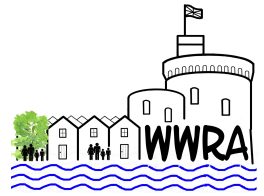




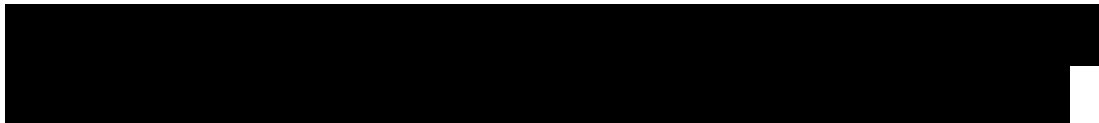
**Old Windsor
Residents
Association**



Have your say on Heathrow

How to respond to the Airports Commissions consultation on more runway capacity in the South East

January 2015



Produced by [REDACTED] Fife Residents
Association (OGFRA), Old Windsor Residents
Association (OWRA), & the West Windsor Residents
Association) WWRA

More info at www.wwra.org.uk

Key features include

- ✓ **Helpful introduction**
- ✓ **Includes who to write to**
- ✓ **Key deadline**
- ✓ **Ideas of what to say**



Index

<u>Content</u>	<u>Page #</u>
Introduction	3
Important information	3
Key deadline	4
Who to write to	4
Where to get more help	4
The Airports Commissions 8 questions	5
<i>Bullet point responses to the Airports Commissions 8 questions</i>	6 - 9
<i>Detailed responses to the Airports Commissions 8 questions</i>	10 - 27



Introduction

The Airports Commission is an independent commission established in September 2012 by the Government to examine the need for additional UK airport capacity and make recommendations to the government how this can be met in the short, medium and long term.

Its consultation on “Increasing the UK’s long-term aviation capacity” is due to end at 11:45pm on Tuesday 3rd February 2015.

Included in its favoured solutions currently are the possibility of building;

- A new North West runway at Heathrow
- A new runway at Heathrow by extending the existing Northern Runway to the West, and
- A new, 2nd, runway at Gatwick

Important information

- The Airports Commission is seeking responses from the public, and groups, on its three proposed solutions, and in particular responses to 8 specific questions.
- Responses can be made in writing and submitted by post, email, using the on-line survey, or using a smart form.
- In this guide, we explain how to respond, and offer suggestions on how you might respond to each of the 8 questions on the basis of issues such as Noise, Health, Infrastructure, & Housing.
- Feel free to pick and chose any of the ideas, and add your own
- You should respond in your own words, and avoid the temptation to simply “cut & paste” sentences from this How to guide. Select the ideas that motivate you, and rephrase them as far as possible. This will help avoid your valuable submission being regarded as part of our response.



Key deadline

You must respond in writing by 11:45pm on Tuesday 3rd February 2015

Who to write to

You can submit your comments in four ways;

1. **In writing to:** Freepost RTKX-USUC-CXAS Airports Commission
Consultation PO Box 1492 Woking GU22 2QR – **must be send special delivery by Monday 2nd February 2015**
2. **By email to:** airports.consultation@systra.com - **simplest method**
3. **Using the on-line form at:**
<http://www.smartsurvey.co.uk/s/134578HXHDU>
4. **Using a smart response form:**
https://www.gov.uk/government/uploads/system/uploads/consultation_response_form_data/file/300/consultation-response-form.doc

Where to get more help

The Airports Commission has published many detailed guides over the last two years, which you can find at

<https://www.gov.uk/government/consultations/increasing-the-uks-long-term-aviation-capacity>

And

<https://www.gov.uk/government/news/airports-commission-publishes-consultation-on-shortlisted-options-for-a-new-runway>

You can also find useful information at the following websites;

HACAN - <http://hacan.org.uk/>

LAANC - <http://www.laanc-heathrow.org.uk/index.html>

WWRA - <http://www.wwra.org.uk/>

WWRA videos - <http://www.wwra.org.uk/media-library>

RBWM -

[http://www.rbwm.gov.uk/minsys3.nsf/d9c360870262e3708025765d004cf06a/911512e3e644956880257ccb00524bbe/\\$FILE/meetings_150129_cab_aviation.pdf](http://www.rbwm.gov.uk/minsys3.nsf/d9c360870262e3708025765d004cf06a/911512e3e644956880257ccb00524bbe/$FILE/meetings_150129_cab_aviation.pdf)

LB Hillingdon -

<http://modgov.hillingdon.gov.uk/documents/s24915/Appendix%201%20-%20Hillingdons%20response%20to%20the%20Airports%20Commission%20Consultation.pdf>



The Airports Commission is now seeking responses to the following 8 questions

Questions inviting views and conclusions in respect of the three short-listed options

- 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.
- 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.

