

01 February 2015

To: The Airports Commission

Dear Sir,

## **REPRESENTATIONS ON CONSULTATION DOCUMENT OF NOVEMBER 2014**

I have previously made representations, about Short to Medium Term Measures and Additional Airport Capacity in the Longer Term. These current representations lean very heavily on the excellent work to date of your Commission.

I was not satisfied with the presentation of a copy of my first representation on this current consultation of November 2014, which was done on your Smart Survey option. Hence I seek to improve my representation here, in Word.

My key point below is that more emphasis needs to be given to passenger interests, they are the real customers.

These representations are designed to cover the whole field concerning London Heathrow airport (LHR), and may I request that they are considered as a cohesive whole, not a smorgasbord to pick and choose from.

1. Concentrate London airport expansion on LHR, UK's existing single hub airport, to maximise UK and local benefits.
2. Deny additional runway capacity and associated strategic expansion expansion at LGW and the other London airports such as Gatwick, Stansted, Luton, and City. They each have a particular role in serving London and the South East, but do not have the critical mass of LHR to serve the whole UK, its four nations and their regions.
3. Actions to address my issues of concerns are now summarised. I have tried to be constructive towards the Commission, whilst raising difficult issues. All the points summarised immediately below from A. to L. should please be considered together.
  - A. Give overwhelming weight to passenger interests, feather weight to airline and Heathrow Airport Ltd interests.
  - B. Plan as the first priority to provide a top of the class passenger experience, to the envy and detriment of competing hubs, in part by a step change in resilience and efficiency, thus in punctuality. Accept that the monopoly of owner-operator Heathrow Airport Ltd, and the airlines are merely self-interested suppliers. Their organisation of LHR operations to gain a quart of activity out of a pint pot of assets is to the detriment of passengers and the four nations of the UK. Rightly praised as a wonderful operational achievement in conjuncture with NATS, it is also a strategic disaster. Likewise, regulatory capture by these suppliers is against the interests of passengers.
  - C. Fix the main long standing strategic stupidity, which is the regular daily chaos which inevitably occurs when runways are scheduled at 98% of Summer and Winter theoretical capacity.
  - D. Make the LHR and the whole UK air transport system safer, by reducing the current intense pressure on NATS and air-side ground operations.

- E. Make LHR more sustainable with near zero aircraft in holding stacks and near zero queuing to take off, all wasteful and unsustainable.
- F. Set aside in perpetuity at least 100 new free loan LHR slots exclusively for additional smaller domestic destinations than those currently served, enabling new direct air services to the UK's four constituent nations and their regions.
- G. Plan for and quickly deliver a purpose built domestic air passenger and air freight mini-hub co-located and fully integrated within an expanding international passenger and freight hub at LHR.
- H. In choosing between Extended Northern Runway (ENR) and the New Runway to the North West, seek to satisfy passenger wishes, particularly transit passenger wishes, which revolve around avoiding time wasting on the ground. Consider carefully the locations and alignments of runways, terminals and below ground structures for easy and reliable inter-connection of passengers, their baggage and not forgetting containerised and bulk air freight and meeters and greeters.
- I. LHR could best be expanded with a step by step way forward to expansion rather than by the single mega project which has raised widespread political opposition, proposed by the Commission.
- J. The Airports Commission's plans, estimated capital costs, construction schedule and risk analysis would benefit from a re-consideration.
- K. The whole of the UK will be best served by having built-in future improvement and expansion plans for LHR. The Airport Commission to date has done a very good but as yet imperfect job. It is well placed to continue its work and so demonstrate that it can do even better.

4. Issues of concern in more detail:

Issue A. Give overwhelming weight to passenger interests, with feather weight to Heathrow Airport Ltd and airlines.

