



Sir Howard Davies,
Chair,
Airports Commission,
PO Box 1492,
Woking,
SURREY GU22 2QR.

2nd February 2015

Dear Sir Howard,

AIRPORTS COMMISSION CONSULTATION.

I am writing to send you comments and views on the Airports Commission's Consultation Document dated November 2014. My intention is to focus on public safety issues as set out below. There are of course many other matters to consider, which HACAN have admirably covered in their various submissions and which I fully support.

In this letter therefore I want to concentrate on your Question 4 (Q3 in some sections), namely *'In your view are there any relevant factors that have not been fully addressed by the Commission to date?'*

The key relevant factor, which does not seem to have been properly addressed so far, is as follows. **What is the additional percentage risk of air accidents if either the Heathrow North West Runway with 260,000 more flights per annum or the Heathrow Hub with 220 - 240,000 more flights per annum is implemented over and above the current 480,000 flights per annum?** This is the core question which I asked you in my letter of 16th July 2013 (copy attached) to address with the Civil Aviation Authority and others, to which to date I have had no answers. To contend that there are no additional risks of increasing flight numbers up to 700,000 - 740,000 per annum cannot be credible, and I believe the public and the Government are entitled to know what those risks are in any evaluation of the two Heathrow proposals.

I would also maintain that your Consultation does not satisfactorily address public safety issues, namely in stating that all three proposals are *'not considered to present any significant safety and security risks'* (Para's 3.46, 3.99 and 3.148). [The same phrase is used for all three proposals.] However this is not what the Civil Aviation Authority, who you have asked for advice on safety issues, are saying as is clear from their Report: 'Operational Efficiency: Preliminary Safety Review' (14).

It is obvious the CAA has reservations about both Heathrow proposals, in particular regarding the safety impact on RAF Northolt, together with other issues. They state that whilst *'no outright showstoppers have been identified at this stage.....there are a number of risks that have impacts on cost, capacity or the environment'* (Para 2.45). Para 2.47 states that *'For both Heathrow options Missed Approach Procedures remain a major design issue and a*

major challenge to deliver a safe and operationally effective environment due to the close proximity of RAF Northolt and its runway axis'. The CAA has additional reservations about the Heathrow Hub proposal in regard to missed approaches and departures as well as the need for 'a human factor assessment' (Para 2.48). The Table on page 15 of their Report - Summary of Key Safety Issues - reiterates these points. [The CAA seem to be more satisfied with the Gatwick option (Para 2.46).] The view in your Consultation that there are not '....any significant safety risks etc...' does not seem to quite tally with these CAA statements and therefore should be further addressed.

Their Report states these issues will be dealt with once planning consent has been obtained or later. Whilst I appreciate this may be the CAA's normal mode of working, I would suggest this is not really good enough for your own decision making process, which should include a fuller safety review. If any of the three proposals is found to be inherently unsafe or increases the risk of air or ground accident then this surely should be a major factor in your ultimate recommendation.

There is of course also a danger that if this process is not undertaken now, and an option is selected - say Heathrow Hub - then the CAA when undertaking a safety review will be under severe pressure to give clearance that such a project is safe and / or give suitable mitigations for operational flights. Given the substantial amounts of money that would have been expended by that time, such a dispensation might be difficult to resist, but still essentially unsafe. If this work is not properly carried out and one of the Heathrow options is recommended (and constructed) and an accident subsequently takes place over Central London with substantial loss of life (held to be due ultimately to this decision), then the consequences would be obvious.

To conclude in answer to Question 4 in the Consultation, the Airports Commission needs to:

- (1) Give a clear indication of the additional air accident risk of the Heathrow options,**
- (2) More adequately reflect the CAA's present views in your final report and**
- (3) Ask the CAA to undertake more detailed work on safety issues *now* before issuing your final report.**

If these issues are properly addressed it may be possible to avoid potential judicial reviews.

Given the far lower number of residents under the flight paths at Gatwick than the Heathrow options and that it can meet your air traffic criteria, I would suggest that Gatwick must be the logical recommendation.

I should be most grateful if you could kindly acknowledge safe receipt.

