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Sir Howard Davies
Airports Commission Consultation
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Dear Sir Howard

Re: Airports Commission Consultation: Increasing the UK's long-term aviation capacity

My comments on the Consultation Document issued for comment in November 2014 are as follows.

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

The Commission's consultation document states that the Gatwick proposal is half the cost of Heathrow Airport's proposal and delivers better value for money.

Gatwick has the potential to deliver the infrastructure needed, whereas the Thames Valley and London Boroughs do not.

Pollution around Heathrow already exceeds WHO limits, whereas that is not so at Gatwick.

The expansion of Heathrow will stifle competition and provides no operational resilience when there are difficulties at the airport or on the transportation links to it. Heathrow's road network is already heavily congested and road works to expand capacity or rebuild the elevated section at Hammersmith will cause more delays that will last for years.

Given these facts, it is clear that the expansion of Gatwick is the preferred option.

The expansion of Heathrow would not deliver the outcomes required and would cost the UK economy additional billions of pounds that is urgently needed elsewhere. It would also be a 'stopgap' measure. Heathrow has already acknowledged that it will need runways

Noise and air pollution

Heathrow is already the noisiest airport in the United Kingdom and Europe and pollution levels at Junction 13 on the M25, Wraysbury, and locally within Windsor exceed the WHO and European limits. This is evidenced by the oily film that we find on vehicles, garden plants and hard paved surfaces here in Windsor. It is evident that current operations do not deliver mitigation measures that are effective.

The Consultation document describes the Heathrow options as having 'significantly adverse noise and air pollution' outcomes, without mitigation'.

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The Commission's findings that these are balanced by the economic benefits and the outcome is therefore 'neutral' are perverse. The Commission has underestimated the extent and quantum of the noise and air pollution that the proposed expansion of Heathrow would bring to those already affected and to many thousands more, who have not, thus far, experienced these pollutions.

It appears to have been using criteria for assessing noise nuisance that are over 30 years old, the 1982 ANIS study principles, which still apply to UK aviation noise matters. It is widely acknowledged that the frequency of noise disturbance is as important as the quantum and this has been acknowledged by Parliament. Unfortunately, the government has failed to deliver an accepted basis for measuring noise nuisance, following its rejection of the ANASE report.

The importance of a proper period of relief from incessant disturbance from aircraft relief is currently accepted. In each of the two proposals, the relief periods have been at least halved from the current expectation and many cases are virtually non-existent.

For these reasons, the limit of 480,000 air traffic movements at Heathrow should be retained until such a noise study is completed and adopted.

North West Runway Proposal

The new North West Runway Proposal is sited 1045 metres north of the existing North Runway and extends 1500 metres west of it. Planes using the runway will be approximately 280 feet lower and therefore far noisier, as they pass over Windsor, Eton and Datchet, to land at the airport.

Planes taking off on the proposed North West runway will not have reached a sufficient height to allow them to diverge from the straight out flight path and will therefore fly directly over Windsor and Eton.

The new runway and the existing North runway will be used concurrently on a daily basis and the number of flights could rise by 54% or more. Those living under and between the flight paths to two runways, will have prolonged periods in which planes will be passing overhead every 30 to 40 seconds, with increased noise levels.

The flight path of planes landing on the proposed North West runway will be just 200 metres to the north of Windsor Castle and just 900 feet above it. The Castle will become unsuitable as a permanent residence for the Monarch and unfit for the State ceremonial role that it currently performs.

Extended (Heathrow Hub) Proposal

The western end for landing will be 2750 metres nearer to Datchet and Windsor. Planes will therefore be approximately 480 feet lower, as they pass over these residential areas, to land at the airport.

Planes taking off will start 3650 m nearer to Datchet and Windsor and aircraft will be unable to attain sufficient altitude to diverge from the straight out departure before they pass over these areas.

As a result, the Extended Runway (Heathrow Hub) proposal will deliver noise levels that rise to fourfold the present level in Datchet and double that in Windsor.

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This will destroy Datchet as a desirable place to live and has the potential to badly damage the thriving tourist economy of Windsor and its castle.

