of information provided. These were:

- The impact assessments and how HAL proposed to manage potential impacts; and
- The outline proposals for the Community Compensation Fund (the Fund).

The local authority responses in particular emphasised a lack of specific technical information and lack of clear commitments on surface access, noise and the Fund. There was a general feeling that further consultation would be required on some matters before the DCO application could be made, because consultees were not able to assess all the proposals using the current information.

PRINCIPLE 3 – INFORMATION SHOULD BE PROVIDED IN A FORMAT WHICH IS CLEAR AND EASY TO UNDERSTAND

Information provided should be as easy as possible to understand for anyone who wishes to respond to the consultation, whilst still providing consultees with sufficient information. The provision of information

⁴ YouGov, HCEB Consultation Experience Surveys, 27 September 2019, page 4.

⁵ YouGov, HCEB Consultation Experience Surveys, 27 September 2019, page 24.

should recognise the differing level of technical understanding amongst the stakeholders. Best practice would therefore be to include information in a range of formats and in an engaging and accessible way that caters for any and all audiences.

How well did the AEC meet this principle?

Overall, the consultation was considered to have broadly addressed this principle, with information presented clearly, in ways understandable to a range of audiences, using plain English and in a number of different formats. This was considered to be particularly true of information provided online, but offline summary documents did not necessarily convey the same information in a similar way. Most of the YouGov panel respondents felt the website was easy to navigate, clearly laid out, and user-friendly. Videos were generally felt to be interesting and appropriate, but again a significant number felt they were biased.

Online and offline users may have found themselves in the position of having differing understandings of the proposals. It is also not clear that information relating to the specific topics raised in the feedback form was available in a non-technical format to all consultees.

As is discussed in the “Local Residents” section, concerns were raised by those living in the Compulsory Purchase Zone (CPZ) and Wider Purchase Offer Zone (WPOZ)⁶ that information about key issues for them was unclear and required considerable effort to seek out. This included matters such as when their homes would be purchased and the valuation process. Neither online nor offline formats made finding this information easy for a group of people that is arguably the most impacted of all.

PRINCIPLE 4 – THE APPROACH TO CONSULTATION SHOULD BE APPROPRIATE FOR ALL RELEVANT AUDIENCES

The methods and channels used in the consultation should consider the characteristics and related needs of those potentially affected by any decision, or who would be likely to respond to the consultation. This includes considering their ability to access information and how easily they can respond to the consultation. Important considerations here are issues such as language and reading ability, routes to obtain information and ability to provide a response.

How well did the AEC meet this principle?

Overall, it was broadly felt that the consultation approach addressed this principle adequately. The approach to consultation was good for those with access to the internet and the consultation website, but weaker for those who could not access information online. Consultation events were held, and often well attended, which may mitigate this to some extent. The format of those events, based on the information available, was felt to largely meet best practice. However, we received feedback from some attendees that access for people with disabilities was very poor at some venues.

The consultation was promoted using a range of channels, which is in line with best practice approaches. Over three-fifths of the YouGov panel members were aware of the consultation and 30% had already submitted a response.

It did not appear that the majority of the documents were available in other languages or formats, the exception being

⁶ For maps and details of the CPZ and WPOZ, please refer to [Heathrow’s expansion proposals](#)

the Noise Insulation Policy document. Whilst it may not be proportionate to translate all documents into all languages or make them available in all formats, it was not obvious from the materials what provisions were made with regard to other languages or formats.

The consultation questionnaire was considered to be relatively long and used a large number of open questions, which may have discouraged some respondents from responding to all questions in full, and there may have been scope to use fewer, broader questions. This may have led respondents to feel better able to suggest alternative options or make amendments.

While the collection of information to monitor the demographic profile of the respondents was in line with best practice, there might have been scope for HAL to state more clearly that providing such information would not affect the consideration given to the views expressed.

PRINCIPLE 5 – THE CONSULTATION SHOULD LAST AN APPROPRIATE AMOUNT OF TIME

The Planning Act 2008, which sets out the legislative requirements for statutory consultation in relation to DCO applications, establishes a minimum period of 28 days for consultation. However, the length of time that a consultation should remain open should consider the nature and complexity of the proposals, the way in which the consultation is being delivered and the characteristics of the consultees.

Consideration should also be given to the timing of the consultation in relation to respondents' ability to be notified about the consultation, access and understand information and develop their response.

How well did the AEC meet this principle?

The consultation period was significantly longer than the 28 days required by law and longer than the consultation periods for most recent statutory consultations for NSIPs.

In allowing 12 weeks for responses, HAL adopted best practice, allowing ample time to contact consultees and for consultees to consider all of the information available and produce their response, even when bank holidays and school holidays were taken into account.

LOCAL RESIDENTS

The following is a summary of the findings from the research undertaken by YouGov and BritainThinks with residents of the five boroughs close to Heathrow Airport. As well as summarising their feedback and attitudes to the proposed expansion, it focuses on the issues that are likely to have a significant impact on local communities, such as the proposals for:

- The Community Compensation Fund;
- The construction programme; and
- Surface access and transport, including concerns about air freight.

The section also includes some of the findings and views of Temple and Collingwood Environmental Planners.

A map of the boroughs surrounding Heathrow airport can be found annexed to this report.

GENERAL FEEDBACK AND ATTITUDES TO THE PROPOSED EXPANSION

Arguably the single most significant finding to emerge from the consultation is the lack of trust towards HAL among local communities. This then influences local communities feel about the proposed expansion and the Airport in general. It is exacerbated by a perceived lack of transparency from HAL.⁷

Aware, but feeling uninformed

Awareness of the proposed expansion is high, but many residents are disengaged from the process, in part due to the protracted debate around the issue. On an emotional level, many have a strong sense of belonging to the area. The home in which

they live is their long-term family home and host to many historical events and/or memories.⁸

But many feel that they have not had the information they need. For example, resident information is generally directed at home-owners – meaning many of those in private rented or social housing have missed out on key information. Those in social housing are also waiting for information from their housing association about what will happen.