Questions on the Commission's appraisal and overall approach

- Q3. Do you have any comments on how the Commission has carried out its appraisal? The appraisal process is summarised in section two.
- Q4. In your view, are there any relevant factors that have not been fully addressed by the Commission to date?

Questions inviting comments on specific areas of the Commission's appraisal

- 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?
- Q6. Do you have any comments on the Commission's sustainability assessments, including methodology and results?
- Q7. Do you have any comments on the Commission's business cases, including methodology and results?

Other comments

- Q8. Do you have any other comments?

There follows ideas of what to say, listed under each of the 8 Airports Commission questions



Bullet point responses to the Airports Commissions 8 questions

Q1: What conclusions, if any, do you draw in respect of the three short-listed options?

1. Heathrow is already antisocially noisy, and noise will effect between 1million and 2million people at Heathrow, as opposed to 20,000 at Gatwick.

NORTH WEST RUNWAY PROPOSAL

1. Aircraft will be lower and cause a lot more noise
2. The 54% increase in flight numbers, combined with minimum runway separation, will affect new areas, and increase noise disturbance every day in existing areas.
3. Noise will be channeled over Datchet, Eton, and Windsor
4. There will be little to no respite, with sound disturbance upto 365 days per year:

EXTENDED (HEATHROW HUB) PROPOSAL

1. Aircraft will be much, much lower and cause a lot more noise
2. Noise will be channelled over Datchet, Eton, and Windsor
3. Noise levels could be 4 X higher
4. Residents under all flight paths will suffer intolerable levels of noise disturbance 365 days per year, from 4:30am to 11:30pm, severely affecting their health.
5. Operational safety measures will maintain the risk of noise
6. Windsor Castle will become a flight hazard

Q2: Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated?

No comment



Bullet point responses to the Airports Commissions 8 questions

Q3: Do you have any comments on how the Commission has carried out its appraisal?

NOISE NUISANCE

1. Misleading noise measures are being used by the Commission
2. Peak noise levels are being ignored:
3. Higher levels of noise are ignored
4. Flight intensity will become intolerable for residents
5. Frequency of flights is as damaging as peak noise levels
6. Agreed flight limits are being ignored
7. Sleep, rest, and health will be seriously effected by the lack of noise respite/breaks

AIR POLLUTION & HEALTH ISSUES

1. Air pollution in the area already exceed WHO safety limits
2. NOx is a powerful Greenhouse gas
3. Air pollution damages health:
4. (7) Emissions trading will not help the local environment
5. (8) We don't know enough about the health effects to risk building at Heathrow
6. (9) The Commission should not consider expansion of Heathrow unless it can be demonstrated that air pollution is kept within the World Health Organisation recommendations.

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

1. Up to 100 times more people will be effected by expansion at Heathrow compared to Gatwick
2. The Finances of many residents will be negatively effected
3. There will be an increased cost to the public purse
4. There will be an increased pressure on health services from increasing mortality and morbidity



Bullet point responses to the Airports Commissions 8 questions

5. Worldwide institutions have concerns about the health effects of airport operations
6. More than 60 medical conditions, many lethal, have been noted:
7. The Commission has neglected the full range of health effects of aircraft noise
8. The Commission has neglected to study the significant, and lethal, effects of air pollution
9. The Commission has ignored the many effects on health of electromagnetic radiation associated with airport, and aircraft operations
10. The Commission has not mentioned, or studied, the effects of pollution from aircraft on those under the flight path
11. The commission has failed to consider the effects of the monumental and extensive construction phase on public health
12. The increased levels of the various types of pollution discussed will effect the mortality and morbidity of 1million people near Heathrow, compared to 20,000 at Gatwick.
13. The Commission has failed to adequately consult on the possibly insurmountable international complexities, and enormous pressures, of increased flight volumes in already congested airspace
14. The Commission has failed to consider the social and economic disruptions caused by the construction phase

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?