Aircraft departing LHR have to attain at least 500ft before diverging from the extended centre line of any runway. Departures from the extended 27R would also have to satisfy the performance criteria to cover a subsequent power loss to one of its engines and the subsequent much reduced rate of climb that would ensue. These complicated calculations take many factors into consideration. Windsor, and therefore Windsor Castle, is situated on raised ground meaning that they are likely to become a hazard for such problem departures.

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 Gatwick Option needs to be developed to better serve the 'hub' mode of operations that appears to be presently favoured by British Airways. This will facilitate the development of airline alliances that can compete with Heathrow.

New York has a thriving economy and is served by three airports. The Commission should examine how this works and what lessons may be applied to the needs of the UK.

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

The use of average noise level measurements does not acknowledge the high levels of noise experienced daily and does not recognise the number of people affected by the totally unacceptable high levels of noise generated by each proposal.

The Commission should report the number of people will be affected by more the 250 to 300 flights at N70 around Colnbrook, Datchet, Horton and Cranford, as this number is probably substantial, as will be the disturbance to their lives.

The Commission appears to have no evidence that emissions trading will be effective in dealing with the adverse environmental impact of the two proposed schemes for expanding capacity at Heathrow. It is essential that they should do so and not simply be a financial penalty that is costed into the ticket price and which allows the pollution to continue.

The Commission should seek a far more rigorous assessment of the air pollution issues and proposed solutions.

The Commission should not consider expansion of Heathrow unless it can be demonstrated that air pollution is kept within the World Health Organisation recommendations.

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

Safety is a major concern and needs much closer attention by the Commission

The Commission does not appear to have addressed the concerns of the Terminal Five Planning Inspector, Roy Vandermeer, who determined that:
The risk of a major air crash involving many casualties on the ground raises questions about the future role of Heathrow. From this and other public safety points of view, development at either Gatwick or Stansted would be preferable to that at Heathrow since approaches to both do not pass over extensive, built up areas.

There have been several incidents since then that might have resulted in a crash within the densely occupied areas that surround Heathrow. The proposed increase in air traffic movements from 480,000 to 730,000 increases the risk of a disaster occurring over the residential areas surrounding the airport.

The substantial increase in aircraft movements and the close proximity of the North West Runway proposal to Windsor and its castle, together with the likelihood that aircraft taking off will follow a straight out flight path as they pass over Windsor, place at risk significant populations and important assets that have hitherto been as much less risk.

Terrorist threats might be better facilitated by either of the two Heathrow options under consideration.

The public need to understand why the concerns of the Terminal 5 Planning Inspector have been set aside.

The two proposals to expand Heathrow involve a dramatic increase in the number of flights using the airport. The disposition of the runways means that flights will be operating in close proximity. Whereas, at present, arrivals and take offs use different ends of the airport, in future two runways will be used simultaneously for take offs or for landings. The Extended Runway proposal also has flights landing and taking off on the same runway.

The London Airspace Management Programme (LAMP) is currently facing problems coping with current aviation activity. This proposed substantial increase in capacity at Heathrow is therefore a major issue.

It is essential that Air Traffic Control should give independent advice on the two proposals and confirm that each can operate safely and deliver the capacity required. The airlines and Heathrow Airport own 46% of NATS, so it may be difficult to secure an unbiased opinion from them of the consequences of expanding operations at Heathrow.

The Commission should ensure that an independent and informed opinion on air traffic control issues is considered in the next stage of the process. It should fully inform the public of the nature of this advice.

Q5: Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results

The Commission's methodology compares the adverse impact that the expansion of Heathrow will have on the life of residents with the economic benefits that they might bring and concludes that there is parity between the two outcomes. The outcome is not neutral when the adverse consequences have such significant impact and cannot be adequately addressed.

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

This issue could be addressed if there were an accepted set of principles for judging the effect of noise disturbance and if conformity with international standards for noise and if pollution were shown to apply to the proposals.