Lack of detail about compulsory purchase

Both during research by BritainThinks and interviews conducted by YouGov, those living in the CPZ or WPOZ⁹ raised specific concerns about lack of detail in the communications from HAL –. A local resident from Colnbrook and Poyle – reflected many comments when they stated: *“It’s quite hard to see the exact location of say the third runway and exactly where it is going to impact. I’d like to see an existing map of everything, and then a clear overlay that you can flip over seeing exactly where the new airport will be... it’s quite difficult to visualise exactly where things will be.”*¹⁰

In the CPZ, there are a number of elderly residents who have been living in their homes for over 40 years. They are very reluctant to accept compulsory purchase and some residents said that they plan to stick it out for as long as possible, in the hope that plans will not go ahead.

Improving communications presents a real opportunity for HAL to make a difference, but also represents a challenge as many residents are disengaged from the information HAL has sought to share with them. Letter box flyers are often discarded without being ‘received’. Similarly, adverts in

⁷ BritainThinks, ‘Hyper local’ area research, Final Report, October 2019, page 8-10.

⁸ YouGov, HCEB – Compulsory Purchase Zone Research, September 2019, page 11.

⁹ For maps and details of the CPZ and WPOZ, please refer to [Heathrow’s expansion proposals](#)

¹⁰ BritainThinks, ‘Hyper local’ area research, Final Report, October 2019, page 11.

the local press can be missed. The trust deficit means that people may well ignore HAL's messaging and communications.

13% of YouGov panel members and 34% of open survey respondents attended an event in person. Across both surveys, a majority agreed that the event was convenient (87% panel; 79% open), but a majority also agreed that it was biased in favour of expansion (71% panel; 87% open).

Most of the panel respondents were satisfied with the event (61% satisfied; 12% dissatisfied); most from the open survey felt the opposite (11% satisfied; 70% dissatisfied)¹¹. Amongst the more highly engaged groups of residents from specific areas most heavily impacted, there was a request for a more tailored approach, plus a senior presence. For example, a local resident of Colnbrook and Poyle said *"I don't expect the CEO of Heathrow to turn up to every meeting, but it's making sure that whoever turns up is senior enough and well informed and gives honest feedback to the residents."*¹²

Proposals for mitigation

The proposed mitigation measures were widely seen by residents as 'tokenistic'; many stated they wanted more detail about tangible actions that HAL could take to mitigate negative impacts on the local area. This view is strongly echoed in consultation responses from local authorities.

Information about positive impacts

While many residents understood the positive aspects of living close to the airport (employment, easier travel opportunities, etc), they also felt that HAL is asking – and has asked – a lot of their communities, not just in terms of physical assets and the

environmental impact, but also patience while decisions are pending. They therefore wanted to see HAL 'give back' to communities. There was recognition that it has done this historically with other expansion work and that it was relatively good in this respect.

Residents felt there was a lack of detail about how the proposed expansion will benefit local people and communities. While information closely detailed the negative impacts on their local area, residents felt the positives (on a national or economic scale) were too far removed from their day-to-day lives to be meaningful to them. However, those residents living further from the airport could readily see the benefits of the expansion in terms of better connectivity and infrastructure.

Plans for green space

The plans for green spaces were generally seen as a real positive, although residents were sceptical about the adequacy of these plans in the face of wider industrialisation of the areas and the environmental impact of an additional runway. Some also felt that the detail presented in the plans wasn't specific enough: an unquantified promise to 'improve green space', presented at the end of a long list of perceived negatives, made the offer seem 'tokenistic' rather than a real benefit for local communities. For example, a local resident of Stanwell said: *"Green spaces are all well and good, but they don't actually benefit most residents. They're just doing it as a show of good will. It seems like an afterthought."*¹³

Common concerns

The most commonly raised concerns from the YouGov panel were: air pollution (58%),

¹¹ YouGov, HCEB Consultation Experience Surveys, 27 September 2019, page 32-34.

¹² BritainThinks, 'Hyper local' area research, Final Report, October 2019, page 16.

¹³ BritainThinks, 'Hyper local' area research, Final Report, October 2019, page 14.

noise pollution from aircraft (57%), more traffic on the roads (53%), and carbon emissions (49%)¹⁴. The same issues were cited by open survey participants; however, the proportion raised the concerns was higher. 85% said they were concerned about air pollution, 82% with carbon emissions and 81% with noise pollution.¹⁵

COMMUNITY COMPENSATION FUND

The HCEB worked with YouGov to explore community reaction to HAL's proposal to create a single Community Compensation Fund to *"help address the positive and negative effects of the Project and improve the quality of life in the area around the airport."* In other words, this single Fund would be designed to both support mitigation measures and community facilities and initiatives.

YouGov found clear differences in attitudes between different groups towards the purpose of the Fund. For example, younger respondents placed a high emphasis on environmental and carbon mitigation of the proposed third runway. Older residents were more focussed on noise impacts.

The principles for the Fund

Although many agreed with the proposal that the Fund should be underpinned by guiding principles, a majority said that the principles as they currently stand are too vague to be effective.

The name of the Fund caused confusion, with the word "compensation" leading many to focus on what level of monetary payment individuals affected would receive. Compensation also has a negative connotation.

It was strongly felt that it would be clearer if there was a separate fund for improving the quality of life for communities in the long

term, which could not be used to fund mitigation measures that are required as part of the proposed scheme. In particular, the current principles were seen to lack an explicit emphasis on both public transport improvements and environmental measures.

How funding should be distributed

Generally, respondents were cautious about the role of local authorities in terms of distributing the Fund. Most respondents – both from the panel and the open survey – wanted the bulk of available funding to go to projects or groups, with smaller amounts designated for both individuals and broader public services.