- a. Passenger wishes revolve around avoiding time wasting of all sorts, in the air and on the ground.
- b. Many departing leisure passengers arrive at LHR very early, as they expect long time wasting queuing at each point on their pathway to boarding their aircraft. But early arrivals clog up the terminals thus slowing down those premium passengers seeking a quick easy pathway to board their aircraft. (At LCY, it has been said that business passengers spend 15-30 minutes air-side, and others spend 2 hours.) Long passenger dwell time is good for Heathrow Airport Ltd who seek a captive audience for their retail offer, but passengers to come to LHR to fly, not to shop. So reallocate terminal space with much less retail floor area and more floor area for more (and more fully staffed) quick pathways to boarding. Such changes will increase passenger capacity and also improve the passenger experience at each terminal at low capital cost.
- c. Most LHR departing passengers arriving at their departure gate in a timely manner expect various delays to their aircraft arriving on its stand and being made ready to receive them. These delays result from the normal day to day chaos which is accepted by Heathrow Airport Ltd and airlines as being part of the normal LHR passenger experience. This acceptance of the unacceptable must change, and can only change if the existing and long standing strategic LHR stupidities are designed out by the Airports Commission.

- d. Nearly all arrivals passengers and those collecting them expect their aircraft to suffer unpredictable delays in holding pattern stacks. Straight-in approaches are a great rarity. Having eventually landed, most passengers expect to be taken on a time wasting scenic tour of the taxiways prior to a long hold awaiting for their gate to become available. Then more delay whilst the air bridge or air-side bus is made ready, and so on. Again, these delays result from the normal day to day chaos which is accepted by airlines and Heathrow Airport Ltd as being part of the normal LHR passenger experience. This acceptance of the unacceptable must change, but can only change if the existing and long standing strategic stupidities are designed out by the Airports Commission.
- e. Transit passengers suffer worst from all these delays and more so as their specialised needs are far from being fully met. Yet again, these delays result from the normal day to day chaos which is accepted by Heathrow Airport Ltd and airlines as being part of the normal LHR passenger experience. This acceptance of the unacceptable must change, and can only change if the existing and long standing strategic stupidities are designed out by the Airports Commission.
- f. The self-interests of monopoly supplier Heathrow Airport Ltd, and the airlines conspire to untruthfully promise unattainable schedules (aided and abetted by their lapdog Airport Coordination Ltd and their regulator) is against the interests of passengers, and should cease.
- g. Heathrow Airport Ltd has its ability to increase landing charges set by the regulator. One basis of this computation is the firm's capital employed. Hence expensively constructing modifications to existing live terminals may make a better business case for the firm than constructing better value new terminals on new ground in the right places as proposed by Heathrow Hub Ltd. These regulatory arrangements need review in the context of an expanding LHR.
- h. So any plan to provide a top of the class passenger experience, to the envy of competing hubs, requires putting the passenger experience at the top of the list of objectives of the Airports Commission.

5. Issues of concern in more detail:

Issue B. Plan as the first priority to provide a top of the class passenger experience, to the envy and detriment of competing hubs, in part by a step change in resilience and thus in punctuality. Accept that the monopoly operator Heathrow Airport Ltd, and the airlines are merely self-interested suppliers. Their organisation of LHR operations to gain a quart of activity out of a pint pot of assets is to the detriment of passengers and the four nations of the UK. Rightly praised as wonderful operational achievements in conjuncture with NATS, it is also a strategic disaster. Likewise, regulatory capture by suppliers is against the interests of passengers.

- a. This is a statement of the blindingly obvious, but seems to have been missed by many including the Airports Commission.

6. Issues of concern in more detail.

Issue C. Fix the main long standing strategic stupidity, which is the regular chaos which inevitably occurs when runways are scheduled at 98% of Summer and Winter theoretical capacity.

