

OLD WINDSOR PARISH COUNCIL'S RESPONSES TO AVIATION COMMISSION'S QUESTIONS ("Bundle 2")

QUESTION 1: Conclusions on the Three Options, etc

Both Heathrow proposers claim aircraft noise will reduce. Will it?

They are being very economical with the truth, as they ignore that

- a) it would be far quieter if there is no additional runway
- b) flights to or from either runway located further west than the existing ones will create far more noise over our far quieter rural areas than London
- c) probably the residents largest current concern about aircraft noise is the number of noise incidents created by aircraft near them together with the related interruptions to everyday life, yet the proposers brush aside the fact that the noise climate will be hugely escalated by the 54% increase in the number of flights and associated noise events, and
- d) either new runway will inevitably generate noise under new flight paths affecting communities not previously affected.

The overall aircraft fleet will be marginally quieter than that of today, but costly technology cannot continue to make the huge advances which the proposers rely on in their noise and pollution predictions, and as existing aircraft fly for 25 years to repay their huge initial costs many noisy planes will fly for years to come. The super quiet A380 is surprisingly no quieter than the noisy B747 in one flight mode.

Both Rolls Royce and Boeing / Pratt & Whitney experts have told different meetings of the Heathrow Airport Consultative Committee that engine designers could concentrate on reducing noise or pollution but could not achieve both.

A three runway airport will reduce respite (quiet) periods from half the time (after the take off ban over Cranford ceases) to less than a third, as well as hitting people between two runways with noise from two sides – but this is almost hidden by the new runway proposers. Community representatives have fought long and hard to retain 'alternation' which on a two runway Heathrow allows aircraft to land on one and take off on the other, and share the noise by changing over at 3 pm every day. That is not possible with either of the three runway options.

HAL craftily says that it will continue the *principle* of alternation with its separate runways but about a third of the time one has to accommodate both landings and take offs at the same time, so neither end will get any respite. The Heathrow Hub Extended Runway, with two in-line runways, has far fewer options and an even greater loss of respite.

QUESTION 2: HOW COULD OPTIONS BE IMPROVED, ETC

It is inconceivable that UK residents could continue to suffer almost 50 year old noise standards – among the worst in the western world – when a new runway opens in 2030.

The proposals relate to operations which could start to operate 15 years into the future, so it is totally inappropriate for the Commission not to strongly recommend that an entirely different modern approach to controlling aircraft noise is introduced. The Commission will be well aware that around 15 years ago the Government adopted the exhaustive Terminal 5 Inquiry recommendation that an entirely different method of calculating and controlling aircraft noise should be urgently adopted.

That resulted in the 6 year £1.4million ANASE study, but the findings were disputed and rejected by Government, which has done nothing since to honour its commitment to replace the discredited and outdated 33 year old ANIS standards. They remain the controlling measures on UK aircraft noise, and have been the subject of a long history of an enormous number of objections.

The logarithmic averaging of noise pays little regard to peak noise or frequency and the N70 count of noise incidents over 70dB takes no account of the many incidents up to 90dB which are inflicted on this area, nor the vast majority of flights which exceed the widely accepted 55dB threshold of annoyance level.

This community strongly urges the Commission to impress upon the UK Government that there is an urgent need for it to honour its commitment to investigate and set up aircraft noise controls appropriate to present day aviation operations and public expectations regarding their health and quality of life.

Maximising existing capacity:

It is recommended that an Independent Runway 'Slot' Allocation System is established with a view to reducing restrictive practices and increasing seat capacity use to free up airport capacity:

It is very obvious that Heathrow has got a huge wasted capacity due to the average used seating capacity of all aircraft using the airport being as low as just over 70%. If something were done to maximise seat take up, and reduce the 27 daily flights to both Paris and New York, the airport would have a very substantial spare capacity to open up other routes and give more flexibility.

QUESTION 2 (Cont'd)

If it was possible to increase the overall seat take up to an average of 90% there would be nearly 20% extra available capacity, and the annual flight number cap of 480,000 x 20% would allow 96,000 more flights p.a.