Participants were asked about how the Fund should be distributed. Most did not have strong opinions on the matter, generally they felt that it would be appropriate for a 'third party' to be responsible for administering the Fund, rather than HAL. Any 'third party' would need to be fully representative of the broad range of stakeholders and communities who are impacted by Heathrow Airport's operations, such as local authorities, residents' groups, local business and education institutions.

Fund value

YouGov found that many respondents felt that the amount proposed for the Fund was quite small. This tended to mean that they were happy with it being spent in more creative ways and, on reflection, less on the idea of compensating individuals.

Involving the community in the Fund

Temple has suggested that as well as the more tangible environmental and community impacts, it is important that the Fund goes beyond addressing the following effects

¹⁴ YouGov, HCEB Consultation Experience Surveys, 27 September 2019, page 11.

¹⁵ YouGov, HCEB Consultation Experience Surveys, 27 September 2019, page 12.

already mentioned in HAL's environmental reports:

- Effects on community facilities;
- Effects on access to housing;
- Effects on demand for public services; and
- Effects on community sustainability, viability, cohesion and integration.

Instead, it suggested that the Fund could focus on the need and opportunity for enhanced provision above the baseline (i.e. before the airport expansion and its effects are mitigated).

The concepts of social value and social return on investment could be fully incorporated into the design of the Fund and process of awarding funding, which could also incorporate ways to ensure that projects or initiatives can be 'needs tested'.

Temple has put forward the idea that the Fund could be designed to support and ensure benefit across all communities and also address, in some cases, major long-term structural challenges and issues which require significant long-term funding.

So for instance, the Fund could be used to support a community interest company (CIC) akin to a regeneration company. This would work to support and build capacity in local communities and ensure they are able to inform fund expenditure priorities within a robust governance framework.

This approach would enable the community to be involved in developing the outcomes they would like to see, without having to develop stand-alone projects or rely on existing local groups or organisations to do this.

CONSTRUCTION

To achieve the project goal of enabling and supporting local communities to thrive rather than just survive during construction, it is important to understand how the effects experienced by communities from construction can be managed, mitigated and compensated for. Temple has highlighted that construction best practice now specifically incorporates community involvement, governance, planning and monitoring, innovative approaches and learning.

Lack of information in the Masterplan

Overall, respondents felt that it was hard to access information about the likely construction impacts on specific communities. The Masterplan did not make it easy to access that information for a local area, and the construction proposals were also hard to navigate. Whilst the "Local Area" documents and web pages may have enabled members of those communities to access relevant information, they lacked essential detail. This meant the reader needed to look into the more technical documents within the PEIR.

On the main website¹⁶, there was a video on the front page of the Masterplan 2022-2050. It included some visualisation, but many respondents felt it was not very meaningful. For example, the loss of areas of Harmondsworth and Longford are referred to simply as "displacement" and there was no visualisation to show what is there and what will be lost.

While this video included images of green space provision, these were deemed to look entirely generic; it was not possible to see how they related to actual locations. In the view of Collingwood Environmental Planning, the use of such vague imagery and

¹⁶

terminology would have served to reinforce any existing mistrust of HAL, and give the impression that HAL does not recognise or understand the significant impact these plans will have on residents.¹⁷

Issues around compulsory purchase valuation

Many homeowners in the CPZ said they were unclear about the dates on which their property would be valued for purchase. They were also highly concerned about the impact of delay. Residents worry that property values will have declined by more than 25% by the time valuations take place, meaning the promised purchase offer (of 25% above market value) could still effectively mean they experience a direct financial loss.¹⁸

A local resident of Harmondsworth said: *"I'm not sure about the legalities around what the value is. My understanding is 125%, but value from when? There's lots of rumours flying around."*¹⁹

Construction skills legacy

Best practice suggests effective community engagement during construction should be included. In addition, there should be a clear commitment from HAL to investing in the skills needed to secure the programme's delivery as well as creating lasting skills legacy in the industry.²⁰

Minimising nuisance from construction

To minimise nuisance from construction, a variety of technological mitigations could be

implemented which have been delivered on other large infrastructure projects.

To measure the whole life impact of the airport expansion construction programme, sustainability assessment methodologies such as CEEQUAL and BREEAM²¹ covering all stages of the project from design, construction and operation would be a key tool.

It was difficult to find the information on construction impacts on local areas. In addition, the Health impacts chapter also had very pertinent information relating to construction. Better links between these two documents would have been helpful, with local area summaries that clearly separate construction and operational impacts.

Overall, construction impacts and how they were considered is broadly in line with what would be expected in relation to social impact assessment (SIA) principles and practice. As local authorities note in their responses, the available information remains fairly high level and standard, given the nature of the project and long duration of construction.

SURFACE ACCESS AND TRANSPORT

This section summarises the report into these issues prepared by The Transport, Environment and Noise Advisory Group (TENAG).

As noted above, air pollution, climate change and noise pollution consistently came out as the top issues raised by local residents across the various surveys²². These are the

¹⁷ Collingwood Environmental Planning, Heathrow consultation review for HCEB, 19 September 2019, page 4.

¹⁸ BritainThinks, 'Hyper local' area research, Final Report, October 2019, page 12.

¹⁹ BritainThinks, 'Hyper local' area research, Final Report, October 2019, page 11.

²⁰ Temple, Vision for Sustainable Communities at Heathrow, Interim Recommendations Report, draft, 16 September 2019, page 2-3.

²¹ CEEQUAL is the international evidence-based sustainability assessment, rating and awards scheme for civil engineering, infrastructure, landscaping and works in public spaces. BREEAM (Building Research Establishment Environmental Assessment Method) is the world's longest established method of assessing, rating, and certifying the sustainability of buildings. There are plans to merge the two frameworks.

²² YouGov, HCEB Consultation Experience Surveys, 27 September 2019, page 11.

biggest negatives associated with the airport expansion and there was often felt to be a lack of clarity about the mitigations being put in place.

