

Consultation Response –

1. What conclusions, if any, do you draw in respect of the three short-listed options? In answering this question please take into account the Commission's consultation documents and any other information you consider relevant. The options are described in Section 3 of the consultation document.

Were any of the three options to get the go ahead, there would be serious costs (economic and environmental), major disruption to contiguous communities (in both the short and long term) and considerable, deleterious impacts upon the quality of life of those living beneath flight paths (current and new) and along road and rail travel routes to the airports. This is unavoidable.

Mitigation measures can only do so much; and those disclosed/discussed by the option's proponents generally appear optimistic, if not overstated. Indeed, at a time when the proponents must have had every incentive (with their new schemes in the offing) to demonstrate their capacity to mitigate, it should be noted that they are yet to meet earlier mitigation promises. For example, on both noise and air pollution, Heathrow has fallen woefully short of targets.

Not that they aren't motivated. After all, it is no mean achievement that vested interests (most notably the new owners of Heathrow) managed, through lobbying, to persuade the government to establish your Commission which, in turn, published its December 2013 conclusion that an additional runway was required by 2030.

The commitment of these interests has been inexorable, as displayed by the extraordinary amount of money they have thrown behind their campaign, employing PR, media and campaign professionals in not inconsiderable numbers and – possibly unwisely - even establishing faux community groups and conducting sham polling.

We have received publicity material from Heathrow claiming that "Expansion will deliver up to 180,000 jobs throughout the UK, while reducing noise for local residents".

We are relying on the Commission to curb this hyperbole and inject some honesty into the debate. There will be adverse impacts. They are unavoidable. And whilst agents acting under the auspices of a highly motivated Heathrow have sought to pretend otherwise, the Commission needs to "front up" to the taxpayers who fund its work.

The Dept. of Transport's 2003 White Paper ("The Future of Air Transport") stated (Para 11.53):

"...that development of Heathrow should be subject to a stringent limit on the area significantly affected by aircraft noise, with the objective of incentivising airlines to introduce the quietest suitable aircraft as quickly as is reasonably practicable. The limit will need to be reviewed at intervals to take account of emerging developments in aircraft noise performance. Specifically for Heathrow, we propose that any further development could only be considered on the basis that it resulted in no net increase in the total area of the 57dBA noise contour compared with summer 2002, a contour area of 127 sq.km".

Some powerful public voices will cast opprobrium on the Commission, were it to subvert this assertion by:

1. backing Heathrow's unsubstantiated mitigation promises.
2. Not offering substantiation to the assumption that planes will become quieter.
3. not looking beyond the Jacob's noise assessments (to assess real experience of noise on the ground – there are areas with a history of complaining about aircraft noise to Heathrow, that do not even appear on the Commission's map of noise affected areas!)

The view expressed by ex Transport Minister, Theresa Villiers (Conservative Party Spring Conference, 2012) is held more widely than Heathrow and the aviation industry would care to admit; namely, that: "...thousands live on a daily basis with a plane overhead every 90 seconds... not to mention the flights that wake them up at 4.30am. The quality-of-life impact of a third runway, with up to 220,000 more flights over London every year, would be massive and there is no technological solution in sight to ensure planes become quiet enough quickly enough to make this burden in any way tolerable. So we need another solution" (Speech to Conference, 18th April 2012)

As recently as January 2015, Heathrow's Chief Executive had to admit that there were still insufficient signs that airlines were producing quieter aircraft.

In Para 11.54 of the 2003 White Paper, it was stated: "The most difficult issue confronting expansion of Heathrow concerns compliance with the mandatory air quality limit values for NO₂ that will apply from 2010 (as set down in EU Directive 1999/30/EC), and in particular the annual mean limit of 40 µg/m³."

The South East Region Air Services (SERAS) Consultation (2003, para 16.30) said: "...another runway at Heathrow could not be considered unless the Government could be confident that levels of all relevant pollutants could be consistently contained within EU limits."

And, more recently, Roy Vandermeer QC (the government's Terminal 5 inspector) stated, in his report to the Department of the Environment: "... the evidence placed before me demonstrates that a third main runway at Heathrow would have such severe and widespread impacts on the environment as to be totally unacceptable".