1. In its 8 criteria categories, the Commission has neglected the important matter of the how the proposals tabled will effect the health of residents, and how many residents will die earlier or suffer more in each area.



Bullet point responses to the Airports Commissions 8 questions

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

1. (Detailed points 1-3) Housing And Infrastructure ~ There Is No Capacity In The Region For Additional Needs

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

1. (Detailed points 1-2) The Presumption For Balancing Adverse Impacts Against Economic Benefits Is Not Acceptable
2. (Detailed points 2-7) Expansion Of Heathrow Will Stifle Competition & Provide No Resilience When Things Go Wrong.
3. (Detailed points 8-9) Grandfather Rights Should Be Abolished
4. (Detailed point 10) The current, airline owned company which allocates any free slots would have to be replaced by an independent government agency to allocate slots impartially and transfer use fees to the relevant airport after retaining a small percentage to cover its costs.

Q8: Do you have any other comments?

1. (Detailed points 1-4) What About Runways 4, 5 And 6 ~ We Cannot Trust Heathrow's Figures or their integrity given their broken promises and failures
2. (Detailed points 5-9) The Creation Of A Single Hub At Heathrow Is Unfair To The Rest Of The UK
3. (Detailed points 10-11) The Commission's Conclusions Will Blight The Lives Of Up To 2 Million Residents, And Possibly Infringe Their Human Rights



Detailed responses to the Airports Commissions 8 questions

The Commission's Questions inviting views and conclusions in respect of the three short-listed options

Q1: What conclusions, if any, do you draw in respect of the three short-listed options?

Heathrow is already antisocially noisy

1. Heathrow is already the noisiest airport in United Kingdom and Europe from Commission's own evidence. The detrimental impact of its present operations on many tens of thousands of residents living in West London is unacceptable and these proposals will create the same conditions for the many tens of thousands of residents living to the west of the airport.
 - We don't want more noise.
 - Heathrow owners and management have proved antisocial with their lack of progress at noise mitigation, whether the Cranford agreement, or other operational measures like steepened glide paths

NORTH WEST RUNWAY PROPOSAL

1. **Aircraft will be lower and cause a lot more noise:** The new North West Runway Proposal is sited just 1045 metres north of the existing North Runway. It is also ends 1500 metres west of it and planes will therefore be approximately 280 feet lower and far noisier, as they pass over Windsor, Eton and Datchet, to land at the airport.



Detailed responses to the Airports Commissions 8 questions

2. **The 54% increase in flight numbers, combined with minimum runway separation, will affect new areas, and increase noise disturbance every day in existing areas.** With an extra 260,000 flight movements. Many new areas will be adversely affected, like Eton, Chalvey, & Langley, and because of the minimum runway separation, existing areas will suffer a double whammy of noise, places like Colnbrook, Datchet, & Windsor.
3. **Noise will be channeled over Datchet, Eton, and Windsor:** Take off heights will vary but it seems unlikely that aircraft taking off on the proposed North West runway will reach a sufficient altitude to allow them to diverge from the straight out flight path much before Windsor and Eton, so noise will be channelled over Datchet, Eton, and Windsor
4. **There will be little to no respite, with sound disturbance upto 365 days per year:** Both runways will be used concurrently and the number of flights will therefore be almost double present levels for those living under and between the flight paths to two runways, with planes passing overhead every 30 to 40 seconds. Existing noise levels will therefore become almost continuous.

EXTENDED (HEATHROW HUB) PROPOSAL

1. **Aircraft will be much, much lower and cause a lot more noise:**
The Extended (Heathrow Hub) Proposal will extend the existing North Runway, so that its western end for landing will be 2750 metres nearer to Datchet and Windsor. Planes will therefore be approximately 480 feet lower, as they pass over these residential areas, to land at the airport
2. **Noise will be channelled over Datchet, Eton, and Windsor:** Planes taking off will start 3650 m nearer to Datchet and Windsor and aircraft will be unable to attain sufficient altitude to diverge from the straight out departure before they pass over these areas.