Reliance on projects outside of HAL's control

TENAG welcomed proposals which seek to improve existing surface access including clear targets for modal shift. They also welcomed the proposed introduction of Road User Charging, respite management, more integration and embracing the best of emerging technology. However, TENAG felt that greater honesty and transparency is essential about what HAL considers to be achievable, particularly as part of what is proposed is contingent upon other organisations to deliver and reliant on uncertain economics and technology.

For example, the aim that the expanded airport will result in 'no more traffic' will be challenging without the delivery of projects outside of HAL's control, such as the Western Rail Access, Southern Rail Access and Piccadilly Line Upgrade projects. Some aspects of the strategy are also poorly defined.²³ TENAG is sceptical as to whether HAL can meet its targets without these new infrastructure developments: the new rail links are essential to traffic management and as a means to improve air quality.

Resident concerns about traffic

Residents are also concerned about traffic. There is particular concern around increases in traffic on local roads as a result of commuters avoiding major construction works on the A3044 and M25, as well as a higher number of trucks trying to navigate narrow roads. Residents already felt that local traffic had worsened in recent years so

were sensitive about this being a growing problem²⁴.

Parking

TENAG also expressed concern about the scale of the two car parks proposed.

Pricing policy should be high enough in the parkways to encourage public transport use but not attract cars to the short-stay car parks. It should also be related to the Heathrow Ultra-Low Emissions Zone (HULEZ) and Heathrow Vehicle Access Charge (HVAC) to incentivise the usage of low emission vehicles when public transport is not an option.

The surface access traffic impact of the whole development needs to be addressed and set out in an integrated fashion with more information about impact, options and trade-offs. A regional approach is essential.

Whilst the plan for road pricing is welcome, it is disappointing that this has not been extended to embrace a Mobility as a Service approach.

CONCERNS ABOUT FREIGHT

TENAG expressed concerns that the proposals for the key role of technology to achieve growth without environmental degradation are unproven.

The impact of freight using off-airport facilities is not taken into account, including on the surrounding road network.

²³ Heathrow Community Engagement Board, Super Response to Heathrow Airport Limited Airport Expansion Consultation, September 2019, page 69.

²⁴ BritainThinks, 'Hyper local' area research, Final Report, October 2019, page 12.

AIRPORT PASSENGERS

This section has been informed by the Passenger Services Group (PSG) of the HCEB which exists to represent the interests of passengers using Heathrow Airport. The PSG, like HCEB, holds no collective view as to whether a third runway and expansion of the airport is desirable: that is for others to decide. However, the PSG's role is to comment on the implications of any proposed change for the passengers it represents.

The PSG believes that any expansion to Heathrow Airport needs to be done in a manner which:

- Delivers a best-in-class experience for both the domestic and international passenger;
- Provides a world-leading surface access to aircraft seat experience for those travellers who require extra assistance;
- Creates more air route opportunities for the rest of the UK and new international routes to meet the demands of 'Global Britain';
- Delivers the maximum amount of benefit to the local community especially in relation to employment, business and infrastructural opportunities;
- Enhances surface transportation options for both passengers and the wider community;
- Recognises the importance of minimising the environmental impact of the airport's operations;
- Minimises the financial charge back to the fare-paying passenger of the costs of airport expansion; and
- Proceeds with expansion in a way which does not compromise the passenger experience.

The PSG recognises that the proposed third runway will not only meet increasing passenger and high-value cargo demand, but will also provide HAL with greater flexibility and operational resilience (weather disruption). It may also both mitigate and minimize aircraft noise disruption around Heathrow.

The PSG supports the proposed expansion being based on both Terminal 5 and Terminal 2 and welcomes the plan for the eventual removal of Terminal 3. However, clear commitments to the Passenger Transit Systems need to be locked into any potential expansion.

The PSG also encourages the principle that landside retail and ancillary services should offer a mix which serves the local community as well as arriving and departing passengers – such as 24-hour pharmacies and grocery stores.

The PSG appreciates the importance of careful phasing and sequencing of the proposed expansion, but has concerns about whether the plans allow for sufficient terminal capacity to be delivered ahead of the growth in passenger numbers. Growth must be carefully matched with capacity.

The PSG supports a nuanced approach to the car driver's needs, so that there are real alternatives and incentives to take dedicated mass transit options for the final part of their journey, if not for all of it. Enhancing transport provision around the Central Terminal Area (CTA), with emphasis on better communicated and seamless options for all that use the airport, is fundamental to effective expansion. However, the ambition should not stop there: the Heathrow CTA can and should be a community transport hub for the entire area.

The communities and landscapes around the airport are an asset. The PSG supports all plans which ensure that HAL protects and

strengthens the opportunities for those around the airport and those using the airport for travel or employment to enjoy the wider area.

PEOPLE IMPACTED BY NOISE

This section has been informed by work from TENAG. It refers to the likely impact of changes to aircraft noise levels and patterns as a result of expansion.

Detailed proposals for new and changed routes for aircraft will not be available until 2022, and there will be a separate consultation around air space changes.

This lack of detail made it difficult to comment on other aspects of noise impact, especially given the fact that HAL is proposing to introduce 25,000 extra flights each year in the four years before the new runway opens. In particular, local communities want to know whether this will result in more night flights overall.

Similarly, there is a question mark about the definition and impact of 'exceptional circumstances' and the status of non-scheduled flights.

Proposals greeted positively

However, there were some proposals that appeared positive to local communities. These included the proposal to co-ordinate the day and night-time respite time, and the proposal for a new and innovative approach which gets away from westerly directional preference to 'managed preference'. These two proposals could result in all communities having longer respite.

TENAG agrees that the "noise envelope" proposed by HAL is a good concept which offers flexibility, particularly through the process of setting a five-year review timetable. It also welcomes the opportunity for local residents' participation via a noise envelope design group.

Construction noise

The cumulative level of noise during construction (including maintenance work and aircraft movement around the airport) needs to be explored further and there is at present very little evidence or estimation of this. A suite of metrics should be applied to surface access as well as aircraft noise.