Opprobrium would also be cast upon the Commission were it to subvert these considered opinions, by turning a blind eye to the airport's well known history of failing to come close to meeting environment targets, and its ongoing breach of EU standards. And, were the Commission to recommend any type of expansion of Heathrow, such a turning of a blind eye might be required of them.

Heathrow argues that Gatwick is too far from London. This is a non argument, however. Even now, the journey to Gatwick, via the Express, is comparable in duration to that on the Tube network (and generally more comfortable, too). Moreover, Gatwick is as close to London's city centre as are many other international airports to their respective cities – and although it is just five miles further away than away from London's centre than Charles de Gaulle is from that of Paris, the duration of the journey from Gatwick to Victoria is shorter than the one from Charles de Gaulle to the Gare du Nord.

The notion that, were Gatwick to be expanded, Heathrow would decline is silly. Like Paris (which has Charles de Gaulle and Orly) and New York (JFK and Newark), London can be served by two Airports (Heathrow and Gatwick), if not three (including Stansted).

Moreover, this would be healthy, as far as competition is concerned.

After all this is about the South East of England, and the UK; not Heathrow.

(And it might behove the Commission to keep an eye on possible developments in competition law. Lest we forget, the change in ownership of Heathrow and Gatwick were forced by this).

That Heathrow has found itself to be the only major airport with flight paths over a capital city is down to reasons that are as historic and they are erroneous. Already, 28.3% of all those to be adversely affected by aircraft noise, within Europe, live under these Heathrow flight paths; already rather damning, from an environmental and quality of life perspective.

But now, according to your Commission's reports, an expansion of Heathrow would expose a larger number of people to aircraft noise than are exposed by all of the other European airports, combined.

For the Commission to make such a recommendation would be quite a responsibility.

And that is not even to take into account the immediate, massive disruption that would be faced by the communities which would have to be relocated, to make way for a third runway at Heathrow (including the destruction of approximately one thousand homes).

It would also require the building of more housing at Heathrow which, according to para. 3.75 of your Consultation Document, might not even be possible. And, as paras. 3.85, 3.89 – 3.91 suggest, the negative impacts would in any case more than offset any economic benefit. Incidentally, I suspect the Commission's economic modeling has exaggerated expansion's economic benefit (and have read professional opinion that considers the Commission unwise for not permitting third parties to scrutinise the modeling which has produced such a panglossian view of employment opportunities); and I also note that – conversely - the Commission hasn't even bothered to tally up the road and rail infrastructure costs that Heathrow expansion would require.

By comparison, a second runway at Gatwick will impact upon only a fraction of those who would be impacted by Heathrow expansion. Approximately, just 4%. That is according to the Commission's current basis for noise assessment, which is challengeable (please see Q. 6). Were it assessed differently, the fraction impacted by Gatwick expansion would be identified to represent an even smaller percentage.

From an environmental perspective – noise and air pollution,

invasion of amenities in, and close to, our densely populated capital – both Heathrow options should be excluded.

There is no shame in this, particularly as the strategic arguments for Heathrow appear tenuous. Of all of Heathrow's passengers, 37% immediately transfer to other flights, and Heathrow's own figures claim that only 30% of all passengers to pass through the airport are business passengers. The remaining 70% are holidaying (or "visiting family"). This 70% could be accommodated elsewhere; and were this to occur (whether through adoption of new aviation strategies or, forcibly, through competition judgements) this would mean that there would be more than enough space for business and freight traffic at Heathrow, just as it is.

And even if passenger numbers were to reach the very high end of the predictions (much of the growth coming from non business demand), these could be capacitated by dispersal across midland airports, a second runway at Gatwick and possibly in time, another at Stansted.

The development of competition law and environmental law requires consideration. It is estimated that, were Heathrow to expand, it would increase its share of the UK's aircraft emissions to a massive 54%. To have an airport that was so dominant as to achieve this would have serious implications for the viability of the UK's other airports (and, within time, might demonstrate itself to be unsustainable, as competition law and practice develops).