- a. It is a miracle when the LHR daily plan is occasionally achieved. Indeed, it is a daily miracle that LHR is able to attempt to operate at such a high capacity, and all praise must be given to operations people, who are coping with the negligence by which so many previous strategic decisions have been determined. It brings to mind the English phrase 'lions led by donkeys'. Heathrow Airport Ltd and the airlines benefit from this ludicrous state of affairs. Passengers suffer, as does the national interest of the UK. The regulators have lost the plot.

- b. The Airports Commission and the regulators should put passengers first. The Airports Commission should start its considerations on capacity by assuming scheduled runway operations are to be limited to 75% of their 2015 theoretical Summer or Winter slot allocations. Resilience against the normal, routine, expected and multiple day to day causes of the existing chaos would be profoundly improved by this '75% Rule'. As resilience is improved, so punctuality will improve, and so will the passenger experience at LHR.
- c. With runways scheduled at 75% of theoretical capacity, the daily chaos and waste of passenger time would be all but eliminated, Summer and Winter. The 75% Rule will permit these new schedules to be fully met even in the face of very adverse external conditions, so passengers benefit from fewer delays less worries, and less stress.
- d. The passenger experience would be lifted to the top of the international class to the envy and detriment of competing hubs. Across the UK, from the Shetland Isles to the Isles of Scilly, from the Giants Causeway to the Milford Haven waterway, more passengers, more wallets, more business and more trade will increase UK prosperity across its four nations.

7. Issues of concern in more detail:

Issue D: Make the LHR and the whole UK air transport system safer, by reducing the current intense pressure on NATS and air-side ground operations

- a. With runways scheduled at 75% of theoretical capacity, leading to near zero aircraft in holding stacks, there will be fewer aircraft in the skies as any one time, in spite of more total ATMs in UK airspace.
- b. Leading to less risk of air to air collisions, near misses and passenger tension.
- c. On air-side ground ops, zero aircraft queuing for take-off means less ground congestion, less ground collisions.

8. Issues of concern in more detail:

Issue E: Make LHR more sustainable with near zero aircraft in holding stacks and near zero queuing for take-off, all wasteful and unsustainable.

- a. Resulting in less waste of aviation fuel and quicker journey times, improving passenger experience. Less capital employed in fewer aircraft required to deliver any given level of ATMs, thus lower airline costs and thus better value air fares.
- b. Such a cost benefit from good sustainability might well more than compensate for higher landing charges.

9. Issues of concern in more detail:

Issue F: Set aside in perpetuity at least 100 new free loan LHR slots exclusively for additional smaller domestic destinations than those currently served, enabling new direct air services to the UK's four constituent nations and their regions.

- a. The existing system of slot allocation by willingness to pay is excellent, except it has destroyed LHR connectivity to all but the very largest regional UK airports. Thus exceptional steps must be taken to ensure that prosperity can be improved across the UK by a countervailing free loan slot allocation system to give frequent and convenient access to the LHR hub from the additional smaller regional airports listed in the Commission's definition of regional airports, plus other even smaller airports. For the avoidance of doubt, those regional airports in the list which are currently served by LHR should not initially be eligible for these free loan slots, unless after a period of use experience suggests they deliver such an un-level playing field as to need review.
- b. Passengers using any UK domestic flights either singly (e.g INV-LHR or INV-STN) or in any combination (e.g. INV-LHR-CWL-LHR-INV) should be exempted for air passenger duty which otherwise would be a tax on the prosperity of the regions of the four UK nations. For the avoidance of doubt, tax havens such as Isle of Man and Jersey are not UK domestic destinations.
- c. £billions have been spent and wasted in a search dating back to the 1960's for a regional policy fix to deal with wealth inequalities across the UK. The 1978 Joel Barnett Formula quick fix which sought to equalise wealth across the UK's four nations is still in use nearly 40 years later and is expected to continue in use into the future. This testifies to the continuing relative lack of success of regional policies.
- d. Yet the air transport arm of the UK Government has watched silently their very effective destruction of regional policy resulting from the unexpected by-product of their slot allocation system. If home and overseas business customers cannot easily and quickly visit and return from potential suppliers and their facilities located in parts of the UK outside the major conurbations, then those customers will continue to desert UK regional suppliers with detrimental effects. If an inward and outward air freight service is denied to these regional suppliers, there are further detrimental effects.
- e. It is time to ensure that LHR works better for the whole of the UK. No other London airport has the potential, it can only be done at an expanded LHR which could and should be conceived and planned to do so.