Future work

The catchment area for consultation is wide and HAL needs to build trusting relationships and be more transparent with those communities that are living in the immediate locality - whether currently affected by noise and those who will be newly affected.

TENAG has suggested that there need to be more independent studies on environmental and health impacts. Not all effects can be translated to decibel measurements and it is increasingly accepted by noise experts that day-to-day living experiences are as important.

There are a number of 'known unknowns' underpinning HAL's proposals, such as the link between noise levels and flight paths (which, as noted above, have yet to be consulted on). Oversight and delivery of the proposals contained within the AEC will be critical. There remains a huge amount of uncertainty around noise, and the evidence presented is generally 'optimistic' scenarios. Scenarios with ranges would be more consultative.

LOCAL AUTHORITIES

Local authorities, as principle planning authorities, are statutory consultees for the AEC. Authorities who did not submit a formal response to the AEC are failing in their statutory duty as a Local Planning Authority. As such, most of the authorities which are impacted by the proposed expansion have published their draft or final responses to the AEC.

We have accessed the submissions of the relevant local authorities via their websites. Please refer to the relevant website for further details.

However, at the time of writing, we are yet to see the response from the London Borough of Hillingdon – the primary host borough for the airport. The absence of a published formal response from the London Borough of Hillingdon means that this summary cannot take into account the view of the statutory authority for these areas.

The sections below aim to provide a brief summary and review of the responses from other highly impacted local authorities who have published their responses. It also includes the views of the Heathrow Strategic Planning Group (HSPG), a non-statutory group of representatives from multiple local authorities, which aims to work together to raise concerns and deal with issues.

These summaries do not present a comprehensive review of the responses by local authorities. For the purposes of this report we have focused on some of the recurring themes emerging from these responses.

Every local authority response we have seen has raised significant concerns about the substance and manner that the AEC has been conducted – regardless of their overall

views on the proposed expansion. They appeared to agree that “the AEC does not provide the level of detail needed” and that the plans presented showed a “real lack of ambition and legacy”²⁵ – something they attributed to a suspected tightening of HAL’s purse-strings. These concerns are highlighted in the excerpts from the local authority responses included below.

As a result, many of the local authorities recommended that HAL should reconsider its proposed timeline for DCO submission, as further statutory consultation will be required.

EXCERPTS FROM HSPG AND LOCAL AUTHORITY RESPONSES

HEATHROW STRATEGIC PLANNING GROUP (HSPG)

*“HSPG has to state its deep concerns with the information and plans provided. HSPG has been working with [HAL] for several years to shape the scheme, yet fundamental issues and concerns remain. There has been a lack of action to address these frequently highlighted concerns”.*²⁶

LONDON BOROUGH OF HOUNSLOW

“We retain significant concerns about the masterplan, the acceptable delivery of the scheme, the surface access proposals as well as the knock-on air quality and noise impacts.... The council is therefore seeking significant enhancements to the mitigation package proposed as well as making recommendations to ensure that expansion is a catalyst for wider regeneration...”

We understand from experience with other DCOs that the level of detail available at statutory consultation stage is generally far higher than has been provided in this consultation... we therefore strongly

²⁵ Heathrow Strategic Planning Group (HSPG), Covering letter to John Holland-Kaye, CEO, Heathrow

²⁶ HSPG, Covering letter to John Holland-Kaye, CEO, Heathrow

encourage [HAL] to undertake further bespoke public consultation exercises on specific topics before they are finalised and included within the final DCO submission to the inspectorate.”²⁷

SLOUGH BOROUGH COUNCIL

“In the last six to nine months... the master-planning and proposed improvements for the Slough area have been significantly scaled back to a position that the Council can no longer support several aspects of the detail as set out in the proposed Heathrow Masterplan...

It is clear that if the impacts are not mitigated sufficiently... then Slough may need to consider qualifying our full support for expansion. It should be recognised that this is not Slough BC no longer supporting the potential benefits that a robustly planned expansion might bring, but more about the Council standing front and centre to protect its residents and improve growth for communities. The Council’s support for expansion is based on the benefits to the area, some of these now need to be advanced and confirmed by [HAL].”²⁸

SPELTHORNE BOROUGH COUNCIL

“There are significant areas where the information required for the Council to be able to form a view on the impact on our residents and the Borough is deficient or completely lacking... There is no positive legacy for local communities.”²⁹

REVIEW OF LOCAL AUTHORITY RESPONSES

FUTURE OPERATIONS AND NIGHT FLIGHTS

There is a general view from statutory respondents that HAL’s proposed ban on

scheduled night flights does not go far enough in providing adequate respite for communities and that the plans for operating a three-runway airport are inadequately fleshed out to be able to substantively respond to. For example, the HSPG “want to see further information... to produce 7 hours of night respite for all communities over a far wider geographic area.”³⁰

There is a desire for flexibility to be worked into the DCO, to allow for altering the runway operations after implementation so that they can be adapted to the real-world needs of the communities around the airport. London Borough of Hounslow “strongly suggest that DCO provision is secured which allows the runway alternation patterns to be reviewed in order to understand the impact on communities and allow for better changes if needed.”³¹

NOISE AND EARLY GROWTH

There is near universal opposition from local authorities to HAL’s proposal to introduce an additional 25,000 flights using the existing two runways – even from authorities who have provided longstanding support for the airport and expansion. The authorities commented that there are no meaningful details of what mitigation measures would be put in place for these additional flights and therefore it is impossible to see how these additional flights would not be to the detriment of the communities they represent; they were viewed as being solely to the benefit of the airport’s bottom line.

Hounslow Borough Council stated that “we fail to see what benefit this early growth will bring to our residents. The council expects to be consulted on this framework which must outline that early ATM [air traffic movement] growth can only proceed where its effects are demonstrably acceptable for our

²⁷ LB Hounslow, Cabinet Report, para 2.5.

²⁸ Slough BC, Cabinet Report, para 7.

²⁹ Spelthorne Borough Council, Cabinet Report.