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

Daily, the motorways in the vicinity of Heathrow are at a standstill in the morning and in the evening. The road networks in the area are overwhelmed and the waste to the economy and to people's lives is enormous. The impact on the environment is pollution that exceeds WHO and European limits.

In the face of this, the proposal to increase Heathrow's capacity from 480,000 to 740,000 makes no sense unless it can be demonstrated unequivocally that these transportation issues can be addressed and that the time and cost of doing so is tangible and acceptable.

The issue is immensely complex and Consultation papers do not cover it adequately, with the result that its conclusions in this area are highly suspect.

Heathrow claims it will get 50% of its passengers using public transport. There is no evidence of how this very ambitious target can be achieved. The reliance on a modified revival of the former Airtrack rail scheme connecting to the Staines Southern Railway Station, to increase the use of public transport, cannot be delivered without closing the A30 crossing at Sunningdale for 40 minutes each hour, which effectively takes this trunk road out of use.

An in depth study by a competent authority is needed to provide a clear and reliable understanding of these matters and the costed options available to provide reliable solutions

The Thames Valley and the London Boroughs do not have enough land to meet current needs and there is already a considerable threat to the Green Belt.

The infrastructure that would be needed to meet the transportation needs of this extra population would be considerable. Existing public services, such as schools, clinics, hospitals, policing and local councils, would be hugely overstretched and the additional road and transport infrastructure would impose a massive additional burden.

Extensive additional development is essential if the full economic potential of delivering this additional airport capacity at Heathrow is to be realised.

The Consultation document identifies the issues but does not adequately address how they may be solved. Without this reassurance, the proposal to expand Heathrow should be set aside in favour of expanding Gatwick, which is not encumbered by these constraints

The consequence is that the mitigation that has been allowed to the Carbon Impact of the Heathrow Proposals cannot realistically be delivered and the Carbon Impact becomes 'Highly Adverse'.

The Consultation Document describes the sustainability challenge as:

An opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have.

For the reasons already stated, it is clear that the case for expanding Heathrow is not sustainable. In contrast, the Gatwick proposal does appear to be sustainable.

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

The Commission estimates the cost of the North West Runway proposal as being £18.6 billion, whilst the Extended Runway will cost £13.5 billion. In contrast, the cost of the Gatwick proposal is £9.3 billion and is reported to be better value for money in relation to the additional capacity it generates.

Ultimately, these costs have to be delivered from the economy and it makes no sense to waste these vast sums on Heathrow, just to boost the balance sheets of its Spanish owners. Gatwick makes far more sense and the surplus cash is desperately needed for investment elsewhere in the country.

The Gatwick proposal delivers the required additional capacity and provides far better value for money.

In 2008, the Competition Commission ordered BAA, now known as Heathrow Airport Limited, to sell Gatwick, Stansted and either Glasgow or Edinburgh airports, amid concerns about its dominance of the market. The proposals to expand Heathrow will once more allow Heathrow Airport Limited and to dominate the market in the UK.

Heathrow's case that a single hub is best for the UK economy and for meeting the needs of travellers is shown to be untrue by the fact that New York is served by LaGuardia, Newark and Kennedy airports. Having more than one hub meets their needs and delivers a competitive market.

The provision of additional capacity at Gatwick will allow other airline alliances to develop hub operations, serving the needs of travellers and providing competition.

They would also provide alternative airline operations when things go wrong. At present, operational issues at Heathrow or on the transport network serving it can cause air travel to and from the capital to come to a halt. That is bad for the economy and for those using the airlines.

Alternative hubs provide greater operational resilience.

Transfer passengers should be routed through other airports. There are 27 daily flights from Heathrow to New York which carry almost 40 percent of transfer passengers, most of whom contribute nothing to the UK economy and should be routed elsewhere.

The substantial amount of cargo that is carried from Heathrow should be re-routed to other airports, relieving the burden on Heathrow and the transport network that serves it. It may suit the airlines to use surplus hold capacity on passenger flights but the practice contributes to the road congestion and pollution.

The "grandfather" right for airlines to retain slots needs to be reviewed. The allocation of slots should be taken into public control, so that best use is made of them.