10. Issues of concern in more detail:

Issue G: Plan for and quickly deliver a purpose built domestic air passenger and air freight mini-hub co-located and fully integrated within an expanding international passenger and freight hub at LHR.

- a. Such a domestic mini hub would need to be set up to offer air side services for small commuter aircraft including those powered by propellor turbine engines, which may not require an air-bridge as passengers may more quickly walk between the mini-hub and their aircraft. Such aircraft have small length and wingspan dimensions, thus many can be served by a compact terminal. Retail space is largely unnecessary, as is extensive catering. The arrangements should sparse, approximating more to a flying club or LCY than the international behemoth of LHR T5A which is currently used (and misused?) for domestic to domestic passengers. Border and Customs controls are not required, but security screening is necessary along with a few small arrivals baggage carousels.

- b. If research demonstrates that the existing air services from the larger UK regional airports might be best relocated from their current complex and costly international terminals to the relatively simple domestic mini-hub, then it should be designed accordingly. Such a mini-hub could release passenger capacity at existing international terminals (e.g. LHR T5A) misused for domestic to domestic passengers.
- c. It could be that the best location for a domestic min-hub is in conjunction with or as part of a new T5D, thereby using some of the existing T5 ground-side travel connections. This could optimise passenger flows airport wide. Possibly the East side of a new T5D could be exclusively for a domestic min-hub, to avoid jet blast issues on the small aircraft. Work is needed to consider these technical issues to arrive at a good balance of value across the airport.
- i. The advantages to the UK's 4 far flung nations and their national regions of such a new domestic mini-hub are considerable, as set out by the Commission. This would be a win-win situation for UK and LHR prosperity.

11. Issues of concern in more detail:

Issue H. In choosing between Extended Northern Runway (ENR) and the New Runway to the North West, seek To satisfy passenger wishes, particularly transit passenger wishes, which revolve around avoiding time wasting. Consider carefully the locations and alignments of runways, terminals and below ground structures or easy and reliable inter-connection of passengers, their baggage and not forgetting containerised and bulk air freight and visiting meeters and greeters.

- a. The Extended Northern Runway (ENR) and the follow-up of the Extended Southern Runway (ESR) proposed by Heathrow Hub Ltd are truly thoughtful, novel and strategically sound proposals. They can be seen as the core physical elements making possible a long awaited transformation of LHR. Heathrow Hub Ltd's suggestion of extensions to the existing two widely spaced parallel main runways provide large additional areas well suited and located for new large main international terminals fit for their purpose and incorporating multiple toast rack style subsidiary terminals with many additional aircraft stands.
- b. The Heathrow Hub Ltd locations, alignments and layouts propose a new build environment in a straight line, which is a highly prized benefit and advantage over many competing hubs. This straight line may hopefully be made compatible with the existing central area built environment created by the donkeys and operated by the lions. LHR T4 is best considered as being eventually or indeed soon to be made redundant. A competent strategic plan would use the prime T4 location for development of other more carefully conceived airport related facilities.
- c. Over the medium and long term, Heathrow Hub Ltd's proposals would make for a simple, easily understood, secure and readily extendable ground plan facilitating fast straight below-ground connectivity for independent air-side and ground-side passengers and their respective baggage handling etc and the necessary back-up systems.
- d. New LHR inward fuel supplies should easily be connected to the existing fuel distribution system, hopefully involving an additional back-up for inward supply giving the necessary system redundancy currently absent.
- e. Air freight movement issues could perhaps be improved by below ground movement facilities set in a straight line, reducing air-side over-ground vehicular traffic, particularly if a strategic LRH plan included for a new internal to LHR freight logistics warehouse located between the extended runways to deal efficiently with containerised and bulk air-freight.