³⁰ HSPG Response, Chapter 1, Strategic Overview.

³¹ LB Hounslow, Cabinet Report, para 6.8.

communities.”³² It also noted that: *“the indicative modelling of impacts in the PEIR address airport growth to 740,000 ATMs per annum and not the 753,000 ATMs currently proposed in the AEC.”*³³

On noise, there is a broad view that more detail is needed, with *“a general concern that [HAL] is relying too heavily on noise insulation to mitigate the impact of expansion and needs to explore further how to reduce noise at source in line with international best practice.”*³⁴

COMMUNITY COMPENSATION FUND

The local authorities expressed concern about the lack of detail provided in relation to the Community Compensation Fund.

Again, this is rooted in the perceived blurring of the important distinction between mitigation and compensation, with Hounslow Borough Council *“absolutely opposed to the use of the community fund to finance interventions and schemes which are necessary to mitigate the impact of the project. This includes all required surface access improvements, noise insulation and biodiversity or green space mitigation.”*³⁵ As mentioned above, opposition to the conflation of mitigation and compensation also runs through HCEB’s conversations with local residents.

The Government’s Airports National Policy Statement (ANPS), passed through parliament in 2018, gave support to the expansion of Heathrow Airport on the basis that it would offer *“the greatest strategic and economic benefits”*.³⁶ The detail of these strategic and economic benefits needs to be set out in more detail, particularly in relation to the structure and delivery of the Fund.

Councils felt that the DCO application process should be used as an opportunity to

move away from HAL’s *“single-till”* approach to compensation and mitigation –. Rather, the option of ring-fenced funds should be explored and included in the DCO so that there is a clear, long-term funding source for the Fund which is directly linked to the growth of the airport (whether measured in numbers of passengers or numbers of flights permitted).

Separately, the principle of ring-fencing should also be used in relation to funding public transport schemes such as the proposed HVAC and HULEZ.

The firm view of local authorities is that the Fund should be a *“value added”* fund which improves the quality of life for local communities compared with today. In addition, *“the fund needs to have a structure which supports effective oversight, meaningful community involvement, long term planning, the allocation of spend, and monitoring of projects and outcomes.”*³⁷

It should not be used, as is proposed in the consultation documents, to fund mitigations which are directly linked to expansion (foreseen or unforeseen) or projects which are already established and funded, such as the Heathrow Academy.

CONSTRUCTION

The construction impacts listed are very specific to certain communities, for whom they are often acute. Local authorities expressed concern that the documents released with the consultation Draft Code of Construction Practice (CoCP) and Construction Proposal (CP) remain *“relatively high level and standard in approach”*³⁸ and do not yet contain the detail required to review whether these are acceptable arrangements for residents, such as *“clear*

³² LB Hounslow, Cabinet Report, para 6.12.

³³ HSPG Response, Chapter 1, Strategic Overview.

³⁴ LB Hounslow, Cabinet Report, para 6.26-27.

³⁵ LB Hounslow, Cabinet Report, para 6.46.

³⁶ See www.gov.uk/government/publications/airports-national-policy-statement

³⁷ HSPG Response, Chapter 1, Strategic Overview.

³⁸ Slough BC, Cabinet Report, para 5.53.

construction route plans and management agreements”³⁹ which will need to be reviewed.

They also lack detail about the monitoring and enforcement of the agreements, which all authorities are keen to see and work with HAL on prior to DCO submission. The HSPG insists: *“there must be a monitoring of [HAL’s] compliance against its commitments, during operations and also construction. Much detail still needs to be worked through on proposals for monitoring, and HSPG does not feel the current proposals have the robustness required.”*⁴⁰

SURFACE ACCESS AND TRANSPORT

Criticism of the Surface Access Proposals (SAP) and Preliminary Transport Impact Report (PTIR) echo comments made elsewhere about the lack of detailed information provided in the consultation documents. The HSPG commented that the reports *“lack specific detail on how the airport’s expansion will impact local transport networks. No detail is provided on specific local impacts.”*⁴¹ Spelthorne Borough Council concluded that *“the Surface Access Strategy is fundamentally flawed, is not scientifically sound and does not justify Heathrow’s masterplan proposals.”*⁴² There are serious questions asked about whether the proposed HULEZ and the HVAC can bring about the scale of mode shift required. The HSPG also recommends *“that [Vehicle Access Charge and HULEZ] funds should be ringfenced for funding transport mitigations and improvement and that there should be a democratically accountable mechanism for distributing this money.”*⁴³

There are detailed concerns from some boroughs about the impact of the proposed Masterplan on journey times for public transport and active travel options – most

notably Slough, who believe that journey times will increase significantly with the alteration of the airport gateway. Another concern for Slough is the absence of a commitment to retain bus lanes on the A3044 and junction changes on the A4. This allows their Slough Mass Rapid Transport Bus (SMaRT bus) to run all the way from the furthest point of their borough into the airport on dedicated bus lanes – improving journey times and reliability.

³⁹ Slough BC, Cabinet Report, para 5.150.

⁴⁰ HSPG Response, Chapter 1, Strategic Overview.

⁴¹ HSPG Response, Chapter 1, Strategic Overview.

⁴² Spelthorne Borough Council, Cabinet Report.

⁴³ HSPG Response, Chapter 1, Strategic Overview.

BUSINESSES

Businesses, small medium and large, are a critical part of the employment landscape which exists around Heathrow Airport. They together employ many thousands of people and all have a stake in seeing businesses of all sizes succeed to generate jobs and employment.

The following is a summary of the feedback HCEB has received from stakeholders and through attending local business events. TENAG has also provided feedback.

Feedback from local businesses and business groups has emphasised the economic benefits and job creation the proposed expansion of Heathrow Airport could bring. For example, the overall view expressed at a business breakfast organised by the Hounslow Chamber of Commerce was that the proposed expansion was a positive thing for businesses within the host borough of Hounslow. However, it is important to note that many business owners and employees are also residents and have expressed concerns about air quality and noise pollution, alongside their positive views about the economic benefits expansion could bring.