But this will not happen because the exercise of 'grandfather rights' on take off and landing slots give the 'owning' airlines the right to fly from or to them to wherever they wish with however many passengers as they wish, and to deny competitors access to those slots they accept having to fly aircraft with lower passenger numbers.

Notwithstanding that these slots have a high financial (and commercial) value, it is strongly suggested that the Commission should recommend that legislation is introduced to outlaw this practice to:

- a) prevent restrictive practices and promote competition on a level playing field,
- b) maximise use of strategically important assets,
- c) reduce the demands for take up of more land for airport expansion,
- d) reduce the number of flights to the benefit of all parties, including operators having to fly, service and fuel fewer aircraft – although there would be a downside for those which would have to surrender their grandfather slots to in return for a realistic surrender value,
- e) maximise use of airport facilities,
- f) free up slots for flights to/from alternative destinations and new operators,
- g) all of which would be in the public interest.

It is high time to bite the bullet to cease this very harmful restrictive practice which does not appear to happen elsewhere in Europe.

It is strongly recommended that the Commission makes a firm recommendation to Government that 'grandfather rights on slots' is discontinued and current airline owned company which allocates any free slots is replaced by an entirely independent government agency to allocate slots impartially and transfer use fees to to the relevant airport after retaining a small percentage to cover its costs.

Apprenticeships: HAL's claims about promoting apprenticeships and careers for 10,000 young people are questioned as it is not supported by its established policies, as it only works in these matters with what it calls its Five Stakeholder Councils, and has persistently excluded Councils such as RBWM from its jobs and careers fairs.

QUESTION 3: HOW HAS COMMISSION CARRIED OUT APPRAISAL, ETC

Without exception the people with whom the author of this has discussed the Aviation Commission's work have all been very impressed by the range and thoroughness of the investigation and analysis of those of the huge range of documents which they have read.

There is however some unease about the final result after the data has been balanced to reach the overall conclusions. It would seem that the strong business orientated background of the Commissioners who may not have a close affinity with the area shows through in regard to an apparently weaker radar about everyday living activities and needs of the public at large around the airports.

Perhaps it is unfair to highlight the almost dismissive summation of the Commission's assessment of the huge potential need for 70,800 additional houses within the area near Heathrow as "a significant challenge to the 14 nearby Councils", but this appears to show a disappointing lack of appreciation of the highly developed area and how the mechanics of local government, housing provision and planning function.

It is to be hoped that if the practice of trying to balance resulting detrimental problems against less than proven employment and business opportunities to assess the pros and cons of a group of opposing topics is to continue, which is often akin to choosing whether chalk or cheese is the better, then it is requested that greater regard to the effects upon the wider community should be given in the concluding stages of the Commission's work.

QUESTION 4: FACTORS NOT FULLY ADDRESSED, ETC

Where will the huge workforce live?

Probably the greatest and permanent impact of 112,400 extra employees related to Heathrow Airport's proposed new North West Runway would be the need for over 70,000 new houses. Both proposals would be far more serious than the Commission's astoundingly unrealistic assessment of "a significant challenge to the 14 local Councils" as they are already on the verge of a housing crisis. The proposers have been chided by the Commission for not identifying where space for such housing could be located, but it should have rejected the proposals as unsustainable in the absence of such essential data.

QUESTION 4 (Cont'd)

Heathrow Hub's proposed doubling of the length of the existing Northern Runway may not create quite so many jobs or need quite so many houses, but its impact on housing and the infrastructure would only be marginally less than the above.

Windsor & Maidenhead's present struggle to find space for 12,500 new houses in the next 15 years already seriously threatens the Green Belt (83% of the area of the Borough) as that equates to 701 houses a year on top of existing approvals, but an extra 500 p.a. over 10 years will be near to impossible to provide here or elsewhere unless standards are dropped. Tower blocks are a social disaster. Large flood risk areas, inadequate drainage and sewage capacity worsen local problems. It took years after the last housing 'boom' for water, gas and electric companies to dig up our roads and upgrade their service mains to match the increased demands.

More roads, schools, doctors and hospitals: The Commission anticipates the need but does not seem to appreciate the extent of the stress already upon these things. If there is not enough land for housing and other needs all costs will escalate as in previous periods of economic overheating, and lower paid key workers will leave the area, which despite the business community's enthusiasm will considerably challenge their viability.