Yours sincerely,

[Redacted signature]

Copies to: Rt Hon David Cameron.MP, Prime Minister.
Rt Hon Patrick Mcloughlin MP, Secretary of State for Transport,
Rt Hon Vince Cable MP for Twickenham, Secretary of State for Business,
Innovation and Skills,
Rt Hon Justine Greening MP for Putney, Secretary of State for International
Development,
Mary MacCleod, MP for Brentford and Isleworth,
Zac Goldsmith, MP for Richmond Park,
Councillor Paul Lynch, London Borough of Hounslow.
Jon Stewart Esq., HACAN.



Sir Howard Davies,
Chair,
Airports Commission,
6th Floor, Sanctuary Buildings,
20, Great Smith Street,
LONDON SW1P 3BT.

16th July 2013

Dear Sir Howard,

REVIEW OF UK AIRPORT POLICY AND CAPACITY.

I am writing to express views I share with many other local residents on the debate regarding future airport policy and capacity for London and the South East and in particular on any proposals to deal with capacity issues by expanding Heathrow Airport. My wife and I are residents under the northern flight path.

The case against Heathrow

No doubt others have expressed strong concerns about the third runway and other expansion options regarding environmental factors, noise, CO2 and other emissions, health hazards, local traffic consequences, air traffic management and not least the CPO land take, all of which are most important. However my prime concern is public safety in Greater London and I would strongly suggest that this should also be a serious concern of the Airports Commission.

Some 70% of incoming flights to Heathrow approach westwards over Central and West London due to the prevailing wind. There is a strong probability that, sooner or later, an aircraft will crash somewhere on London, possibly on Central London. This very nearly happened on 17th January 2008 when BA 0038 crash landed just within the Heathrow perimeter fence (due simply to ice blockage in fuel lines). Thirty seconds earlier that could have been on Hounslow Town Centre, five minutes before on Richmond Town Centre (it was on the southern flight path) and ten to fifteen minutes beforehand, it would have crashed on Central London. I am aware that the emergency services are very concerned at this possibility.

The recent forced landing of an Airbus A319 on 24th May further emphasizes this point. What appeared to have been a relatively routine maintenance error resulted in a major emergency. After takeoff to Oslo, Flight BA 762 had to circle back over London, (on I believe the northern flight-path) to land with one engine visibly on fire - surely not a satisfactory outcome over densely populated areas. Problems with the Boeing 787 (Dreamliner), including the recent fire at Heathrow, give further cause for concern.

Politicians, quite understandably, do not want to publicly admit such concerns for fear of being branded alarmist, but this 'elephant in the room' is still there. Many people,

particularly in West London, who live under the flight paths, are very worried. No other major western European city, with London's number of landing aircraft, has flight paths over its central area. I suspect that our Mayor is also seriously concerned.

I would strongly suggest that the Airports Commission should require Heathrow Ltd, The Department of Transport, the CAA and the AAIB to publish evidence on the additional percentage risk of an air accident happening if a third runway is constructed with the resultant increase of some additional 220,000 flights (2008 proposals) to over 700,000 flights per annum. With this number of flights, will the increased risk be 46.25% (a simple extrapolation) or some other figure? I asked this question in 2008, following the Department of Transport's earlier consultation, but received no satisfactory answer. Further proposals for a fourth runway or even a new runway to the south west of the Airport do nothing to mitigate this concern.

Likewise if, finally, 'mixed mode' proposals are adopted (and present flight alternation paths abandoned), what will be the increased risk of accidents to planes flying parallel flight paths, possibly only one mile apart? Do we really want two Airbus A 380's - each potentially capable of carrying 600 - 700 people - flying nearby one another over London on a wet November evening in stormy conditions (possibly coupled with an air traffic control systems malfunction)? Any answer of 'no additional risk' is simply not credible, with or without the increased number of flights made possible by an additional third or even fourth runway. I am aware that Heathrow have recently said they do not wish to pursue 'mixed mode' operations but they have changed their views frequently and may do so again.

Public safety must be the primary reason why airport expansion should not even be considered at Heathrow and why in the longer term Heathrow should be closed and relocated. This must surely outweigh any 'prestige' or hub argument for a bigger Heathrow. [My fear is that such a decision will not be taken until *after* a major air disaster has sadly taken place.] The Airports Commission surely has a key role in advising government on these public safety issues.

Thames Estuary / Stansted / Gatwick?

