HEATHROW AIRPORT

Local Authority Boundaries in the vicinity of the Airport:

- HILLINGDON LB
- HOUNSLOW LB
- COUNTY of SURREY
- BOROUGH OF SPELTHORNE
- COUNTY of BUCKINGHAMSHIRE
- DISTRICT of SOUTH BUCKS

BUCKINGHAMSHIRE

HILLINGDON

HEATHROW AIRPORT

SURREY

HOUNSLOW

REPORT NO. 665
LOCAL GOVERNMENT

BOUNDARY COMMISSION

FOR ENGLAND

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LOCAL GOVERNMENT BOUNDARY COMMISSION FOR ENGLAND

CHAIRMAN

Mr K F J Ennals CB

MEMBERS

Mr G Prentice
Mrs H R V Sarkany
Mr C W Smith
Professor K Young
Signed

K F J ENNALS (Chairman)

G R PRENTICE

HELEN SARKANY

C W SMITH

K YOUNG

R D COMPTON
Commission Secretary
16 July 1992
INTRODUCTION

1. This report contains our final proposals for local authority boundaries in the vicinity of Heathrow Airport. The proposed changes will affect the boundaries of the London Boroughs of Hounslow and Hillingdon, the Borough of Spelthorne in the County of Surrey, and the District of South Bucks in the County of Buckinghamshire. We have proposed significant boundary changes to unite Heathrow within one London authority (Hillingdon). Our proposals will, however, only transfer a small number of people between local authorities. Our conclusions are set out in paragraph 191.

2. On 1 April 1987 we announced the start of a review of Greater London, the London boroughs and the City of London as part of the programme of reviews we are required to undertake by virtue of section 48(1) of the Local Government Act 1972. We wrote to each of the local authorities concerned.

3. Copies of our letter were sent to the adjoining London boroughs; the appropriate county, district and parish councils bordering Greater London; the local authority associations; Members of Parliament with constituency interests; and the headquarters of the main political parties. In addition, copies were sent to the Metropolitan Police and to those government departments, regional health authorities, and electricity, gas and water undertakings which might have an interest, as well as to local television and radio stations serving the Greater London area, and to a number of other interested persons and organisations.
4. The London boroughs and the City Corporation were requested to assist us in publicising the start of the review by inserting a notice for two successive weeks in local newspapers so as to give a wide coverage in the areas concerned.

5. A period of seven months from the date of our letter was allowed for all local authorities and any person or body interested in the review to send us their views on whether changes to the boundaries of Greater London authorities were desirable and, if so, what those changes should be and how they would serve the interests of effective and convenient local government - the criterion laid down in the 1972 Act.

OUR APPROACH TO THE REVIEW OF GREATER LONDON

6. We took the opportunity in our Report No 550, "People and Places" (April 1988), to explain in some detail the approach we take to our work and the factors which we take into consideration when conducting reviews, including the guidelines given to us by the Secretary of State (set out in Department of the Environment Circular 20/86 in the case of the reviews of London).

7. Subsequently, in July 1988, we issued a press notice, copies of which were sent to London boroughs, explaining the manner in which we proposed to conduct the review of London borough boundaries. In the notice we said that, from the evidence seen so far, this was unlikely to be the right time to advocate comprehensive change in the pattern of London government - although the notice listed a number of submissions for major changes to particular boundaries which had been made to the Commission, some of which the Commission had itself foreseen in "People and Places". These and other major changes to particular boundaries are being considered by the Commission as it makes proposals for changes to the boundaries of the London boroughs in its Review.

8. More recently, we have felt it appropriate to explain our approach to this, the first major review of London since London government re-organisation in 1965 and to offer our thoughts on the issues which have been raised by the representations made to
us, and by our consideration of them. We have therefore published a general report, entitled "The Boundaries of Greater London and the London Boroughs" (Report No 627) which discusses a number of the wider London issues which have arisen during the course of this review.

THE BOUNDARIES COVERED BY THIS REPORT

9. This report covers the boundaries of the following authorities in the vicinity of Heathrow: the London Borough of Hillingdon, the London Borough of Hounslow, the County of Surrey, the Borough of Spelthorne, the County of Buckinghamshire and the District of South Bucks.

OUR REVIEW OF LOCAL GOVERNMENT BOUNDARIES IN THE VICINITY OF HEATHROW AIRPORT: INTRODUCTION

10. We recognised at an early stage that the pattern of local government boundaries in the vicinity of Heathrow Airport presented major anomalies and we therefore decided to treat the Heathrow area as a separate issue in its own right. We undertook to examine local authority boundaries across the Greater London boundary affecting the borough of Spelthorne in Surrey and the district of South Bucks in Buckinghamshire in addition to the two London boroughs involved, Hillingdon and Hounslow. As well as obtaining submissions from the local authorities directly concerned, we also investigated the relationship between the airport and the surrounding communities, and the provision of local authority services to the airport. At an early stage in the review we visited the airport to see the scale of its activities. We also invited officers from the local authorities to attend a meeting with us at which they presented their Councils' views.

THE INITIAL SUBMISSIONS MADE TO US

11. In response to our letter of 1 April 1987, we received submissions from the four local authorities directly concerned (the London Boroughs of Hillingdon and Hounslow, Surrey County
Council and Spelthorne Borough Council), Heathrow Airport Limited (HAL), the London Boroughs of Ealing and Richmond, three local Members of Parliament, four Spelthorne councillors, ten interested organisations and 185 members of the public. Four petitions were also received.

12. The London Borough of Hillingdon and the London Borough of Hounslow each proposed to incorporate the whole airport within its own boundary. The London Borough of Hillingdon argued that, as Heathrow is a single entity and London's major airport, it should be united within a single London Borough. It pointed out that, as the Borough already included 72% of the airport by area, and was responsible for the majority of the local authority services provided at the airport, the easiest and best solution, in terms of the provision of services, would be for Hillingdon to encompass the whole airport; this could be done by adopting the Southern Perimeter Road as the new southern boundary to the borough. This suggestion was supported by three organisations but opposed by two others. Mr Terry Dicks MP also expressed his support for Hillingdon's proposal.

13. The London Borough of Hounslow argued that for planning and other reasons Heathrow should come within a single London authority. Hounslow felt that it should encompass the whole airport, on the grounds that it is the local authority most affected by the airport's activities in planning and environmental terms. It considered various options for including the airport in its area, including the combined use of the M4, M25, and A30 (this line was also suggested by one member of the public) but finally decided on a combination of the A4, M25, A3113, Southern Perimeter Road and Bedfont Road, thus minimising the effects on neighbouring boroughs. This suggestion was supported by the London Boroughs of Ealing and Richmond, two organisations and by Mr Patrick Ground QC MP, but opposed by one member of the public.

14. In its original submission Spelthorne Borough Council argued that there would be significant advantage for "effective and convenient local government" in the individual local authorities having within their respective areas those parts of the airport
whose activities most affect them. It therefore suggested a rationalisation of the boundaries whilst retaining the present tripartite split. Spelthorne pointed out that relatively few local government services are provided at the airport itself, and contended that, in terms of effective and convenient local government, there was nothing to be gained from a single authority approach. It also claimed that particularly strong community ties existed between Spelthorne and the Cargo and Fourth Terminals, through employment links, and therefore suggested their complete incorporation into Spelthorne. Spelthorne's approach was fully supported by Mr David Wilshire MP.

15. **Surrey County Council** supported Spelthorne's views, but preferred a two-way split of the airport, with the exclusion of Hounslow. Surrey's case was based on planning, road access and future consultation grounds and on the experience which both it and Spelthorne had gained in providing services to a significant part of the airport, namely Terminal Four and the Cargo Terminal. This suggestion was later supported by Spelthorne Borough Council.

16. **Heathrow Airport Ltd** (HAL) originally suggested placing the whole of the airport in Hillingdon. However, HAL's suggestion went further than Hillingdon's own proposal by using the M25 and A30 as the new boundaries, thus bringing into Hillingdon a larger area to the south of the airport, including Stanwell and Stanwell Moor. HAL claimed that this would solve the problems and make allowance for the probable areas of future airport-related development. HAL said it had initially considered a compromise solution, similar to that proposed by Surrey, to be viable (though less desirable) but had later come down strongly in favour of a single authority solution. In this later view HAL also modified its original Hillingdon-based proposal, to exclude Stanwell Moor, but to include all HAL-owned land to the south and east of the airport, thereby including in Hillingdon the area known as "Camp Four", and the balancing and water treatment facilities near East Bedfont. In addition, it proposed the extension of Hillingdon by including open land on both sides of the M25. It considered this land to be a likely area for a
future collector/distributor road system to serve the airport, irrespective of whether the airport was extended into the Perry Oaks site. HAL eventually decided to exclude Stanwell from its proposals altogether. In a separate representation, HAL stated that from the point of view of security the fewer the number of separate organisations that need to go "airside" the better. Airport security, therefore, would be assisted by including Heathrow in one local authority.

17. HAL's initial suggestion affecting Stanwell and Stanwell Moor evoked a considerable response from the residents concerned. We received representations from Mr David Wilshire MP, four Spelthorne Borough Councillors and 183 members of the public, all of whom objected to any suggestion to transfer Stanwell and Stanwell Moor to Hillingdon, on the grounds that the airport acts as a barrier to north-south movement and that the two communities would in effect be detached from the rest of Hillingdon. Many of the residents referred to their depth of community feeling towards Staines, while some objected to any moves that would transfer the areas either to Hillingdon or to Hounslow; a number supported the suggestions put forward by Spelthorne and Surrey, while many residents favoured the present system of shared responsibility. Four petitions (with 880, 310, 303 and 30 signatories respectively) were also received. The first opposed the transfer of Stanwell to either Hounslow or Hillingdon; the second supported Surrey and Spelthorne's views; and all four objected to Stanwell being transferred to Hillingdon.

18. The London Fire and Civil Defence Authority and the London Planning Advisory Committee both supported the principle of uniting the airport within a single London borough. London Underground Ltd argued that the airport should be united in one authority. Its concern was to establish a close relationship with the local fire services at Heathrow which it had found to be "unusually difficult"; it believed the status quo represented an unnecessary risk to its passengers.
19. Heathrow is a striking example of modern development overlying existing local authority boundaries, which then remained unaltered in detail at the time of reorganisation of London government in 1965. We considered that the layout of the airport which had been developed since 1944 bore no relation to local authority boundaries. The latter followed arbitrary lines which, for example, divided the aircraft maintenance area, and even Terminal Four, between different authorities.