- e. New built development at LHR could go forward without having to work within the constraints of upgrading ancient live terminals, thus speeding construction and lowering both capital costs and operational unit costs in a major way. Something approaching efficient repetitive volume production of new built development phased in a step by step manner in isolation from the current chaos may become possible if undertaken as part of a LHR strategic plan involving T4 retirement.
- f. By comparison with the novel, thoughtful, strategically sound proposals from Heathrow Hub Ltd, the proposals from Heathrow Airport Ltd for a New Runway to the North West is comprised of a lazily warmed over version of their previous foolish concept for a short 3<sup>rd</sup> runway with its new terminal remote from the built development already in the central area. They fail the strategic, locational and straight alignments tests. They fail the passenger tests. Their proposals lack competence, and are in the shameful tradition of over-bearing monopoly. It seems that a herd of donkeys remain ensconced at Heathrow Airport Ltd.
- g. From the passenger point of view, only one proposal meets the bill, that of Heathrow Hub Ltd for a ENR followed by an ESR.

12. Issues of concern in more detail:

Issue I. LHR could best be expanded with a step by step way forward to expansion rather than by the single mega project which has raised widespread political opposition, proposed by the Commission.

- a. Taking a step by step way forward to expansion enables a quicker commencement which delivers interim benefits and at less initial cost and with less risk.
- b. The necessary national political support by the UK's four nations and their regions would be more likely to be forthcoming by virtue of the relatively early delivery of the domestic mini-hub and its new slots. This mini-hub would greatly expand the understanding that what is good for LHR is in this scenario also good for all the distant parts of the UK. Thus the necessary UK Parliamentary majority is more likely to be attained in spite of the many unknowable alternative outcomes of the 2015 General Election.
- c. The timing of practical completion of each of the steps towards the low intensity use (by means of the 75% Rule) applying to all four LHR runways, together with the legal restriction of ATMs, hold the key to enforcement acceptable to neighbours.
- d. The step by step way forward towards expansion better matches the increasing proportion of ATMs being flown with low noise aircraft. With the few new domestic slots made possible by a new ENR (3rd runway) being flown by smaller regional aircraft, perceived noise levels are unlikely to increase.
- e. Only when the new ESR (4th runway) and its built development are completed will a substantial increase in ATMs occur and by then a much lower proportion of old noisy aircraft will still be using LHR.
- f. The completion of the step by step 3rd ENR and 4th ESR runways and the appropriate built development in the space between these extended main runways will reduce the numbers of private property demolitions required.
- g. The step by step way forward towards expansion will still be compliant with the Commission's judgement of its timing for necessary capacity increases.

13. Issues of concern in more detail:

Issue J. The Airports Commission's plans, estimated capital costs, construction schedule and risk analysis etc would benefit from a re-consideration.

- a. The need for greater attention to passenger interests suggests a re-consideration by the Commission.
- b. Likewise, the need for greater attention to the needs of the UK and its four nations and their far flung regions will result in wider and much needed political support in the UK Parliament.
- c. Passenger handling facilities (mainly terminals) therefore need to be of a scale sufficient to very comfortably handle only 75% of the theoretical runway capacity. When bad weather or the myriad of other foreseeable events occur, there will be spare runway capacity to continue to provide a punctual stress free passenger experience, without drama.
- d. Simultaneously with new new step of runway capacity becoming available, the statutory capacity limits on air traffic movements (ATMs) should be adjusted to the 75% Rule. The results could be:

