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Email Body:

Dear Sir/Madam,

Please find attached a response for feedback concerning the three proposals currently being considered for additional runway capacity in the south east. My contact details are included in the first document should anything require further clarification.

Regards,

Bar Index	Relative Length (Estimated %)
1	95
2	98
3	88
4	98
5	97
6	92
7	95
8	88
9	96
10	94
11	98
12	25
13	75

Airport jobs: false hopes, cruel hoax



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In 2003, on behalf of a number of environmental groups, he persuaded the government to rerun their computer forecasts on the assumption that by 2030 air travel would be paying the same rate of tax as car travel. The dramatic results of this exercise were set out in *The Hidden Cost of Flying* (AEF, 2003), in which he also calculated the value of the tax concessions for aviation at £9 billion a year, a figure that has gained wide acceptance.

In *Fly now, grieve later* (AEF, 2005) he summarised the concerns about the impact of air travel on climate change, and explored the political and practical problems in making airlines pay sensible rates of tax.

Colleagues from other environmental groups have encouraged him to write this booklet, and he would like to thank all those who have contributed much helpful information.

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EXECUTIVE SUMMARY

1. With the current recession, when thousands are losing their jobs, any promise of more jobs is welcome. Airports and airlines for their own commercial reasons tend, however, to exaggerate the number of jobs that will be created by airport expansion.
2. Claims that airports create 'indirect', 'induced' and 'catalytic' jobs are based on dubious statistical concepts.
3. Between 1998 and 2004, despite a 30% rise in air passengers, the total employment attributed to airports and airlines actually went down.
4. Master Plans produced by each airport are inconsistent, and their employment forecasts are little better than guesses – designed to influence local councillors and planners.
5. The Airport Operators Association has forecast that by 2030 an increase of 104 % in the number of passengers passing through UK airports will produce a 21% increase in jobs at airports.
6. UK residents took 41.5 million more return flights for leisure in 2005 than foreigners came here for leisure. The aviation tourism deficit is costing the UK about 900,000 jobs as a result of people spending their money abroad instead of here.
7. Aviation – direct employment at airports and by airlines – provides under 200,000 jobs in the UK. Thus at present air travel is costing the UK roughly a net 700,000 jobs.
8. That is not a moral judgement that people ought to spend their holidays in Britain, merely a statistical fact that flying abroad creates jobs elsewhere, not in this country.
9. As a result of the Government's plans for the growth in aviation, the situation is due to get worse. By 2030 the UK tourism deficit in terms of return trips by air passengers is forecast to double, to 88.5 million.
10. The growth in air travel is likely to lead to a net loss of a further 860,000 UK jobs by 2030. This loss of jobs will affect every part of the UK.

INTRODUCTION

Like 'sex', the word 'jobs' makes an excellent tabloid headline: short, sharp and emotive. It stirs deep folk memories of the poor law and the workhouse, and of the mass unemployment of the 1920's and 1930's. Being without a job, with a prospect of hardship, anxiety and loss of self-respect, is still the dread of almost every family of working age. With the current recession, when thousands are losing their jobs, and millions fear that they may do so, any promise of more jobs is welcome.

Thus the suggestion that a new or expanded airport will create more jobs is a sure way to attract support from the public and a fair wind from the planners. Naturally airport companies and airlines make the most of this. Yet because they have a commercial interest in magnifying the number of new jobs, their figures need careful examination. False hopes can prove a cruel hoax.

TOTAL EMPLOYMENT IN AVIATION

There are no official statistics showing the number of people employed in the aviation industry. Undeterred by the lack of hard facts, the Air Transport White Paper (2003) supported the Government's plans for airport expansion with the claim: "The aviation industry itself makes an important contribution to our economy. It directly supports around 200,000 jobs, and indirectly up to three times as many." These figures were based on a report commissioned and paid for by the aviation industry from a consultancy firm, Oxford Economic Forecasting (OEF).¹

The definition of aviation used by OEF included airline and airport operations, passengers and freight services, aircraft maintenance, air traffic control, and on-site retail and catering, but excluded aircraft manufacture.

Since there are no official statistics, OEF stated that they 'put together these statistics from a number of sources.' Their conclusion was that in 1998 the aviation industry in the UK generated around 180,000 jobs (full-time equivalents).

The Department for Transport (DfT) produced a Progress Report in December 2006, and made a similar claim. 'The aviation industry makes a significant contribution to employment and investment in the UK economy. It is itself a substantial employer, providing around 200,000 jobs directly and [somewhat more cautiously] many more indirectly.'

This statement was based on a further report by OEF produced in October 2006.² Using figures supplied by the Airport Operators Association, OEF found that the aviation industry directly employed 186,000 people in 2004.³ That is the latest figure which is available.

EMPLOYMENT CATEGORIES

Discussion about employment in aviation is usually carried out in terms of different categories. The exact definitions vary from one study to another but are broadly as follows:

Direct on-airport: All jobs within the airport boundary, including hotels, catering and retail.

Direct off-airport: Employees outside the airport working directly for airport and airline companies; for example, airline offices where these are located outside the airport.

Indirect: Jobs in firms which supply goods and services to the aviation industry. OEF quote jobs in the energy sector generated because of airline purchases of aircraft fuel; in the aerospace industry because of airline purchases of aircraft equipment; construction workers at airports; and

the workers required to manufacture the goods sold in airport retail outlets.⁴

Induced: Jobs created when aviation employees (direct and indirect) spend their income. For example, when an airline pilot buys a loaf of bread he is helping to create employment for bakers.

Travel agents: OEF (but not other studies) also added employment in travel agents on the grounds that travel agents mainly sell holidays by air.

Catalytic: Jobs in firms attracted to the area as a result of the transport links created by the airport. Since these firms will normally be relocating from other parts of the UK, there is little effect on total national employment.

The two OEF studies gave the figures for each category (excluding catalytic) in 1998 and 2004 as follows:

	1998	2004
Direct airport jobs	180,000	186,000
Indirect jobs	200,000	167,000
Induced jobs	94,000	88,000
Travel agents	75,000	82,000
Total	549,000	523,000

The significant thing about this table is that it shows that in six years when the number of passengers passing through UK airports rose by 30%, the number of direct jobs at airports only went up 3%. Moreover during these years, **the total level of employment attributed to aviation actually went down.**

In every document produced by the aviation industry, or by the Department for Transport on their behalf, these categories of employment are trotted out as if they are indisputable truths. They

are used to back up claims that airport expansion creates many jobs 'in the wider area.' Yet each of the concepts is distinctly dubious.

Mini-hoax?

The figures for 1998 above appeared to be the basis for the White Paper statement "The aviation industry ... directly supports around 200,000 jobs, and indirectly up to three times as many". At first sight that sentence seems to suggest that the number employed indirectly is *three* times the number employed directly. But the table above shows that the number employed indirectly, including induced and travel agents, is actually *twice* the number employed directly.

The phrase would be true if it is construed as meaning that the total number employed, directly *and* indirectly, is three times the number employed directly. Let us hope that the civil servants who drafted the White Paper were deficient in their grammar, not in their mathematical honesty.

Direct employment includes a substantial number of jobs in airport shops. Airport shops do not provide much extra employment; they mainly take business away from the High Street. Indeed buying goods at an airport is basically illogical: it is cumbersome to carry shopping on and off an aircraft. The only reason why most people shop is that, due to possible delays in reaching the airport, and long check-in times, many people arrive several hours before their flight and are corralled with little else to do; and because of the lure of duty and tax free goods - an unjustified

subsidy for aviation. It could be argued that jobs in airport shops should be included in the statistics of retail employment, not under aviation.

Indirect employment has a certain validity as a statistical concept but has the fatal flaw that it means double-counting people employed in other industries. For example, it is stated that it includes jobs in producing aircraft fuel: thus it may include some workers on the North Sea oil rigs. Since these people are also included in the statistics of workers in the oil industry, there is obvious double-counting.

The inclusion of construction workers is incorrect: Government guidance says that they should be classified under 'construction', and not be included in the industry for which they may be undertaking a project.⁵

If every other industry used the same technique the number of people employed in British industry would far exceed the total population.

The definition of indirect employment also leads to some rather far-fetched results. It is said to include the workers who produce the goods sold in airport shops: thus it includes, for example, the Scottish distillery workers who produce the whisky sold in airport duty-free shops.

Travel agents do depend largely on selling holidays by air. But with the increasing trend to buy flights and book hotels on the internet, travel agent employment is likely to decline. Again there is double counting: travel agents are also included in the statistics of employment in the tourist industry.

Induced employment could be a valid concept if applied to public works designed to relieve serious unemployment. John Maynard Keynes in 1936 used the concept of the multiplier to explain how providing extra employment could trickle down through the economy. Yet as he acknowledged, this theory was mainly applicable

to a situation of mass unemployment. "It is obvious that the employment of a given number of men on public works will ... have a much larger effect on aggregate employment at a time when there is severe unemployment, than it will have later on when full employment is approached."⁶

Moreover, many of the induced jobs are not created in the local area: the baker who bakes the pilot's loaf may be local but the man on the oil rig certainly is not. To the extent that a sizeable proportion of expenditure by every family these days is on goods produced abroad, the induced jobs will not even be created in the UK.

According to OEF and other airport studies, induced employment includes jobs due to purchases by both direct and indirect airport employees, again leading to some far-fetched results. Thus it includes not only the bakers who provide the bread for the airline pilots but also the bakers who provide bread for the oil rig workers and the distillery workers. When the man on the oil rig takes a holiday in Cornwall, the hotel staff (or at least a proportion of them) are counted as part of aviation employment. When the distillery worker buys some kippers for his family supper, some of the fishermen who caught the herrings are counted as being employed in aviation!

There is no reason why the process should not go on indefinitely. Why not also take into account that when the fishermen spends some of their income on cabbages that creates jobs for farmers, and when the farmers buy newspapers that helps to create jobs for journalists, and when the journalists fly abroad that creates jobs in aviation, and so on ad infinitum.

FORECASTS OF FUTURE EMPLOYMENT

The DfT forecast that the number of passengers passing through UK airports will increase from 228 million in 2005 to 450 million in 2030.⁷ There

are, however, no official forecasts of what this might mean in terms of employment.

Perhaps that is not surprising. The future of aviation is almost impossible to predict. Even the passenger figures are subject to huge uncertainties.⁸ They depend on the assumptions that:

- after the current recession, growth returns to its previous trend;
- the price of oil remains below \$78 per barrel in real terms until 2030;
- there is no increase in tax on air travel to raise revenue;
- any tax imposed for climate change reasons (or the cost of emissions trading permits) will be exceptionally low;
- the growth in aviation is not affected by the recent decision to aim for an 80% cut in CO2 emissions by 2050.

