



Date: 31<sup>st</sup> January 2015

Airports Commission Consultation  
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PO Box 1492  
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Dear Sir / Madam

**Re - Airports Commission - Consultation Document on**

- **Gatwick Airport Second Runway**
- **Heathrow Airport Extended Northern Runway**
- **Heathrow Airport North West Runway**

I wish to respond on the above consultation. The consultation raises a number of specific questions it is seeking a response on. However before addressing these I would wish to make a few broader comments on what is a key decision of London and indeed the UK.

**Why the need for a Hub Airport?**

Firstly I would wish to question the whole principle of the need for a hub airport. I accept we wish to have good direct links to other major cities /countries, and this will help with economic growth for the UK. But what is the advantage to the UK from helping passengers just transit here? Apart from some shopping and airport fees – is there real benefit to the general population who have to pay for this through increased environmental costs - with consequential cost to the UK through noise and poorer health and costs of mitigation measures? Have you allowed for the compensation costs from the causal link between aircraft noise disrupted sleep patterns and associated heart effects?

Also with smart IT systems how much of the issue of transit passengers be addressed anyway by careful routing, so the majority of connections could be made at say Heathrow or Gatwick anyway? I appreciate that this may need changing to a number of routes to Heathrow or Gatwick. But surely the prime purpose is to benefit the UK taxpayer, not airlines with their own preferences!

**Safety / Consequences of an Aircraft Crash**

Secondly I would argue that the issue of safety has properly been addressed. We have had one crash at Heathrow in the past few years with the aircraft in question just making it over the perimeter fence. Has the data on near misses been properly analysed in a transparent way? The consequence of an aircraft crashing on landing or take off does not seem to have been properly addressed. The area round

Heathrow is heavily populated in many directions. Also flight paths to and from Heathrow in particular fly over much of central London. So the consequences could be very significant.

Turning now the Specific Questions raised in the latest consultation.

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

I conclude that: -

- A lot of time money and effort has been spent of looking at elements of the proposals and the commission is to be supported in taking evidence based approach to decision making.
- 200,000 extra flights is equivalent to about one plane every 2 minutes based on an 18 hour operating window 365 days a year. This is similar to the current landing rate at Heathrow (every 90 seconds at peak). If correct this speaks volumes to the potential impact regardless of which option is chosen.
- That two of the remaining proposals (those at Heathrow) look to be extremely financially risky in terms of the investment return. Sections 3.94 and 3.145 both state: -

*The Commission's analysis suggests that Heathrow Airport Ltd may have to raise additional equity of up to c. £5.1 billion and additional debt of up to c. £24.9 billion. This will put the airport at the highest end of the range of financing for infrastructure projects in the UK and could make Heathrow Airport Ltd of comparable scale to Network Rail (with a long- term debt of c. £35 billion) and larger than National Grid (c. £25 billion). Raising this level of financing would be challenging; and there are risks associated with an increase of passenger aero charges to £27-28, significantly higher than current charges across the UK and globally, in a context where Heathrow must compete with other airport operators.*

These risks are hardly mentioned in the discussion on the options.

- Noise is hugely more significant at the Heathrow options than Gatwick. Figure 3.1 shows impacts in the range 5,000 to 30,000 compared to Heathrow where it is 200,000 to 750,000 (Figure 3.9 and 3.10). This type of noise has been linked to ill health effects and would impact very significant numbers of people.
- Gatwick gives much greater resilience and competition.

**Q2: Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in section three.**

- It would be useful to know what part of the costs (e.g. road and rail improvements) are funded from general taxation and what the airport operator is funding.
- Similarly the benefit arising from these separate parts should be identified separately so it is possible to see the return for the taxpayer separately from that for the airport operator.
- The report seems to take at face value claims made over how the new runways will be operated. However given future pressure on landing slots the report argues will continue to arise what

guarantees will there be that these are adhered to. We have a lot of experience with BAA not keeping to exiting commitments.

- The relief offered by the operating modes must be guaranteed – at the expense of the operator losing its license. This in turn should be factored into the risk assessments - it may be even more difficult to secure funding with such constraints.