20. We recognised the importance of Heathrow to the national economy as a major international airport, increasingly in competition with others in Europe. In so far as local authority services are relevant to its successful operation, we believed they should be provided to it in the most effective way possible. At the same time, we were very aware of the communities immediately surrounding it and of the work of the local authorities responsible for those areas.

21. In the light of the evidence submitted, we took the view that the retention of the geographical split between three authorities was impossible to justify in terms of the needs of the airport and those who use it and work there and in terms of the efficiency of local authority operations. We felt that the division of Heathrow, not only between individual local authorities but also between types of local authority - shire county/district on the one hand and London borough on the other - was not conducive to effective and convenient local government. While appreciating the desire of the surrounding authorities to retain a stake in the airport, to give more substance to their representative role, we saw little merit in seeking to divide it "more rationally" (for example, by placing the Cargo Terminal and Terminal Four wholly in Spelthorne, the maintenance area wholly in Hounslow and the remainder, including Perry Oaks, in Hillingdon). While such a division would produce some benefit in clarifying boundaries, we felt that it would not deal with the main issues concerning the airport.

22. We noted that the sum of local authority services provided
on the airport itself was not large in comparison with the range authorities normally provide. They nevertheless included the following: port health control (including inspection and control of imported food, medical inspection of immigrants and port health measures), environmental health (including food hygiene, control of infectious diseases, disinfection of aircraft, animal health and welfare, health and safety, pest control and noise), social services and trading standards. The local authorities also exercised limited planning control on the airport, as its operational land is subject to the terms of a General Development Order.

23. The majority of services are provided by a combination of two, or sometimes three, of the authorities concerned. We noted, in this respect, that another authority, the City of London Corporation, is responsible for animal imports and therefore operates the Animal Quarantine Station. With regard to fire services, Heathrow has its own emergency service. However, the London Fire Brigade remains responsible for the whole airport, except for Terminal 4 where the Surrey Fire Brigade is responsible for attending "domestic fires" only. The policing of the airport is carried out by the broadly self-contained Heathrow Division of the Metropolitan Police.

24. We took the view that the present arrangements work (with some vulnerability from time to time) because of a determination on the part of all the authorities concerned. However, we felt that the question which needed to be addressed was whether, for the busiest international airport in the world, those arrangements were good enough, or if better arrangements were possible. We considered that the need for the airport management, and for many firms and other organisations on the airport, to have to deal with up to four local authorities in the conduct of day-to-day business was unsatisfactory. While some of these problems could be alleviated by one authority acting as the agent of another, as to an extent happens already (for example, Hillingdon is the Port Health Authority for the whole airport), we took the view that such arrangements in themselves tend to obscure lines of responsibility and hence weaken accountability. Moreover, we also had regard to the views of both Heathrow
Airport Ltd and London Underground Ltd that the current division of responsibilities made it harder to maintain the high standards of security and safety now required on the airport.

25. On the grounds of practical service delivery alone, therefore, we considered that there was a strong case for Heathrow to be placed within the area of a single local authority.

26. Planning considerations seemed to us to be particularly relevant in the case of a national asset of such importance, where capital investment decisions have far-reaching environmental implications as well as a long lead times. We noted that the airport's operational land is covered by the General Development Order which limits local authority involvement at the airport in planning terms. In addition, proposals for major developments, such as new or extended terminals and runways, have in practice been decided at national level in view of their scale and importance. Our concern, however, was that any local authority responsible for granting permission for development in the area outside the operational control of the airport, or dealing with the enforcement of environmental controls, needed to be able, and to be seen to be able, to take a balanced view of all the relevant considerations.

27. We were concerned that the present boundaries inhibited such a balanced view within any one local authority. Planning decisions made in one authority's area may adversely affect people in another area. It was not our wish to comment on the merits of particular cases, although we were aware of difficulties in dealing with development round Heathrow near the current boundary, but we felt the main point to be that any boundary which cut across the area of immediate impact of a single large development could cause considerable difficulties to the authorities concerned, and to the people they represented. The resulting process of consultation could also be disadvantageous to developers in terms of additional delay. Local government was not 'convenient' under these circumstances.

28. We considered therefore that, in order to deal effectively
with development and environmental needs, and to bring to an end
the current duplication of planning processes, the boundary
should at least go well beyond the perimeter, to encompass this
area of immediate impact in which the airport's presence was a
dominating influence. Before seeking to define a boundary to
reflect this approach, we considered whether it should go
further, to embrace the area over which Heathrow exercised a
strong, if not dominant, influence. We recognised that a much
wider area round Heathrow was subject to airport-related
development pressure, including at least the whole of Spelthorne,
the southern part of Hillingdon, and the greater part of
Hounslow, and that the area affected by noise and traffic impact
extended still further.

29. We concluded that only radical change would enable the whole
area of development pressure to be brought into one local
authority. While this would undoubtedly have benefits for
planning, any such radical change would mean either the
incorporation of Spelthorne into London (rejected in 1963), or
its division into two parts, possibly leaving the part not
brought in London too small to be an effective district, or a
major incursion of Surrey into London. We felt that, despite
Heathrow's importance, the practical problems caused by its
division between authorities did not warrant such major
restructuring, which would have major implications also for the
whole pattern of boundaries in south-west London. We concluded
that only the immediate area dominated by the airport should be
included.

30. We therefore carefully investigated the area round Heathrow,
in relation to the whole pattern of land use and communications
in this part of west London, to see how far beyond the perimeter
the boundary needed to go. We took account of the noise and
public safety zones; the location of land owned by Heathrow
Airport Limited; and the general disposition of areas of land
subject to commercial pressure for airport-related and associated
uses. We observed those parts of the surrounding area which
suffer from the airport through visual intrusion, noise or
traffic, both from the runways and from ancillary developments
and operations. We noted, for example, how the physical presence
of the airport could be felt both north of the A4 and in Stanwell. In our view, Stanwell was vulnerable because it is at this part of the perimeter that a large area of housing comes closest to the airport's terminals. The direct impact of the airport gradually lessens with distance, and we sought to find the most appropriate line that would effectively delimit those parts round the perimeter of the airport which were most affected by the airport's operations and dominated by its impact. We sought lines which would both provide clear boundaries and encompass, as far as possible, whole communities so that, within them, the interest of those communities could be weighed against the development of the airport and its related uses, by the elected representatives of one local authority.

31. In considering the best location for such a boundary, we noted that the bulk of the airport and of the areas overwhelmingly dominated by it currently fell for the most part in London, except for Stanwell and Stanwell Moor. The airport has closer links with London than it has with Surrey, through patterns of transport, commercial, industrial and social activity. Its immediate orientation is essentially towards London, notwithstanding its regional and national role, as had been recognised in successive transport studies. We noted, moreover, the introduction of the new unitary development planning system in London. The current development plans of all the authorities with a share in the airport already devoted considerable attention to its needs and to its impact on its surroundings. We considered that it would be advantageous for the whole airport and its immediate environs to be within one London planning area. Not only would the public and HAL then be able to work within a consistent framework for development, and contribute towards its revision in due course, but there would also be only one level of strategic guidance. We took the view that, although Hillingdon and Hounslow could in theory produce a joint Unitary Plan, it would have to cover a large and disparate area (from Northwood to Chiswick). We noted the fact that it would not be possible for a formal joint plan to be prepared between a county district and a London borough.

32. In the light of all the service delivery, safety, security,
transport, environmental and planning arguments, we concluded that Heathrow, with its immediate environs, should be united within London and within a single London borough.

33. We first considered the case for that borough to be Hillingdon, in which the greater part of the operational area of the airport lies. As the largest provider of services at the airport, it had built up expertise at officer level in various fields over many years. Although we saw this as an important factor, we did not consider, however, that this should be an overriding factor in determining future local government at the airport, as it was clear that any of the local authorities concerned could provide effective services. Hounslow, Spelthorne and Surrey had all built up their own expertise in particular fields. More importantly, we saw little logic in extending Hillingdon southwards to include Stanwell and Stanwell Moor, as these would both be isolated by the airport itself from the rest of the borough. The response from the residents to Heathrow Airport Ltd's initial suggestion tended to support this view. Furthermore, we considered HAL's suggestion that Hillingdon should include all HAL-owned land and areas in which future airport-related developments were anticipated (including Camp Four, Bedfont Lakes and land adjacent to the M25), to be unnecessarily extensive. It would create a highly anomalous pattern of local authorities in the area, with long fingers of Hillingdon and Spelthorne protruding into each other's territory. We felt that these factors would, in themselves, militate against effective and convenient local government.

34. We considered the case for Hounslow. We observed that Hounslow's predominantly east-west orientation and the pattern of existing communications lent itself more readily to the incorporation of the relevant areas - both to the north of the airport (as far as the M4, thereby including Harlington, Sipson, Harmondsworth and Longford) and to the south (including Stanwell and Stanwell Moor). All these areas have ready access to the centre of Hounslow; furthermore, Hounslow already included by far the greatest number of residents affected by noise. It also had the largest share of the airport's labour force living within it. We felt this should help to ensure that it took a balanced view
of the airport's future development, taking account of its local value as a centre of employment as well as of its environmental impact. In addition, we considered that, in this sector to the west, the M25 and Colne Valley already formed the natural boundary of London.

35. We therefore considered that, of the two London Boroughs, Hounslow had the stronger claim and went on to consider an appropriate boundary for an extended Hounslow. We considered that, with regard to the southern boundary, while the A30 would present a clear boundary, it would be an unsatisfactory one as it would detach Staines Moor and the houses immediately north of the road from the rest of Staines, with which they undoubtedly have strong links. We therefore favoured a line to the north of the King George VI and Staines reservoirs, thus leaving the whole of a Site of Special Scientific Interest in Spelthorne.