Detailed responses to the Airports Commissions 8 questions

3. Take offs over Cranford will start 950 metres nearer to Cranford than is the case with the current situation.
4. **Noise levels could be 4 X higher:** As a result, the Extended Runway (Heathrow Hub) proposal will deliver noise levels that rise to fourfold the present level in Datchet and double that in Windsor.
5. **Residents under all flight paths will suffer intolerable levels of noise disturbance 365 days per year, from 4:30am to 11:30pm, severely affecting their health.** Heathrow will be unable to operate any runway alternation with the extended Northern Runway option, so residents along all flight paths will suffer noise disturbance, and the related health effects, continually with effectively no respite, from 4:30am to 11:30pm, 365 days per year. That's 600 flights per day over Colnbrook, Datchet, & Windsor, and 300 flights per day, every day, over Old Windsor
5. **Operational safety measures will maintain the risk of noise:** Aircraft departing LHR have to attain at least 500ft before diverging from the extended centre line of any runway. Departures from the extended 27R would also have to satisfy the performance criteria to cover a subsequent power loss to one of its engines and the subsequent much reduced rate of climb that would ensue. These complicated calculations take many factors into consideration.
6. **Windsor Castle will become a flight hazard:** Windsor, and therefore Windsor Castle, are situated on raised ground meaning that they are likely to become a hazard for such problem departure



Detailed responses to the Airports Commissions 8 questions

Q2: Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated?

No comment

Q3: Do you have any comments on how the Commission has carried out its appraisal?

NOISE NUISANCE

1. **Misleading noise measures are being used by the Commission:** The method used by the Commission to measure noise does not reflect the level of disturbance. The use of average noise level measurements is of particular concern, as it does not report the high levels of noise experienced daily.
2. **Peak noise levels are being ignored:** Similarly, the Commission determines the extent of the impact of aircraft noise by measuring the number of people affected by a given average noise contour. This ignores the number of people affected by the totally unacceptable high levels of noise generated by each proposal.
3. **Higher levels of noise are ignored:** Even when N70 data is considered for level of disturbance, the number of flights is set too low, at more than 50. How many people will be affected by more the 250 to 300 at N70 around Colnbrook, Datchet, Horton and Cranford?
4. **Flight intensity will become intolerable for residents:** It may be argued that some existing areas are already affected by such intolerable conditions but how many new airport developments have previously been allowed with express intention of creating such an intolerable environment with such a high intensity of flights?



Detailed responses to the Airports Commissions 8 questions

5. **Frequency of flights is as damaging as peak noise levels:**
Parliament has acknowledged that the frequency of flights as well as the intensity of noise needs to be. The previous ANASE report seems to have been ignored by the Commission, with the result that no accepted basis for measuring noise nuisance has been employed.
6. **Agreed flight limits are being ignored:** For these reasons, the limit of 480,000 air traffic movements at Heathrow should be retained until such a noise study is completed and adopted.
7. **Sleep, rest, and health will be seriously effected by the lack of noise respite/breaks:** The importance of a proper period of relief from incessant disturbance from aircraft relief is currently accepted. In each of the two proposals, the relief periods have been at least halved from the current expectation and many cases are virtually non-existent.

AIR POLLUTION & HEALTH ISSUES

1. **Air pollution in the area already exceed WHO safety limits:** It is understood that Nitric Oxide air pollution in parts of Wraysbury, Windsor and Bray exceeds the World Health Organisation's safety limits. It is the same in places around Heathrow.
2. **NOx is a powerful Greenhouse gas:** Nitrogen Dioxide is 300 times worse than CO2 in its effect on global warming.
3. **Air pollution damages health:** It is widely acknowledged that atmospheric pollution from airport operations has a detrimental impact on the health, particularly in relation to cardio-vascular diseases.



Detailed responses to the Airports Commissions 8 questions

4. In the first three weeks of September last year 9100 flights passed over Windsor to land at Heathrow. That was one every 80 to 90 seconds during daylight hours.
5. The schoolchildren of Hounslow go out to play and the noise and pollution in the air is horrific. They go home and the noise and the air pollution is horrific. This will be the situation in Wraysbury, Datchet and Windsor, if either of these two proposals is adopted.
6. The proposition that the adverse environmental impact of Heathrow's operations should be offset by a reduction in pollution from other sources means that the pollution around Heathrow can rise even more.
7. **Emissions trading will not help the local environment:** The use of emissions trading, to accommodate high pollution zones, is unacceptable, due to the wide scale impact of Heathrow's flight operations – pollution from aircraft affects many thousands of people.
8. **We don't know enough about the health effects to risk building at Heathrow:** Stansfield & Matheson, in their report "Noise pollution: non-auditory effects on health" say, *"Undoubtedly, there is a need for further research to clarify this complex area, including better measurement of noise exposure and health outcomes"* It is therefore essential that a far more rigorous assessment of the air pollution issues should be undertaken, and more research conducted before conclusions can be reached.
9. The Commission should not consider expansion of Heathrow unless it can be demonstrated that air pollution is kept within the World Health Organisation recommendations.