Taking the next step, to translate the number of passengers into the number of employees is fraught with further uncertainty.

For many years there was a rough rule of thumb that every million passengers per annum require a thousand airport and airline (direct) employees. That rule roughly held good for the level of employment at the time of the Air Transport White Paper. In 2003 there were roughly 200 million passengers and 200,000 employees.

It would be rash, however, to predict that every *extra* million passengers will require an *extra* thousand employees. In 2005 the Airport Operators Association commissioned York Aviation to study future employment trends.⁹ Their conclusion was that direct airport employment would increase from 185,900 in 2004 to 225,200 in 2030 assuming full expansion of all airports as in the Air Transport White Paper. A forecast increase of 237 million passengers (104 %) in the number of passengers was only expected to produce a 39,300 (21%) increase in

Treasury hoaxed

Explaining why he had dropped his proposal to replace air passenger duty by a tax per plane, the Chancellor in his Pre-Budget Report in November 2008 stated that: *'The Government recognises the contribution that the aviation industry makes to the UK economy: providing around 200,000 jobs directly in the industry, employing up to 500,000 people in the supply chain, ...'* A footnote explained that this statement was based on the 2006 OEF report.

When it was pointed out to the Treasury that the OEF report showed that the number of jobs 'in the supply train' (i.e. indirect jobs) was 167,000 not 'up to 500,000', their only reply was to put the blame onto the Department for Transport for supplying the information.

jobs. The ratio of extra jobs to extra passengers is only 166, far below 1,000.

Even that may be over optimistic. It has not happened in the past. As previously noted, a 30% rise in UK passenger numbers only produced a 3% rise in employment. The same is true abroad. At Frankfurt airport, flight movements increased 78% between 1978 and 1996, yet employment only rose by 0.6% over the same period.¹⁰

Promises by airports and airlines that expansion will mean more jobs may not be borne out in the real world. There are a number of changes which will tend to reduce the number of people employed at airports. The low cost airlines have shown how it is possible to make drastic cuts in

staff, with fewer staff at the airport, fewer staff on board and a higher proportion of aircraft seats filled. Although the figures may not be exactly comparable, Ryanair handles over 10,000 passengers for each member of staff whereas British Airways handle under 800.¹¹ If competition forces the traditional airlines to adopt the low cost model there will be a fall in airport employment.

What is not so generally realised is that there is a parallel move to 'low cost airports' with

NEW RUNWAYS 'VITAL FOR JOBS'

by Vincent Moss, Political Editor

Sunday Mirror, 11 January 2009

Airline bosses have warned that 500,000 new jobs would be lost unless the Government backs a major expansion of Britain's airports...

tickets bought on the internet; check-in done electronically, and baggage handling increasingly automated, so that the same number of airport staff can handle far more passengers. Heathrow Terminal 5 was designed as a self-service terminal - with as many as nine out of ten passengers having no need to contact members of staff until they reach boarding gates.

The future may see a move to an even more simplified type of airport. Baggage will be checked-in at the car park, passengers will go straight to the gate room with the security checks carried out just before boarding. That is the Ryanair model, and it is the reason why they complain that at Stansted BAA are planning to build a 'Taj Mahal' terminal.

ARE MORE JOBS A GOOD THING?

Since 'jobs' is such an emotive headline, it seems almost like sacrilege to ask if more jobs in aviation actually benefit the nation. In a recession, more jobs in almost any industry, even jobs digging useless holes in the ground, are welcome.

In more normal times, however, when there is reasonably full employment, if the public have a fixed amount of money to spend, then more jobs in aviation will mean fewer jobs in other industries. This was the point made in a study by Berkeley Hanover Consulting.¹² It has also been acknowledged (sotto voce) by OEF.¹³ So more pilots and more air hostesses, more baggage handlers and more air traffic controllers would mean fewer doctors, fewer nurses, fewer teachers, fewer waste collectors, fewer shop assistants, fewer people behind the bar in the pub. That is fine, and good economics, if it reflects real consumer preferences about how they wish to spend their money. And if the prices of the various services reflect their true cost, without any subsidy.

Economic growth, or real wealth per head, is created by increasing efficiency. This means reducing the number of jobs for a given output, not increasing them. More jobs in aviation will only add to economic growth if they replace less productive jobs elsewhere. But many jobs in aviation, such as baggage handling or aircraft cleaning, are relatively unskilled. And they are all subsidised.

Aviation pays no fuel tax and no VAT. It benefits from duty-free sales at airports and from artificially low landing fees. Although it pays air passenger duty this is comparatively low compared to the fuel tax and VAT reliefs. The net tax subsidy received by air travel as compared to car travel is around £9 billion a year.¹⁴

This means that, on average, the tax subsidy per (direct) job in the aviation industry is £50,000 a year; or £1,000 a week; or £25 an hour.

Any industry could promise to provide more jobs if it received that level of subsidy.

Once upon a time jobs in aviation seemed romantic: brave pilots; seductive air hostesses; far-flung destinations; all the buzz of being at the forefront of technological innovation. Now we have learned how polluting the industry is, however, employment in aviation seems less glamorous. In 2005 UK aviation produced 37.9 million tons of CO₂, forecast to rise to 59.9 million tons in 2030 even after taking into account more efficient aircraft.¹⁵ On average at present each aviation worker is responsible for over 200 tons of CO₂ per year, or the equivalent of around 400 tons if radiative forcing is taken into account.

Each job in aviation is thus about twenty times more damaging to the climate than the average job in the rest of industry (energy supply, business and transport).¹⁶

MORE LOCAL JOBS?

It is now time to switch from the national to the local picture. Again there are no official statistics for the number of people employed at each airport. The Airport Operators Association and OEF have produced the following table, albeit by now somewhat out-of-date.¹⁷

Employment in the Aviation Industry, 2004

Airport	Passengers (Million)	Direct employment
Aberdeen	2.64	2,716
Belfast City	2.13	807
Birmingham	8.86	9,071
Bristol	4.65	4,747
Cardiff	1.89	1,932
East Midlands	4.38	4,512
Edinburgh	8.02	2,300
Gatwick	31.47	23,761
Glasgow	8.58	5,442
Heathrow	67.34	68,427
Luton	7.54	7,756
Manchester	21.25	18,000
Newcastle	4.72	4,855
Stansted	20.91	10,592
Other Airports	20.63	21,116
Total	214.98	185,900

Funny thing is that some of the figures in this table appear to be too high. One might think that the Airport Operators Association would know how many people are employed at each airport, but not so. The Bristol Airport Master Plan compiled by Bristol Airport shows that the number directly employed in 2005 as 2,284, not 4,747. The Birmingham Master Plan shows the total, including some indirect employment, as 7,500 in 2006, not 9,071.

On other occasions airports exaggerate the number of jobs they provide. For example, the East Midlands Airport employee survey claimed 7,089 employees in 2004, compared to the figure of 4,512 shown in the above table. The explanation is thought to lie in the inclusion of non-airport companies located in the airport business park.

Whenever a new airport is proposed, or when plans are announced for the expansion of an existing airport, the airport company invariably claims that it will create more jobs for the local area. These forecasts tend to be optimistic and should be treated with caution.

When Manchester Airport announced in 1991 that it wanted to build a second runway, the Chairman of the Airport company claimed that this would create 50,000 new jobs.¹⁸ A subsequent report, presented by the Airport to the public inquiry, revised the figure to 18,000 new jobs. This figure included indirect and induced employment, and employment in firms which would be attracted to the Manchester area. It also included jobs created by inward tourism - without taking account of outward tourism. The media continued to use the 50,000 figure, and indeed it was repeated by the airport chief executive in 1997 after planning permission was granted.¹⁹

In the real world, the runway was built, and opened in 2001. The total number of jobs at the airport in 2006 was 4,000 more than ten years previously. Even adding indirect and induced employment at the usually quoted ratios, the

increase would be around 6,400. It is obvious that the figure of 50,000 extra jobs was a flight of fancy.

The Air Transport White Paper encouraged the growth of most airports in the UK. It also indicated that each airport should produce a master plan. The Department for Transport has, however, now admitted that Master Plans tend to be over optimistic about future passenger numbers. They explain that their forecasts for total UK passenger numbers are lower than the sum total of all the master plans because each airport tends to be over optimistic.²⁰

Master Plans do not last forever. Luton Airport published their draft master plan in October 2005, and withdrew it in July 2007, cancelling the previously planned new runway.

Master Plan psychology

Master plans are produced by the airport owners, and are an expression of their hopes for the future. If they were called 'What We Would Like To Happen In Order To Maximise Our Profits' they would be treated with appropriate scepticism. In normal parlance they would be called 'airport plans'. But the addition of the word 'master' implies that all else must be subservient to them. And the fact that they are usually written in capital letters, like God, subtly implies that they are omnipotent and omniscient. Local planning authorities bow. When the Master Plans also contain forecasts of more jobs, the planners genuflect.

Indeed the Government has made master plan genuflection compulsory by amending the planning system so that regional plans and local plans have to take 'Master Plans' into account.

Forecasting the future number of passengers, and the future number of jobs, at each airport is largely guesswork. Individual circumstances, the balance of scheduled versus charter flights, the importance of low cost airlines and the scope for creating jobs well away from the region (e.g. British Airways engine maintenance in Cardiff and software support in Bangalore, India) all make these numbers unreliable.

The ratio of 1,000 extra jobs per 1 million extra passengers is sometimes too low, sometimes much too high. At Exeter in 2005 there were 1,359 jobs per million passengers, predicted to fall to 1,029 in 2030. At Bristol the ratio was 439 jobs per million passengers, predicted to rise (yes, rise) to 454 by 2030; at Edinburgh the ratio is forecast to rise from 376 at present to 391 in 2030. All three airports look to be in the running for awards for inefficiency!

At Luton some councillors were quoting the 1,000 jobs per million passengers until it was

Announcing the go-ahead for the third runway at Heathrow, Transport Secretary Geoffrey Hoon said:
"Heathrow airport supports over 100,000 British jobs. A third runway is forecast to create up to 8,000 new on-site jobs by 2030 and will provide further employment benefits to the surrounding area." (January 2009)

pointed out to them that the growth in jobs at the airport in the ten years to 2006, based on the local council's annual employment survey, had been around 100 jobs per million passengers.