The arguments for expansion of Heathrow for strategic reasons (without a clear commercial model, there are, after all, several competing ones) seem insufficiently cogent or obvious to justify expansion of Heathrow. And that is before one even takes into account the multivarious downsides and challenges that, ineluctably, it will demand: the environmental pollution, noise and massive logistical disruption to neighbours - and the air and noise pollution and enormous travel infrastructure impacts upon much of South West London and its suburbs.

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

In most evaluations of change, an assessment is conducted of the status quo, without which an evaluation of change is likely to be incomplete. And yet minimum attention seems to have been given to the adverse impacts already suffered by those living under the flight paths.

The impact of aircraft noise on communities is not limited to what expansion will bring. It already exists.

Compared to other airports (e.g. Charles de Gaulle, Paris), Heathrow's mitigation performance is already poor. Very poor. That is before expansion even begins. Not only do Charles de Gaulle's mitigation projects and compensation extend to a wider contour (their using 55dB Lden noise contours), but their per head spend is many times more than Heathrow's. This needs to be acknowledged.

And surely the Commission needs to recognise the failure to mitigate under current conditions, and demand that this be rectified – otherwise neither will there be a foundation upon which to base further mitigation measures, nor any public trust that any mitigation measure recommended by the Commission will have any chance of being enacted.

Neither of the Heathrow options has properly addressed the nature, scope and cost of reparations for losses to disrupted communities. It would be disingenuous to expect a government to address this issue at a later date, rather than demanding full disclosure from the option's proponents and factoring these elements into the Commission's cost analysis. The Commission should do this properly.

It would be useful if the new flight paths required for either of the Heathrow options could be identified with greater certainty. It would be disingenuous to intimate that a proper assessment has been conducted as to the probable impacts upon communities, without having identified these areas and those communities properly. The fact that (under the Commission's 57db noise assessment metrics) many of these areas will not feature on the noise map will not – of itself – preclude regular aircraft peak noises of 80 – 100db from waking people up in the mornings and disrupting their enjoyment of their gardens and homes. The affected communities need to know who they are, and the Commission needs to demand identification

of them so that it can assess the consequences of any decision that it might make.

Road traffic, to and from Heathrow airport, already places heavy demands on roads infrastructure in South West London and surrounding counties (with some negative impact to economic activity). As only a small fraction of users of Heathrow are Transfer passengers, the vast bulk of the increased volume of passengers will require road or rail services to exit the airport and travel into London, or surrounding areas. This infrastructure is already at capacity. As Heathrow is likely to increase the burden that it places on current infrastructure, by a further 50%, schemes for sustainably carrying this volume of traffic, without adversely impacting upon the economic and leisure activity in all affected areas need both to be identified and approved as viable.

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

The Commission's appraisal seems to have failed to identify many of the impacts that expansion of Heathrow would have on its neighbouring communities, and communities further afield, beneath its flight paths.

The Quality of Life (PWC) report is poor. "Our results need to be treated with some caution", write the authors, and the Commission should take heed. There are innumerable unsubstantiated claims and conjectures, and I suspect that questions would indeed be asked of the Commission's judgement, were it to place weight on the document.

Even within context, the following statements seem ridiculous:

"We can be confident that aircraft noise is bad for subjective wellbeing".

"... specific conditions, including strokes and heart attacks are known to affect subjective wellbeing".

The "Mapiness" survey, predicated upon modern gimmickry, is risible.

Most of the small sample lived within 5 Km of the airport. In Heathrow's case – because the measurement is taken from the centre of the airport – this means no more than two miles of the perimeter fence. This area (which houses the highest concentration of airport employees) is not a proper representative sample (as the authors seem to inadvertently imply themselves, later in the same report, by disclosing that families with children are less likely to live in these areas).

This – and so much else besides, within the QOL report - is not proper work.

Objectives are numerated as:

To minimise impacts on existing landscape character and heritage assets.

To identify and mitigate any other significant environmental impacts.

To maintain and where possible improve the quality of life for local residents and the wider population.

To manage and reduce the effects of housing loss on local communities.

Yet little reference is made to them in the report.

And it adds to an impression that the Commission have spent insufficient time getting to grips with very real QOL impacts. More than lip service needs to be proffered in respect of the main, and unavoidable consequence, of increased air traffic; i.e. the higher peaks and increased regularity of aircraft noise.