Detailed responses to the Airports Commissions 8 questions

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

5. **Up to 100 times more people will be effected by expansion at Heathrow compared to Gatwick:** Expansion at Heathrow will newly affect over 320,000 people, or according to the European Commission, over 700,000, whereas at Gatwick, 18,000 will be newly affected. And It is likely that an extra 250,000 new workers and their family members will also be affected at Heathrow.
6. **The Finances of many residents will be negatively effected:**
When you consider the potential impact on public health, you are putting a great risk on the health and well being of nearly a million people, not to mention the effect on their finances, lost income due to sickness
7. **There will be an increased cost to the public purse:** Even now, without expansion the there is a cost of £16bn per year to the UK economy (Aviation Environment Federation) increased cost to the NHS, increased payments on benefits including incapacity benefits (or their replacements), lost productivity, a loss of tax revenue, a loss of GDP, and a loss of public services ultimately.
8. **There will be an increased pressure on health services from increasing mortality and morbidity:** 61 conditions effecting 1million people, and a greater level of intensity will place existing local NHS Trusts, already struggling to cope, under destructive pressure.
9. **Worldwide institutions have concerns about the health effects of airport operations:** There are more than 50 eminent public institutions and universities worldwide who note public health issues associated either directly, or indirectly, through airport operations including WHO, PHE,



Detailed responses to the Airports Commissions 8 questions

COMEAP, HPA, ENNAH, NHS, NIEHS, European Commission, MRC, Harvard.

10. More than 60 medical conditions, many lethal, have been noted:

These 50+ medical institutions, and public bodies, record more than 60 conditions caused by airport operations.

11. The Commission has neglected the full range of health effects of aircraft noise:

The Commission has not mentioned a number of issues in its publications, either by complete omission, or possibly inadequate consideration of the full range of concerns, in relation to the effects of Noise on health including;

- a. Interference with Speech Perception - World Health Organisation,
- b. Social and Behavioural Effects of Noise - World Health Organisation,
- c. Speech intelligibility - World Health Organisation,
- d. The effect on vulnerable Subgroups (people with particular diseases or medical problems (e.g. high blood pressure); people in hospitals or rehabilitating at home; people dealing with complex cognitive tasks; the blind; people with hearing impairment; fetuses, babies and young children; and the elderly in general), - World Health Organisation,
- e. Additional physiological effort - Department of Psychiatry, Medical Sciences Building, Queen Mary, University of London,
- f. Cancer - Transport 2000,
- g. Cardiovascular diseases - Imperial College, Kings College London, MRC,
- h. Combined Effects on Health of Noise from Mixed Sources (health load) - World Health Organisation,
- i. Hearing impairment - World Health Organisation,
- j. Heart diseases - Department of Psychiatry, Medical Sciences Building, Queen Mary, University of London,



Detailed responses to the Airports Commissions 8 questions

- k. Hormonal stress - Department of Psychiatry, Medical Sciences Building, Queen Mary, University of London,
- l. Lethal 'startle effect' for the sleeper - World Health Organisation,
- m. Physiological Functions - World Health Organisation,
- n. Sleep disturbance - immediate & chronic (reduced life span) - Brisbane Airport & Australian Government,
- o. States of helplessness - Department of Psychiatry, Medical Sciences Building, Queen Mary, University of London,
- p. Stress - Department of Psychiatry, Medical Sciences Building, Queen Mary, University of London,
- q. Stroke - Department of Psychiatry, Medical Sciences Building, Queen Mary, University of London,
- r. Performance - World Health Organisation,
- s. Reading Acquisition (Cognitive impairment) - World Health Organisation,
- t. Spirituality & personal growth - Roman Catholic Church