36. We decided to issue draft proposals to extend Hounslow westward along the M4, southward along the M25, and then along the northern edge of the King George VI and Staines reservoirs, before returning eastward along the A30 to the present Hounslow/Spelthorne boundary in the vicinity of West Bedfont. We considered that the new pattern of local authorities which would thus be provided in the area would better reflect both the importance of the airport and its significance for the lives of residents and businesses in the areas immediately surrounding it. We also felt that it would not do violence to the general pattern of boundaries in this sector of the periphery of London. In our view it would also greatly assist the management of the airport by simplifying its many day-to-day dealings with local government. As regards possible future development, we felt that the use of the M25 as Hounslow's western boundary would simplify the planning process for all concerned if an application for the construction of a fifth terminal was submitted.

37. We announced our draft proposals in a letter on 29 May 1990. Copies were sent to all the local authorities concerned and to all those who had made representations to us. The London Boroughs of Hillingdon and Hounslow, the County Councils of Surrey and Buckinghamshire, the Borough Council of Spelthorne and
the District Council of South Bucks were asked to publish a notice advertising the draft proposal. In addition they were requested to post copies of the notice at places where public notices are customarily displayed. They were also asked to place copies of our letter on deposit for inspection at their main offices for a period of eight weeks. Comments were invited by 24 July 1990. In response to requests for more time this deadline was extended until 1 November 1990.

RESPONSE TO OUR DRAFT PROPOSALS

38. We received submissions from the four local authorities directly concerned (the London Boroughs of Hillingdon and Hounslow, Spelthorne Borough Council and Surrey County Council). Submissions were also received from the London Boroughs of Ealing and Richmond upon Thames, Berkshire and Buckinghamshire County Councils and South Bucks District Council, five Members of Parliament, four Spelthorne Borough Councillors, one Surrey County Councillor, Heathrow Airport Ltd (HAL), 29 other interested bodies and organisations and from approximately 600 individuals.

39. The London Boroughs of Hillingdon and Hounslow each proposed uniting the airport in its own area.

40. Hillingdon welcomed our proposal to unite Heathrow within a single London authority. However, it stated that the authority should be Hillingdon, not Hounslow, and opposed the transfer of the adjacent communities with the airport.

41. Hillingdon expressed the view that the draft proposals did not meet the criteria of effective and convenient local government, stating that they overestimated the effect of Heathrow on some surrounding authorities, yet underestimated the effect on Hillingdon. It disputed the importance the Commission had attached to aircraft noise, stating that the noise footprint extended beyond London and affected people in the Home Counties just as much as those in London. The Council stressed, however, that its area suffered greatly from noise and that, as a result, it had developed skills in noise reduction through its work with
RAF Northolt, also located in the Borough, and with HAL. It commented that it had also built up expertise in providing a range of airport-related services, and had wider experience in this field than Hounslow.

42. The Council argued that there would be cost and disruption to local authority services if the draft proposal was implemented. It cited as an example a local Hillingdon school whose site would then be split between Hillingdon and Hounslow. It added that district health authority boundaries were co-terminous with the council's, an arrangement which had benefitted integrated provision of health and social services and would be lost under the draft proposal. It stated that the Hillingdon Magistrates' Courts service based at Uxbridge, which dealt with most of the work arising from Heathrow, would also be disrupted.

43. Hillingdon emphasized the level of local opposition to change, referring to a survey of residents in the villages south of the M4 which it had commissioned. This had demonstrated that the majority of Hillingdon residents living to the south of the M4 did not wish to move; that their links were to Hillingdon for many functional and community purposes; and that the M4 was not a barrier to movement. The Council also referred to development which was taking place on both sides of the M4, and stated that the motorway was crossed by several roads carrying traffic into Hillingdon. It expressed the view that there were good north to south transport links in the area, connecting Heathrow and the surrounding Hillingdon communities with the borough.

44. Hounslow agreed with the draft proposal to unite Heathrow in its area. The Council reiterated the argument it had expressed in its previous submission that, as the borough most affected by Heathrow in environmental and planning terms, it was the best fitted to take a balanced view of the airport. It stated that, although it provided relatively few services on the airport, the borough played a significant role. Hounslow recognised that airport planning issues affected other authorities, and in the event of Heathrow being transferred, proposed to establish a Heathrow Advisory Planning Forum to represent the interests of the local area.
45. However, in view of the strong local opposition, Hounslow opposed that part of the Commission's draft proposal which would transfer the adjacent communities to the borough. Accordingly, it requested that its original proposal, to unite only the airport area in Hounslow, be accepted by the Commission.

46. **Surrey County Council** strongly opposed the draft proposal on the grounds that it did not accord with effective and convenient local government, was inconsistent with proposals made by the Commission elsewhere and would result in an anomalous stretch of boundary. It also objected to what it regarded as the possibility of more parts of Surrey being taken into London. In view of the strong local opposition to change expressed by the residents of the communities south of the airport - Stanwell and Stanwell Moor - it requested that these areas remain in Spelthorne.

47. The County Council accepted that the present boundary was anomalous, and restated its original proposal for a realignment along the M4, the A3044 and the southern runway of the airport. It argued that this would avoid cutting across the area of immediate impact of the airport, whilst preserving the rights of Spelthorne and the County Council to influence current and future development.

48. Surrey stated that no local authority or body had proposed that Stanwell and Stanwell Moor be moved, and argued that the draft proposal was clearly opposed by the majority of local people, as evidenced by those residents (over 12,000) who had signed petitions and leaflets distributed by the council. It commented that Stanwell and Stanwell Moor possessed distinct identities as village communities, and that they had no affinity with either Hounslow or Hillingdon, which were perceived by residents as being remote and inaccessible. The Council expressed the view that, in the event of the transfer of the airport, either Hillingdon or Hounslow would have to reorganise service provision arrangements to take in the airport and its environs. It added that taking in such a large area would exacerbate the elongated shape of the receiving boroughs.
49. The County Council disagreed with our view that, to deal effectively with development and environmental considerations, the Greater London boundary should be extended well beyond the perimeter of the airport. It also argued that the draft proposals would reduce the number of residents who, through their elected representatives, could have a say in the airport. The Council commented that the areas severely affected by airport-related noise included Poyle and Colnbrook, which the Commission had proposed should be transferred to authorities with no involvement in the airport, and that the Commission had not addressed the airport's effect on other areas, stretching from Windsor to Richmond.

50. Surrey County Council stated that, in the event of transfer, the expertise built up by the Surrey authorities in the cargo handling aspect of the airport's activities would be lost, and it saw no benefits to be derived in terms of airport security from uniting the airport in one local authority area. The County Council noted our view that the tripartite split of the airport affected the discharge of development or environmental controls outside Heathrow's operational area. However, it commented that there was no evidence, either from local residents or the local authorities involved, to suggest that a balanced and effective approach to planning had not been taken.

51. Spelthorne Borough Council stated that the Commission's proposals exaggerated the importance of Heathrow Airport in terms of local government services. The Council claimed that we had departed from the criteria of effective and convenient local government by placing great emphasis on how services were provided to a "private" developer, such as Heathrow Airport Ltd.

52. Spelthorne objected to the proposed transfer of Stanwell and Stanwell Moor, on the grounds that it was not supported by any local authority or interested party, and was overwhelmingly opposed by local people. The Council stressed that Stanwell's historic links and community ties lay with Staines, Ashford and the rest of the Borough, rather than Hounslow. A social survey, commissioned jointly with Surrey, had shown that Stanwell
residents were closely linked to centres in Spelthorne for shopping, leisure and community activities, and that they held a strong attachment to Stanwell and Spelthorne and felt no identity with Hounslow. Spelthorne stressed that residents' links and affinity with the Greater London area were even less strong now than they had been in the 1960s, when similar proposals had been rejected.

53. The Council commented that transferring Stanwell would disrupt the provision of services in the area. It expressed the view that Stanwell was not the only area overwhelmingly dominated by the airport, and that other areas were equally affected, drawing the Commission's attention to Poyle and Colnbrook.

54. Spelthorne opposed the principle of uniting the airport in one authority, stating that the existing joint approach adopted by the authorities in the area more closely reflected local residents' interests than would a single authority approach.

55. Heathrow Airport Limited (HAL), whilst welcoming the draft proposal to unite Heathrow within one authority, disagreed with the conclusion that the airport and its surrounding communities should be united in Hounslow. It opposed the transfer of the communities associated with Heathrow in view of the strength of local opposition.

56. HAL commented that the draft proposal ignored the links across the M4 between the Hillingdon communities and the rest of the Borough, and expressed the view that, despite Heathrow's east-west orientation, there were strong north-south links between Hillingdon and the airport. The company also disputed the contention that Hounslow was the authority most affected by aircraft noise, stating that parts of Hillingdon and Spelthorne were similarly affected. Additionally, it argued that Hillingdon had only a marginally smaller share of airport employees living in the Borough, and that Hounslow's share was steadily diminishing.

57. The company disputed the view expressed in the draft proposal that Hounslow was the best placed authority to take a
balanced approach to airport-related development, alleging that Hounslow's stance on development issues meant that it would be prejudiced against HAL's interests. Instead, it supported the case for uniting Heathrow in Hillingdon, commenting that as that Borough already administered 72% of the airport area, and had experience and expertise in providing services, it would be more able to take a balanced view of the airport's development.

58. We also received 29 submissions from other bodies and organisations in response to our draft proposal. Support for the single London authority approach came from those who provided services in and around the airport, or who were organised on a London-wide basis.

59. The London Planning Advisory Committee commented that, for strategic planning purposes, there were advantages in unifying Heathrow in one London borough. London Transport and the London Regional Passengers Committee cited security and safety considerations in favour of uniting Heathrow in one London authority.

60. It was also claimed that operational efficiency would benefit from uniting Heathrow within a single London borough. The London Waste Regulation Authority stated that efficient waste regulation was hampered by the current split, and would improve if the airport became the responsibility of one London authority. The London Ambulance Service and the London Chamber of Commerce also voiced support for bringing Heathrow wholly within London.

61. British Airways (BA) commented that uniting the airport in Hillingdon would benefit the needs of Heathrow, as that borough had experience of providing services on the airport. It referred to what it saw as Hounslow's "antagonism" towards airport development, which it considered would hinder the airport's growth, and expressed the view that Hillingdon would be better placed to take a balanced view of development. British Airways also referred to what it regarded as strong orbital transport flows, and north-south communications, connecting Hillingdon with the airport.
62. The Federation of Anti-Noise Groups also supported uniting Heathrow, but not the surrounding communities, in a single London authority.