i. existing permitted annual ATMs, two runways:	480,000 statutory limit
ii. add Extended Northern Runway (ENR), theoretical ATMs 75% of 720,000	540,000 statutory limit
iii. add Extended Southern Runway (ESR), theoretical ATMs 75% of 960,000	720,000 statutory limit
- e. This previously unconsidered concentration on passenger interests, resilience, and punctuality will result in multiple benefits including a top of the class passenger experience, safety, sustainability?
- f. The viable runway alternatives have reduced themselves to one, namely the Extended Northern Runway ('ENR') proposed by Heathrow Hub Ltd, which can be constructed as a relatively simple, stand-alone civil engineering project. The long lead item requiring early commencement would be the extensive M25 changes to deal with both the ENR and its sister the ESR, which should be done once and done right first time. Of course the precursor to any action would be the ceremonial putting out to grass of the donkeys.
- g. Non-strategic changes at the existing terminals can increase passenger capacity by reducing retail space to add new pathways to boarding, and increasing aircraft stand numbers and capacity to accommodate more of the increasingly large aircraft using the existing ATMs
- h. The proposed new step-by-step scenario now includes:
  - i. Start reduction of retail space, adding new passenger capacity and pathways in all existing terminals.
  - ii. Continue and expand the current programmes of new aircraft stands and better taxiways.
  - iii. Start construction of M25 road tunnels plus related highways works for both ENR and ESR.
  - iv. Start of construction of below ground LHR works in readiness for large new international terminal T6 for expansion and T7 as a larger T4 replacement, with new air freight, fuel, power, water and sewerage facilities etc. These all to take account of possible future 5<sup>th</sup> and 6<sup>th</sup> runway locations.
  - v. Start phased construction traffic access for ENR taxiways and runway, followed immediately by start construction of the ENR.
  - vi. Start construction of domestic mini-hub probably as part of new T5D.
  - vii. When ENR can safely be brought into use, enforce 75% Rule for all schedules giving limited net runway capacity gain, and but over 100 new daily ATMs (slots), for new domestic free loan slots.
  - viii. These steps can be completed earlier than existing Airport Commission proposals whilst providing a new and top of the class passenger experience hitherto unheard of at LHR, plus a domestic mini-hub.
  - ix. Commencement of ESR construction and T6 large international terminal, then large T7 in due course.

Can all these benefits be available more quickly, efficiently, more economically and with greater political certainty than the proposals from the Airports Commission? Assuming the Commission will not be operating the usual Whitehall donkey-led 'Not Invented Here Policy of Outright Rejection', at the very least the Commission should give serious weight to the many points made in this documentation.



14. Issues of concern in more detail:

Issue K. The whole of the UK will be best served by having built-in future improvement and expansion plans for LHR. The Airport Commission to date has done a very good but as yet imperfect job. It is well placed to continue its work and so demonstrate that it can do even better.

- a. The Commission needs to consider how best to up its game, and consider an intentional and agreed level of mission creep. There needs to be a body to provide all the stakeholders with future strategic direction, including options for the possible future fifth and sixth runways.
- b. Continuing with the monopoly of Heathrow Airport Ltd and its inadequate regulatory environment which is more interested in nit-picking than strategy could be a backward step.
- c. Consider separating the ownership of the Heathrow assets from the operational role which might be best franchised out by a number of 7 year contracts for each component of LHR. Perhaps each airline alliance should be offered a franchise for its designated terminal?
- d. Whether or not the Airports Commission considers and determines favourably the suggestions in this Issue K section, it will still be necessary to have a continuing long term plan for further LHR passenger service improvement and future expansion which all stakeholders and particularly passengers can buy into.
- e. Just now, to gain support for LHR expansion, please bring to the table all the many positives. For example, the huge economic benefits local to LHR and to the four nations of the UK by having a world leading passenger experience at a leading international hub airport based in the UK with an integrated domestic mini-hub. Yes we can!

This concludes my representations, thank you for reading thus far. These representations are designed to be put into the public domain by the Airports Commission, and I suggest they are.

Yours faithfully,

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