To assume that this will not occur might prove to have been sloppy thinking (See Q. 6), particularly in light of the actual evidence (which other agencies have been prepared to cite).

Continuous high levels of noise, preclusion of the enjoyment of gardens and homes, and sleep deprivation are critical issues.

As it is, with the basis of the Commission's noise assessment being average noise (the "average mode contours" metrics), areas impacted by peak noise are not even appearing on your noise map.

Already hampered by this opaque approach to noise, and its concomitant inaccuracy, might it not appear that the Commission is seeking to brush some of these critical issues under the carpet, unless work of merit is conducted in relation to these quality of life issues?

Even though it is in the public domain that communities to the South West of Heathrow have been impacted by aircraft noise, the Commission seems to have failed to consider impacts upon these areas.

It is unavoidable that an expanded Heathrow would either increase the quantity of planes overflown, or the quantity of planes flying overhead.

And yet, in conjunction with the lacuna that is the absence of detailed flight paths, the gaps and omissions in detailed assessment of noise impacts upon the populous appear surprisingly stark.

The application of the terms "significant adverse" and "adverse impact" seem peculiar. Heathrow expansion is adjudged as "significant adverse"; yet only "adverse" if their mitigation measures are taken into account. But this equates it with Gatwick (despite the fact that Heathrow impacts upon exponentially more people – even when minimising the number by using AMC 59db). Is some undisclosed handicap system in operation?

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

The Commission appears to have failed to conceive of an UK wide Airport Strategy, into which any recommendation, that it might make, could fit. This seems peculiar, as the fundamental question is supposed to be UK air capacity; and any recommendation made will critically affect the opportunities left open for other airports within the UK.

To handle air capacity within the UK, the country requires a set of competing, independent airports. But if Heathrow expands – as planned, to handle over 100,000 million passengers - it will have become the world's largest airport by a significant margin.

By way of representing its size, in relation to other UK airports, this expanded Heathrow will have become responsible for 54% of the UK's aviation emissions.

What might happen to the long term viability of other UK airports, in this scenario? In the event that a UK airport has to be closed (Heathrow was shut down due the best part of day in December, due to computer failures), to which other airports should planes be sent? To what extent should the operational viability of other airports be overlooked? Can a recommendation really be made in isolation from these questions? Surely it is about the South of England and the UK, not just Heathrow?

If Heathrow were to expand, it would become the largest airport in the world, in terms of passengers handled , even though it resides in the small land mass that is the UK). And it would concentrate Britain's aviation traffic at one point, even more so than it does today. In these circumstances, what might be the ramifications were it to be forcibly shut (e.g. by terrorism)? Other than the likelihood that there would insufficient airport space to handle its flights elsewhere within the UK (courtesy of its own expansion), such an event would have a far more damaging economic impact than had it not been expanded (and much traffic was going to other UK airports). It is far safer to have a variety of smaller hubs (such as New York, where Newark caters for 35 million passengers, and JFK caters for 50 million passengers respectively – and each smaller than Heathrow is, even as of now).

Heathrow could be permitted to concentrate on business and freight, with holidaying/tourist traffic (currently 70% of its business)

going elsewhere (Gatwick, Stansted and other south eastern airports now operating international flights).

At the moment, the Commission's analysis of the true costs of the schemes would seem to be incomplete (and that's before the failure to account for the various infrastructure projects that will be required to carry Heathrow's increased volume of passenger traffic into London and its surrounding areas).

What is the current impact upon children, family life and schools? The Commission does not tell us. The Quality of Life report, from PWC, even signposts that it hasn't bothered to consider the adverse impacts of aircraft pollution on children. There have actually been a variety of considered studies into the impact upon children and schooling ("Children's cognition and aircraft noise exposure at home", St. Mary's 2004; "Aircraft and road traffic noise and children's cognition and health: a cross-national study", Lancet, 2005; "Exposure-effect relations between aircraft and road traffic noise exposure at school and reading comprehension: the RANCH project", 2005). All have found impacts to be adverse. Not only has the Commission failed to conduct any such work of its own, into these important issues; it hasn't even addressed the work that has been undertaken into these issues (all of which is in the public domain) and conceived of a response.