63. A number of bodies and organisations responsible for co-ordinating services in Hillingdon commented that uniting the airport within Hillingdon would aid the provision of services. In particular, the Hillingdon Health Authority argued that the benefit of a co-terminous boundary between Hillingdon and the Hillingdon Family Health Services Authority would be lost under the draft proposal, and stressed that there were close links between the communities south of the M4 for many aspects of health care provision.

64. In addition, Hillingdon Area Magistrates' Courts Committee stated that it had co-operated with Hillingdon in providing courtroom and ancillary accommodation to cope with the court's workload, which included serious crime at the airport and other airport-related responsibilities.

65. Local organisations associated with Spelthorne supported that Borough's counter-suggestion, and emphasized their opposition to the transfer of the communities of Stanwell and Stanwell Moor to Hounslow.

66. Our draft proposal was opposed by three Members of Parliament. Mr David Wilshire MP expressed the view that the current split of Heathrow between three local authorities reflected the interests of those affected by the airport. He opposed the transfer of Stanwell and Stanwell Moor, on the grounds that they had no identity or links with Hounslow. Mr Michael Shersby MP commented that Hillingdon's experience and expertise suggested that it would be more suitable to unite the airport in that authority. He added that the draft proposal ignored the close links which Hillingdon had forged with the airport authorities. Mr Terry Dicks MP stressed the strong local feeling against the draft proposal.

67. Our draft proposal was supported by two Members of Parliament. Mr Patrick Ground QC (formerly Member of Parliament
for Feltham and Heston) and the Rt Hon Sir Barney Hayhoe (formerly Member of Parliament for Brentford and Isleworth) supported uniting the airport in Hounslow, but opposed the transfer of the adjacent communities.

68. Four Spelthorne councillors and one Surrey councillor wrote opposing the draft proposals. They argued against the inclusion of Stanwell and Stanwell Moor in London, and opposed uniting Heathrow within a single authority, commenting that the existing boundaries reflected the local authority interests in the airport.

69. Approximately 650 individuals wrote opposing our draft proposal. The majority of respondents were residents of the communities south of Heathrow proposed for transfer, and other nearby areas. Those residents of Stanwell and Stanwell Moor who wrote strongly opposed being transferred to a London borough, citing the strength of opposition to similar proposals at the time of London government re-organisation in 1963. Local residents contrasted what they perceived as their semi-rural community with the urban, inner-city sprawl of London.

70. The main arguments advanced by local residents were that their communities were long established, and had strong affinities with their respective boroughs. There was no sense of identity with Hounslow. A significant number of people from the Hillingdon villages of Harmondsworth, Harlington, Sipson, Longford and Cranford objected to being transferred into Hounslow. They stated that they had good links with the rest of Hillingdon unhindered by the M4. Hounslow was seen as inaccessible and it was claimed that its service centres and community facilities were not conveniently located. Some respondents argued that moving the communities into Hounslow would accentuate that Borough's elongated shape, which would not be conducive to effective and convenient local government.

71. A few individuals supported the retention of the tripartite split of Heathrow, arguing that this aided inter-authority cooperation and allowed the views of all local residents affected by the airport to be taken into account. A number of respondents
expressed the view that the draft proposal benefitted only the interests of private developers and that, in the event of change, only the airport area should be affected. Some Hillingdon residents supported that borough's case for uniting the airport in its area.

72. Our draft proposal was supported by five respondents. They supported our reasons for uniting the airport in Hounslow. Some residents in Hillingdon and Spelthorne were unhappy with the services provided by their existing authority.

OUR FURTHER DRAFT PROPOSALS

73. We considered that the response to the draft proposal confirmed our view that the geographical split of the airport between three authorities across the Greater London boundary did not reflect the needs of the airport and impaired the efficiency of local authority operations. We noted that only Spelthorne and Surrey of the principal parties supported retaining the three-way split; the airport authorities and the majority of the bodies and organisations who responded to our draft proposal supported uniting Heathrow within London. We received further evidence to support our view that services and the general day to day management of the airport did not benefit from its division between local authorities, and that the resultant diffusion of functions obscured lines of responsibility and weakened accountability. We accepted that whilst the present arrangements appear to work adequately, better arrangements could be found which would be more conducive to Heathrow's status as the busiest international airport in the world. We remained of the view that to retain the existing division of responsibilities between authorities would not be in the interests of effective and convenient local government. We further believed that a rationalization of the existing boundary along the lines of Surrey and Spelthorne's suggestion would not resolve the problems arising from the present division and would not address the main issues of Heathrow's influence and orientation in the region and its present and future development.

74. We felt that Heathrow's strategic importance in London is
recognised by many organisations which provide important services across London or who are organised on a London-wide basis, many of whom supported uniting the airport in a single London borough. Throughout the review we noted that clear indications had been given that Heathrow's links were firmly towards London. We considered that the airport's main communication and public transport links are into the capital. Apart from the City Airport, Heathrow is the only civilian airport in London. We noted that Heathrow had long been regarded in a London context in administrative and functional terms. The Herbert Commission had considered Heathrow to be an integral part of London, while regional transport studies had recognized the airport's importance in London. We considered that information received on planning and environmental considerations supported a single authority approach. On the evidence of service arrangements, safety, security, transport, environment and planning we concluded that benefits would be gained from uniting the airport within a single local authority within London.

75. We noted that our proposal to include the surrounding communities with Heathrow had attracted much criticism. Many individual respondents from the peripheral communities voiced their opposition to being moved into the same local authority as the airport. The principal parties had all said that, in the light of the overwhelming local opposition, these local communities should be excluded.

76. In framing our draft proposal we had considered that planning considerations were important in view of the pressures for development around Heathrow which had implications for the surrounding environment. We took the view then that any local authority responsible for granting planning permission to the area outside the operational control of the airport or dealing with the enforcement of environmental controls needed to be able to take a balanced view of all the relevant factors. We had felt that this called for the boundary to go well beyond the airport perimeter to encompass the area of immediate impact in which the airport was a dominating influence. We had concluded that those communities lying adjacent to the north and south of the airport (Cranford, Harlington, Harmondsworth, Longford, Sipson, Stanwell,
Stanwell Moor) should be included as they were vitally affected by the activities of the airport.

77. We had recognized, however, that other communities in the region were also severely affected by aircraft noise and in drawing a distinction between the areas of immediate and wider impact we were conscious that the area over which the airport had a strong influence in terms of noise and pressure for development was very extensive.

78. We were not entirely convinced by the arguments used against our approach to the inclusion of the adjacent communities. However, we recognized that by moving only the adjacent communities our draft proposal had failed to include the full extent of those areas significantly affected by Heathrow. As we had stated in the draft proposal, we believed that only major change to the structure of local government in this part of London and Surrey would reflect accurately the full impact of the airport on the local area. Furthermore, our draft proposal would have involved transferring about 20,000 people against their wishes and would probably have caused disruption to the boroughs concerned. On the basis of the information received in response to our draft proposals we recognized that the communities surrounding the airport identify strongly with their present authorities. The clearly-expressed opposition to the draft proposal from these communities, and in particular the protests from residents south of the airport against moving into London, had demonstrated that the people in these areas felt no particular affinity in functional or community terms with Hounslow.

79. We reconsidered our draft proposal in the light of the strong local opposition and have concluded that whilst our proposed boundary would include areas severely affected by the airport it would not include other areas affected by Heathrow. Only major restructuring would enable the full extent of the airport's influence to be delineated in local authority areas; whether a development which was as important as Heathrow Airport should be a decisive factor in determining the pattern of local authorities over the entire area of its influence was doubtful,
but in any event this was not the time to propose major structural change on the edge of London. We therefore decided to withdraw our proposal to transfer the adjacent communities and instead to propose bringing the airport itself and not the surrounding communities within one London borough.

80. We then re-examined the arguments for and against uniting Heathrow in Hillingdon or Hounslow respectively. In our draft proposal we had argued that Hounslow's east-west orientation and its ease of access to the airport and the communities either side of the airport pointed to the inclusion of the airport in its area. We had considered that Hounslow was in the best position to take a balanced view of the airport's future development taking account of its local value as a centre of employment as well as of environmental impact.

81. The exclusion of the adjacent communities from the area under consideration altered the balance of consideration. We considered that without the communities the case for Hounslow was materially weakened and the arguments for Hillingdon were correspondingly strengthened. In particular, Hillingdon's lack of direct accessibility to the communities south of the airport was no longer a factor to be considered. We considered that the extent of the environmental impact of the airport should not be an overriding factor in deciding in which of the two boroughs to place Heathrow, bearing in mind that the noise footprint extends over a wide area affecting people outside as well as inside London and that local authorities have limited responsibilities in this respect. We also recognized that the measurement of the effect of noise is open to different interpretations. We did not doubt that, despite some allegations that had been made, both Hillingdon and Hounslow could take a balanced view of the airport's development and both were easily accessible to the airport.

82. We attached importance to the fact that Hillingdon had long experience of providing services over most of the airport to the general satisfaction of airport companies and operators. We noted that Hillingdon had built up a level of expertise through providing airport related services and as a result of dealing
with RAF Northolt and Hayes heliport, both of which were situated in the borough. In considering the response to our draft proposal we noted the information from Hillingdon and local bodies and organisations concerning the potential disruption to services that a change of authority would cause. Hillingdon already administered local authority services over the greater part of the airport site and transferring responsibilities for service provision would inevitably cause some disruption. Although we recognized that a limited range of local government services are provided on the airport itself, the information we had received in response to our draft proposal suggested strongly that services in and around the airport would be disrupted if Heathrow were moved into Hounslow.

83. We concluded that moving the whole of Heathrow into Hillingdon would rationalize the existing situation in which Hillingdon already administers most of the airport and would be the less disruptive of the options.

84. We therefore decided to withdraw our draft proposal and to issue a further draft proposal to transfer the airport into Hillingdon. We believed that uniting Heathrow in Hillingdon by aligning the boundary along the M25, the A3113, the Southern Perimeter Road, the Stanwell Road, the Bedfont Road, the A30 and the River Crane would provide a clear and enduring boundary in the area and moreover would provide a well-defined outer London boundary. We considered that to the west of Heathrow the M25 and Colne Valley already formed the natural boundary of London. As regards possible future development, we felt that the use of the M25 as Hillingdon's western boundary should simplify the planning process for all concerned if an application for the building of a fifth terminal was submitted.