The explanation for variations in employment forecasts may be that the forecasts are tailored to what will best impress the public and the planners. For example, the Heathrow

2005 Interim Master Plan²¹ recorded 68,400 direct on-airport jobs, a ratio of 1,021 jobs per million passengers. However, the Terminal 5 Inspector had concluded that the maximum the area could support was 61,500 jobs. So the Master Plan predicted that, even if by 2015 passenger numbers grew by 40%, the number of jobs would fall by 10%. Very convenient!

The fear that increasing efficiency will lead to a loss of jobs is a potent weapon in the hands of airport proponents. When existing jobs are at risk, all the airport workers must inevitably vote for expansion. The Government consultation document *Adding Capacity at Heathrow Airport* suggested that by 2030, with the airport operating as at present the number employed at the airport would have fallen to 52,400 but that - if a new runway and new terminal were to be built - the number would be 60,400.

Fear of a loss of jobs through new technology is not a good reason to promote otherwise unjustified expansion. If it were, we would now have a large number of people employed as charcoal-burners, fletchers, wheelwrights, ostlers and postillions.

There appears to be a tendency for airport owners to pitch their guesses high in areas where they reckon that extra jobs would be welcome to the local population and to the local councils; and to pitch their guesses low where extra jobs would be less popular. At Gatwick, which has for fifty years had a high level of employment, extra jobs are seen as causing problems for local firms. There is strong opposition to the in-migration of labour which creates a demand for additional housing in an area where the protection of the countryside has a high priority. Surprise, surprise, the Gatwick Interim Master Plan (October 2006) showed no extra jobs being created between 1997 and 2015 despite a forecast increase in passengers from 25 to 40 million.²²

The Gatwick Master Plan contains details of a possible additional runway designed to double the size of the airport, making it larger than

Heathrow today. Yet it contains none of the usual hyperbole about the extra employment that would be created. BAA know only too well that local councillors would be appalled at the prospect of building still more houses, more offices and more factories in the Surrey and Sussex countryside.

Every Master Plan, except Gatwick's, contains high flown rhetoric about the number of jobs created in the wider community, by indirect, induced or catalytic employment. The Aberdeen Master Plan claims that 2,800 jobs at the airport support 9,000 other jobs across Scotland. Birmingham claims that 'Taking account of additional indirect and induced impacts, in 2006, it is estimated that the Airport supported around 10,490 full time equivalent jobs in the West Midlands Region.' Heathrow, with 70,000 employees, 'supports over 100,000 further jobs right across the UK.'

As we have seen, the concepts of indirect and induced employment are distinctly dubious at national level; they become even more dubious at a local level.

Local indirect employment

To recap, indirect employment is defined as jobs in firms which supply services to the airport. Clearly there will be some local firms connected to the airport, for example local hotels or off-airport car parking. Airport construction workers may be local but temporary. Many indirect jobs will, however, be in other parts of the UK, or abroad, although in respectable job statistics these are not included. Aircraft fuel will provide jobs in the North Sea or in Saudi Arabia; and purchases of aircraft equipment may come from Airbus in Toulouse or from Boeing in Seattle. Airport shops are not noted for selling local produce.

In the SERAS studies conducted for the Department for Transport in the run-up to the 2003 White Paper, consultants Halcrow listed various previous studies which had worked out indirect employment ratios, that is the number of

local indirect jobs for each direct airport job. The figures varied between 0.2 for Newcastle and 0.45 for Stansted. The average was 0.3.²³ But all these studies had been commissioned by aviation lobbying organisations.

It is true that investment creates employment. But jobs are used to justify anything and everything. If recession strikes, the political value of any scheme which boosts them will rise. Projects which in more prosperous times might have been rejected by planners or ministers will suddenly find favour. Anyone who stands in their way - however daft the schemes may be - will be walloped as an antisocial Luddite.

But the big question is asked very rarely in the press: how reliable are these promises? Whenever a new defence contract or superstore or road or airport is announced, newspapers and broadcasters repeat the employment figures without questioning them. They rarely return to the story to discover whether the claims were true.

George Monbiot, *The Guardian*, 1 April 2008

Local induced employment

We have seen already that induced employment is a concept which leads to some far-fetched results. That is even more so on a local level. When the airline pilot buys his bread there is a fair chance that the baker to whom he gives employment will be situated in the local area. But practically everything else he buys in the

supermarket will have come from all over the UK, indeed all over the world. When he buys a banana he will be providing induced aviation employment in the West Indies.

In 1995 the Treasury suggested a figure of 0.2 for the regional induced employment ratio.²⁴ The Halcrow study for SERAS found a range of values, varying from 0.2 at Birmingham Airport to 0.5 at Stansted, the variation being due to the use of different definitions. The average was 0.3 although this calculation was not included in the final version of the SERAS consultation paper as even the DfT admitted that the number was difficult to calculate accurately.

DO AIRPORTS ATTRACT FIRMS TO THE AREA?

Airport companies love to talk about catalytic employment. It is a long, arcane and erudite word - and therefore must be true. It means that airports act as a catalyst (as in a chemical reaction) and attract firms to the vicinity. Catalytic employment is a beggar-my-neighbour concept. Any firms attracted to the area will have come from some other area, which will thus lose jobs. It is also somewhat old-fashioned: electronic communications and teleconferencing mean that air travel is less vital for business operations.

A key academic study of this subject, although applying mainly to road transport, was carried out for the Department for Transport by Professor Ronald W. McQuaid and colleagues at the Transport Research Institute at Napier University, Edinburgh.²⁵ They found that:

"There is a wide body of knowledge stretching back to the 19th Century outlining the theoretical transport-related drivers of business location, This initial review indicates that transport is a factor in business location decisions

but is neither the only, nor the most important factor. There are cases where the linkages between transport investment in isolation and industrial location appear to be weak, or indirect."

"The evidence suggests that transport is a necessary, but not sufficient condition in determining business location. Other factors such as a skilled and/or cost of workforce, the quality of the local environment and cost of premises have been shown to be equally, if not more important when considered in isolation. Research has also shown that climate, business environment and government assistance may be magnets for business location.... transportation costs are typically found to be only a very small proportion of firms' total costs - usually less than 5%. As such, any improvements to the transport infrastructure is likely to yield small cost savings and gains to firms."

The South West Regional Development Agency commissioned the consultants EKOS to undertake an economic assessment of South West Regional Airports. Their report, published in December 2007, found that "The relationship between high growth sectors in the region and air travel appears to be weak. Air travel may not necessarily be a prerequisite for economic growth"

A 1998 survey of Economic Development Officers in local authorities concluded that the availability of workforce skills and suitable development sites were of equal or greater importance than transport in terms of attracting inward investment.²⁶

Aviation proponents quote a number of business surveys which put good communications, or proximity to an airport, as an important reason for their choice of location. One of the most often quoted is the 'European Cities Monitor' conducted annually by the commercial real estate agents Cushman & Wakefield.²⁷ For example, the DfT in their consultation on the expansion of Heathrow stated: A survey of 500 of

Nearly ten times as many UK businesses support the idea of a fast rail link from London to the North than support expanding Heathrow.

Only 4% of British businesses polled believe they will benefit from expanding Heathrow. 95% said it would make little or no difference. In contrast, 23% of businesses believe they will be helped by a new high-speed rail line to the North, as proposed by David Cameron.

Woodnewton Associates. 5 December 2008.

www.woodnewtonassociates.co.uk

Europe's top companies found that 52% of companies considered transport links a vital factor in deciding where to locate their business; and 58% identified good access to markets, customer or clients as essential. A footnote shows this to be a quote from a BAA document: 'The Economic Benefit of Heathrow' which in turn quoted the European Cities Monitor.

This was based on a survey of 500 senior executives across Europe. 53 % (52 % in 2007) did indeed include 'transport links with other cities and internationally among the factors they considered essential in choosing a location. But it was only fourth in the list of important factors, and closer examination shows that 'links with other cities' included trains and motorways!

Looking at UK companies only, a Cushman and Wakefield survey of 200 executives (presumably part of the same survey) asked what factors were most important in deciding their choice of location. 'Transport links internationally' was only mentioned by 30 % (22% in 2007).²⁸ Seven other factors were considered more important. This survey is not quoted by the aviation proponents.

OMIS is a leading independent consultancy specialising in business location and corporate relocation, which has for over a decade conducted surveys of CEOs and senior executives of major companies located in the biggest cities across the country. The latest survey of over 5,000 business leaders was carried out between August and November 2005 and the results released in March 2006. It showed little correlation between major cities' air services and their attractiveness to business. Manchester, Glasgow and Leeds were all put higher than London. The previous survey, in 2003, put Leeds (with only a small airport) as the most attractive location for business.²⁹

The major Japanese investments in the UK, in car assembly plants at Sunderland, Swindon and Derby, and in electronic and electrical consumer goods in South Wales, prove that the quality of airport facilities/air links are not the most important consideration in relation to inward investment decisions. None of these locations (with the possible exception of Swindon) is anywhere near an airport which offers services to Japan.

The aviation industry, and indeed the Air Transport White Paper, make a great play with the importance of inward investment. The point has been answered by Professor John Whitelegg:

Data for the UK as a whole show that the amounts of money invested by UK companies abroad is higher than that invested by overseas businesses in the UK. If there is a link between the enhanced accessibility provided by international air services (as the aviation industry claim) then it works to the disadvantage of the UK and supports a net outflow of resources. Put very simply potential jobs in the UK are sacrificed for the benefits of investing abroad. Whilst we would not wish to claim that this job loss and net outflow of funds should be "laid at the door" of aviation we also wish to question the logic of the opposite assertion from the industry itself. Inward

investment cannot be claimed as a benefit of airports or aviation. If it is claimed then equal weight has to be given to the debit side of the balance sheet.

The balance sheet shows a substantial net deficit ... approximately £38 billion each year.³⁰

This net deficit has a direct equivalence in job losses. If we accept that the cost of creating a job in the UK is approximately £23,000 (National Audit Office, 1999) then this outflow represents a job loss of 1.65 million each year for 5 years....

This job loss is facilitated by the development of air services and the aviation industry.³¹

BOGUS SURVEYS

The Department for Transport, in their 2006 Progress Report on the Air Transport White Paper, stated that: 'According to the latest research by Oxford Economic Forecasting, access to air services is an important factor for 25 per cent of companies across the whole economy in influencing where they locate their operations within the UK. Access to these services also affects the decisions by 10 per cent of companies as to whether to invest in the UK at all.'