In our part of the world, schools change their behaviour on days of easterly take-offs. This is not irrelevant to the Commissions work. But does the Commission even know this? And, if not, why not?

There have been several studies indicating that residents living close to Heathrow are more susceptible to certain illnesses. The risks of stroke, heart and cardiovascular disease, for both hospital admissions and mortality are 20% higher in areas close to Heathrow (study of 3.6 million people in 12 closest boroughs - BMJ Oct. 2013).

In Hillingdon, there is an unusually high per capita incidence of coronary heart disease, pulmonary disease and asthma. Medical staff interfacing with these patients attribute these clusters to Heathrow Airport proximity. To what does the Commission attribute it?

To those residents, living under Heathrow's Flight Paths, who are familiar with the Commission's reports, it seems surprising that the Commission has neither demanded, nor instructed, a full Health Impact Assessment, in respect of each short-listed option. We no longer live in Victorian times, but in an era of "Health and Safety".

To disregard the communities that will bear the brunt of expansion, in this manner, might well suggest a failure by the Commission to comprehend the significance of all that it is supposed to be assessing.

In most of the areas contiguous to Heathrow, planning is invariably a major challenge. In addition to the need to find new housing for approximately 1,000 families in the event of a third Heathrow runway, it is envisaged that expansion could herald 70,000 (mainly low paid) new jobs. Much of the countryside surrounding Heathrow is Green Belt land. Where are the displaced communities to be housed? Where are the new employees to be housed? Will this be possible? Heathrow have not perceived it to be in their interests to highlight this issue (the direct consequence of the developments they are urging the Commission to recommend) and consult with the relevant agencies and authorities to test the plausibility of what will be required. Unfortunately, it would appear that the Commission has not bothered to do this either? Why so?

Heathrow Airport undoubtedly gives rise to economic benefits; but its presence also impacts negatively on certain economic activity. Besides the negative impact it has on the quality of life of South West London residents, and the general manner in which this can feed into these residents' own economic activity, the presence of Heathrow has long prohibited numerous amenities and areas of business activity from realising their full potential. And yet, whilst there is conjecture that non expansion of Heathrow could lead to a decline of 14,000 airport related jobs, there is neither assessment of the ways in which its presence currently has a negative impact upon non airport related activity, nor an assessment of how expansion will compound these impacts. The airport currently impacts adversely upon the lives of those beneath its flight paths, and expansion can only make this worse. If expansion does not occur, communities will not be lost, and the benefits of amenities and open spaces that are currently enjoyed will not be devalued – against the status quo.

So, these are self-evidently positive benefits that would accrue from non-expansion.

How can there be a proper analysis unless these devaluations – all consequences of expansion – are computed into the assessment? And conversely, how can the Commission's evaluation of non-expansion fail to take into account the benefit of them not having to occur, due to non expansion?

How is it possible that the Commission's assessment could be so lopsided? The Commission seems hitherto to have failed in this respect.

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

As stated (under Q. 4), the Commission has failed entirely to assess the impacts of Heathrow Airport, in respect of the status quo. Pollution (air and noise) and the impacts upon health, amenities and the negative impact on certain business activities (yes, it is possible that airports can have negative effects). If one doesn't assess the pros and cons of the current situation, how can a proper change assessment be carried out? This is an omission by the Commission.

The mitigation records – as well as promises – of all short listed options need to be properly evaluated, as do their costs. Mitigation has been proffered by the proponents of these options because even they see it as key to the deal they would necessarily need to strike with neighbouring communities. The Commission needs to show that they key and seriously assess the plausibility and viability of each and every aspect of the mitigation offer.

As stated (under Q. 2), it is not possible to assess the impacts of expansion upon the communities under new flight paths, if those flight paths have not been clearly identified. And it is no excuse that the relevant agencies have not hitherto provided these. If those who might be affected are to trust the Commission's recommendation, they need to see that you have computed their concerns into your assessments.

Many of these to-be affected areas are currently oblivious.