85. We issued our further draft proposals on 17 January 1992. Copies were sent to the usual recipients. Comments were requested by 13 March 1992. However, following representations from Hounslow Borough Council and several local MPs seeking an extension to the consultation period we decided to extend the deadline for comments to 17 April.
RESPONSE TO FURTHER DRAFT PROPOSALS

86. We received responses to our further draft proposals from eight local authorities, from 33 bodies and organisations, seven MP's, one MEP, a group of Spelthorne councillors and from 150 individuals.

87. The London Borough of Hillingdon welcomed the further draft proposals, and stressed the importance of the borough's experience and expertise in providing services across 72% of the airport area to the satisfaction of airport users and operators. It agreed with the withdrawal of the draft proposal in the light of the overwhelming local opposition to transferring the nearby Hillingdon villages into Hounslow. Hillingdon argued that transferring the nearby villages would have caused substantial disruption to services.

88. The Council stated that in conducting surveys of local opinion it had found high levels of satisfaction with the borough's services and that residents felt no affinity with Hounslow.

89. Hillingdon supported our view that the three way split of responsibility was not conducive to effective and convenient local government and that the airport should be united in one London borough. It cited the support of other bodies and organisations on the basis of strategic planning, safety, security, transport, waste regulation and environmental reasons.

90. The Council stated that it had long experience in dealing with planning and development issues arising from Heathrow, adding that, given the likely pattern of future development, this experience should not be discarded. It stated that there had been more pressure for development north of the airport in Hillingdon than in Hounslow and claimed that it balanced the needs of airport-related development and protection of the Green Belt effectively by only allowing applications for development which would not compromise the integrity of the Green Belt. Hillingdon had also dealt with noise problems arising from Terminal 4 which affected Hounslow on behalf of that borough.
91. It claimed that the range and depth of services it provided was superior to those provided by Hounslow and that it had more expertise over a wider field. In the event of the transfer of the airport to Hounslow, it considered these services would be disrupted.

92. Hillingdon emphasised that the current division of the airport could sometimes result in duplication and blurring of responsibilities. Despite good co-operation between authorities, for example over the building of Terminal 4 (currently split between Spelthorne/Surrey and Hillingdon), the split of responsibility between authorities had resulted in some problems in service provision. The Council stressed that the range of services on the airport required that a consistent and uniform approach be taken across all terminals. It stated that having one authority dealing with the various airport-related issues would increase efficiency and accountability by removing the inevitable confusion resulting from the existing administrative split.

93. Hillingdon stated that the proposed site of the Fifth Terminal would fall largely in the Borough and its effects would be felt most by its residents. The issue of a potential third runway would be of major importance to Hillingdon.

94. The Council asserted that the difference between the number of employees living in Hounslow and Hillingdon was so small as to be insignificant. Because of the changing pattern of travel to work, particularly caused by the M25, there was likely to be a reduction in the number of workers living in both Hillingdon and Hounslow.

95. Hillingdon contended that no authority had control over noise levels emanating from the airport. Noise levels were fixed by international agreement. The noise footprint extended beyond the area of consideration in this boundary review to places as far west as Maidenhead, Windsor, Slough and Staines. It would therefore be illogical to look only at how much Hounslow was affected by noise.
96. The Council agreed that the proposed alignment would provided a practicable and enduring boundary. It stated that the transfer of the remaining 28% of the airport not currently in Hillingdon would cause little disruption. In the event of transfer, the Council stated that it intended to develop consultative arrangements with other local authorities on major airport issues.

97. The London Borough of Hounslow described the further draft proposals as a volte face. It stated that although Heathrow is a "designated" airport and major planning decisions would go to a public inquiry, it was important for "effective and convenient local government" that the lead authority on the airport should be the one which is most affected by planning decisions. Such an authority would therefore be best able to take a balanced approach to airport related issues. Hounslow added that the Commission's insistence on including the surrounding communities at the draft proposals stage and then excluding them in the face of the local opposition at this latest stage was unfair to the borough's case as it distorted the results of the consultation exercise.

98. Hounslow stated that its case rested on its ability to balance the advantages and disadvantages of development as the authority most affected by the airport. The twin factors of noise and jobs illustrated this balanced approach.

99. Hounslow stated that although the Department of Transport is moving away from the Noise and Number Index as a standard measure of noise, it used this measure to assess the figures produced by Hillingdon because it was in general use. The Council agreed that Hillingdon and Spelthorne had the highest share of residents affected in the 60 N.N.I band. However, it stated that this is an extremely high level which affected relatively few people near landing and take-off points and is therefore not a realistic planning yardstick for the area around the airport. Hounslow used the 40 N.N.I contour which is the level above which sound-proofing was required for all new development applications. Extrapolating from Department of Transport figures, Hounslow stated that the number of residents
affected by noise above 40 N.N.I is 133,000 and 10,000 for Hounslow and Hillingdon respectively.

100. Hounslow stated that HAL's latest figures showed that it had more airport workers in its borough (15.7%) than Hillingdon (12.4%). It recognised that this was a marginal difference but stated that figures for employees in air transport and support industries based in the borough showed that Hounslow had by far the most airport-related employees working in the borough.

101. Hounslow noted the Commission's statement that both it and Hillingdon would be able to take a balanced view of development. However, it also noted that the further draft proposals letter reported references made by BA and HAL that Hounslow was antagonistic towards airport development. It stated that the Commission should have dismissed these statements as irrelevant to matters of planning policy. Hounslow stated that HAL and BA had misinterpreted normal planning procedures as being obstructive or antagonistic to development. Whilst Hounslow regretted the negative descriptions of the Council by the airport companies, it stated that planning policy was not relevant to a proper consideration of "effective and convenient local government". It added that criticism of Hounslow by private operators with vested commercial interests should not be accorded much weight. Hounslow stated that, since these companies made their comments, the borough had met representatives of BA in order to settle any misunderstandings. The result of the meeting was that BA did not now believe that any problems would arise with Hounslow on normal planning issues and appreciated that the borough is well equipped to take a balanced view of airport development.

102. Hounslow stated that its Airport Strategy represented a positive approach to planning. Its balanced view was characterised by the fact that whilst it was concerned to manage the environmental impact of the airport, it was committed to policies which promote improved public transport access (especially by rail) and benefit development of economic and employment links between the borough and the airport. Hounslow claimed strong east-west communication links running through the
borough connecting Heathrow with London. Hounslow compared its Unitary Development Plan with Hillingdon's, commenting that the documents are remarkably similar and that if anything Hillingdon's policies are more explicit given their immediate concerns about a possible third runway and a Fifth Terminal.

103. Hounslow had encouraged the improvement of rail communications to the airport and would encourage links between the airport and the local labour market. It had taken measures to encourage large and small business development associated with the airport in the borough.

104. Hounslow criticised the Commission's emphasis on the importance of Hillingdon which in reality provided a limited range of services on the airport.

105. Hounslow listed the activities in the field of environmental health in which it has expertise and substantial involvement. It also detailed its responsibilities in in-flight catering and food hygiene. It stated, however, that although it had no role at present in certain areas, it had relevant expertise which would enable it to take on these functions easily. Hounslow was now able to provide the most integrated commercial regulatory service of all the authorities involved at Heathrow since it had recently reorganized its service provision arrangements. In addition, it stated that the non-council services such as the magistrates' and judicial services could be equally well provided under its administration, and noted that, in any event, many of the more serious cases referred to Uxbridge Magistrates' Court ended up in Isleworth Crown Court in Hounslow.

106. Hounslow said that it took a leading role in inter-authority working and liaison groups connected with the airport and played an active role in the Association of Sea and Airport Health Authorities.

107. It cited a public opinion survey of Hounslow residents conducted by independent consultants which showed that 48% of people would not be in favour of a new terminal or runway at Heathrow, 40% would be in favour, 12% expressed no preference.
It also showed that 49% wanted the airport to be included in Hounslow, 17% wanted it to go to Hillingdon and 34% expressed no preference.

108. **Surrey County Council**, whilst welcoming the Commission's decision to exclude the local communities from transfer, reiterated its view that the southern part of the airport should remain in Surrey.

109. The Council disputed the Commission's claim that the geographical split of the airport impaired its effective operation. It stated that many strategic services were provided by specific authorities and that services such as police, fire and animal quarantine would continue regardless of any boundary changes. The Council also stressed the importance of the specialist trading standards and environmental health expertise built up by Surrey and Spelthorne in their work at the Cargo Terminal and added that no evidence had been produced to show that services would benefit from being provided by another authority. The Council claimed that the Commission had placed too much weight on the views and interests of a private developer and in doing so had not given proper regard to the criteria of effective and convenient local government. It added that BA had admitted in the past that the three way split is not detrimental to the airport's operation.

110. Surrey stressed that in considering "effective and convenient local government" the Commission's main concern, in this case, should be how best to ensure that local inhabitants affected by or involved with the airport had a say in its future development. It expressed concern that under the further draft proposals the Council would no longer have the right to be directly consulted on airport-related development. It stated that in the light of the airport's major effect on the economy, transport policies and environment of Surrey, the County should retain a stake in planning the airport's future development.

111. Surrey stated that it administered land earmarked for a possible Fifth Terminal. Under the present arrangements any planning application for such a development would be considered
by Spelthorne with reference to Surrey's strategic view and both authorities would have a strong input at any subsequent public inquiry. Under the latest proposals, however, all the land west of the Perry Oaks Sludge Works up to the M25 and including the County council-owned Bedfont Court Estate would be transferred to Hillingdon. In view of the fact that no firm application for a Fifth Terminal had been made, it claimed that the Commission's proposals anticipated future decisions by the British Airports Authority (BAA) and the Government. The Council stated that there was no justification for the new boundary to include areas which may become the subject of a future planning application for airport expansion.

112. Subsequent to BAA publishing proposals for a Fifth Terminal, Surrey wrote to the Commission stating that the likely implications of Terminal 5 would cause considerable opposition from the local residents affected.