According to the OEF report, "Questionnaires were sent out by OEF to around 6,000 companies and 165 replies were received."³² Any respectable polling organisation would regard this 2.75% rate of response as exceptionally low and wide open to bias. The poor response means that where OEF and DfT refer to 10% of companies, they are relying on the forms returned - a mere 10% of 165. 16 companies out of 6,000.

The letter sent out to the 6,000 firms explained that: "Oxford Economic Forecasting is conducting this survey on behalf of the CBI, the Department for Transport, a consortium of airlines and airports, and VisitBritain in order to assess the contribution of air services to the UK economy and the competitiveness of UK

business. The results of the survey will be presented to the Government to inform the 2006 Progress Report on its White Paper on airports policy." With that powerful introduction it is extremely significant that 5,835 companies did not bother to reply. The conclusion could well be the opposite to that drawn by OEF and the DfT – that over 97% of companies do not consider that air services are sufficiently important to spend ten minutes filling in a questionnaire.

Another bogus survey was contained in a report by York Aviation commissioned by the City of London Corporation in 2008. Based on a survey of London businesses the report argued that air travel is important to the City. But in fact only 44 firms responded, accounting for 38,000 business journeys a year. That is, about 0.1 per cent of Heathrow business journeys.

At Prestwick, SQW Consulting recently produced a study³³ for the South Ayrshire Council and Scottish Enterprise that claimed that 66% of companies used the airport for business trips. Over 1,000 questionnaires had been posted and the survey was sent by email to all members of the Chamber of Commerce. Only 174 replies were received. But, of course, they were the ones most likely to return the questionnaire. If it were to be assumed that all the firms who did not bother to respond were not interested in the airport, then the proportion of firms who used the airport was well under 10%.

THE TWO WAY ROAD

In 1999 the Government Special Advisory Committee on Trunk Road Assessment (SACTRA) reported that: "There is no guarantee that transport improvements will benefit the local or regional economy at only one end of the route - roads operate in two directions, and in some circumstances the benefits will accrue to other, competing, regions."³⁴

Sally Cairns of the University of Oxford Environmental Change Institute has commented: "It seems plausible that the two-way road argument could also prove to be relevant for an expansion of UK air capacity."³⁵ Thus a local firm may be happily supplying goods to a local area but when a local airport is developed it may become possible to supply the area more cheaply by air from somewhere where they can be mass produced.

The argument for airport expansion is, however, usually made in terms of improving communications for businessmen. But that is also a two-way road. The expansion of UK airports with an increased range of destinations is likely to facilitate UK businessmen travelling abroad to set up factories or call centres in countries such as China and India, thus leading to a loss of UK jobs.

It is easy for the managers of, let us say, a biscuit-making business in Futhershire, to believe that the opening of a new airport or the expansion of an existing airport will enable them more easily to travel the world extolling the virtues of Futhershire Biscuits. And make it easier for buyers from abroad to travel to Futhershire, sample the delights of its climate and cuisine, and place large orders for Futhershire Biscuits. The local councillors who all their lives have eaten little but Futhershire Biscuits are, of course, delighted to grant any necessary planning permissions.

What is less easy to envisage, but in the real world just as likely, is that the airport will enable marketing executives from biscuit making companies in France, Germany, Italy or wherever, to fly in, size up the market, and run the old established Futhershire Biscuits Ltd out of business. Like roads, flights go in both directions.

Where an airport only serves a small town it is unlikely to be able to support a wide range of routes. Doncaster Council thought that the creation of the new Robin Hood Airport would

bring prosperity and jobs to Doncaster. But in fact it offers scheduled services to 16 destinations, only two of which are daily (to Belfast and Dublin). Eight are to obvious tourist resorts (such as Tenerife) which are unlikely to be used for business purposes. Four of the routes are to Poland, and it is not difficult to guess that these are mainly catering for migrant workers, the exact opposite of the intention of creating jobs for local residents.

Thus it is possible to have a long runway, and to give the local airport a grand name, but still have few flights which are any use to business people. Another example is Manston aerodrome, now re-named Kent International Airport, which apart from charter flights only has a service to Majorca which departs every Friday during the summer, a service to Jersey every Saturday in the summer, and a service to Gran Canaria which departs every Tuesday but only in August. But hope springs eternal. The Manston Master Plan, published in October 2008 predicts a throughput of 6 million passengers a year by 2033 (sic) with employment rising to 7,500.

THE TOURISM EMPLOYMENT DEFICIT

The fact that so many more Brits fly abroad for their holidays than foreigners come here, means a huge loss of jobs in this country. Every part of the country is adversely affected. The UK currently runs a tourism deficit of £19 billion a year.³⁶ That includes tourists arriving or departing by train or ferry: the tourism deficit due to aviation is around £17 billion a year.

The average pay of people employed in the UK tourist industry is £19,000 a year.³⁷ It can thus be deduced that the **aviation tourism deficit is equivalent to a loss of roughly 900,000 jobs in the UK.**

A practical businessman might argue that creating a new job involves not only paying the worker concerned but also a roughly similar sum in overheads, such as premises and equipment. Yet providing the premises and the equipment can also be translated into extra jobs, so we come back to the loss of approximately 900,000 jobs. That is on the assumption – a statistical concept, not a likely situation – that if people did not fly abroad, they would spend the same amount taking holidays in the UK.

To repeat, this is a statistical exercise, not a moral judgement. It is not necessary to say that people 'ought' to take holidays in this country. Nor would it be correct to say that environmentalists are kill-joys who want no-one to have a holiday in the sun. But if the jobs created by aviation are to be counted, then the jobs lost by aviation must also be included.

If, to use a different example, people want to eat more bananas and fewer English apples, there is nothing wrong in that. It merely means a slight change in the exchange rate so the UK has to sell more widgets or financial derivatives in order to pay for the extra bananas. In terms of jobs it is merely a statistical issue of how many jobs are lost in the apple orchards here and how many are created in the banana plantations abroad. The banana merchants, unlike the aviation lobbyists, do not try to argue that buying more bananas creates more jobs in the UK.

Two 'moral' issues do arise. One is in relation to the impact of the ever increasing number of tourist flights on climate change. The other is that the number of Brits going abroad, and the trend towards short breaks abroad, is largely caused by the large fiscal subsidy given to aviation by the exemption from fuel duty and VAT (only partially balanced by the air passenger duty). But these issues are not relevant to a discussion of jobs.

The official forecast of the number of tourists coming in and going out, now and in future years, is given in the official air passenger forecasts published in January 2009.³⁸ Data from the key

table is reproduced on the following page. It is assumed that new runways will be built at Heathrow and at Stansted, but 'constrained' means that airport growth is limited to the proposals in the Air Transport White Paper. These figures show the number of passengers passing through airports, so it is necessary to divide by two to get the number of return trips.

A number of points emerge from this table:

- The right hand column shows that in 2005 there were 83 million more UK leisure flights than foreign leisure flights. Thus Brits had 41.5 million more holidays abroad than foreigners came here for pleasure.
- As a result of the Government's plans for the growth in aviation, the situation is due to get worse. In 2015 the UK tourism deficit in terms of numbers of return air passengers is forecast to be 60 million, and by 2030 it will have grown to 88.5 million. (These figures are significantly worse than forecast in November 2007).
- At Heathrow, leisure passengers at present outnumber business passengers by 30 million to 19 million. By 2030, with another runway, the number of business passengers is forecast to rise to 40 million but the number of leisure passengers is forecast to rise to 59 million, with outward bound British tourists outnumbering incoming tourists almost three to one.
- Gatwick maintains its reputation as a bucket-and-spade airport, with six times as many leisure passengers as business passengers. Brits going abroad outnumber foreign tourists coming in by four to one.
- Stansted is also mainly leisure, not business. At present the Stansted tourism deficit in terms of the number of return air passengers is 3 million. Building a second runway would increase the forecast deficit to 8.5 million return passengers. Stansted expansion would, on the same basis of calculation as above, cause the loss of 120,000 UK jobs as a result of people spending their money abroad instead of in the UK³⁹: far, far more than any growth in aviation jobs at an enlarged airport.

CONSTRAINED TERMINAL PASSENGERS BY JOURNEY PURPOSE AND YEAR							
2005	Heathrow		Gatwick		Stansted		National
UK Business	12	24%	3	11%	3	14%	40 20%
UK Leisure	19	40%	20	68%	11	55%	116 57%
Foreign Business	7	15%	1	4%	1	7%	15 7%
Foreign Leisure	11	22%	5	17%	5	25%	33 16%
International- International Transfer	18		3		1		22
Total	66		33		10		225
2015	Heathrow		Gatwick		Stansted		National
UK Business	15	26%	4	11%	5	14%	57 20%
UK Leisure	24	43%	22	66%	19	55%	162 58%
Foreign Business	8	14%	2	5%	2	7%	20 7%
Foreign Leisure	10	17%	6	18%	8	25%	42 15%
International- International Transfer	21		3		2		26
Total	78		37		36		308
2030	Heathrow		Gatwick		Stansted		National
UK Business	26	26%	4	11%	7	13%	91 22%
UK Leisure	44	44%	26	68%	30	56%	234 56%
Foreign Business	14	15%	2	4%	3	6%	32 8%
Foreign Leisure	15	15%	7	17%	13	25%	57 14%
International- International Transfer	34		2		3		39
Total	133		40		56		452

DOUBLING THE EMPLOYMENT DEFICIT

The Government's policy of encouraging the doubling of air travel by 2030, will double the aviation tourism deficit, and could mean the loss of a further 900,000 UK jobs in leisure and recreation.

Against this would need to be set any increase in aviation employment. As mentioned earlier, the Airport Operators Association commissioned a study by York Aviation which found that doubling the number of passengers by 2030 could be achieved with a 39,000 increase in direct airport employment.

Thus the Government policy is likely to lead to a net loss of a further 860,000 UK jobs by 2030, as a result of people spending their money abroad rather than in this country. That is an average loss of 3,500 jobs per month - every month - year in and year out.

Air travel may be a great benefit to the UK in that it enables the British public to travel the world, and to enjoy the sun. Or it may be a great disaster in that it is causing ever increasing climate change damage. But what it does not do is to provide more jobs in this country.

More jobs in Alicante, Antigua and Athens; more jobs in Bangkok, Cancun and Corfu; more jobs in Faro, Ibiza, Larnaca and Orlando; more jobs in Palma, Phuket, and Prague. But fewer jobs in Britain.

HOAX BY THE AVIATION LOBBY

The aviation lobby group Flying Matters put out a press release on 3 December 2008, clearly designed to influence the decision on Heathrow expansion.