Had they known, they might even have been making submissions to this consultation process. They have not been informed of what could be heading their way, in terms of aircrafts overhead; so have had no chance to contribute.

The unavailability of this information could only be regarded as convenient by a team of assessors who were minded to disregard affected and potentially affected communities.

Surely, if the Commission were properly regarding these communities, it would have demanded that this future flight paths information be presented by the relevant agencies - stating that there assessments could only be incomplete without them.

As stated (under Q. 4) all of the options should be considered in light of the UK Airports network, for the impacts upon the network

will be colossal. Such an approach can only illuminate the quality of the assessment.

Certitude is required in the assessment of the each of the scheme's costs, including the tax-payer subsidy. Without a clearer investigation and statement, there cannot be full confidence as to any of the projects' viability. If a future government (particularly one facing liabilities flowing from the recommended option) were to realise that the Commission's assessment/recommendation had not even been properly costed, its work may well be seen as having been good for nothing.

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

The Commission's work seems contradictory. Both the phrases "uniformly negative" (Para 14.7, Heathrow Sustainability Assessment) and "neutral" (Para. 15.4) are used. Yet while there is to be some benefit for Heathrow Airport itself, the history of airport building has demonstrated that its impacts are adverse for businesses within its hinterland (other than those related to the airport, itself) and residential populations.

Indeed, the poor Quality of Life Report (commissioned from PWC) did at least seem to identify this; although true to its charlatanism, did posit (referencing a Dutch study) that a reduction of 10% in the values of homes impacted by expansion could be argued, by the Commission, as one of the gleaming benefits with which to placate residents worried by adverse impacts (!).

The whole area of Noise appears deficient (Appendix 5). Possibly the Commission has not engaged as thoroughly as it ought to have done, owing its own lazy assumption that advances in technology must herald a generation of quieter planes.

Having blind faith in this possibility is no better than hoping, without substantiation, that each and every mitigation measure, mooted by the short listed options' proponents, will satisfactorily achieve what they claim.

And recent evidence would seem to question this assumption of quieter fleets.

Despite the expectation that the Airbus 320 would be followed by a quieter model, we now know that the Airbus 380 is not only louder than its forebear, but just as loud as the Boeing 747, despite the widely held assumption (and marketing) that it would have been quieter. (Please see Para 4.13 DfT *Night Flying Restrictions at Heathrow, Gatwick and Stansted Stage 1 Consultation* January 2013)

So, despite the brief from Airbus laboratories (no doubt the sort of marketing that feeds the Commission's lazy assumption) the reality of the modern technology is that it is not quieter.

As recently as January 2015 the Chief Executive of Heathrow has had to admit that the airline industry has not met its own promises on quieter planes.

In the Civil Aviation Authority's paper "Managing Aircraft Noise" (2014), they challenge – however inadvertently – both this assumption, and the very basis of noise assessment adopted by the Commission, as not fit for purpose:

As can be seen, reaction to aircraft noise begins to change markedly around 57 dBA L_{eq}, resulting it being adopted a key policy level for those significantly affected by aircraft noise.....

In other words, the period over which L_{eq} is calculated has to be relevant to the pattern of noise exposure and any comparisons have to be on the basis of like for like. The same principle applies to noise from aircraft and from other sources. Thus changes in the distribution of noise exposure through the course of a day will not be reflected in a standard 16-hour L_{eq} noise index. Although the day, evening, night, L_{den} index, will capture the effect of re-distributing noise between the day, evening or night periods, it will not capture the effects of a redistribution of noise within each of the periods. This can be addressed by the use of supplemental metrics, e.g. use of the L_{eq} noise index over a shorter time period, or by using other metrics that provide greater information on the variation of noise level and number of events over time. The challenge that arises with supplemental metrics is that there is no evidence to inform the critical threshold values to adopt, nor the weighting to be assigned to each metric.

At Heathrow due to tightening capacity constraints, there has also been a steady increase in aircraft size, the proportion of long haul flights has increased, and many domestic routes have reduced frequency or disappeared; all of which would have seen noise increasing without the accompanying technological and operational developments”.

