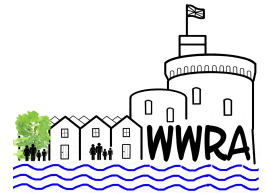




**Old Windsor
Residents
Association**



Have your say on Heathrow

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

January 2015 V3

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Produced by Oakley Green & Fifiel Residents Association (OGFRA), Old Windsor Residents Association (OWRA), & the West Windsor Residents Association) WWRA

More info at www.wwra.org.uk

Key features include

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



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Introduction

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

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

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

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

Important information

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



Key deadline

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

Who to write to

You can submit your comments in four ways;

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

Where to get more help

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

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

And

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

You can also find useful information at the following websites;

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

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

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

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

RBWM -

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

LB Hillingdon -

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



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

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

- Q1. What conclusions, if any, do you draw in respect of the three short-listed options? In answering this question please take into account the Commission's consultation documents and any other information you consider relevant. The options are described in section three.
- Q2. Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in section three.

Questions on the Commission's appraisal and overall approach

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

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

- Q5. Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?
- Q6. Do you have any comments on the Commission's sustainability assessments, including methodology and results?
- Q7. Do you have any comments on the Commission's business cases, including methodology and results?

Other comments

- Q8. Do you have any other comments?

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



Bullet point responses to the Airports Commissions 8 questions

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

1. Heathrow is already antisocially noisy, and noise will effect between 1million and 2million people at Heathrow, as opposed to 20,000 at Gatwick.
2. Both Heathrow proposers claim aircraft noise will reduce. Will it?
3. A three runway airport wil reduce respite (quiet) periods

NORTH WEST RUNWAY PROPOSAL

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

EXTENDED (HEATHROW HUB) PROPOSAL

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



Bullet point responses to the Airports Commissions 8 questions

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

1. It is inconceivable that UK residents could continue to suffer almost 50 year old noise standards – among the worst in the western world – when a new runway opens in 2030.
2. Heathrow Airport's comments on apprenticeships are unsupported:

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

NOISE NUISANCE

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

AIR POLLUTION & HEALTH ISSUES

1. Air pollution in the area already exceed WHO safety limits
2. NOx is a powerful Greenhouse gas
3. Air pollution damages health:
4. (7) Emissions trading will not help the local environment
5. (8) We don't know enough about the health effects to risk building at Heathrow



Bullet point responses to the Airports Commissions 8 questions

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

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

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

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



Bullet point responses to the Airports Commissions 8 questions

14. The Commission has failed to consider the social and economic disruptions caused by the construction phase
15. Where will the huge workforce live?
16. More roads, schools, doctors and hospitals will be needed
17. Could the building industry cope?
18. The roads around Heathrow are already too busy
19. The doubling of cargo capacity and movement of it entirely by road
20. Public Transport will struggle
21. There will be increased Flood risks
22. Revised flight paths will cause increased noise nuisance and safety problems

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

1. In its 8 criteria categories, the Commission has neglected the important matter of the how the proposals tabled will effect the health of residents, and how many residents will die earlier or suffer more in each area.
2. The absence of a mention of the serious Health Issues within the Appraisal Modules of the Commission's Objectives is a grave omission in the balancing of the pros and cons of the runway proposals which would have been expected under 'People' and 'Quality of Life' appraisals.

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

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



Bullet point responses to the Airports Commissions 8 questions

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

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

1. (Detailed points 1-2) The Presumption For Balancing Adverse Impacts Against Economic Benefits Is Not Acceptable
2. (Detailed points 2-7) Expansion Of Heathrow Will Stifle Competition & Provide No Resilience When Things Go Wrong.
3. (Detailed points 8-9) Grandfather Rights Should Be Abolished
4. (Detailed point 10) The current, airline owned company which allocates any free slots would have to be replaced by an independent government agency to allocate slots impartially and transfer use fees to the relevant airport after retaining a small percentage to cover its costs.
5. (Point 11) Yet another runway is likely to be needed after 2040
6. (Point 12) Heathrow should have competitors

Q8: Do you have any other comments?

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



Detailed responses to the Airports Commissions 8 questions

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

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

Heathrow is already antisocially noisy

1. Heathrow is already the noisiest airport in United Kingdom and Europe from Commission's own evidence. The detrimental impact of its present operations on many tens of thousands of residents living in West London is unacceptable and these proposals will create the same conditions for the many tens of thousands of residents living to the west of the airport.