12. The Commission has neglected to study the significant, and lethal, effects of air pollution: The Commission has not mentioned a number of issues in its publications in relation to the effects of on public health of pollution, especially from increased road traffic both immediately around the airport from a doubling of passenger numbers to 120m, and a doubling of freight and ancillary support services, and as a result of the extensive building of 71,000 or more houses in the already overcrowded areas around the airport including;

- a. Adverse pregnancy outcomes (such as preterm birth) - US National Institutes of Environmental Health Services,
- b. Asthma - World Health Organisation,
- c. Cancer - Brisbane Airport & Australian Government, Cardiovascular diseases, - Committee on the Medical Effects of Air Pollutants,
- d. Changes in lung function - US National Institutes of Environmental Health Services,



Detailed responses to the Airports Commissions 8 questions

- e. Chronic and acute respiratory diseases - World Health Organisation, Chronic bronchitis - Committee on the Medical Effects of Air Pollutants,
- f. Diabetes - NHS,
- g. Heart disease - World Health Organisation,
- h. Heart failure; - NHS, High blood pressure - NHS, Irregular heartbeats; - NHS,
- i. Low birth weight - NHS,
- j. Lung blood clots; - NHS,
- k. Lung function diseases - Brisbane Airport & Australian Government,
- l. Lung function growth in children - Brisbane Airport & Australian Government,
- m. Obesity - NHS,
- n. Pneumonia - World Health Organisation,
- o. Stroke, - World Health Organisation

- 13. The Commission has ignored the many effects on health of electromagnetic radiation associated with airport, and aircraft operations:** The Commission has not mentioned a number of issues in its publications in relation to the effects of on public health of electromagnetic radiation from the increased volume of static & mobile equipment either in the airport, in aircraft, or in other vehicles which have been noted to cause;
- a. Adverse reproductive outcome - World Health Organisation,
 - b. Behavioural changes and effects such as the induction of lens opacities (cataracts) - World Health Organisation,
 - c. Calcium ion mobility - World Health Organisation,
 - d. Cancer - World Health Organisation,
 - e. Decreased ability to perform mental tasks - World Health Organisation,
 - f. Induced RF burns or shock - World Health Organisation,
 - g. Interference in certain medical devices, such as cardiac pacemakers and hearing aids - World Health Organisation,
 - h. Physiological responses - World Health Organisation,



Detailed responses to the Airports Commissions 8 questions

- i. Reduced endurance - World Health Organisation,
- j. Suppressed startle response - World Health Organisation,
- k. The microwave hearing effect - World Health Organisation,
- l. Thermoregulatory responses, - World Health Organisation

14. The Commission has not mentioned, or studied, the effects of pollution from aircraft on those under the flight path: The commission has not adequately considered the effects on public health of emission of chemicals from aircraft engines and fuel dumping. In particular, what are the relevant chemicals, elements, and compounds to be considered? A list to date could include; Benzene, Carbon Monoxide (CO), Formaldehyde, Nitrogen Dioxide (NO₂), Particulate Matter (PM₁₀ /PM_{2.5}), Toluene, Xylene, and other emissions?

15. The commission has failed to consider the effects of the monumental and extensive construction phase on public health: The Commission has failed to comment on the effects of construction phase of dust and other pollutants, especially during high pressure inversions. The construction zone would extend from Heathrow, and to at least 7 neighbouring local authorities, and include building the runway & airport buildings, rebuilding M25, extending roads, building ancillary off airport facilities, constructing 71,000 or more houses, hotels, schools, surgeries, health facilities, and public amenities



Detailed responses to the Airports Commissions 8 questions

16. **The increased levels of the various types of pollution discussed will effect the mortality and morbidity of 1million people near Heathrow, compared to 20,000 at Gatwick.** All of these 61 conditions will affect up to 1million people causing increased mortality, with a rise in the death rate, and reduced life expectancy; and also cause a severe increase in morbidity as 1million people, and their children are subjected to increase levels of sickness, with children and other vulnerable groups suffering permanent, irreversible damage.
17. **The Commission has failed to adequately consult on the possibly insurmountable international complexities, and enormous pressures, of increased flight volumes in already congested airspace:** The proposals regarding LHR have not taken into consideration the complex Air Traffic Control changes that would be required. It is very likely that a large number of the statistical figures regarding the increased number of movements are far too optimistic, rendering possible conclusions that these Proposals are not as viable as predicted.
- a. We believe that Air Traffic Control viability is absolutely paramount to any Commission Report.
 - b. Without this viability the whole process becomes worthless.