113. The Council reiterated the airport's major effect on the county's economy, transport policies and environment. Under the further draft proposals, it stated that it would lose its statutory right to be consulted directly on the planning application for Terminal 5. Losing this influence would be very detrimental to those parts of Surrey under the flight paths as well as to the County as a whole which would suffer increased air and road traffic.

114. The Council stated that it could only continue working with BAA over the plans for development if it retained the right to be consulted. It noted that BAA's initial round of direct consultation included Surrey but not Berkshire or Buckinghamshire. In the light of these factors, it stated that the Commission should not make any final proposals in advance of a major public planning inquiry on Terminal 5, not least to avoid making a decision which could be perceived as being unduly favourable to developers or as intervening in the proper planning process.

115. For these reasons the Council reiterated its original proposals to retain the three-way split of the airport by
aligning the boundary along the southern runway.

116. In addition, Surrey wrote to the Secretary of State urging him not to pursue substantial change in the Poyle/Colnbrook area which we had proposed in our Report No. 558, against the wishes of the local residents and in the light of the imminent review of local government structure. It requested that the Commission as part of its final proposals for Heathrow should recommend that the Poyle/Colnbrook area be united in Surrey.

117. Spelthorne Borough Council welcomed the further draft proposal's exclusion of Stanwell and Stanwell Moor from transfer in the light of the overwhelming local opposition. However, the Council remained opposed to the Commission's continued support for uniting the airport in one London borough. It pointed out that, under the further draft proposals, several residential properties in the borough would be moved into Hillingdon.

118. Spelthorne supported the status quo and the split of the airport between existing authorities and proposed that the boundary be aligned along the Southern Perimeter Road then along the southern runway to rejoin the Perimeter Road. It stated that the Perimeter Road would provide a long term boundary and that, under its proposal, properties outside the operational area of the airport would remain in Spelthorne. It added that there was no justification for transferring any land outside the operational area of the airport.

119. In opposing the decision to unite Heathrow in one London borough, the Council stated that the direct impact of the airport was not limited to a single authority and that residents of Spelthorne, Hillingdon and Hounslow suffered noise and other environmental effects of the airport. The Council argued that it was in the interests of local democracy that all three authorities who were directly affected by Heathrow should also be directly involved in decisions affecting the airport, in particular any future application for a Fifth Terminal.

120. It commented that Heathrow Airport Ltd accepted that existing local government services operate efficiently at the
airport and there was no evidence of any problems caused by the present arrangements. It claimed that the Commission's proposals appeared to owe more to private development interests than to consideration of the criteria of effective and convenient local government.

121. Spelthorne concluded by saying that, in the event of the Commission confirming its proposals as final, it would press for a statutory right of consultation on airport related matters. It stated that the various forums proposed in the past would not be effective replacements for existing democratic control.

122. Buckinghamshire County Council reiterated the view expressed in its response to the draft proposals which the county supported insofar as it was affected. The Council noted that the revised proposals were unchanged as far as it was concerned.

123. South Bucks District Council reiterated its view, expressed in its response to the draft proposals letter, that as the boundary between the district and Hillingdon south of the M4/M5 junction currently crossed and recrossed the M25 it had no objection, in this particular instance, to the Commission's proposal to align the boundary along the western edge of the M25 carriageway. However, the Council stated its opposition, in principle, to using motorways as boundaries.

124. The Council also pointed out that the land to the west of Heathrow Airport proposed for transfer to Hillingdon, although not part of the airport at present, had previously been identified as a possible site for a Fifth Terminal. It added that there should be no presumption as a result of the land being transferred that it is to become part of Heathrow Airport. The Council also expressed concern that this review would reactivate the boundary issue at Poyle/Colnbrook, resolution of which could substantially affect its boundary.

125. Heathrow Airport Limited welcomed the fact that the Commission had withdrawn its draft proposals. It noted that the adjacent communities had been excluded from transfer and that this would limit to a minimum the amount of disruption under the
latest proposals. It agreed that Heathrow, as an important international facility, should be better served by local administrative arrangements to ensure its continued success. It stated that as an integral part of London (especially as it is now enclosed by the M25), Heathrow should be united in one London borough.

126. HAL referred to the arguments contained in its previous submission against transferring the airport and the surrounding communities into Hounslow on the grounds of geographical orientation, noise and the balance between airport and community needs. HAL argued that because it is not possible for all the local communities around the airport to be brought under the same London borough, the choice of which borough should incorporate the airport should be determined by other factors.

127. HAL stated that Hillingdon already has control of 72% of the airport. The area controlled by Hounslow which would be transferred to Hillingdon contains only the British Airways maintenance base and no resident population. HAL argued that to transfer the airport to Hounslow would cause unnecessary disruption to services at the airport thus jeopardizing Heathrow's efficient running. It added that there would be no compensating planning benefits from moving the airport into Hounslow as originally envisaged by the Commission.

128. HAL stated that evidence from the Hillingdon Health Authority and the Hillingdon Magistrates' Courts Committee stated that their workload and accommodation needs had been planned on the assumption that the airport remained in Hillingdon. HAL maintained the view that Hounslow would be unlikely to take a balanced view of the airport's needs set against environmental factors. It added that, although Hounslow may have moderated its negative attitude towards airport development by revising its Draft Unitary Development Plan and Airport Strategy document, the stringent environmental criteria the Council had adopted meant that, in practice, its attitude had not changed.

129. The extent of interaction between HAL and Hillingdon had led to the latter gaining substantial expertise in aviation and
airport related issues, thus aiding the development of a balanced approach. It cited Hillingdon's wider experience in handling planning applications as having given the borough a clear understanding of the issues involved in development matters. HAL stated that Hillingdon was more than willing to oppose certain types of development if the need arose; for example, it had successfully petitioned against the original Heathrow Express Rail proposals.

130. HAL recognised the need to minimise the airport's negative impact on the surrounding communities by playing a full and active role in local life. HAL stated that future demand for greater representation from adjoining authorities would need to be met in respect of such issues as future development and environmental matters. To this end, HAL would seek to establish a consultative group in conjunction with the local authorities concerned.

131. HAL supported, in general, the Commission's proposed boundary as a clear and enduring line. However, it stated that there were some anomalies in the new alignment. It proposed minor realignments to include areas it believed were closely associated with the airport.

132. British Airways supported the further draft proposals. It welcomed the Commission's recognition of the importance of Heathrow to the national economy and the role that the efficient provision of local government services can play in contributing to its success.

133. The company agreed that the existing three-way split of responsibility between authorities is not conducive to effective and convenient local government. In view of the fact that Hillingdon is the authority with the most expertise and experience in dealing with Heathrow, BA supported uniting the airport in that borough. It stated that this did not imply that BA's involvement with Hounslow had been less than satisfactory, but emphasised the importance of Hillingdon's practical experience. BA welcomed the exclusion of the local communities from transfer. It stated that the proposals would produce a
clear and logical boundary, adding that bringing Heathrow's major road access points (namely the M4, M25, A4, A30 and A3113) into Hillingdon would improve transport planning.

134. As regards planning issues, BA stated that its initial concern about Hounslow and Spelthorne's attitude towards the airport's development had lessened. BA welcomed Hounslow's new approach to development issues and looked forward to working with the borough, regardless of the outcome of this review, when development and modernisation plans for Heathrow were produced.

135. The Federation of Heathrow Anti-Noise Groups welcomed the decision to exclude the communities around the airport from being transferred.

136. The Federation, however, opposed uniting the airport in Hillingdon, stating that Hillingdon had, in the past, received the bulk of rateable revenue from Heathrow and had supported plans for the airport's extension whilst itself suffering very little from noise nuisance. Despite the fact that revenue arrangements have changed under the Uniform Business Rate, Hillingdon still supported the airport's development.

137. It stated that services on the airport were provided largely by private companies, and disputed the arguments advanced in the further draft proposal letter that transferring Heathrow to Hounslow would cause severe disruption to services.

138. The Federation claimed that the Commission had underestimated the environmental problems caused by Heathrow. It stated that over 500,000 people were affected by aircraft noise, many of whom also suffered from pollution by surface traffic associated with the airport. It stated that the majority of the residents affected were in Bedfont (Hounslow), Twickenham (Richmond), Poyle and Colnbrook (Spelthorne and South Bucks) and stated that very few Hillingdon residents were affected because the flight paths from Heathrow do not go over that borough. It stated that as Hounslow had far more experience than Hillingdon of dealing with noise problems, the airport should come under the former's control.
139. The Federation raised the issue of the possible location of a Fifth Terminal on the Perry Oaks site and asked how this would affect the Commission's proposals. It also raised the possibility of a third runway between the A4 and M4 which would double the number of people exposed to aircraft noise, many of whom would be outside Hillingdon.

140. It concluded that, in view of these factors, it might be better to leave the airport divided between several boroughs but to adjust the split to match the degree of environmental impact on each borough.

141. London Ambulance Service reiterated its view that the airport should be united in one authority. It stated that the need to consult with more than one local authority about contingency planning increased its workload and could cause confusion in the event of a major incident.

142. As Hillingdon covers 72% of the airport and the District Health Authority boundaries are coterminous with the Borough’s, it supported the proposal to unite the airport in Hillingdon.

143. It added that from an operational point of view there was no reason to transfer the nearby Surrey communities to a London authority as originally proposed. It stated that it had an effective agreement with the Surrey Ambulance Service to provide emergency cover in the vicinity of Heathrow.

144. The London Fire and Civil Defence Authority stated that it had no objections to the further draft proposals and that it would be able to deal with these proposals equally effectively as with the previous proposals.

145. The Authority added that the Home Office's recommended attendance standards to the areas to be transferred would continue to be met although it would, under its current policy, deploy its mutual assistance arrangements with the Surrey Fire Brigade to ensure the most rapid response to residential areas or to form part of any predetermined attendance to Heathrow Airport.
146. The London Chamber of Commerce and Industry fully supported the Commission's conclusion that the airport should be united in one London borough and that that borough should be Hillingdon.

147. The London Borough of Hounslow Chamber of Commerce protested at the Commission's proposal to unite the airport in Hillingdon rather than Hounslow. Whilst agreeing with the principle of uniting the airport in one authority, it stated that the appropriate authority was Hounslow. It believed that Hounslow was the borough best suited to look after the airport and local residents' interests.