- We don't want more noise.
- Heathrow owners and management have proved antisocial with their lack of progress at noise mitigation, whether the Cranford agreement, or other operational measures like steepened glide paths

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

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

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



Detailed responses to the Airports Commissions 8 questions

- The overall aircraft fleet will be marginally quieter than that of today, but costly technology cannot continue to make the sweeping advances which the proposers rely on in their noise and pollution predictions, and as existing aircraft have to fly for 25 years to repay their huge initial costs many noisy planes will fly for years to come. The super quiet A380 is surprisingly no quieter than the noisy B747 in one flight mode.
- Both Rolls Royce and Boeing / Pratt & Whitney experts have told different meetings of the Heathrow Airport Consultative Committee that engine designers could concentrate on reducing noise or pollution but could not achieve both.

3. A three runway airport wil reduce respite (quiet) periods

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

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



Detailed responses to the Airports Commissions 8 questions

NORTH WEST RUNWAY PROPOSAL

1. **Aircraft will be lower and cause a lot more noise:** The new North West Runway Proposal is sited just 1045 metres north of the existing North Runway. It is also ends 1500 metres west of it and planes will therefore be approximately 280 feet lower and far noisier, as they pass over Windsor, Eton and Datchet, to land at the airport.
2. **The 54% increase in flight numbers, combined with minimum runway separation, will affect new areas, and increase noise disturbance every day in existing areas.** With an extra 260,000 flight movements. Many new areas will be adversely affected, like Eton, Chalvey, & Langley, and because of the minimum runway separation, existing areas will suffer a double whammy of noise, places like Colnbrook, Datchet, & Windsor.
3. **Noise will be channeled over Datchet, Eton, and Windsor:** Take off heights will vary but it seems unlikely that aircraft taking off on the proposed North West runway will reach a sufficient altitude to allow them to diverge from the straight out flight path much before Windsor and Eton, so noise will be channelled over Datchet, Eton, and Windsor
4. **There will be little to no respite, with sound disturbance upto 365 days per year:** Both runways will be used concurrently and the number of flights will therefore be almost double present levels for those living under and between the flight paths to two runways, with planes passing overhead every 30 to 40 seconds. Existing noise levels will therefore become almost continuous.



Detailed responses to the Airports Commissions 8 questions

EXTENDED (HEATHROW HUB) PROPOSAL

- 1. Aircraft will be much, much lower and cause a lot more noise:**
The Extended (Heathrow Hub) Proposal will extend the existing North Runway, so that its western end for landing will be 2750 metres nearer to Datchet and Windsor. Planes will therefore be approximately 480 feet lower, as they pass over these residential areas, to land at the airport
- 2. Noise will be channelled over Datchet, Eton, and Windsor:** Planes taking off will start 3650 m nearer to Datchet and Windsor and aircraft will be unable to attain sufficient altitude to diverge from the straight out departure before they pass over these areas.
- 3.** Take offs over Cranford will start 950 metres nearer to Cranford than is the case with the current situation.
- 4. Noise levels could be 4 X higher:** As a result, the Extended Runway (Heathrow Hub) proposal will deliver noise levels that rise to fourfold the present level in Datchet and double that in Windsor.
- 5. Residents under all flight paths will suffer intolerable levels of noise disturbance 365 days per year, from 4:30am to 11:30pm, severely affecting their health.** Heathrow will be unable to operate any runway alternation with the extended Northern Runway option, so residents along all flight paths will suffer noise disturbance, and the related health effects, continually with effectively no respite, from 4:30am to 11:30pm, 365 days per year. That's 600 flights per day over Colnbrook, Datchet, & Windsor, and 300 flights per day, every day, over Old Windsor



Detailed responses to the Airports Commissions 8 questions

5. **Operational safety measures will maintain the risk of noise:**
Aircraft departing LHR have to attain at least 500ft before diverging from the extended centre line of any runway.
Departures from the extended 27R would also have to satisfy the performance criteria to cover a subsequent power loss to one of its engines and the subsequent much reduced rate of climb that would ensue. These complicated calculations take many factors into consideration.