It was headed: "**Stopping new runways would cost half a million new jobs**". The text stated that: "*International visitors to the UK from around the world are set to more than double from 32 million last year to 82 million by 2030... The forecast growth in international visitors ... is expected to generate an additional half a million jobs by 2030.*"

These figures appear exaggerated, partly because they include visits by train and ferry. The Department for Transport official forecast (as shown in the table on page 19) is that international business and leisure visits by air will increase from 24 million in 2005 to 44.5 million in 2030.

More important, to count incoming tourists without counting outgoing tourists must be statistical rubbish. The correct procedure should be to look at the net tourist deficit.

By admitting the connection between air travel, tourism and jobs the aviation industry has vindicated the approach taken in this study.

ANNEX: THE REGIONAL IMPACT

The seminal work on the cost of regional tourism deficits was done by Friends of the Earth, and published in August 2005.⁴⁰ Their conclusions are shown in column A of the table below.

NET LOSS OF JOBS DUE TO TOURISM DEFICIT

Region	Tourism deficit 2005 (£ million)	Tourism jobs lost 2005	Jobs at airports 2004	Net loss of jobs, rounded
	A	B	C	D
North East	- 761	40,000	4,100	36,000
North West	- 2,212	116,000	21,800	94,000
York/ Humber	- 1,610	85,000	2,100	83,000
East Midlands	- 1,339	70,000	6,500	64,000
West Midlands	- 1,680	88,000	7,200	81,000
East of England	- 1,913	101,000	20,000	81,000
London and South East	- 2,335	124,000	96,800	27,000
South West	- 1,240	65,000	6,800	58,000
Wales	- 756	40,000	1,800	38,000
Scotland	- 1,291	68,000	12,400	56,000
N. Ireland	- 114	6,000	5,300	1,000
TOTAL	- 15,251	803,000	184,800	620,000

On the same basis that the average pay in the UK tourist industry is £19,000, column B shows the number of tourism jobs which are at present lost to each region as a result of air travel.

The column C shows the direct employment at UK airports in each region, as reported by the Airport Operators Association.⁴¹ Indirect, induced and catalytic employment are excluded: if they were to be included for airports, they would also need to be included for the UK tourist industry (and the UK tourist industry, if it had a lobby anything like as powerful as the aviation industry, would be busy totting up the number of indirect and induced jobs it provides).

Column D (B minus C) shows the net loss of jobs which is suffered at present by each region as a result of aviation. The totals are lower than the figures given on previous pages as this table applies to earlier years.

For every region the aviation tourism deficit causes a substantial net loss of jobs. Far more jobs are created in the hotels, cafes, golf courses etc in Spain, Italy, Greece, Florida etc - and thus lost here - than are provided by UK airports and airlines.

If the Government were to succeed in its aim of more than doubling air traffic by 2030, the situation would get worse. As shown earlier, the aviation tourism deficit would double. Assuming the increase in air travel were to be spread equally over all regions, the number of jobs lost in each region would double.

Column E in the table overleaf shows the extra leisure and recreation jobs that would be lost as a result of the doubling of air travel by 2030. Since doubling means adding the same again, column E is the same as column B above.

It is then necessary to estimate the extra airport jobs that would be created in each region by a doubling of air traffic. If it is assumed that the 21% increase in direct airport employment, as suggested by the Airport Operators Association, occurs proportionately in each region, it is simple

to derive column F as 21% of the figures in column C.

Thus we reach column G, a rough estimate of the net loss of jobs in each region that can be expected as a result of the policy of doubling the amount of air travel.

FUTURE NET LOSS OF JOBS DUE TO INCREASED TOURISM DEFICIT

Region	Extra tourism jobs lost to region by 2030	Extra direct airport jobs created by 2030	Net loss of jobs by 2030, rounded
	E	F	G
North East	40,000	860	39,000
North West	116,000	4,580	111,000
York/Humber	85,000	440	85,000
East Midlands	70,000	1,370	69,000
West Midlands	88,000	1,510	86,000
East of England	101,000	4,200	97,000
London and South East	124,000	20,330	104,000
South West	65,000	1,430	64,000
Wales	40,000	380	40,000
Scotland	68,000	2,600	65,000
N. Ireland	6,000	1,110	5,000

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22

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²⁴ *Framework for the Evaluation of Regeneration Projects and Programmes*. HM Treasury, 1995

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³⁰ United Nations Conference on Trade and Development (UNCTAD), World Investment 2002, Transnational Corporations and Export Competitiveness. September 2002.

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³⁷ Gross pay of employees in hotels, restaurants, recreational, cultural and sporting. ONS. 2008

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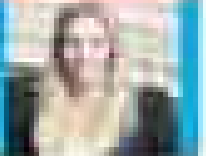
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Opening date
announced for play
area – page 3



Katie, 18, is on her
way to Downing St
– page 7



'WE DIDN'T THINK YOU'D NOTICE AIRCRAFT NOISE'

Heathrow's reason for failure to tell residents about new flightpaths

By [Name] and [Name]

Residents of Bracknell and Slough have been told that Heathrow Airport's new flightpaths will be implemented without their knowledge or consent. The airport's new flightpaths, which will see aircraft flying over the towns, were announced last month by the Civil Aviation Authority (CAA). The airport's new flightpaths will see aircraft flying over the towns, which is a significant change from the current flightpaths. The airport's new flightpaths will see aircraft flying over the towns, which is a significant change from the current flightpaths. The airport's new flightpaths will see aircraft flying over the towns, which is a significant change from the current flightpaths.



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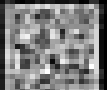
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More local people support Heathrow expansion than oppose it.

"Taking everything you know into account, do you currently support or oppose expanding Heathrow?"



*Polling completed by Populus. In total, 10,006 residents were interviewed. Results were weighted to be demographically representative of all adults in each constituency, and were also weighted by past vote to be politically representative of all adults.



Dear Sir/Madam,

In terms of responding to the Commission in its' preferred format, I would reply as follows, with a summary thought at the close. Please also find attached other related material that I trust you find of benefit and relevance.

Kind regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

AIRPORTS COMMISSION Q1:

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

Concerning all of the proposals, the biggest problems with aviation and its' effect on the population are that of noise and pollution. LHR creates verbal 'noise' about noise reduction/abatement programs, but each and every one of them are near-irrelevant. For example, it offers double glazing for "those most affected", yet over 83% of the population already has it (*1 – at the end) and the program (along with all of them) only stretch to a few hundred metres or so from the airport perimeter. It has yet to comprehend that its' negative impact stretches for at least 15 miles and probably 20 or more. The noise footprint data is wholly inadequate, only measures average noise levels as opposed to peak noise levels, and has no measurement of regular background noise as a differential to aircraft noise to regular background noise. This is especially important to villages and towns that are not currently under flight paths and are quiet in nature, when compared to noisy, urban backgrounds where aircraft noise percentage differential would be much lower.

More relevantly than noise mitigation measures, please explain to local residents within 15-20 miles of an airport: **How do you noise attenuate a garden. Or a school playground. Or a place of worship, or the countryside?** It is simply preposterous, and programs of compensation on offer (only those immediately around the airport) are the equivalent of trying to put a sticking plaster over a volcano.

This also dovetails into the **Airports Commission own Heathrow Airport Extended Northern Runway: Business Case and Sustainability Assessment, item 9.14:**

"Of course, these figures cannot and do not capture the full noise impacts of an expanded Heathrow. For instance, it is well understood that people who live beyond an airport's noise contours can often be irritated and upset by the overflight of planes. And an expanded Heathrow would lead to more planes overflying the capital."

A total of 106,645 individual noise complaints were received by Heathrow on noise and disturbance during the flight path “trial” period of 26/8/2014 to 12/11/2014, peaking at 4,376 for one day in October (26/10/2014). This compares to a few tens of complaints per day that Heathrow would otherwise have received on average. This in itself demonstrates just how angry people are over aircraft noise who were previously unaffected by it.

Given the apoplectic rage and incandescence felt by those not previously affected by aircraft noise, it is crucial to be under no illusion whatsoever about how angry the residents of Ascot and other areas are, which was unwavering throughout the trial. People did not “get used to it”, they hated and resented it more and more as it continued and continued – the quantum and time trajectory of the level of complaints bear perfect testament to this. If this would get rolled out over other, previously unaffected communities like ours, and given how strong other communities also felt about the ‘trial’ (Bagshot, Windlesham, Lightwater, Englefield Green to name a few) it would not be inconceivable for there to be public order issues to the extent of the miners’ strike, or that of the poll tax. People are enraged.

As of today (3/2/15) this has yet to abate, despite LHR’s denials of this. We are a family that have been in Ascot for almost 20 years, and I have worked from home for the past 11 years. From what used to be between 2 and 6 flights overhead per day, we are now not only subjected to 50-60 per day, causing noise sufferance and distress, we (and thousands of residents living to the south west of the airport) are also subject to Heathrow’s lying on the changes of flight patterns. **This is significant for the Commission for two reasons:**

1) The public anger to an increase in flight movements overhead can already be indicated and therefore predicted, given the seismic reactions to the “trials” overhead of the aforementioned towns and villages previously largely unaffected by aircraft movements.

2) Heathrow cannot be trusted

Its’ own history of lying to the public is on record:

1. In 1978, the Terminal 4 public inquiry was assured that no further capacity would be needed.

2. In 1995 the Terminal 5 public inquiry was assured that a 3rd runway would not be needed. Sir John Egan, BAA's Chief Executive, wrote to residents in surrounding boroughs on 16 May 1995 and said "T5 does not call for a third runway".

3. In another letter to residents in 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."

4. In 1999, Sir John said "Our position could not be clearer, nor could it be more formally placed on the record: T5 will not lead to a third runway"

In May 2003, just four short years later, BAA admits publicly that it wants a third runway at Heathrow

5. Heathrow has shown its' mendacity, duplicity and contempt to the British public over and over again for far too long. This isn't a game, it's peoples' lives they are wreaking havoc with. People can't sleep properly, think properly, breathe properly, and move around (transport-wise) properly.

I was at the Airports Commission meeting at Heathrow on 3rd December, indeed I spoke from the floor. I heard CEO Heathrow CEO John Holland-Kaye apologise for Heathrow making previous commitments by a predecessor (which were 'permanent' commitments, and to which planning permission flowing from public enquiry ought to have been conditional upon the commitments made).

Mr. Holland-Kaye also refused to answer the questions put forward repeatedly by John McDonnell MP with respect to the funding of Back Heathrow. He ought to have also asked Mr Holland-Kaye what others have also asked, namely "What proportion of the make-up are employees, their spouses and friends of the aforementioned, and/or will the membership be independently audited and scrutinised etc.?" No positive replies would have been given to this, either. It was disappointing that they were given a platform, given their lack of a genuine mandate under the banner of a "community organisation", something that it patently isn't.