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

'Grandfather Rights' on slots give the 'owning' airlines the right to fly wherever they wish from

them with however many passengers as they wish, and to deny competitors access to those slots they accept having to fly aircraft at less than capacity.

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

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

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

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

Q8: Do you have any other comments?

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

In 1995 the Terminal 5 inquiry was assured that a 3rd runway would not be needed. Sir John Egan, BAA's Chief Executive, wrote to residents in surrounding boroughs and said "T5 does not call for a third runway" (BAA's 'Dear neighbour' letter to residents in a wide area around Heathrow; 16 May 1995).

In another 'Dear Neighbour' letter to residents (April 1999) Sir John Egan wrote: "We have since repeated often that we do not want, nor shall we seek, an additional runway. I can now report that we went even further at the Inquiry and called on the Inspector to recommend that, subject to permission being given for T5, an additional Heathrow runway should be ruled out forever. In May 2003, just four years later, BAA admits publicly that it wants third runway at Heathrow

The proposals to increase capacity at Heathrow will only be a stop gap. Heathrow has already declared that it will need a fourth runway. Understandably, their prime interest lies with expanding their business and they will not be satisfied until they have runways 4, 5 and 6, to compete with Schiphol, in Amsterdam (6 runways), Charles de Gaulle, Paris (4 runways) and Frankfurt (4 runways)

The provision of a second runway at Gatwick will deliver the needed additional capacity and permit the industry to serve London from several airports and provide a basis for future expansion being provided on several airport locations.

Windsor's thriving tourism business will be badly damaged if Heathrow is expanded.

The Consultation document reports that the Extended Runway proposal will result in a doubling of noise levels in the town, from 56 dB to 59 dB, with flights passing over the town at just 775 feet, compared with 1250 feet at present. Flights into and out of the airport will increase 54% and respite periods will be dramatically reduced.

The Northwest Runway proposal will result in flights passing over Windsor at 40 second

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intervals, when that runway and the existing North runway are in simultaneous use. Planes landing on the Northwest Runway will pass over every 80 seconds and will be almost directly over the Castle at a height of just 990 feet.

Windsor and Maidenhead attracted 6.9 million tourism day trips in 2013 and 1.9 million visitor stayed overnight. The bulk of these visits were to Windsor and the income is estimated to have been in the region of £472,696,000. Tourism is estimated to have supported 6,976 FTE jobs, 12.9% of the total employee jobs.

Whilst a proportion of these earnings will have come from LegoLand & Ascot Racecourse, the major portion will have come from Windsor, the town and the Castle. It is a huge tourist attraction throughout the year.

If either of these two proposals to expand Heathrow go ahead, there seems little doubt that the Castle will become unsuitable as the Monarch's principal residence and that State ceremonial occasions will have to return to London. This is likely to have a significant adverse impact on the willingness of tourists to visit the town and the Castle, with proportional loss of earnings and employment.

In Conclusion

1. Both these proposals to expand Heathrow will blight the lives of tens of thousands of residents living to the west of the airport and damage the local economy in Windsor.
2. They are not sustainable and would impose a considerable burden on housing and infrastructure, which would involve massive expenditure that would not be met by Heathrow Airport Ltd.
3. The operational viability of the air traffic management issues has not been shown to be viable and there are major concerns that it may not be so.
4. The safety issues arising from expansion are a major concern for those living in the West of London and in residential areas to the west of the airport.
5. The cost of providing additional capacity by expanding Heathrow is considerably greater than do so at Gatwick and deprives the UK economy of several billions of pounds, which are desperately needed for other purposes.
6. The Commission's findings that adverse pollution and other issues are balanced by the economic benefits and the outcome is therefore 'neutral' is false, given the extremity of the adverse issues, particularly given the breach of World Health Organisation guidelines on acceptable environmental limits, that each of the two proposals would cause.
7. Both proposals to expand Heathrow present a threat to residents' 'human rights', as defined by standards set by the World Health Organisation and other European bodies. This threat is massive, tangible and avoidable. It is also disproportionate in relation to the overall benefits that would accrue from either proposal.

Yours sincerely,

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