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

- The process has concentrated just on proposals made to the Commission. No attempt has been made to generate new or original proposals.
- Use of 2050 as a baseline and assumptions on both improvements in emissions and noise is very disingenuous.
- It would be useful to know what peer assessment has been undertaken of all the supporting documents. These are long and complex documents and it is difficult for the lay person to find time to read understand and assess. So there should be some clear process whereby it can be shown that independent parties have independently reviewed them. Such an approach would also help give lay people more confidence in the work of the Commission and the final results.

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

- The environmental impacts have not been properly costed. For example there are costs associated with noise abatement in peoples homes and schools, costs associated with air pollution / health impacts.
- Heathrow is the only major UK airport where air pollution levels remain stubbornly above EU legal limits. The European Union's Directive on Air Pollution has set legal limits, which now need to be met by 2020. Failure to comply could result in infraction proceedings being taken against the UK – and possible swinging fines being imposed if the limits are not met and / or suitable steps are not taken by then.
- In the Heathrow area the pollution comes from the planes but also from the traffic on the nearby motorways and I feel the Commission has not properly assessed these. For example Colin Matthews, the CEO of Heathrow until July 2014, has said that traffic on the M4 in the vicinity of the airport would need to be 'diesel-free' to allow for a third runway to be built. This is inconceivable by 2020. And even if the area were to become diesel free the economic impact would be great as either lorries and commercial vehicles would not be able to enter such an area – or new low emission fleets would need to be purchased.
- The impact on traffic would be huge and is not properly assessed. At present traffic regular could grind to a halt in the area surrounding Heathrow. The M25 between junctions 14 and 15 (Heathrow to the M4) is the busiest section of motorway in UK. Heathrow itself has admitted that only some form of congestion charge could keep levels to a manageable level if a third runway was built.
- Potential costs associated with Flood Defence measures appear not to have been factored in. They could be considerable.
- The proposal to build at Heathrow in particular will provoke a lot of protest and organized campaigns to stop such a move. Has this been properly factored into the costs included in the appraisals?

**Q5: Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?**

See above

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

See above.

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

- There appears to be double counting in assessing the Heathrow options. The economic gain appears to claim significantly more jobs being created locally – then adding in the additional economic activity with building these.
- The use of the 2050 timeline helps present economic benefit being greater by applying over so many years. £120b sounds a lot but looks like this is just £3.4b pa. And it is not clear if the benefits are based on 2014 prices or includes inflation. If the later then true value much lower.
- The economic benefit model used for Heathrow is different from that of Gatwick – the report admits that the Heathrow model is novel and the report says (Section 3.128): - *These results should be interpreted with caution, given the innovative methodology used, but they provide an indication of the scope for wider benefits to be felt throughout the economy, for example from enhanced productivity, trade or consumer spending, as a result of expansion.*  
This potentially may overstate the benefits compared to Gatwick.
- Over the past few years there has been significant growth in house and land prices in London compared to other part of the country (including round Gatwick). Will this make a difference to the economic cases?
- It would face massive opposition. There would be opposition not just from local residents but also from environmentalists, many local authorities, politicians from all parties as well as some businesses and trade unions. When the last Government tried to build a third runway, it was defeated by this coalition. Huge rallies attended by thousands of local people, cross-party backing, eye-catching direct action, all backed up by sound arguments saw off the plans for a third runway

**Q8: Do you have any other comments?**

The proposal for an extra runway in or around London needs to provide some real benefits to the UK and not just to the airport operator. People in the area will be impacted by extra noise, increased pollution and congestion. That said they some may gain through employment or other “trickle down” mechanisms. Many though especially those impacted by noise - will be some distance removed from the

airport selected and so the “trickle down” effect will be at a distance. It would be helpful to those so impacted to have a better explanation of what the benefits are to them.

In progressing it is essential that taxpayer’s money is not used to fund supporting infrastructure help business without due economic reward for the taxpayer generally. It is not clear what infrastructural improvements (roads rail etc.) will be funded from the taxpayer and what from the airport operator. This should be spelt out to make it clear what the benefits to the taxpayer are.

Whatever the Commission recommends - the actual business case for constructing any new runway will be a commercial decision for the airport operator, will be funded by business – and they will make commercial decisions based on rate of return. As noted some of these calculations look to be marginal.

Yours sincerely,

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