I was also randomly selected to be interviewed as part of the recent Heathrow-commissioned Populus poll of 10,006. All questions unashamedly lead people into cul-de-sacs of 'support Heathrow or UK plc will crash and burn'. Even this poll, with its' slanted questions and biased purple colourings graphic could still only muster 50% support, with 50% either strongly oppose, oppose, or neither. The reality is well over 80% of real people within a 15-mile radius of the Airport are strongly opposed to any expansion. More than half would support the airport being relocated altogether. Yet it would be difficult to hear this, given the asphyxiation of the discussion by Heathrow's blanket media and advertising coverage.

One can only hope the decision-makers aren't as easily lead astray by 'opportunistic bias.'

6. Heathrow controls, manipulates and distorts all information under its' possession. We know this from the data it produces on noise complaints. It lies on the quantum, on the classification, and given the conflict of interest it possesses (by the public having no alternative than to complain to the bully itself), it manipulates this for its own gain

It fails to register all complaints made by individuals that may have been impacted by more than one aircraft in a day. To manipulate the total number of complaints made downwards, it suppresses complainants and complaint numbers of the most impacted people by blocking their email address :

From: postmaster@baa.onmicrosoft.com

Sent: 30 November 2014 14:01:10

To: XXYYZZ

1 attachment (4.5 KB)

Delivery has failed to these recipients or groups:

noise@heathrow.com (noise@heathrow.com)

Delivery not authorized, message refused

Your message wasn't delivered due to an email rule restriction created by the recipient's organization email administrator. Please contact the recipient or the recipient's email administrator to remove the restriction.

For more information about this error see DSN code 5.7.1 in Exchange Online - Office 365.

Diagnostic information for administrators:

Generating server: DB4PR05MB352.eurprd05.prod.outlook.com

noise@heathrow.com

Remote Server returned '550 5.7.1 TRANSPORT.RULES.RejectMessage; the message was rejected by organization policy'

From its' manipulation, it then compares data to which it has a vested interest in, and a conflict of interest in, and matches it against unaudited and unauditable data from its' own source employee organisation 'Back Heathrow'

<http://www.standard.co.uk/news/transport/heathrow-noise-complaints-soar-in-flight-path-test-9992331.html>

Although the above questions of credibility and trust might seem remote from a decision on additional runway capacity, it of course is inextricably linked.

Absolutely nothing Heathrow says can be trusted. There are over two decades of bare-faced lying, manipulating data & information, polls, sham support organisations (eg 'Back Heathrow'), blanket media coverage, advertising, all with the purpose of manipulating reality.

"No matter how big the lie; repeat it often enough and the masses will regard it as truth." Hitler

I therefore urge you to microscopically pick at every syllable of every utterance that Heathrow ever makes. Its' own public record demonstrates that every item of data has to be treated with suspicion, scrutinised, challenged and then held legally accountable for everything they have said and promised.

In short, discount pretty much everything you hear from Heathrow, as they will say and do anything required to be successful in their request to wreck the south-east of England. The population (and Public Enquiries, and no doubt the Airports Commission) are treated with utter contempt (see link below), and lied to time and time again. Enough is enough.

<http://www.telegraph.co.uk/finance/newsbysector/transport/10839726/Heathrow-noise-complainers-being-fussy-claims-board-member.html>

AIRPORTS COMMISSION 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 short-listed options could be improved by revising all previous options put forward and putting the proper weighting on what actually matters to local residents and the population at large –

Environmental – noise, pollution, overall health & well-being. Under every possible measurement, both of Heathrow's proposals are entirely undeliverable on these parameters. It consistently breaches EU emission limits which will become worse should more flights happen at the airport. Two million people will be overflowed with Heathrow's proposals, when compared to 18,000-20,000 at Gatwick. None on 'Boris Island'.

Transport links/overall road movements – Heathrow is set at one of the busiest road network junctions in the country, if not Europe – the M25/M4/A4 area. Widening the M25 will NOT ease congestion within the region, as the massively increased quantity of traffic will still need to use the existing infrastructure other than the proposed M25 widening by Heathrow. This will result in tailbacks of tens of miles and making the entire infrastructure grind to a complete halt for the entire region, though fortunately the last mile will be swifter due to the proposed fanning of the M25, which will be paid for by taxpayers, and recouped by charging the motorist whether or not they are intending to use the airport.

Trains and buses are nice ideas, but the reality is people do and will travel by car, especially if a family is travelling to go on holiday with its' associated luggage – realism is a must on such topics.

Employment/economic – please see the PDF attachment entitled "Airport Jobs – false hopes, cruel hoax" by [REDACTED] PLEASE READ THIS DOCUMENT, IT IS ESSENTIAL. It quickly and concisely blows away the utter bullshit spouted by Heathrow on the subject, and shows how government departments get sucked in and lied to on false premises, usually seduced by the word 'jobs' that NEVER materialise, yet expansion has happened and it is too late. The area around Heathrow does not need more 'jobs', as the area is in near full employment. What it certainly doesn't need is the lying on the subject, the congestion, and noise and airborne pollution that additional flight movements would inevitably bring.

Housing – not only are Heathrow's plans to raze hundreds of houses to the ground, it suggests the requirement of 70,000 additional houses. Well, for another 180,000 'jobs' that it's going to apparently create, it'd need a few more than that. Plus all the extra tourists and temporary workers, don't forget the hotels. Given that the Heathrow area is already at a standstill, plus the local councils cannot cope with the existing outstanding housing requirements, let alone the quantities forecasted, let alone Heathrow expansion, it simply is not deliverable as a realistic proposition on housing alone.

AIRPORTS COMMISSION Q3:

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

Noise level measurements are outmoded and insufficient. Average noise levels do not measure the high level of noise suffering that people endure, morning after morning, afternoon after afternoon, evening after evening, night after night.

Peak noise levels need to be considered, as well as actual quantity of flights. Flight intensity can make you insane, with flight after flight

Noise preferential routes are routinely ignored, presumably to 'soften up' the population for noise bile in the future at all angles from the airport

AIRPORTS COMMISSION Q4:

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

Up to 100 times more people will be affected by expansion at Heathrow compared to Gatwick. Expansion at Heathrow will newly affect over 700,000 people according to the European Commission. At Gatwick, only 18,000 will be newly affected. This in itself shows Heathrow is undeliverable and unsustainable, and will cause untold misery to many hundreds of thousands of people who are not even aware that it will until it is too late.

The full range of health effects have been largely ignored by the Commission.

AIRPORTS COMMISSION Q6:

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

There is no capacity for the full infrastructure and housing requirement within the local area around Heathrow for what would be reasonably required to make the project viable.

AIRPORTS COMMISSION 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, and rejected outright

1) The Airports Commission has sought to balance 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 & weighting on both variables. This is absolutely not the case. A few thousands of people work at the airport or directly benefit from its' employment. A couple of million live around it and are little affected by its' so-called economic benefits, if at all. If it were not there, it would be occupied by other more useful space occupation, such as housing and or light industrial/commercial uses which are far more benefitting the local area. The noise and air pollution affects EVERYBODY, as does the congestion and other effects previously mentioned. Their negative effects are catastrophic, their positive economic benefits are slight, and displaceable by other industries.

2) Expansion of Heathrow will stifle competition. Only five years ago, the Competition Commission, ordered BAA/ Heathrow Airport Limited, to sell Gatwick, Stansted & either Glasgow or Edinburgh airports, amid concerns about its dominance of the market. The proposals to expand Heathrow will once more facilitate Heathrow to dominate the market in the UK.

3. It is simply not the case 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.

4. 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 alike.

5. The need for such a dominant hub as Heathrow would become 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.

6. Heathrow has huge wasted capacity due the overall average used seating capacity. Of all aircraft using the airport, it 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 EACH), the airport would have a very substantial spare capacity to open up other routes and give more flexibility. 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 commercial 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 these very harmful restrictive practices.

AIRPORTS COMMISSION Q8:

Do you have any other comments?

A. 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 therefore better value for money and more deliverable in relation to the additional capacity it generates, at a more economic level, and a more deliverable project overall with 100 times less people affected by it.

B. 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 predominantly foreign owners. Gatwick makes far more sense.

C. Cash is desperately needed for investment elsewhere in the country, especially towards the road and rail networks. The Commission's recommendations could have the implications of severely blighting the lives of up to 2 Million residents. It is conceivable that the noise and pollution generated could impact Article 8 of the ECHR on the right to a private and family life

D. Both Heathrow proposals would severely blight the lives of many hundreds of thousands of residents living to the west of the airport and, for them, this is not worth the marginal economic benefit it would bring to a region of the UK that is already in robust economic health. The ploy to pick the noise contour up and shift it westwards is unjust. How would you like it if someone decided to build a motorway at the bottom of your garden when you have enjoyed your amenity for decades?

E. Item **9.15** from the Heathrow Commission report “The Commission notes the importance the promoter places on offering the local community periods of respite from being overflown. The effect of such respite is only demonstrated in the noise modelling by virtue of its effect on the average. The Commission recognises the importance of such mitigation methods and is interested in views of how to take further account of them.”

And in paragraphs **9.17 / 9.18 / 9.19** the word “Respite – “

Noise impact and the balance of disrupting different communities, and whether indeed it is right to balance noise impact over wider groups of residents.

This is a crucial question, and I would like to answer it in a way that I know could be answered in a similar way by the vast majority of residents that have been impacted by the recent “trial” (and the ongoing nuisance referred to above):

When deciding where to locate in the area (between 1995-1997), we rented a couple of different properties in different areas (within, perhaps, a 25 mile radius of Slough) whilst at the same time, visiting many other towns, villages, and communities in wishing to seek out an area that we felt would be right to settle in and raise a family. We looked at all the local facilities, from schools, shops, arterial & local transport links, parks, recreation & leisure, crime, and so forth. We had friends who lived in Datchet at the time, and one summer evening we were dining al fresco in their back garden, and we had to interrupt our conversation on occasions because of the (I now believe to be) incoming aircraft passing overhead. They explained at the time that they moved there because the house was available, relatively inexpensive, and a decision that was right for them at the time. They have since relocated to the south coast.

Being new to the South-East, we quickly learnt that residing underneath a flight path was a new and critical factor for our consideration, and something that we definitely wanted to avoid. We soon found out that Windsor was another area that was badly affected by flight noise, and therefore another area that was swiftly removed from our available options.