148. It stated that Hounslow is the borough most affected by Heathrow as regards aircraft and road traffic. Most aircraft pass over Hounslow and all major road access routes run through the borough. Hounslow is the major westward corridor between the heart of London and Heathrow. It added that Hounslow provided good access to the motorway network around Heathrow and that there were excellent links with the London Underground service. Most of the major buildings on the airport, it was stated, were located within Hounslow's area.

149. It stated that a large number of major international companies are located in Hounslow, particularly along the Great West Road and Bath Road which is the main route into Heathrow. Close proximity to London is vital for their main business. Hounslow provides the catchment area for the bulk of staff employed at Heathrow.

150. The Chamber commented that Hounslow always dealt with commercial planning applications rapidly and gave consideration to the economic development of that part of Heathrow in the borough.

151. London Tourist Board and Convention Bureau took the view that Heathrow should be in one planning authority and supported uniting the airport in Hillingdon. It stated that the proposal would help ensure that Heathrow Airport continued to thrive as an international airport and to be of major importance to the tourist industry in London.
Representations from Members of Parliament and a Member of the European Parliament

152. Seven MPs and one MEP responded. Those representing Hounslow and Hillingdon constituencies supported their respective boroughs' cases. There was general agreement that local communities should be excluded from transfer.

153. Mr David Wilshire MP (Spelthorne) defended the existing tripartite split of responsibility. He stated that his submission should be considered in conjunction with the representations received from individuals throughout the review.

154. Mr Wilshire asserted that part of Heathrow Airport should remain in Spelthorne, stating that it formed part of the "local community". He said that there was clear evidence that the overwhelming majority of Spelthorne residents wanted part of Heathrow Airport to remain in Spelthorne.

155. Mr Wilshire made suggestions for boundary change which would retain Spelthorne and Surrey's role in the airport whilst removing anomalies such as the split of Terminal 4. He added that, unlike the further draft proposals, his proposals would not transfer any people. He stated that these proposals would ensure that that part of the airport which is closely linked to Spelthorne and could only be accessed from it remained in the borough. Mr Wilshire stated that his proposed Spelthorne/Hillingdon boundary would be drawn so that future building would not cause new anomalies. He claimed that his proposal would also ensure that Hounslow would be able to keep that part of the airport to which it is linked and which could only be accessed through the borough.

156. He alleged that the Commission had tailored "effective and convenient local government" to suit the convenience of bureaucrats and service managers. He stated that local government could only be truly effective when it accorded with the local sense of identity, adding that this view underpinned the forthcoming review of local government structure. He asserted that, in addressing the international importance of
Heathrow, the Commission was departing from its criteria by seeking to assist air travellers, the expansion of the airport and commercial profitability. Mr Wilshire recognised that Heathrow was important to London but stated that it was also important to Spelthorne residents and businesses further afield.

157. He claimed that the Commission's approach was flawed. He said that any shortcomings of joint bodies resulted from the failure of councillors and officers to come to grips with the implications of accountability. Although it was clear that the provision of public services at the airport needed to be unified he stated that this did not mean that there would have to be unified service delivery territories especially now that public services were not the exclusive responsibility of local government.

158. Mr Wilshire asserted that the Commission appeared to hint that London should be expanded and that a new borough centred on Hounslow should be created. Basing a borough on the airport would not in any way recognise the natural communities. The airport was a barrier dividing communities of separate and distinct character.

159. Mr Patrick Ground QC (former MP for Feltham and Heston) and Rt Hon Sir Barney Hayhoe (former MP for Brentford and Isleworth) welcomed our decision to withdraw the proposal to transfer the local communities around the airport in the light of the strong local opposition. They said, however, that they were not persuaded of the desirability of uniting the airport in Hillingdon, stating that Hounslow had a good case for including the airport in its area.

160. Mr Terry Dicks MP (Hayes and Harlington) supported our further draft proposals, as did Mr John Wilkinson MP (Ruislip - Northwood) who agreed that it was unsatisfactory for the airport to be divided between three authorities across the Greater London boundary. He stated that since Hillingdon had the greater experience of providing services to Heathrow the airport should be united in that borough.
161. Mr Tim Smith MP (Beaconsfield) expressed concern that the consideration of the Heathrow review had taken so long particularly as it was holding up final consideration of boundaries in the Colnbrook area.

162. Mr Jeremy Hanley MP (Richmond and Barnes) agreed with the principle of uniting the airport in one local authority. However, he expressed concern that the restraints on unrestricted development of the airport exercised by Hounslow and Spelthorne would be removed. He said that the increase in aircraft movements over the last eight years and the associated noise was of great concern to local residents, and sought assurance that our further draft proposals were intended to help local residents rather than to benefit the interests of the British Airports Authority.

163. Mr Michael Elliott MEP (London West) agreed with the principle of uniting the airport in one London borough. However, he felt it should be united in Hounslow rather than Hillingdon. Mr Elliott claimed that the reasons behind the further draft proposal favoured the interests of the airport and its users. He stated that these arguments did not outweigh the factors influencing the Commission's original proposals which were based on employment. He added that as a long-standing representative of the area and a local resident he had experienced, at first hand, the growing effect of the airport over the years.

Representations from individuals

164. We received 150 representations to our further draft proposals from members of the public. 51 supported the proposals whilst 99 expressed dissatisfaction with them. Many of the letters were terse statements of support or opposition offering little in the way of argument.

165. In the main, the representations emanated from the communities surrounding Heathrow Airport, in particular from the Surrey villages of Stanwell and Stanwell Moor to the south of the airport. Whilst welcoming the decision not to transfer them into Hounslow, the local residents opposed the proposal to unite the airport in Hillingdon stating that as long as part of the airport
came under the jurisdiction of Surrey and Spelthorne, the local residents would have a say on the airport which affected their daily lives to a great extent. The contentious issue of future development on the airport and its effect on local residents was also raised. It was stated that Hillingdon suffered few problems associated with the airport in comparison to Spelthorne. Writers commented that they worked at the airport and had close connections with it. They feared that uniting it in Hillingdon would remove their say in its operation. Writers defended the rationale behind the present three-way split.

166. A few letters were received in support of the Commission's original proposal to unite the airport in Hounslow, arguing that Hounslow was the borough most affected by the airport and had the closest links with it.

167. Most of the representations received from the villages to the north of the airport supported the further draft proposals. Authors emphasized the experience and expertise which Hillingdon had acquired in providing services on the airport. Residents stressed their strong cultural, social and historical links with the rest of Hillingdon, which would have been severed under the draft proposal. It was also stated that there would be disruption to local authority and associated services if responsibility for the airport were transferred to another authority.

OUR FINAL PROPOSALS

168. We considered that to a large extent the response to our further draft proposal letter from the local authorities, bodies and organisations and individuals repeated the arguments which had been expressed at previous stages. However, we felt that, on the question of whether Hillingdon or Hounslow should have control of all the airport, some new information had been submitted together with some arguments in favour of the latter.

169. We have been conscious of the need to make proposals which are in the interests of effective and convenient local government. Criticisms have been made by some interests,
suggesting that we have given undue weight to the needs of the airport and perceived policy differences between the relevant local authorities on airport development. We do not accept these. We have considered all the submissions and representations objectively on the basis of effective and convenient local government. It has been our aim to strike a balance between the effective and convenient provision of services to the airport (the airport and its users being recipients of these services), the pattern of community life (strongly influenced by the presence of the airport) and the wishes of the people.

The importance of Heathrow

170. The international significance of Heathrow had been recognized by all the local authorities and other respondents. It had been generally agreed that better administrative arrangements could be found to ensure Heathrow's continued successful operation and that the role of local authorities as providers of services on the airport was one which could be enhanced and improved by different administrative boundaries.

171. We remain of the view that the geographical split of the airport between three authorities across the Greater London boundary does not reflect the needs of the airport and potentially impairs the efficiency of local authority operations.

The need to unify the airport

172. Of the local authorities directly involved with the airport, only Surrey and Spelthorne, strongly supported by the local MP Mr David Wilshire, made a case for maintaining the existing tripartite split of responsibility.

173. Surrey, Spelthorne and Mr David Wilshire argued strongly for preserving the present split on the grounds of local democracy and accountability. They contended that as Spelthorne contained a significant proportion of residents concentrated in Stanwell who are affected by Heathrow's activities, these people should have a say in the airport's activities through their local council. Those supporting the principle of the multi-authority
split of responsibility also recognized that there were major boundary anomalies at the airport such as the division of Terminal 4 between Spelthorne and Hillingdon. They therefore proposed to rationalize the split by drawing the boundary along the southern runway.

174. There is little doubt that the local authorities concerned do their best to ensure that inter-authority arrangements work satisfactorily and that Heathrow Airport does not suffer unduly from being split between three authorities across the Greater London boundary. At the same time, local authorities and airport companies had restated their claims and had submitted evidence to demonstrate both the duplication of service provision and a degree of confusion over areas of responsibility and jurisdiction. We felt that the proposals to rationalize the tripartite split would solve specific anomalies such as the division of Terminal 4 but would not remedy the larger problems caused by the division of the airport itself. With three different types of authority operating on the airport across the Greater London boundary - two unitary London boroughs and a shire county and district together with joint bodies - we took the view that problems could arise from differing levels and standards of service provision across the airport. We felt that Heathrow as a major international facility would clearly benefit from a consistent and fully integrated service provision. This would be best provided by a single authority. Moreover, airport security would be improved by reducing the number of organisations requiring access.

175. However, we also felt it was important that the other authorities affected by Heathrow continued to have a say in its running. We sympathized with the view that those authorities affected by Heathrow should have a "stake" in the airport. We recognized that the effect of Heathrow Airport was felt over a wide area not confined to London and extended to the shire counties to the west and south. There are large areas to the west of the airport, for example in Buckinghamshire and Berkshire and other parts of the Home Counties, which are affected by but have no "stake" in the airport. Other London boroughs are also affected. We felt, however, that any solution which sought to
reflect the full impact of Heathrow on the surrounding area would necessitate Heathrow becoming the centre of a borough encompassing a very broad area or the hub of many boroughs radiating from it. We had attempted to find a boundary which took account of the impact of the airport on the local communities surrounding it when we issued our first draft proposal. However, in deciding to exclude these local communities from transfer in the light of the response to the draft proposals, we accepted that our draft proposals had failed to include the full extent of the areas significantly affected by Heathrow.