Impact on small businesses

Business feedback emphasised that HAL will need to consider the impact of airport expansion on micro-businesses, small companies, and the self-employed. These groups may not have the resilience to transfer the business elsewhere successfully, or their regular customers could be affected by changed transport routes. Currently there is no indication of support available for businesses, unlike local residents.

We are aware that for High Speed Two there are two funding programmes to help offset the disruption of Phase One on local communities and businesses – the Community

and Environment Fund (CEF) and the Business and Local Economy Fund (BLEF).

There also remains an equalities concern as anecdotal evidence suggests that a lot of small shops such as convenience stores, general repair shops, small goods suppliers, grocers, butchers, fruit and vegetable stores are owned by BAME people, disproportionate to the general population.

These businesses often provide an informal social point of focus, especially for BAME women and older people. HAL's Equalities Impact Assessment (EQIA) stated that there will be 'no significant effect' from the proposals ; however, this conclusion will need to be backed up by evidence and further targeted outreach to understand the specific needs of these businesses and the wider social and cultural impact, both positive and negative, of the proposals.

Understanding local benefits

A common concern of attendees at various Chamber of Commerce events was the lack of local business involvement in the local supply chain. As with local residents, the benefits of the proposed expansion are often discussed in wider national terms. Clearly communicating specific **local** benefits would go a long way to reassuring local businesses that the benefits of the proposed expansion will be felt locally, not just at a strategic national scale.

Training and employment

It would be helpful if HAL could provide data on the details of their employment offer and current success rates from the Heathrow Academy. There remains a lack of detail on the employment and training offer, such as how the proposed 10,000 apprenticeships will be funded, how recruitment will be targeted, and the range of skills and training that will be offered.

It was also suggested that HAL could specifically target the training and employment of disabled and other equality groups, or go beyond its statutory duties and responsibilities, given the scale and scope of the proposed development activity.

Impact of construction

Many of the areas of concern raised by local residents apply to some extent to businesses around Heathrow Airport.

As with local residents' homes, construction blight exists already and if approved will continue for many years. HAL should consider the impact on sensitive local industries such as high street retail and food and beverage, and if specific support and mitigation will be required.

Businesses in the CPZ

This detail is particularly important to businesses within the CPZ and WPOZ. As with residents, there is a need for clear, specific and timely information to be provided, relevant to the local area. Given the drawn-out process of decision making, consultation and, if approved, construction, HAL will need to make additional efforts to communicate with businesses in these areas.

Impact of traffic proposals

More generally, there was a view that a critical issues for businesses – as well as for residents – will be how HAL's aim that there will be "no more airport-related traffic on the roads than there is today" is measured and defined. Some of the "airport-related" class of traffic may be hidden. Traffic could also go to a transport hub well away from the airport, so that other transport methods, such as a train, can be used. It is TENAG's view that **all** airport as well as non-airport related traffic should be included in this definition.

TENAG accepts that setting the boundary is difficult since HAL has no control of hotels,

freight and cargo providers outside the airport perimeter. However, the ANPS notes that HAL is committed to meeting the target of no more traffic on roads than today; achieving this would need an area-wide approach, the structure for which does not yet exist.

The masterplan should show details of local road diversions which will be crucial for local businesses to plan, particularly if they have a major logistics function.

This is especially needed in the light of current widespread congestion and full capacity on existing roads and rail.

Some local authorities are concerned that the proposed HVAC and HULEZ schemes around the airport would push vehicles out into the surrounding roads where there are no such charges. Residents expressed concerns over worsening local traffic, and this would also present a significant challenge to businesses.

We note that the forecast is to increase cargo from 1.7 to 3 million tonnes by 2040; we welcome the significant increases promised in efficiency through IT, new building, consolidation and forecourt layouts and vehicle call facilities. These measures will be essential if the 'no more traffic' pledge is to be met.

AIRPORT EMPLOYEES

Airport employees include those directly employed by HAL, the airlines as well as sub-contractors working at the airport.

Employees are represented on our Strategic Advisory Group: Communities & Stakeholders by a representative from GMB Union (Unions and Airport Workers).

Heathrow Airport is a major local employer, and a key part of the local economy. Its national strategic and economic importance has been the basis for the case for expansion. Most local and national business groups, and the trade unions which represent many airport and airline employees have been supportive of the proposals for expansion, notwithstanding specific feedback and concerns.

HCEB has not conducted any independent and targeted research into the views of airport employees and we have seen no evidence that HAL has conducted any bespoke outreach either. Anecdotally, there is fairly low awareness amongst airport and airline workers about the specifics of the proposals.

There are a number of issues which have been raised by our Strategic Advisory Group and by expert panels which have relevance to airport employees. Some bespoke consultation would be beneficial to understand specific concerns of airport employees, particularly about the surface access proposals.

Access proposals

Shift workers may have little option other than to use a private car to reach the airport. Proposals for the HVAC and HULEZ may have a particular impact on staff. Not all public transport runs 24-hours a day and it is not clear how this has been considered.

The proposals refer to 'direct shuttle services' to and from terminal and employment locations. While it may be too early to specify technology, the objective should be to minimise walking distance, level changes and wait times, and be electric powered. The terminal shuttles may have dedicated routes, but the staff shuttles will probably have to share roads but can still be electric. Although the proposed Parkways are primarily car parks, they will also provide the interchange point for pedestrian and cycle access, so should include cycle parking facilities and good access to the staff shuttles.

Clearly, the reduction in staff parking spaces will require very significant action on the part of all employers. The masterplan has only limited details about how this demand will be managed. This will require consultation and communication with staff and trade unions as well as an equalities impact assessment being carried out.

Training and employment

As noted in the business section, there remains a lack of detail on the employment and training offer, such as how the 10,000 apprenticeships will be funded, how recruitment will be targeted, and the range of skills and training that will be offered.