Could the building industry cope with another runway, terminal and associated works being built at the same time as all the necessary housing and infrastructure? It would be an enormous problem for the industry which the runway proposers and supporters have failed to consider. The proposals are simply unsustainable.

The roads around Heathrow are already too busy so it is already actively considering congestion charging around the airport, surely indisputable proof that there would be awful road problems if it gets a 54% increase in flights.

A minimal two lane increase on the already daily gridlocked M25 where it would be confined by a tunnel is an astoundingly short sighted and unacceptable proposal as it could not be widened to cope with the huge increases in activity which both runway proposers anticipate. The so called Smart Motorway works on the M4 where the hard shoulder safety lanes are being sacrificed for permanent traffic lanes is a clear demonstration that the road system is already overloaded.

Safety: There are safety concerns about the unusual Heathrow Hub version of a mixed mode runway on an extremely busy Heathrow as it often averages 30

aborted landing 'fly arounds' a month.

Another concern is that neither of the Heathrow proposers indicates the extent of the 'no go' Safety Zones near rural populated areas beyond the runway ends.

QUESTION 4 (Cont'd)

Other surface access proposals by HAL are likely to have far reaching repercussions as the tunnelling of the A4 Bath Road between the two northern runways would disrupt the local distributor function of this important trunk road and compromise widening to meet increasing future demands.

The doubling of cargo capacity and movement of it entirely by road from a depot remote from the motorways would put a huge additional juggernaught burden on the road network which HAL have avoided to mention. The Heathrow Hub proposals have not been assessed, but will add to local problems however its surcharge is handled.

Public Transport: Heathrow claims it will get 50% of its passengers using public transport, but there is no evidence of how that can be achieved as it remains an unfulfilled target at the present time. HAL has been actively considering Congestion Charging to address current problems, but has gone silent on that during the consultation period as it is aware that that would be an unpopular means of promoting its use of public transport use target.

The reliance on a modified revival of the former Airtrack rail scheme to Staines Southern Rail station to increase use of public transport is a totally unrealistic proposal. The Southern Rail network from London Waterloo to Staines, Reading, Guildford and beyond was built when there was very little road traffic and has many level crossings which would unacceptably increase road congestion if train frequencies were increased. The study of the viability of Airtrack demonstrated that the A30 crossing at Sunningdale would have almost doubled the closure of that important trunk road and 'safety valve' for the M3 to 42 minutes in the hour!

Heathrow's references to the Crossrail and the Western Rail Access schemes being appropriate to the expansion of Heathrow dodge the fact that these are necessary and designed to meet today's London and Heathrow traffic needs, and are not a financial gamble anticipating that Heathrow will continue to ex

Flood risks: M25 and A4 tunnels would displace a huge volume of underground water storage capacity and, contrary to EA policy, create greater flood risks elsewhere. The only flood mitigation proposed appears to be in upstream lagoons on the Colne, which would do nothing to relieve the increased threat upon the present serious flood risk area around Wraysbury and the Thames.

QUESTION 4 (Cont'd)

Revised flight paths: The recent trails caused a great deal of additional noise and distress on both sides of the airport. It is indisputable that the skies over SE England are full of aircraft and flight paths will have to be changed to reduce fuel use, pollution and time wasting aircraft 'stacking' (circling) in locations around Heathrow until a landing slot is available. Another runway close to two of the world's busiest will make the skies even more crowded and new routes will have to avoid conflicts between 54% more flights to and from more Heathrow runways. No decisions have been made about where the additional flights and their noise will be routed as UK, EU and Trans Atlantic computerised flight path control is under total review – but indications should have been given.

QUESTION 5: THE 16 APPRAISAL MODULES.

The absence of a mention of the serious Health Issues within the Appraisal Modules of the Commission's Objectives is a grave omission in the balancing of the pros and cons of the runway proposals which would have been expected under 'People' and 'Quality of Life' appraisals.

The health affects of Noise, whether high in frequency or volume, **and air pollution** from aircraft and road traffic have not been investigated despite a wide range of authoritative studies into the huge range of both obvious and insidious health affects which impinge on the wellbeing of individuals and communities as well as the efficiency and profitability of the business community and of UK plc.