6. **Windsor Castle will become a flight hazard:** Windsor, and therefore Windsor Castle, are situated on raised ground meaning that they are likely to become a hazard for such problem departure



Detailed responses to the Airports Commissions 8 questions

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

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

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

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

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

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



Detailed responses to the Airports Commissions 8 questions

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

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

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

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

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

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



Detailed responses to the Airports Commissions 8 questions

- f) free up slots for flights to/from alternative destinations and new operators,
- g) all of which would be in the public interest.

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

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

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

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

NOISE NUISANCE

1. **Misleading noise measures are being used by the Commission:**
The method used by the Commission to measure noise does not reflect the level of disturbance. The use of average noise level measurements is of particular concern, as it does not report the high levels of noise experienced daily.



Detailed responses to the Airports Commissions 8 questions

2. **Peak noise levels are being ignored:** Similarly, the Commission determines the extent of the impact of aircraft noise by measuring the number of people affected by a given average noise contour. This ignores the number of people affected by the totally unacceptable high levels of noise generated by each proposal.
3. **Higher levels of noise are ignored:** Even when N70 data is considered for level of disturbance, the number of flights is set too low, at more than 50. How many people will be affected by more the 250 to 300 at N70 around Colnbrook, Datchet, Horton and Cranford?
4. **Flight intensity will become intolerable for residents:** It may be argued that some existing areas are already affected by such intolerable conditions but how many new airport developments have previously been allowed with express intention of creating such an intolerable environment with such a high intensity of flights?
5. **Frequency of flights is as damaging as peak noise levels:** Parliament has acknowledged that the frequency of flights as well as the intensity of noise needs to be. The previous ANASE report seems to have been ignored by the Commission, with the result that no accepted basis for measuring noise nuisance has been employed.
6. **Agreed flight limits are being ignored:** For these reasons, the limit of 480,000 air traffic movements at Heathrow should be retained until such a noise study is completed and adopted.
7. **Sleep, rest, and health will be seriously effected by the lack of noise respite/breaks:** The importance of a proper period of relief from incessant disturbance from aircraft relief is currently accepted. In each of the two proposals, the relief periods have been at least halved from the current expectation and many cases are virtually non-existent.



Detailed responses to the Airports Commissions 8 questions

AIR POLLUTION & HEALTH ISSUES

1. **Air pollution in the area already exceed WHO safety limits:** It is understood that Nitric Oxide air pollution in parts of Wraysbury, Windsor and Bray exceeds the World Health Organisation's safety limits. It is the same in places around Heathrow.
2. **NOx is a powerful Greenhouse gas:** Nitrogen Dioxide is 300 times worse than CO2 in its effect on global warming.
3. **Air pollution damages health:** It is widely acknowledged that atmospheric pollution from airport operations has a detrimental impact on the health, particularly in relation to cardio-vascular diseases.
4. In the first three weeks of September last year 9100 flights passed over Windsor to land at Heathrow. That was one every 80 to 90 seconds during daylight hours.
5. The schoolchildren of Hounslow go out to play and the noise and pollution in the air is horrific. They go home and the noise and the air pollution is horrific. This will be the situation in Wraysbury, Datchet and Windsor, if either of these two proposals is adopted.
6. The proposition that the adverse environmental impact of Heathrow's operations should be offset by a reduction in pollution from other sources means that the pollution around Heathrow can rise even more.
7. **Emissions trading will not help the local environment:** The use of emissions trading, to accommodate high pollution zones, is unacceptable, due to the wide scale impact of Heathrow's flight operations – pollution from aircraft affects many thousands of people.



Detailed responses to the Airports Commissions

8 questions

8. **We don't know enough about the health effects to risk building at Heathrow:** Stansfield & Matheson, in their report "Noise pollution: non-auditory effects on health" say, "*Undoubtedly, there is a need for further research to clarify this complex area, including better measurement of noise exposure and health outcomes*" It is therefore essential that a far more rigorous assessment of the air pollution issues should be undertaken, and more research conducted before conclusions can be reached.
9. The Commission should not consider expansion of Heathrow unless it can be demonstrated that air pollution is kept within the World Health Organisation recommendations.