When the aviation industry is unable to rely on the very assumptions, on which it is hoping to persuade outsiders that noise could be better managed, it seems peculiar that a Commission that is supposed to be conducting a proper investigation, fails to look beyond this assumption. Lazy?

The corollary is that neither has it looked beyond the metrics modeling of “average noise contours”, a blunt and crude approach which has provided the basis of its noise assessment.

Absurdly (as the CAA has stressed) it does not measure, nor does it seek to measure, the very thing that actually disturbs people about aircraft noise and has them complaining. Peak Noise. Rather it measures an average level of aircraft noise, which is so crude that it computes into its average times when planes are not even flying (i.e. non noise).

Noise disturbance is not measured in this way, in other circumstances, because it is known that to measure it in such a fashion would actually constitute a failure to measure what is supposed to be measured. When any of the local authorities, contiguous to airports seek to protect their residents from noise created by anti-social neighbours, they measure the peak noise that disturbs. They don't compute an average noise level from the offending property and, then, compute into that average all of the times when the anti-social neighbours do not make noise (perhaps because they are away from their properties). For that would be, self evidently, to fail to measure what they were supposed to be measuring.

In Richmond-upon-Thames, the plug will be pulled on concerts at Twickenham Stadium, if the peak noise reaches 68db at the front door of houses in the immediate vicinity. Were they create a measurement that was merely an average of the night's noise and, then - in emulation of the Commission's noise assessment model - compute into that average all of the times of the relevant day when the event was not even taking place - concert promoters could get away with virtually any level of peak noise.

There are certain areas in Richmond-upon-Thames that are overflowed by easterly take offs. 30% of all take offs are in this direction; and in some months the figure is higher (e.g. 50% in November 2014). These areas are regularly subjected to aircraft noise of over 80 - 100db; and, despite residents being vocal of their disquiet at this noise - which is all in the public domain) these areas do not feature on the Commission's Noise Contour maps (9.2 and 9.3) as being affected by aircraft noise.

Does the Commission understand how this is possible? Will the Head of the Commission be confident that can both explain why this is so, and explain why he considers such a state of affairs to be wholly satisfactory?

Either way, this is down to the methodology. The metrics are simply not furnishing the Commission with a true reflection of the reality of noise disturbance.

So, just as the failure to identify, with certitude, areas that will be newly affected by expansion (and thus alert these communities and consult them), the Commission has been unable to properly assess the current noise impacts in the easterly direction - let alone the impact that ensue from increased easterly take offs (which must

inevitably flow from expansion plans that permit a quarter of million extra annual flights).

The Commission also seems to think that noise will be reduced within larger planes carrying more passengers. But it is only by using the current "average noise contour" methodology that one could get away with saying this is neutral in terms of noise impact, as larger planes have lower trajectories in the climb, thereby transmitting higher peak noises to the ground.

Please note:

1. the Civil Aviation Authority's paper "Managing Aircraft Noise (2014) flatly contests the assumption that larger planes will make less noise.
2. The CAA arrives at this conclusion, because it is talking about real noise levels (the peak noise that disturbs); not magically using "average noise contours" metrics to conceal it.

It seems that the Commission's assumption that new planes can be given lower Noise Quota Counts has induced a lack of forensic study into noise; an over reliance on "average noise contours" metrics. And the failure to look beyond this crude tool has left the Commission with partial data; data that fails to reveal the when, how and why of residents actually being disturbed by noise. To an extent, sufficiently embarrassing, that some noise affected areas don't even warrant a mention on the Commission's declared noise maps.

Safety, as an issue, should always be a primary concern. One of the most striking aspects of Heathrow's location is that it is the only major airport with flight paths over a capital city. Even outside of the city, the residential areas over which the flight paths pass are densely populated. As Heathrow currently is, there have been some "near misses" which – on account of the high densely populous below – would have been disproportionately calamitous. Were plane movements to increase by the envisaged margin – from to 480,000 to 700,000 – the nature of the risk can only increase.

The skies of South England are already some of the most crowded (as well as Heathrow, planes fly in and out of, and stack around Gatwick, Stansted, Luton, Southend, Southampton, Bournemouth, London City Airport etc). And a further 250,000 flights into the airspace of the South of England, or can only present challenges to this risk.