If the case for major expansion is to be made, then surely this should take place at either a new airport in the Thames Estuary or, perhaps quicker and cheaper, at an expanded Stansted Airport with a Crossrail 1 or 2 connection. The latter would obviously not be popular with the local population, but ultimately it must be a much safer solution if a major crash takes place. For example, when the crash of a Korean cargo plane sadly took place near Stansted no one was killed on the ground. Additional capacity at Gatwick is also an option.

The ultimate closure of Heathrow would obviously have significant implications for the airlines and support businesses, although jobs would not be lost, but relocated. For any option a new town the size of Milton Keynes would probably be required, although this might entail the expansion of say Bishop's Stortford in the case of Stansted.

The site of Heathrow could become a major new garden suburb, very well connected by public transport, as proposed by the Town and Country Planning Association (you

will no doubt have seen Graeme Bell's 'Heathrow Garden City' TCPA paper published in May 2012). This envisages housing for some 30,000 people and employment for some 80,000, as well as major educational facilities at the current Terminal 5, although it is possible the overall site could take even greater amounts of housing. The Mayor has recently suggested the area could support a new suburb of some 200-250,000 (100,000 homes) roughly the size of a London Borough. Significant contributions to London's dire housing problems would thus be made by creating both a new 'Milton Keynes' and Heathrow Garden City. Further studies would be required, but the task is not insurmountable. Milton Keynes was built relatively quickly.

The Thames Estuary airport option - whether an island or partially on land - although obviously more expensive, has wider and more long term objectives, namely the creation of a new Thames Barrage (almost certainly needed in the longer term later this century) with tidal hydro-electricity, rail (HS1 and Crossrail links) and motorway connections (linking Kent and Essex). A number of proposals are already on the table, but clearly major civil engineering, environmental, economic, fiscal, hydro-graphic, logistical and transport studies will need to be undertaken. It would be a longer term solution on a scale worthy of Brunel or Bazalgette.

Gatwick, often overlooked in this equation, has the capacity for at least one extra runway, which if combined with a substantially expanded Stansted would give the advantage of runways to the north and south of London with no flight paths over the city.

Whatever is finally decided - on the basis that Heathrow's location is ultimately unsafe as a long term solution for London (rather than the 'new hub' argument) - it is clear that any decision must involve a more holistic view of transport planning, including the role of the high speed rail network for internal and international journeys, together with air travel requirements. The whole transport network must be evaluated as part of this process. This is a critical point which the Airports Commission will no doubt take on board in its Intermediate and Final Reports to Government, as you make very clear in your Foreword to the Airports Commission's Guidance Document.

A better not bigger Heathrow.

In the shorter term much can be done by the better management of Heathrow, which may involve greater governmental direction of Heathrow Ltd. At the present time much of what happens at Heathrow is about the value of 'slots' to the airlines. Do we really need 60 flights to Paris a day with available Eurostar services? If the hub argument is so strong in order to promote business travel to China / India etc., then surely more capacity can be released by directing leisure flights to London's other airports. Better rail connections will play their part and in particular Crossrail 1 could help, even more so if it was connected to Stansted as suggested by Michael Schabas. Also may I suggest that the Commission looks at Manston - Kent International Airport, capable of taking Boeing 747s - in East Kent for freight and other services.

The arguments put forward by lobbyists on behalf of the Heathrow Ltd, BA (IAG), the CBI and London First etc., should be treated with great caution given their vested

interests. Expansion at Heathrow proposal is really about the profits of a largely foreign owned company, affected by competition from other UK airports and Eurostar (11million passengers).

Conclusion

I believe there are two conclusions which should guide the Airports Commission in formulating their reports on airport capacity, both related to the paramount need for public safety.

1. It must make no sense whatsoever to increase the risk of air accidents by expanding Heathrow's capacity through a third or even fourth runway and / or mixed mode operations.
2. Ultimately the risk of an air accident over Central London must be substantially reduced through the relocation of Heathrow to a safer position. It is recognized that this is a longer term solution, hopefully enacted before the law of averages results in a major crash taking place. At least if the decision has been taken to relocate, no politician or civil servant could be found negligent.

I and others would welcome the opportunity to discuss these views with you and the Commission further. In the meantime I should be most grateful if you could kindly acknowledge safe receipt of this letter.

Yours sincerely,

[Redacted Signature]