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

5. **Up to 100 times more people will be effected by expansion at Heathrow compared to Gatwick:** Expansion at Heathrow will newly affect over 320,000 people, or according to the European Commission, over 700,000, whereas at Gatwick, 18,000 will be newly affected. And It is likely that an extra 250,000 new workers and their family members will also be affected at Heathrow.
6. **The Finances of many residents will be negatively effected:** When you consider the potential impact on public health, you are putting a great risk on the health and well being of nearly a million people, not to mention the effect on their finances, lost income due to sickness
7. **There will be an increased cost to the public purse:** Even now, without expansion the there is a cost of £16bn per year to the UK economy (Aviation Environment Federation) increased cost to the NHS, increased payments on benefits including incapacity benefits (or their replacements), lost productivity, a loss of tax revenue, a loss of GDP, and a loss of public services ultimately.



Detailed responses to the Airports Commissions 8 questions

8. **There will be an increased pressure on health services from increasing mortality and morbidity:** 61 conditions effecting 1million people, and a greater level of intensity will place existing local NHS Trusts, already struggling to cope, under destructive pressure.

9. **Worldwide institutions have concerns about the health effects of airport operations:** There are more than 50 eminent public institutions and universities worldwide who note public health issues associated either directly, or indirectly, through airport operations including WHO, PHE,

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

10. **More than 60 medical conditions, many lethal, have been noted:**
These 50+ medical institutions, and public bodies, record more than 60 conditions caused by airport operations.

11. **The Commission has neglected the full range of health effects of aircraft noise:** The Commission has not mentioned a number of issues in its publications, either by complete omission, or possibly inadequate consideration of the full range of concerns, in relation to the effects of Noise on health including;
 - a. Interference with Speech Perception - World Health Organisation,
 - b. Social and Behavioural Effects of Noise - World Health Organisation,
 - c. Speech intelligibility - World Health Organisation,
 - d. The effect on vulnerable Subgroups (people with particular diseases or medical problems (e.g. high blood pressure); people in hospitals or rehabilitating at home; people dealing with complex cognitive tasks; the blind; people with hearing impairment; fetuses, babies and young children; and the elderly in general), - World Health Organisation,
 - e.



Detailed responses to the Airports Commissions 8 questions

- f. Additional physiological effort - Department of Psychiatry, Medical Sciences Building, Queen Mary, University of London,
- g. Cancer - Transport 2000,
- h. Cardiovascular diseases - Imperial College, Kings College London, MRC,
- i. Combined Effects on Health of Noise from Mixed Sources (health load) - World Health Organisation,
- j. Hearing impairment - World Health Organisation,
- k. Heart diseases - Department of Psychiatry, Medical Sciences Building, Queen Mary, University of London,
- l. Hormonal stress - Department of Psychiatry, Medical Sciences Building, Queen Mary, University of London,
- m. Lethal 'startle effect' for the sleeper - World Health Organisation,
- n. Physiological Functions - World Health Organisation,
- o. Sleep disturbance - immediate & chronic (reduced life span) - Brisbane Airport & Australian Government,
- p. States of helplessness - Department of Psychiatry, Medical Sciences Building, Queen Mary, University of London,
- q. Stress - Department of Psychiatry, Medical Sciences Building, Queen Mary, University of London,
- r. Stroke - Department of Psychiatry, Medical Sciences Building, Queen Mary, University of London,
- s. Performance - World Health Organisation,
- t. Reading Acquisition (Cognitive impairment) - World Health Organisation,
- u. Spirituality & personal growth - Roman Catholic Church



Detailed responses to the Airports Commissions 8 questions

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

- a. Adverse pregnancy outcomes (such as preterm birth) - US National Institutes of Environmental Health Services,
- b. Asthma - World Health Organisation,
- c. Cancer - Brisbane Airport & Australian Government, Cardiovascular diseases, - Committee on the Medical Effects of Air Pollutants,
- d. Changes in lung function - US National Institutes of Environmental Health Services,
- e. Chronic and acute respiratory diseases - World Health Organisation, Chronic bronchitis - Committee on the Medical Effects of Air Pollutants,
- f. Diabetes - NHS,
- g. Heart disease - World Health Organisation,
- h. Heart failure; - NHS, High blood pressure - NHS, Irregular heartbeats; - NHS,
- i. Low birth weight - NHS,
- j. Lung blood clots; - NHS,
- k. Lung function diseases - Brisbane Airport & Australian Government,
- l. Lung function growth in children - Brisbane Airport & Australian Government,
- m. Obesity - NHS,
- n. Pneumonia - World Health Organisation,
- o. Stroke, - World Health Organisation