Aircraft noise at night, or in increasingly so in the daytime in the case of many shift workers, disturbs sleep both obviously by waking and also less so in subconscious disturbance when the brain and body should be recuperating.

Children exposed to night noise are known to be impaired in reading ability by 6 months by age of 11 and this must be reflected in other learning difficulties in all matters among all students and intellectual workers of all ages. Mental stress is another serious by product of noise exposure. Similarly physical rest disturbance must be harmful to growing children and those involved in physical activities.

Air pollution around Heathrow already exceeds EU standards in many places, and two Air Quality Management Zones exist around roads close to rural Old Windsor around J13 of the M25 and across most of Windsor from the A308 and A322.

A large proportion of the road traffic pollution is generated by airport activity, topped up by aviation emissions. Nitrogen Dioxide (NO₂) or 'Nox' gas is highly toxic while microscopic Particulates (PM₁₀) are particularly damaging to the lungs.

QUESTION 5 (Cont'd)

A whole range of health and life threatening problems are created because nobody can opt out from breathing even if they knew they were in a polluted air zone, and very few would be aware if they were in any case. This invisible enemy is already responsible for many very serious lung related breathing problems which create a further range of heart and blood circulation problems such as heart attacks and strokes which can inflict permanent disabilities or sudden death.

Assessment and apportionment of the real and substantial costs of aviation generated health problems is mentioned under Question 7 – Business Cases, etc.

QUESTION 6: SUSTAINABILITY ASSESSMENTS, ETC

Neither of the proposals for an additional runway at Heathrow meet the recognised criteria for being sustainable as the long term affects will seriously impair the quality of life of future generations.

It may not be appreciated that road congestion, housing, and the entire built and services infrastructures including schools, medical, leisure and sports facilities are already stretched to breaking point and a 54% increase in flights by bigger aircraft carrying an even larger number of passengers would be enormously challenging for an already short and expensive land supply and funding from the public purse.

Existing unacceptable noise and air pollution problems would be exacerbated over a far wider area and an even larger population, all of which would unreasonably add to tensions and health problems exacerbated by the current circumstances.

These items are outlined under the other Questions and their collective impact would be truly staggering. The interests of a thriving business community and the prospect of additional employment in an area where unemployment is only a factor in two sub areas do nothing to justify the many harmful affects and an overheated economy on the character of the sub region or the wellbeing of its communities.

Both of the Heathrow runway proposals are very obviously NOT sustainable.

Heathrow should endeavour to be BETTER, NOT BIGGER.

QUESTION 7: BUSINESS CASES, ETC

An even larger monopoly is not in the public interest:

Another runway at Heathrow would multiply its capacity from over twice to over three times that of any other UK airport. The Competition Commission forced BAA to sell Gatwick and Stansted to create a more level playing field and fair competition in civil aviation. It would be a flagrant abuse of Government policy to make Heathrow larger than the aggregate of all its competitors in the South East.

To rub salt into the wound, should Heathrow be allowed to have another runway there would be something like a goldrush to reserve a large number of take off and landing 'slots' after decades of demand outstripping their availability and value. This could have a disastrous impact upon Gatwick if many flight operators were to transfer to a brand new Heathrow facility.

Yet another runway is likely to be needed after 2040 is a fearsome prospect that the Commission accepts. Heathrow has already admitted that it would be bidding for a fourth runway in the future to meet further demands. Its case would be sharpened by the fact that a three runway airport creates difficulties balancing arrival and departure movements (and providing alternation and respite periods) **Further Heathrow expansion should cease NOW - Enough is enough.**

Health Related Costs: (See Question 5 – Appraisal Modules)

The aviation industry should meet the imminent EU air pollution fines (not the local Councils) and be forced to contribute to the escalating costs of health treatment resulting from its noise and air quality generated problems, as despite its growth it still enjoys exemption from fuel tax granted after the Second World War to help promote international trade and recovery. Such real and substantial costs must be part of the Commission's financial viability assessments.