Having found Ascot as part of our reconnaissance, we found that it had the right blend of the above considerations, and we purchased a house for several hundreds of thousands of pounds, nestling in a community that would be ideal to start a family. Excellent neighbours, a good school, all precisely what we had worked so hard to achieve. Nothing was given to either of us, something that our children have also learnt from us since.

Noise “Respite”

If someone has a vested interest in the answer, they must never be allowed to ask the question. A short and amusing, 2-minute video clip demonstrates this very succinctly: <https://www.youtube.com/watch?v=G0ZZJXw4MTA>

Noise “respite” is a disingenuous concept being peddled by Heathrow, seeking to ask distorted and leading questions to communities already living under existing flight paths, as to what they would prefer – the status quo or “respite” from aircraft noise. Their answer will be obvious.

The reality of Heathrow promoting the notion of ‘respite’ is simply the wish for LHR to expand operations wider, and across previously unaffected communities. This cannot be right or fair, and will literally affect hundreds of thousands, if not millions of previously unaffected residents, and the ramifications of this will be far greater than the deep unrest and disquiet that the most recent trial has caused. Communities won’t realise what’s happened until it’s too late, and the outcome I would suggest would be similar in magnitude to that of the Poll Tax demonstrations, given the known level of anger there currently is in the areas surrounding us.

Unless someone purchased their house prior to Heathrow fully opening for civilian use on 31 May 1946, every person living under existing flight paths (estimated at 98%+) have subsequently chosen to do so, by paying their money and taking their choice. Not all areas under the flight path are cheap, either (e.g. Windsor), yet this was a conscious decision that people have made, and they are entitled to have made it.

Also this is **where background noise is greatest** and therefore has there been a metric to measure background noise v aircraft noise...? Our green belts would be spoilt by the noise vomit that LHR currently spews out – false premise

Why should many other communities be affected by noise than are currently? What sense does that make? To spread noise and air pollution everywhere? Is that how sewage works? Or landfill? Think of it in planning terms. Virgin countryside is kept sacrosanct, and existing built up areas and brown field sites are always utilised first, before even considering the utilisation of precious green belt land, which is always highly guarded and treasured, as once it’s gone, it’s gone forever. The blight of what is Heathrow must be heavily regulated and kept tightly reigned in as far as can be achievable. If it were to submit a first-ever planning application now for its initial creation it would surely be immediately refused, given its’ detrimental effect on such a wide array of communities. It cannot be allowed to expand, nor blight incremental communities by the spreading of new flight paths.

People have elected to live where they have of their own free will. It is not right, or fair, or sensible, or rational to spread noise and air pollution wider than is absolutely necessary, most especially under the Heathrow misnomer of noise ‘respite’, which is made to sound idealistic and altruistic, when nothing could be further than the truth.

“Consultation” on the subject in at least some sense has already happened. Despite being barred from any ‘consultation’ during the ‘consultation’ (other than being permitted to ask a question to the panel at public meetings), the facts are that there are in excess of 6,500 signatures wanting an immediate end to flight path “trials” over Ascot, and for it to never be considered as a future overhead flight path :

<https://www.change.org/p/please-sign-this-petition-to-stop-a-switch-of-heathrow-flightpaths-over-ascot>

There were 1,100 angry attendees at Ascot Pavilion on 13 October 2014 (see attached photo, showing under half of the room, to which [REDACTED] the CAA attended), expressing

their complete dissatisfaction over the “trial”, and rigid concern and anger over the future prospect of being considered for future flight path direction overhead.

There were similar petitions created by other communities, such as Englefield Green:

<https://www.change.org/p/heathrow-airport-stop-the-current-trial-flight-routes-over-englefield-green>

and Windlesham, Lightwater and Bagshot:

<https://www.change.org/p/heathrow-complaints-team-3-villages-communities-lightwater-bagshot-and-windlesham-should-be-subject-to-no-more-aircraft-noise-than-they-experienced-before-the-departure-trials-pre-december-2013>

There would undoubtedly have been others by similarly affected communities who felt (and continue to feel) as angry as we do. The lack of communication over the “trials” initially taking place, pales into complete irrelevance when compared to the deep concern and anger we feel that our communities may be considered as future flight path areas, and that we are still being badly affected by increased noise since the conclusion of the “trial”.

F. Airport Commission 3.148 “The delivery risks associated with a new north west runway at Heathrow Airport are substantial, but could be managed. The airport operator would need to work closely with local communities for any expansion at the site to be achievable and the development of effective mechanisms to mitigate or compensate for environmental and community impacts would be crucial. Design, planning and construction risks associated with delivery include airspace redesign, handling the M25 works and relocation of the nearby waste energy plant (see below). These are significant, but are not unusual for an infrastructure scheme of this scale. Therefore, the Commission views 2026 as a realistic runway opening date, and the risks to achievement of the Commission’s assessment that new capacity is needed by 2030 appear low. Many nearby local authorities strongly oppose expansion, as do a number of community organisations, although regional business groups are supportive.”

I would suggest to the Commission that hundreds of thousands of people, and almost every local council are bitterly against both of Heathrow’s expansion models, and a few tens of businesses would prefer it as a matter of course, yet would manage perfectly well without it. The Airport operator **cannot** work closely with local communities on this, as they bitterly oppose it full stop. The proposals are NOT deliverable on noise, airborne pollution, congestion, housing and so forth. **The Commission cannot recommend something that is patently undeliverable**

G. Airport Commission paragraph 9.25 on Heathrow “The Commission notes the potential for optimised flight paths to reduce the total numbers of people affected by the Heathrow Airport Extended Northern Runway scheme. **Additional mitigations, ranging from compensation packages to incentivising quieter fleets (many of which have been proposed by the airport operator itself), have the potential to further mitigate the noise impacts at Heathrow.** The effect of such mitigations would however have to be extremely significant to reduce the scheme’s noise impacts to ADVERSE

As explained above under Question 1, how do you noise attenuate a garden. Or a school playground. Or a place of worship, or the countryside?

Has the Commission thought that the population might want to open a window or two in their house (how dare they!), and outside of the winter months, God forbid, sit in their gardens?! Some people work outside as well.

The commission has to think away from such preposterous ideas of mitigation measures being somehow leveraging on a solution to the problems created by Heathrow. Whilst fractionally better than nothing at all, they are largely irrelevant for over 99% of the affected population within the Heathrow affected area of 15-20 miles radius of it.

Quieter aircraft – If Mike Tyson offers to punch you at 70% strength, should you be grateful ???

H. One major aim must be to use the existing capacities as efficiently as possible to increase the throughput and work against the growing delays. Better sequencing algorithms, fuller planes, reduction of 27 per day destination flights, freeing up grandfather rights to take-off/landing slots

I. There is no calculation in the Commission reports for the blight of all homes and populations to the south west, west, and north west of Heathrow Airport that are being impacted by the proposals. House prices are going to be impacted by at least 10% (see the attachment from a local estate agent) If compensation were to be paid to ALL those blighted by noise (and why shouldn't it be?) at least 10% value of at least 500,000 homes @ an average price of at least £250,000 each = £12,500,000,000.

Of course, 10% blight price is conservative. And why should we only be compensated for the absolute value in house price depreciation? Why not for the introduction of being under a flight path (notwithstanding Heathrow lying on this) and either having to move or have to suffer it? That should be at least another 10% MINIMUM of house price value in the amenity loss, so the figure above would need to be doubled at least to properly compensate the effect the airport will have on the quality of life of people, making this an eye-watering £25,000,000,000. THIS IS ANOTHER REASON WHY HEATHROW'S PROPOSALS ARE UNSUSTAINABLE AND UNVIABLE.

J. I am not entirely convinced that aviation capacity is required at all, especially when compared to the current infrastructure on roads and rail. As this article makes clear we are not even close to having an aviation capacity crisis in the UK. :

<http://www.politics.co.uk/comment-analysis/2014/11/12/comment-how-we-ve-been-conned-into-believing-the-uk-has-an-a>

(There was a strong irony of two “Expand Heathrow” adverts even on this linked page !

As it mentions, “of the ten busiest airports in the country, just one (Heathrow) is ‘technically’ full. The rest are massively underused. In 2012, Stansted had 47% of all its runway slots left empty, while Luton airport had 51% unused.

Even Gatwick, which is currently fighting with Heathrow for the right to build more runways, was 12% underused.

The aviation lobby itself admits there is no current shortage of runways in the UK, preferring instead to predict that we will face a theoretical shortage at some point in the future.

Compare this to our domestic public transport network where commuters are already routinely left without seats or even room to breathe and you begin to see the scale of the confidence trick being played on us.”

K. Heathrow Airport is quite simply built in the wrong place. If it were to apply for planning permission now for its' existing operations, it would be emphatically rejected out of hand given the environmental impacts it has on the local population, including, but not limited to, on noise, pollution, vehicular movements and so forth. It is way beyond time for Heathrow to be informed that no further expansion will EVER be permitted, something that it itself requested as a condition of Terminal 5 being permitted. This can then be clear and unequivocal. Should it then feel the need to expand in the future, it knows that it will need to do what every other business does when it expands beyond its' premises – relocates. This then can be where its' impact on the local population, wherever this might be, will lead to a paradigm shift towards a small fraction of nuisance/disturbance/pollution etc. of what it does at the moment.

Heathrow knows that the local (and wider) population (eg a 15-20 mile radius of the airport) do not support expansion, despite the politburo propaganda it continues to spew out.

L. The displacement of the noise contour westwards to reduce the level of overall noise suffered by the population is simply a cynical ploy in which to make both of LHR's proposals look more appealing. In what way, shape or form is this justified to the towns and villages that lie to the west of the airport, to which the combined populations run into the tens of hundreds of thousands?

Part of the reason Heathrow can claim this is that it has based its noise measurements on the outdated 57 decibel contour. People living well outside this contour are disturbed by noise and this is not taken account of in Heathrow's predictions.

As Heathrow itself has pointed out, The UK government currently uses the “57 decibel summer Leq contour”, giving an “average noise measure” resulting from operations between 7am and 11pm across the summer period when airports are likely to be at their busiest. Past Government research concluded that 57 decibels marks the threshold above which ‘significant community annoyance’ begins. Heathrow acknowledges that this does not mean that no-one outside of this contour will consider themselves annoyed by aircraft noise. **I resolutely concur with Heathrow's own statement.**

The measurement is deeply flawed for several reasons. It omits:

- 1) peak level noise (electing to work on average numbers),
- 2) early and later flights (that are far more likely to cause noise annoyance)
- 3) Heathrow acknowledges that this does not mean that no-one outside of this contour will consider themselves annoyed by aircraft noise.
- 4) noise travels further and unabated on clear, cool wintery conditions where other background noises are most likely to be at their minimum levels.