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13. The Commission has ignored the many effects on health of electromagnetic radiation associated with airport, and aircraft operations: The Commission has not mentioned a number of issues in its publications in relation to the effects of on public health of electromagnetic radiation from the increased volume of static & mobile equipment either in the airport, in aircraft, or in other vehicles which have been noted to cause;

- a. Adverse reproductive outcome - World Health Organisation,
- b. Behavioural changes and effects such as the induction of lens opacities (cataracts) - World Health Organisation,
- c. Calcium ion mobility - World Health Organisation,
- d. Cancer - World Health Organisation,
- e. Decreased ability to perform mental tasks - World Health Organisation,
- f. Induced RF burns or shock - World Health Organisation,
- g. Interference in certain medical devices, such as cardiac pacemakers and hearing aids - World Health Organisation,
- h. Physiological responses - World Health Organisation,
- i. Reduced endurance - World Health Organisation,
- j. Suppressed startle response - World Health Organisation,
- k. The microwave hearing effect - World Health Organisation,
- l. Thermoregulatory responses, - World Health Organisation

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



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15. The commission has failed to consider the effects of the monumental and extensive construction phase on public health:

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

16. The increased levels of the various types of pollution discussed will effect the mortality and morbidity of 1million people near Heathrow, compared to 20,000 at Gatwick. All of these 61 conditions will affect up to 1million people causing increased mortality, with a rise in the death rate, and reduced life expectancy; and also cause a severe increase in morbidity as 1million people, and their children are subjected to increase levels of sickness, with children and other vulnerable groups suffering permanent, irreversible damage.

17. The Commission has failed to adequately consult on the possibly insurmountable international complexities, and enormous pressures, of increased flight volumes in already congested airspace: The proposals regarding LHR have not taken into consideration the complex Air Traffic Control changes that would be required. It is very likely that a large number of the statistical figures regarding the increased number of movements are far too optimistic, rendering possible conclusions that these Proposals are not as viable as predicted.

- a. We believe that Air Traffic Control viability is absolutely paramount to any Commission Report.
- b. Without this viability the whole process becomes worthless.



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- 18. The Commission has failed to consider the social and economic disruptions caused by the construction phase:** During construction, anyone living or working around the M4 will face years of disruption due to Heathrow's plans for the M25, M4 and A4 and prolonged construction programme. Even aside from the new runway itself, Necessary supporting projects include widening the M25 and putting it in a tunnel under the new runway, diversion of major roads such as the A4, and new rail interchanges, any one of which is a significant intervention with major disruptions.
- a. After construction, the added strain on the busy roads around west London will cause ongoing and significant disruption across a large swathe of the capital, and beyond. In many ways, the west of London is already saturated. The increased road and rail traffic which would accompany expansion of Heathrow would serve to stifle existing business, rather than promote new growth.
- 19. Where will the huge workforce live?** Probably the greatest and permanent impact of 112,400 extra employees related to Heathrow Airport's proposed new North West Runway would be the need for over 70,000 new houses. Both proposals would be far more serious than the Commission's astoundingly unrealistic assessment of "a significant challenge to the 14 local Councils" as they are already on the verge of a housing crisis. The proposers have been chided by the Commission for not identifying where space for such housing could be located, but it should have rejected the proposals as unsustainable in the absence of such essential data.
- 20.** Heathrow Hub's proposed doubling of the length of the existing Northern Runway may not create quite so many jobs or need quite so many houses, but its impact on housing and the infrastructure would only be marginally less than the above.
- 21.**