A relatively small example of why Heathrow should have competitors: Heathrow Airport only upgraded its compensation and mitigation offers in the latter stages of the Commission's consultation after Gatwick offered its own worst affected neighbours an annual £1,000 Council tax subsidy and double glazing up to 15 miles along its flight paths. But Heathrow still only offers the latter up to about 4 or 5 miles away and its publicity about its £550 million compensation and mitigation offer does not mention that £300 million of this is allocated for its essential Compulsory Purchases.

QUESTION 8: OTHER COMMENTS

No Comments.

END OF OLD WINDSOR PARISH COUNCIL SUBMISSION

2nd February 2015.

OLD WINDSOR PARISH COUNCIL'S RESPONSES TO AVIATION COMMISSION QUESTIONS (“Bundle 1”)

QUESTION 1 : Conclusions on the Three Options, etc.

The Heathrow NW Runway would only be 1,045m north of the existing northern runway, between the A4 Bath Road and the M4. It is based on the previous Runway 3 proposal, but being closer to the existing runway it would avoid the demolition of several listed buildings and relocating the M4/M25 interchange. **Most of the villages there would disappear under the runway which would end over a half mile closer to Colnbrook as it would be set far further west than the present runways.**

The relocation of the Grundon Power From Waste Recovery site from alongside the Colnbrook By Pass will be a major exercise – if another site can be found.

The Heathrow Extended Northern Runway would double the length of the present northern runway to the west and end between Horton and Colnbrook, nearly one and a half miles closer to Windsor. This would have a hugely detrimental noise impact on the town and its international tourist attractions.

A central separation zone between the new and existing runways would allow take off flights from the end facing into the wind and landings at the other end.

Alternative premises for businesses displaced by the demolition of the Poyle Trading Estate would be difficult to locate anywhere else in the area.

Both of the Heathrow runways would cross the M25, which would have to be tunnelled under them, which could create problems relating to flooding policies and widening the M25 in future years.

The Gatwick Runway would be on the Crawley side of the airport. It differs from Heathrow in that there are very few houses near either end of the runway and the airport proposes to continue to promote direct flights to a large number of places rather than a hub operation. There is space for associated growth.

Almost all of the Councils around Heathrow are now backing Gatwick because West Sussex CC and I think Crawley BC were among others supporting it to provide employment and boost the local economy.

QUESTION 1 (Cont'd)

Heathrow paid its mouthpiece **“Back Heathrow”**, which ran a sustained and costly false scare campaign about loss of jobs under the guise of being an independent residents group, to claim more support than opposition. It should be noted that the response from at least one circulation of 400,000 scaremongering prepaid return tick forms and other activities generated a claim of 50,000 supporters, indicating 12.5% support. Few if any Councils or other bodies have had either the funding or staff availability to challenge this less than realistic alarmist publicity, so most of the people polled for an opinion have unfortunately not had a full grasp of the facts. Despite that a poll carried out on behalf of the Royal Borough of Windsor & Maidenhead has shown an appreciable majority opposed to another runway at Heathrow and support for one at Gatwick.

NB: Other Items relating to this and other Questions in “Bundle 2”

2nd February 2015

Old Windsor Parish Council

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Airports Commission Consultation,
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GU22 2QR.

3rd February 2015.

Dear Sirs,

Response to Airports Commission's Questions of November 2014 relating the Three New Runway Options

1.1. I have been asked by the Chairman of Old Windsor Parish Council to submit the attached submission (in two parts) to the Airports Commission regarding the above on behalf of the residents of this community.

Old Windsor lies about 4 miles from the end of the Southern runway, 2 miles closer than the separate town of Windsor. It is a relatively quiet village of 5,000 residents of a virtually 100% residential community alongside the Thames with open Green Belt countryside on the other three sides. A substantial part of that boundary is comprised by the National Trust land of Runnymede Crown Estate Home Farm and Windsor Great Park

1.2. As Old Windsor is a quiet community, aircraft noise has a far greater detrimental impact upon it than a suburban town, but the Parish Council strives to support a balance between the economic and leisure benefits of Heathrow and the environmental and health disadvantages of its activities. It notes that a large cross section of the community it represents relies on the airport and its catalytic activity for employment.

1.3. I would be grateful for advice on the outcome of this Appeal.

Thanking you,
Yours sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]