An expanded Heathrow – with an increase in passenger movements from 72,000,000 to 105,000,000 (which would make it the world's largest airport, by some margin) would disproportionately concentrate that risk over some of the UK's most densely populated areas.

Moreover, if such an expanded Heathrow were to be subjected to a terrorist attack, it would devastate the UK's ability to maintain air traffic, in a way that would not be possible if other airports had been able to take on greater capacity. Just like banks, an airport can become too large.

Greater attention needs to be given to Safety, by the Commission. Particularly in respect of Heathrow, it would seem difficult and unwise to make a recommendation, without a detailed safety appraisal of the risk factors associated with all contingencies.

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

While the options' proponents will, understandably, only be contemplating their own narrow economic self-interest, the Commission's responsibilities run wider.

Unless projections are made as to how each option will interact with the rest of the UK's airports, it will be akin to introducing a new product into a market, without trying to understand what the consequences will be for the rest of the market in which it operates. Such business would not normally care about this (happy to see its competitors fall by the wayside). Heathrow is no different. But, as "regulator", so to speak, the Commission should present a complete picture.

Each option will have a significant set of ramifications for other UK airports. What are these? And would they be in the interests of a wider UK Airports Strategy?

Yet the Business cases don't even seem to consider the allocation of the various different air traffic classes – tourists, transfer, business passengers and freight) between the different UK airports.

Question 8 - Do you have any other comments

There are 5 runways for London now - 2 at Heathrow and 1 each at Gatwick, Stansted and Luton (this is not to include London City Airport). An extra runway will mean that London will become more than extremely well served.

However, Heathrow already handles more passengers than any other airport in Europe, and globally, only Beijing and Atlanta, USA handle more.

For reasons of competition, environment and safety, it would seem wise to allocate an extra runway to an airport other than Heathrow (i.e. to either Gatwick or Stansted).

But for a couple of other reasons, two medium term, one short term, a recommendation by the Commission to expand Heathrow, might be seen to have been myopic:

1. Even before competition law develops further, the BAA monopoly was broken up, thereby enabling Gatwick to improve its offer. To expand Heathrow (which would make it the largest airport in the world) would be to reproduce a monopoly comparable to that which had to be corrected by competition law, a decade ago. A third party analysis, commissioned by LAANC demonstrated the possible benefit from expanding Gatwick to be worth as much as £10.4 Billion, by 2050.
2. At a time when the Treasury's priority is to reduce spending, the proposal for an extra runway at Gatwick is less expensive.
3. As it is, Heathrow already adversely affects far too many people (at conservative estimates, more than twenty times as many as Gatwick) which is why expansion has been abandoned each time, at the earliest juncture. Although the Commission has yet to properly identify which new communities are to be affected (very difficult when the new flight paths have not been set in stone for consideration; and the Jacob's noise assessment is likely to be deemed to have been inadequate for the task), many more people will be adversely affected and they will be brought into the debate, for the very first time, were the Commission to make a recommendation for Heathrow expansion. Politics is about the

art of the possible. Politically, it is unlikely that there will be an irreversible decision for Heathrow Expansion, and any final recommendation by the Commission will serve no one if it fails to take this into account. A recommendation for Heathrow Expansion will be a hospital pass to a democratically elected government, and one that is likely to be dropped.

The funds of the powerful vested interests behind the two airports, and especially those of Heathrow, will have enabled them to make their arguments to the Commission vociferously and powerfully; in the same way as Heathrow has expended much treasure in making their arguments to citizens – and earning some opprobrium from the media in the process, by establishing a mock grass roots movement called “Back Heathrow”. Likewise, Heathrow has had visiting passengers signing pro expansion cards. And, all in order that they can persuade the Commission of mass support for their schemes. At the time of writing Heathrow has plastered billboards with the message: “Those Around Us Are Behind Us”; claiming that local authorities support Heathrow expansion. This is not true (as several councils have taken to their local media to proclaim). Heathrow is involved in a campaign of misinformation. And, were the Commission to give the impression that they had fallen for it – by citing any such vested interest misinformation to support their final recommendation – they would damage their standing.