Lden is the preferred European measure, and stands for the level of noise during the day, evening and night. The measurement includes an additional weighting for noise during the evening and at night when it can be more disturbing. Lden measures from transport and industry above an average level of 55 decibels over a 24 hour period are known as the '55dB Lden'. EU research indicates that between 10-28% of the population exposed to noise levels greater than 55dB Lden contours could be 'highly annoyed'. . **I resolutely concur with the EU's statement, and would expect the percentage to increase were it applied to people who are not yet exposed to aircraft noise and find themselves becoming so.**

M. I would welcome any measures which cut noise - steeper descents and take-offs; less noisy planes, fuller aircraft to free up other slots etc. These measures assist fractionally but the real benefit comes from less aircraft movements at all

N. Manchester Metropolitan University Centre for Air Transport and the Environment quoted:

"Although generally aircraft have got quieter, growth in aircraft size and traffic volume has resulted in an increasing number of noisy events and this is emerging as a new challenge at some airports. Forecasts, also suggest that the anticipated rate of fleet replacement and technological improvement will not keep pace with future traffic growth, especially at rapidly growing airports."

Research suggests that changing expectation of quality of life amongst these people, growing democratisation, increasing home ownership and a number of other non acoustic factors will lead to increasing opposition to aircraft noise in the future. This is important because despite significant efforts by the industry, the lives of tens of millions of Europeans, and hundreds of millions of people across the World are adversely affected on a daily basis by aircraft noise

Sleep disturbance caused by night flying is of particular concern and this has given rise to night noise restrictions at airports across the World

Conventionally, research into aircraft noise and regulatory drivers for technological improvement have confined themselves almost exclusively to reducing noise exposure. It is however becoming increasingly clear that communities and individuals respond very differently and exhibit differing levels of tolerance to noise depending upon a wide variety of social, economic and cultural factors (Hume et al. 2004). Equally, the way in which noise impacts upon communities will vary according to a variety of issues (such as weather conditions) that affect lifestyle. These relationships need to be understood if effective noise control programmes are to be developed

Given that the nature of aircraft operations, the number of people exposed to noise, perceived levels of community disturbance and other factors at each airport are unique, it is accepted that the that the most appropriate noise management solutions are found through consultation with all aviation stakeholders but in particular communities exposed to the noise. The process of consultation does however require a clear understanding of how noise impacts upon people's lives. Current measures of noise exposure (measured in terms of noise energy) have only limited value in the airport community dialogue. These pressures are leading to a renewed interest in the metrics and methods used to define, assess and manage aircraft noise.

<http://www.cate.mmu.ac.uk/research-themes/environmental-capacity-at-airports/noise/>

O. Spokeswoman [REDACTED] said: "The Commission's independent appraisal has made it clear that Heathrow could not only deliver over 41,000 more jobs for local residents by 2030 with expansion, but also ensure reduced levels of noise for those living near the airport.

"It says that 'When compared to current noise levels, fewer people are predicted to be affected across all metrics.'

"Heathrow expansion would also result in a 'positive impact' on night flight noise in the future, according to the Commission, thanks to improvements to aircraft technology and the capability of early morning arrivals to land further to the west."

Well, guess what, there are people that live to the west of the airport !! Yes, they may be less densely populated, and that is precisely why many chose to live there !! The cynical ploy of Heathrow in trying to pick the noise contour up and displace it westwards is nothing other than a cynical ploy to make it appear that a 3rd runway would be less damaging overall.

BUT the crucial difference is that people that live to the west of the airport (and south-west and north west) did so so not be underneath a flight path !! And the people close to and to the east of, the airport knew they were buying a house that was impacted by flight path (and ground) noise. !!! It was THEIR FREE CHOICE, THEIR DECISION.

P. 725,000 live under the Heathrow flight paths and London is already the most overflown city in Europe

Number of people affected by over 55Lden:

AIRPORT	AFFECTED	AIRPORT	AFFECTED
London Heathrow	725,000	Manchester	94,000
Frankfurt	238,700	Brussels	49,700
Paris de Gaulle	170,000	Amsterdam	43,700
Paris Orly	110,000	Madrid	43,300
Gatwick	11,900	Stansted	9,400

The figures are the latest from the European Commission (2006). They mean that 28% of all people impacted by aircraft noise across Europe live under the Heathrow flight paths. The actual number would rise to well over a million if a third runway was built.

Q. At least 750 homes would be demolished. We need more homes, not less. This is the bare minimum that would be required. Most people believe it will be many more because the current plans leave too many people uncomfortably close to the new runway. Lives would be disturbed and communities destroyed.

R. A third runway is not essential for London economy. More business people and tourists fly into London each year than fly to any other city in the world. Most have no preference which airport they use. This trend will continue whether or not a third runway is built at Heathrow. Heathrow is the best known, but that is more reason for other airports to become known & utilised.

S. Hundreds of thousands would be under a flight path for the first time. A new runway inevitably means new flight paths. Many people in West London and Berkshire will get planes for the first time, for as many as 13 hours every day.

T. Heathrow is the only major UK airport where air pollution levels remain stubbornly above EU legal limits. The EU's Directive on Air Pollution has set legal limits which now need to be met by 2020. In the Heathrow area the pollution comes from planes but also from the traffic on the nearby motorways. Colin Matthews, the CEO of Heathrow until July 2014, has said that traffic on the M4 in the vicinity of the airport would need to be 'diesel-free' to allow for a third runway to be built. This will not be happening.

U. Traffic will grind to a halt. The M25 between junctions 14 and 15 (Heathrow to the M4) is the busiest section of motorway in UK. Heathrow has admitted that only some form of congestion charge could keep levels to a manageable level if a third runway was built.

V. 8. It would cause big climate problems. A third runway in itself would not bust the Government's targets to cut CO2 emissions but it would mean that the planes using the country's other airports would need to be strictly controlled.

W. It will face massive opposition. There would be opposition not just from local residents but also from environmentalists, many local authorities, politicians from all parties as well as some businesses and trade unions. When the last Government tried to build a third runway, it was defeated by this coalition. Huge rallies attended by thousands of local people, cross-party backing, eye-catching direct action, all backed up by sound arguments saw off the plans for a third runway.
The public will not let it happen anyhow.

X. There are alternatives. Other airports should have been considered more carefully where the impacts of expansion would be less. There is also scope for a switch to rail. Around 20% of the flights currently using Heathrow are domestic or to near-Europe. And 45% of air trips within Europe are 500 kilometres or less in length. If trains were fast and more affordable, a number of people would switch from air to rail.

Y. From Heathrow Annual Report and financial statements for the year ended 31/12/13:

"The company welcomes the inclusion of Heathrow in the shortlist and has begun working with local authorities, communities and other stakeholders, to refine the runway option, including public consultation."

Simply informing people of how they will be compensated if 3rd runway goes ahead, and public meetings that are stifled in their contribution (you are only allowed to ask questions), that are nevertheless 100% four-square diametrically opposed to expansion or against changing any of the existing flightpaths, is hardly anything of the kind. It simply ticks a few boxes for the Commission to make it look like they are doing what they're supposed to be doing. It takes NO ACCOUNT of the way people feel about the proposals, and I am grateful for this opportunity to inform the Commission otherwise.

"(Heathrow has) an average load factor of 76.4% (2012: 75.6%)"

The number is slightly up, yet shows that, on average, almost a quarter of seats are empty on every plane.

“With a north west third runway there will be 15% fewer people within Heathrow’s noise footprint in 2030 than today. This is due to its positioning further from London, quieter new generation aircraft and changes in operating procedures.”

New runways mean more flightpaths which mean MORE people affected by the noise, not less. Ask the populations of Ascot, Bagshot.... Etc whether they agree with LHR on this statement. It is quite simply a ridiculous claim. And cynical for Heathrow to wish to move the noise foot print to the west in an attempt to “improve the numbers”, whilst showing complete contempt for the populations that would be directly impacted by such a move.

“Heathrow has begun working with local authorities, communities and other stakeholders to refine the runway option, including a first public consultation which started on 3 February.”

With respect, this is utter rubbish. If you see the photos from Ascot, Egham/Staines and Bagshot, the rooms were filled with very angry people that did not want to engage in the process at all, and were there to express their anger about both the flight path “trials” that were being conducted, and to voice their opposition to a 3rd runway being considered.

Separately, London Borough of Hounslow council have called for “No third runway, better protection from noise for our residents and schools and also better public transport to and from the airport..” They have started their own petition – 741 at the time of writing:

<http://petitions.hounslow.gov.uk/Betternotbigger/>

Z. “We didn’t think you’d notice” The Bracknell News front cover, quoting Heathrow’s representatives at the Bagshot meeting when questioned over the flight path trial noise being experienced (see attached front cover) It shows just how out of touch Heathrow are with the population that surrounds them.

AA. By [REDACTED], 3rd September 2014 (Prime Economics) “Why would you choose to fly a quarter of a million more planes every year over one of the world’s most densely populated cities when instead you can fly them mostly over fields? Why tunnel part of the busiest motorway in Europe – the M25 - causing serious traffic disruption, when you can build on land already set aside for expansion? The choice is an obvious one. Expand the best and only deliverable option – Gatwick – and create a market that serves everyone.”

SUMMARY

Given that Heathrow Airport is the worst pollutant, the most noisy, the most complained about, the most adversely-leveraging organisation known against humans’ quality of life, the most untrusted/least reliable and the most wrongly-positioned company known, is Heathrow Airport the most detested, loathed and abhorrent organisation in United Kingdom history?”

Heathrow Airport has always acted as if it’s omnipotent and omniscient, while government entities genuflect in deference to it and the aviation industry, itself dictating aviation policy, abdicating in its’ responsibility on this occasion (and with no disrespect intended) to appoint

a Commission into what it had already stated by the current Prime Minister shortly before becoming so (even Heathrow itself) :

“The third runway at Heathrow is not going ahead, no ifs, no buts,” David Cameron
19/10/2009

(*1) Noise attenuation programs

Domestic Energy Fact Find, Department of Energy & Climate Change in partnership with BRE (Building Research Establishment) Group., 2005 report stated that 83% of households already have some or full double glazing anyhow, and on a rising trajectory so this figure will undoubtedly be higher than that now

<https://www.bre.co.uk/filelibrary/pdf/rpts/countryfactfile2007.pdf>