Detailed responses to the Airports Commissions 8 questions

18. The Commission has failed to consider the social and economic disruptions caused by the construction phase: During construction, anyone living or working around the M4 will face years of disruption due to Heathrow's plans for the M25, M4 and A4 and prolonged construction programme. Even aside from the new runway itself, Necessary supporting projects include widening the M25 and putting it in a tunnel under the new runway, diversion of major roads such as the A4, and new rail interchanges, any one of which is a significant intervention with major disruptions.

- a. After construction, the added strain on the busy roads around west London will cause ongoing and significant disruption across a large swathe of the capital, and beyond. In many ways, the west of London is already saturated. The increased road and rail traffic which would accompany expansion of Heathrow would serve to stifle existing business, rather than promote new growth.

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?

1. **In its 8 criteria categories, the Commission has neglected the important matter of the how the proposals tabled will effect the health of residents, and how many residents will die earlier or suffer more in each area.** The 8 categories considered comprise Strategic Fit , Economy , Surface Access , Environment , People , Cost , Delivery , Operational Viability. Even the category of People fails to address the magnitude, severity, or extent of the public health impact in its three sub-categories of 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. , To reduce or avoid disproportionate impacts on any social group.



Detailed responses to the Airports Commissions 8 questions

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

Housing And Infrastructure ~ There Is No Capacity In The Region For Additional Needs

1. The Airports Commission estimates that 70,800 new homes will be needed, especially if the NW runway proposal to expand capacity at Heathrow is adopted. This number of new homes will accommodate almost a quarter of a million additional people.
2. Land in the Thames Valley and in the London Boroughs is already under immense pressure to accommodate current needs and there is already a considerable threat to the Green Belt, in attempts to meet this demand.
3. The infrastructure that would be needed to serve the needs of this extra population would be considerable. Existing public services, such as schools, clinics, hospitals, policing and local councils, would be hugely overstretched and the additional road and transport infrastructure would impose a massive additional burden.

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

The Presumption For Balancing Adverse Impacts Against Economic Benefits Is Not Acceptable

1. The Airports Commission has balanced the adverse impact that these proposals will have on the life of residents with the economic benefits that they might bring and concludes that there is parity between the two outcomes. The Commission has not demonstrated the basis for reaching this conclusion. It is essential that it should do so.



Detailed responses to the Airports Commissions 8 questions

2. It is not acceptable that tens of thousands of residents, whose lives are already adversely affected by activities at Heathrow, along with many more thousands, should be subjected to worsening noise and air pollution, exceeding WHO guidelines.

Expansion Of Heathrow Will Stifle Competition & Provide No Resilience When Things Go Wrong. Grandfather Rights Should Be Abolished

3. Just five years ago, the UK's regulatory watchdog, the Competition Commission, ordered BAA, now known as Heathrow Airport Limited, to sell Gatwick, Stansted and either Glasgow or Edinburgh airports, amid concerns about its dominance of the market. These proposals will once more allow Heathrow to dominate the market in the UK.
4. It is not true that a single hub is best for the UK economy and for meeting the needs of travellers. New York is served by Newark and Kennedy airports. Having more than one hub meets their needs and delivers a competitive market.
5. Airline alliances each need their own hub. The UK needs more than one, dominant alliance and this would be possible with several hubs around London, serving the needs of travellers and providing competition.
6. They would also provide alternative airline operations when things go wrong.
7. The need for such a dominant hub as an expanded Heathrow would be is not accepted. For example there are 27 daily flights from Heathrow to New York which are only viable because they carry almost 40 percent of transfer passengers, most of whom contribute nothing to the UK economy but add considerably to the complication of the operation at peak periods. The "grandfather" right for airlines to retain slots needs to be reviewed.