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22. Windsor & Maidenhead's present struggle to find space for 12,500 new houses in the next 15 years already seriously threatens the Green Belt (83% of the area of the Borough) as that equates to 701 houses a year on top of existing approvals, but an extra 500 p.a. over 10 years will be near to impossible to provide here or elsewhere unless standards are dropped. Tower blocks are a social disaster. Large flood risk areas and inadequate drainage and sewage capacity exacerbate the local problems. It took years after the last housing 'boom' for the water, gas and electricity supply companies to dig up our roads and upgrade their service mains to match the increased demands.
23. **More roads, schools, doctors and hospitals:** The Commission anticipates the need but does not seem to appreciate the extent of the stress already upon these things. If there is not enough land for housing and other needs all costs will escalate as in previous periods of economic overheating, and lower paid key workers will leave the area, which despite the business community's enthusiasm will considerably challenge their viability.
24. **Could the building industry cope** with another runway, terminal and associated works being built at the same time as all the necessary housing and infrastructure? It would be an enormous problem for the industry which the runway proposers and supporters have failed to consider. The proposals are simply unsustainable.
25. **The roads around Heathrow are already too busy** so it is already actively considering congestion charging around the airport, surely indisputable proof that there would be awful road problems if it gets a 54% increase in flights.



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26. A minimal two lane increase on the already daily gridlocked M25 where it would be confined by a tunnel is an astoundingly short sighted and unacceptable proposal as it could not be widened to cope with the huge increases in activity which both runway proposers anticipate. The so called Smart Motorway works on the M4 where the hard shoulder safety lanes are being sacrificed for permanent traffic lanes is the clearest possible demonstration that the road system is already overloaded.
27. Other surface access proposals by HAL are likely to have far reaching repercussions as the tunnelling of the A4 Bath Road between the two northern runways would disrupt the local distributor function of this important trunk road and compromise widening to meet increasing future demands.
28. **The doubling of cargo capacity and movement of it entirely by road** from a depot remote from the motorways would put a huge additional juggernaut burden on the road network which HAL have avoided to mention. The Heathrow Hub proposals have not been assessed, but will add to local problems however its surcharge is handled.
29. **Public Transport:** Heathrow claims it will get 50% of its passengers using public transport, but there is no evidence of how that can be achieved as it remains an unfulfilled target at the present time. HAL has been actively considering Congestion Charging to address current problems, but has gone silent on that during the consultation period as it is aware that that would be an unpopular means of promoting its use of public transport use target.



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30. The reliance on a modified revival of the former Airtrack rail scheme to Staines Southern Rail station to increase use of public transport is a totally unrealistic proposal. The Southern Rail network from London Waterloo to Staines, Reading, Guildford and beyond was built when there was very little road traffic and has many level crossings which would unacceptably increase road congestion if train frequencies were increased. The study of the viability of Airtrack demonstrated that the A30 crossing at Sunningdale would have almost doubled the closure of that important trunk road and 'safety valve' for the M3 to 42 minutes in the hour!
- 31.(18). Heathrow's references to the Crossrail and the Western Rail Access schemes being appropriate to the expansion of Heathrow dodge the fact that these are necessary and designed to meet today's London and Heathrow traffic needs, and are not a financial gamble anticipating that Heathrow will continue to ex
32. **Flood risks:** M25 and A4 tunnels would displace a huge volume of underground water storage capacity and, contrary to EA policy, create greater flood risks elsewhere. The only flood mitigation proposed appears to be in upstream lagoons on the Colne, which would do nothing to relieve the increased threat upon the present serious flood risk area around Wraysbury and the Thames.



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

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

- 1. In its 8 criteria categories, the Commission has neglected the important matter of the how the proposals tabled will effect the health of residents, and how many residents will die earlier or suffer more in each area.** The 8 categories considered comprise Strategic Fit , Economy , Surface Access , Environment , People , Cost , Delivery , Operational Viability. Even the category of People fails to address the magnitude, severity, or extent of the public health impact in its three sub-categories of To maintain and where possible improve the quality of life for local residents and the wider population. , To manage and reduce the effects of housing loss on local communities. , To reduce or avoid disproportionate impacts on any social group.
- 2. The absence of a mention of the serious Health Issues within the Appraisal Modules of the Commission's Objectives is a grave omission in the balancing of the pros and cons of the runway proposals which would have been expected under 'People' and 'Quality of Life' appraisals.**