176. We believe that only major restructuring would enable the full extent of the airport's influence to be delineated in local authority areas; even if this was desirable it is not the time to propose major structural changes on the edge of London. We therefore feel that it would not be feasible in the context of this review to include all the areas affected by Heathrow in one authority or to ensure that all the authorities affected by the airport have a part of it in their area.

177. We therefore reaffirm our view that uniting the airport in one authority would reduce the need for the present complicated liaison arrangements between authorities on local service provision and would eliminate the risk of any confusion or blurring of responsibilities. We remain of the view that unification would strengthen rather than weaken accountability. However, we believe that there is a need for a strong and effective forum for consultation on major developments at the airport, involving all the authorities who are directly affected. Such a body should through local authority membership properly represent the interests of those residents affected by the airport living in the authorities adjacent to Heathrow as well as those living further afield who are significantly affected by Heathrow. We note that the London authorities and HAL have expressed support for this course of action.
Heathrow and London

178. The material submitted in response to our further draft proposal demonstrated once again Heathrow's strong links with London and its importance to the capital in terms of jobs, commerce and travel, a fact recognised by the local authorities and by the bodies and organisations and private companies who have responded. We therefore remain of the view that Heathrow should be united in one authority within London.

Communities surrounding Heathrow

179. Our decision to exclude local communities from transfer was unanimously welcomed by local residents and by the local authorities, bodies and organisations or airport companies. Local residents in the communities to the north and south of the airport, especially in Stanwell to the south, reiterated their opposition to being moved, stating that they had no affinity with London in general and Hounslow in particular (although they had once all been in Middlesex).

180. We noted that a small number of Spelthorne residents would still be moved into Hillingdon in London under our further draft proposal. These residents were located very close to the airport site and some were situated within the Perimeter fence. We considered that finding a boundary line which transferred the airport, whilst excluding these residences, would present difficulties in view of the fact that these properties are so close to airport buildings and runways. To exclude them from transfer to either Hillingdon or Hounslow would necessitate a tortuous boundary which would very likely be made anomalous by any subsequent development on the airport.

181. We took the view that such a boundary would not provide as clear or as enduring a line as that provided by the M25 and Airport Way under our further draft proposals and would make for a very poor outer London boundary. We considered that, on balance, the interests of "effective and convenient local government", in this case, would be better served by transferring these residents with the airport. We noted that these residents
were likely to be significantly affected under the proposals for a Fifth Terminal, although we do not wish to anticipate the outcome of an application for development there.

182. We have therefore confirmed our view that the airport itself should be transferred and that the surrounding communities should as far as possible be excluded from transfer. We recognise, however, that some residents living very close to or even on the airport site would be transferred in order to unite the airport.

The Outer Boundary of London

183. We were satisfied that our further draft proposal would provide the best boundaries available for including the airport in a London authority. The M25 motorway, the Colne Valley and the airport are all barriers to movement in the area. As we have reported elsewhere, for example in Report No 627, we are concerned that there are major anomalies in the outer London boundary, particularly in its southwest section. This review has not been the occasion to make sweeping changes but, wherever possible, we have sought to match the boundary more closely to the pattern of development, in the light of all the factors we have considered.

Heathrow in Hillingdon or Hounslow

184. We recognised that the range of services provided on the airport by local authorities was limited in comparison with the services normally provided by councils. In our view, direct local authority service provision should not be considered in isolation to matters of security and provision of emergency services. Moreover, certain airport services are provided by other authorities (eg the City of London operates the Animal Quarantine Section) and the majority of services are provided by a combination of two or three of the authorities concerned.

185. Although Hillingdon provided more on-airport services, Hounslow had a significant input in some services. We took the view that Hillingdon had discharged its functions effectively
hitherto and had the full confidence of the airport authorities. But there was no reason to suppose that Hounslow could not take on Hillingdon's responsibilities and discharge them no less effectively and conveniently. In terms of geographical position, communication links and ease of access there are arguments to suggest that either borough could provide a good standard of service. We considered that although Hounslow has good east-west links with the airport, the north-south links via Hillingdon are more than adequate for the effective provision of services. We also felt that, despite the existence of radial links, there are significant roads crossing the M4 and there are important orbital north-south links in the area which were likely to increase in importance.

186. We noted Hillingdon's and Hounslow's claims that they were significantly affected by Heathrow in terms of the airport's activities and employment at the airport. However, there were significant differences in the scale and nature of the airport's effect on the two boroughs. From all the available evidence Hounslow appeared to suffer the worst effects of aircraft noise within the built up area. The runways run east to west extending the noise contours in those directions.

187. In this review, we have stressed the necessity for local authorities to take a balanced view of development issues arising from the airport. This takes account of the White Paper on Airports (1985) which gives local authorities a key role in the effective operation of the airport by exhorting them to take a balanced approach to airports by reconciling the encouragement of development with protection of the local environment.

188. Hillingdon and Hounslow each stated that they were the borough best able to take a balanced view of development issues. We are satisfied that each borough would be able to do so and to reconcile effectively the development and environmental issues arising from the airport.

189. We remain of the view that Hillingdon's current "ownership" of 72% of the airport area is important. Hillingdon has proven experience and is supported by the airport operators as the
authority best able to take on responsibility. It has also built up expertise in airport matters through its work at RAF Northolt and Hayes Heliport in the borough. Although its road and rail links are not as clearly orientated into Heathrow as Hounslow's there are good connections, and access to the rest of the airport is adequate for the provision of services.

190. We believe there would be a significant level of disruption to local authority services connected with the airport in the event of Heathrow being transferred to Hounslow whereas uniting the airport in Hillingdon should cause less disruption to current arrangements than other solutions. We have noted the comments from providers of key local authority services such as fire, health and ambulance, accepting the further draft proposal. We also take the view that, in confirming our decision not to include the local communities with the airport, the balance as between Hillingdon and Hounslow has altered in favour of the former. We feel that a limited approach to the area of transfer suggests that more emphasis should be placed on the immediate consideration of local authority services to the airport and associated services directly relevant to Heathrow.

191. In framing our final proposals we have arrived at the following conclusions:

- Heathrow is a major international facility which would be better served by different administrative arrangements for local authority services;

- the tripartite split of the airport should be ended and the airport united in one authority;

- that authority should be in London;

- the airport area should be united as far as possible; the main surrounding communities should be excluded from transfer with the airport, and

- the airport should be united in Hillingdon rather than Hounslow.
**Boundary between Hillingdon and Hounslow**

192. We received representations from the London Ecology Unit and the Hounslow Branch of the London Wildlife Trust that a site containing natural wildlife habitats would be split under our proposals. To avoid splitting the site which is located on either side of the River Crane, they proposed aligning the boundary along the western edge of the site so that it remained wholly in Hounslow. We considered that no evidence had been adduced to suggest that splitting the site between two authorities would hamper its effective administration. We noted that finding a boundary which would retain the whole site in Hounslow would mean departing from the River Crane, which already forms a long stretch of the present Hillingdon/Hounslow boundary and is a clear feature in the area, in favour of an inferior boundary. We therefore decided not to adopt the proposed alignment.

193. We noted that HAL had suggested an amendment to the further draft proposal to realign the boundary so as to include some land in its ownership. While these areas are owned and maintained by HAL they do not contain any facilities of major importance to the airport and their inclusion would not seem critical to its efficiency. We recalled that when we framed our further draft proposals we had taken great care to draw a boundary which whilst providing a clear line would reflect the extent of operational land. We considered that adopting HAL's line would compromise the integrity of the boundary without any commensurate benefits in terms of effective and convenient local government. We therefore decided not to adopt their suggestion.

For these reasons we have decided to confirm our further draft proposals as final.

**Poyle and Colnbrook**

194. Our final proposals for the Poyle and Colnbrook area were reported on as part of our review of the boundaries of Berkshire
(Report No 558). Under our final proposals for Heathrow part of Hillingdon's current boundary with Buckinghamshire and Surrey would be realigned along the M25. This accords with our final proposals in the Poyle/Colnbrook area apart from a small stretch in the vicinity of Longford Moor where they deviate east of the M25 to rejoin the existing boundary. Our final proposal for Heathrow supersedes the final proposal for the Hillingdon/Buckinghamshire boundary at this point. We believe that our final proposals to align the whole of this stretch of the boundary along the M25 would provide a strong and consistent alignment in this area.

ELECTORAL CONSEQUENCES

195. Our final proposals have some limited electoral consequences for the local authorities affected by this review. The details of our proposals for changes in electoral arrangements are described in Annex B to this report.

CONCLUSIONS

196. We believe that our final proposals, which are summarised in Annex A to this report, are in the interests of effective and convenient local government and we commend them to you accordingly.

PUBLICATION

197. A separate letter is being sent to the London boroughs of Hillingdon and Hounslow, Surrey County Council, Spelthorne Borough Council, Buckinghamshire County Council and South Bucks District Council asking them to deposit copies of this report at their main offices for inspection for a period of six months. They are also being asked to put notices to that effect on public notice boards. Arrangements have been made for similar notices to be inserted in the local press. The text of the notice will explain that we have fulfilled our statutory role in this matter and that it now falls to you to make an Order implementing the proposals, if you think fit, though not earlier than six weeks from the date our final proposals are submitted to you. Copies
of this report, together with the attached maps illustrating the proposed changes, are being sent to all those who received our draft proposals letter and further proposals letter of 29 May 1990 and 17 January 1992 respectively, and to those who made representations to us.

July 1992
LOCAL GOVERNMENT BOUNDARY COMMISSION FOR ENGLAND

REVIEWS OF GREATER LONDON, THE LONDON BOROUGHS
AND THE CITY OF LONDON

HEATHROW AIRPORT

AFFECTING HILLINGDON LONDON BOROUGH, HOUNSLOW
LONDON BOROUGH, SPELTHORNE BOROUGH (SURREY)
AND SOUTH BUCKS DISTRICT (BUCKINGHAMSHIRE)

FINAL PROPOSALS

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