Detailed responses to the Airports Commissions 8 questions

8. Heathrow has got a huge wasted capacity due the overall average used seating capacity of all aircraft using the airport is just over 70% and if something were done to maximise seat take up, and reduce the 27 daily flights to both New York and Paris the airport would have a very substantial spare capacity to open up other routes and give more flexibility.
9. If say a 90% seat take up was possible there would be nearly a 20% extra capacity available i.e. $480,000 \times \text{one fifth} = 96,000$ flights. At present, this will not happen because the grandfather rights on slots give the 'owning' airlines the right to fly wherever they wish from them with however many passengers as they wish, and to deny competitors access to those slots they accept having to fly aircraft at less than capacity.

Notwithstanding that these slots have a high financial value, the Commission should recommend that legislation is introduced to outlaw this practice to:

- a) prevent restrictive practices & promote competition on a level playing field
- b) maximise use of strategically important assets
- c) reduce the demands for use of more land for airport expansion
- d) reduce the number of flights to every parties' benefit including operators having to fly (and fuel) fewer aircraft - except [partially] the airlines which would have to surrender the grandfather slots in return for some realistic purchase fee
- e) maximise use of airport facilities
- f) free up slots for flights to / from alternative destinations
- g) All of this would be in the public interest.

It is time to bite the bullet to cease this very harmful restrictive practice.

10. The current, airline owned company which allocates any free slots would have to be replaced by an independent government agency to allocate slots impartially and transfer use fees to the relevant airport after retaining a small percentage to cover its costs.



Detailed responses to the Airports Commissions 8 questions

Q8: Do you have any other comments?

What About Runways 4, 5 And 6 ~ We Cannot Trust Heathrow'S Figures or their integrity given their broken promises and failures

1. Back in 1978, the Terminal 4 public inquiry was assured that no further capacity would be needed.
2. In 1995 the Terminal 5 inquiry was assured that a 3rd runway would not be needed. Sir John Egan, BAA's Chief Executive, wrote to residents in surrounding boroughs and said "T5 does not call for a third runway" (BAA's 'Dear neighbour' letter to residents in a wide area around Heathrow; 16 May 1995).
3. In another 'Dear Neighbour' letter to residents (April 1999) Sir John Egan wrote: "We have since repeated often that we do not want, nor shall we seek, an additional runway. I can now report that we went even further at the Inquiry and called on the Inspector to recommend that, subject to permission being given for T5, an additional Heathrow runway should be ruled out forever. In May 2003, just four years later, BAA admits publicly that it wants third runway at Heathrow
4. How can we trust their predictions? It seems obvious that they will not be satisfied until they have runways 4, 5 and 6, to compete with Schiphol, in Amsterdam (6 runways), Charles de Gaulle, Paris (4 runways) and Frankfurt (4 runways)

The Creation Of A Single Hub At Heathrow Is Unfair To The Rest Of The UK

5. The proposal to create a single national hub at HR is unfair to the rest of the country. Once again, massive improvement in infrastructure would be focussed in the South East, whilst the rest of the country looks on and their economies falter.
6. Only last week, the headlines were NORTH SOUTH DIVIDE GETS A LOT WORSE. SOUTHERN TOWNS BOOM WHILST NORTHERN ECONOMIES CONTRACT (The I newspaper 19th January)



Detailed responses to the Airports Commissions 8 questions

7. A measure of this is that average gross weekly earnings in the in the North East were recently reported as being only 64% of those in London. (http://www.huffingtonpost.co.uk/john-mills/uk-inequality_b_5567318.html)
8. The Commission estimates the cost of the North West Runway proposal as being £18.6 billion, whilst the Extended Runway will cost £13.5 billion. In contrast, the cost of the Gatwick proposal is £9.3 billion and is reported to be better value for money in relation to the additional capacity it generates.
9. Ultimately, these costs have to be delivered from the economy and it makes no sense to waste these vast sums on Heathrow, just to boost the balance sheets of its Spanish owners. Gatwick makes far more sense and the surplus cash is desperately needed for investment elsewhere in the country.

The Commission's Conclusions will blight the lives of up to 2 Million residents (in the 2M area), and possibly infringe their Human Rights

10. Both these proposals to expand Heathrow will blight the lives of hundreds of thousands of residents living to the west of the airport and, for them, this is not worth the economic benefit it brings to a region of the UK that is already in robust economic health
11. Both proposals present a threat to residents' 'human rights', as defined by standards set by the World Health Organisation and other European bodies. This threat is massive, tangible and avoidable. It is also disproportionate in relation to the overall benefits that would accrue from either proposal.