Detailed responses to the Airports Commissions 8 questions

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

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

1. The Airports Commission estimates that 70,800 new homes will be needed, especially if the NW runway proposal to expand capacity at Heathrow is adopted. This number of new homes will accommodate almost a quarter of a million additional people.
2. Land in the Thames Valley and in the London Boroughs is already under immense pressure to accommodate current needs and there is already a considerable threat to the Green Belt, in attempts to meet this demand.
3. The infrastructure that would be needed to serve the needs of this extra population would be considerable. Existing public services, such as schools, clinics, hospitals, policing and local councils, would be hugely overstretched and the additional road and transport infrastructure would impose a massive additional burden.
4. **Neither of the proposals for an additional runway at Heathrow meet the recognised criteria for being sustainable as the long term affects will seriously impair the quality of life of future generations.**

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



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

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

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

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

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

1. The Airports Commission has balanced the adverse impact that these proposals will have on the life of residents with the economic benefits that they might bring and concludes that there is parity between the two outcomes. The Commission has not demonstrated the basis for reaching this conclusion. It is essential that it should do so.
2. It is not acceptable that tens of thousands of residents, whose lives are already adversely affected by activities at Heathrow, along with many more thousands, should be subjected to worsening noise and air pollution, exceeding WHO guidelines.



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

3. Just five years ago, the UK's regulatory watchdog, the Competition Commission, ordered BAA, now known as Heathrow Airport Limited, to sell Gatwick, Stansted and either Glasgow or Edinburgh airports, amid concerns about its dominance of the market. These proposals will once more allow Heathrow to dominate the market in the UK.

5. It is not true that a single hub is best for the UK economy and for meeting the needs of travellers. New York is served by Newark and Kennedy airports. Having more than one hub meets their needs and delivers a competitive market.

6. 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.

7. They would also provide alternative airline operations when things go wrong.

8. The need for such a dominant hub as an expanded Heathrow would be is not accepted. For example there are 27 daily flights from Heathrow to New York which are only viable because they carry almost 40 percent of transfer passengers, most of whom contribute nothing to the UK economy but add considerably to the complication of the operation at peak periods. The "grandfather" right for airlines to retain slots needs to be reviewed.

9. 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.



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10. If say a 90% seat take up was possible there would be nearly a 20% extra capacity available i.e. $480,000 \times \text{one fifth} = 96,000$ flights. At present, this will not happen because the grandfather rights on slots give the 'owning' airlines the right to fly wherever they wish from them with however many passengers as they wish, and to deny competitors access to those slots they accept having to fly aircraft at less than capacity.

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

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

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

11. 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.



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

It should endeavour to be Better, NOT Bigger.

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

Q8: Do you have any other comments?

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

1. Back in 1978, the Terminal 4 public inquiry was assured that no further capacity would be needed.
2. In 1995 the Terminal 5 inquiry was assured that a 3rd runway would not be needed. Sir John Egan, BAA's Chief Executive, wrote to residents in surrounding boroughs and said "T5 does not call for a third runway" (BAA's 'Dear neighbour' letter to residents in a wide area around Heathrow; 16 May 1995).
- 3.



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4. 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
5. How can we trust their predictions? It seems obvious that they will not be satisfied until they have runways 4, 5 and 6, to compete with Schiphol, in Amsterdam (6 runways), Charles de Gaulle, Paris (4 runways) and Frankfurt (4 runways)

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

6. The proposal to create a single national hub at HR is unfair to the rest of the country. Once again, massive improvement in infrastructure would be focussed in the South East, whilst the rest of the country looks on and their economies falter.
7. Only last week, the headlines were NORTH SOUTH DIVIDE GETS A LOT WORSE. SOUTHERN TOWNS BOOM WHILST NORTHERN ECONOMIES CONTRACT (The I newspaper 19th January)
8. A measure of this is that average gross weekly earnings in the in the North East were recently reported as being only 64% of those in London. (http://www.huffingtonpost.co.uk/john-mills/uk-inequality_b_5567318.html)
9. 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.



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

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

11. Both these proposals to expand Heathrow will blight the lives of hundreds of thousands of residents living to the west of the airport and, for them, this is not worth the economic benefit it brings to a region of the UK that is already in robust economic health

12. Both proposals present a threat to residents' 'human rights', as defined by standards set by the World Health Organisation and other European bodies. This threat is massive, tangible and avoidable. It is also disproportionate in relation to the overall benefits that would accrue from either proposal.