After the GMB Union's long-running campaign, last year, HAL announced all contracted staff working at the airport would be paid the London Living Wage of £10.55 per hour by 2020. However, the GMB is urging HAL to make sure all staff, including contractors, are paid *at least* this wage.

HCEB appreciates the challenges around securing this wage increase across a diverse group of contractors and sub-contractors. However, it is vital that airport employees share in the success of the airport.

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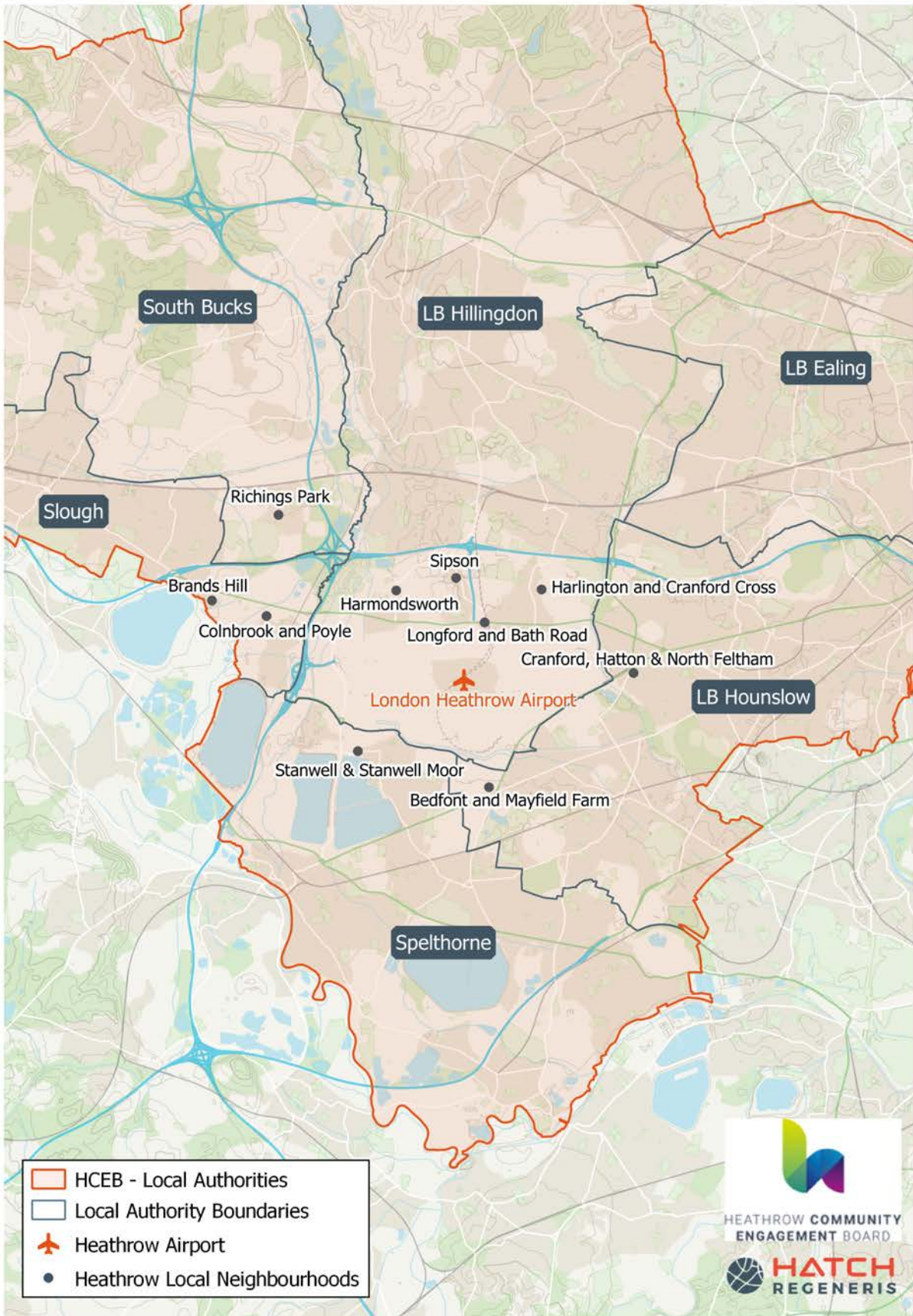
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GLOSSARY

ACC	Airport Consultative Committee
AEC	Airport Expansion Consultation
ANPS (or NPS)	Airports National Policy Statement/ National Policy Statement
ATM	Air Traffic Movements
BLEF	Business and Local Economy Fund
BREEAM	Building Research Establishment Environmental Assessment Method
CEF	Community and Environment Fund
CEEQUAL	the international evidence-based sustainability assessment, rating and awards scheme for civil engineering, infrastructure, landscaping and works in public spaces.
CIC	community interest company
CP	Construction Proposal
CoCP	Code of Construction Practice
CTA	Central Terminal Area
CPZ	Compulsory Purchase Zones
DCO	Development Consent Order
EQIA	Equalities Impact Assessment
HACC	Heathrow Airport Consultative Committee
HAL	Heathrow Airport Limited
HCEB	Heathrow Community Engagement Board
HSPG	Heathrow Strategic Planning Group
HULEZ	Heathrow Ultra-Low Emissions Zone
HVAC	Heathrow Vehicle Access Charge
NSIPs	Nationally Significant Infrastructure Projects
PIER	Preliminary Environmental Information Report
PSG	HCEB's Passenger Service Group
PTIR	Preliminary Transport Impact Report
SAGs	HCEB Strategic Advisory Groups: Communities and Stakeholders Advisory Group (SAGCS) and Elected Members
SAP	Surface Access Proposals
TENAG	HCEB's Transport, Environment and Noise Group
ULIM	Unanticipated Local Impacts
WPOZ	Wider Purchase Offer Zone

ANNEX – MAP OF THE BOROUGHS SURROUNDING HEATHROW





HEATHROW
**COMMUNITY
ENGAGEMENT**
BOARD