

Airports Commission  
Sanctuary Buildings  
20 Great Smith Street  
London  
SW1P 3BT

29<sup>th</sup> October 2013

Dear Sir / Madam

### Response to Sir Howard Davies' Speech 7 October 2013

West Windsor Residents Association represents 1000 households west of Windsor, immediately under the easterly approach path to the northern runway at Heathrow. We do not have ready access to a wealth of current data related to overall airline operations in the UK. but among our members we have residents with considerable knowledge of airline and aviation matters. By virtue of our location we also have a lot of experience of the adverse impact of airline operations on the environment and welcome the opportunity to comment on Sir Howard Davies' speech

We welcome the remit to "maintain the UK's position as a hub for international air traffic". A key aspect of this will be to properly define "the needs of the U.K. economy". The 'predict and provide' philosophy we consider to be completely wrong.

Towards the end of his career, Charles Lindberg, who probably did more than any other person to develop global aviation routes during the early days of aviation, was said to wonder if the airplane had been an entirely good thing. He apparently felt the machine had become responsible for too much noise, too much commotion and too much pollution. The proliferation of air travel seemed to him to allow too much aimless coming and going, of too many people, for no very good reason.

Such concerns may now seem overstated but they do emphasise the need for decisions aiming to provide optimum capacity to be sensibly balanced with the impact of doing so.

#### THE HUB OPERATION

Much emphasis is placed on the importance of the hub operation. A key reason given is that the connecting flights allow the operation of flights over routes that would not otherwise be viable and we agree that there is some merit in that argument. However, there is also the question of whether a single dominant hub is consistent with the objective of ensuring adequate competition.

There is also the question, certainly with regard to Heathrow, whether the hub operation has achieved the desired level of route development to justify maintaining a single dominant hub. Since 1991, the number of passengers passing through Heathrow have increased approximately 70 per cent but the number of passengers in transit or transferring have more than doubled, increasing from a quarter of the total in 1991 to more than a third in 2011. At the same time the number of destinations served has decreased by 20 per cent.

The reason is not difficult to see! Consider the number of flights to New York, for example. There are approximately 27 daily and only 62 per cent of those passengers originate in London. One questions the need for so many such flights which, in view of the capacity constraints at Heathrow, must be operated at the expense of routes the hub operation is said to be a key factor in enabling. Clearly the emphasis has been to concentrate on those routes that are most profitable to the airlines rather than developing new routes. That is understandable but it is not a reason for allowing continual expansion at the expense of environmental considerations. Equally a single hub should not be allowed to become so dominant as to constrain competition from other airports as has been the case until now.

We therefore submit that the development or modification of a number of purpose built airports, able to compete on equal terms, both in facilities, surface transport feeds and Fifth Freedom Rights in the Southeast as well as other regions should be considered in maintaining the U.K as a hub for international air transport. Such an approach would also provide greater ability to react to security and weather problems as well as more flexibility if future aviation needs diverge from those currently anticipated.

#### BALANCED RESPONSE

Previous experience makes it clear that growth in demand will over a period continue, particularly with the expansion of the emerging economies and the increased living standards within those economies. We therefore accept the premise that increased runway capacity will be required in the medium to long term but that must be achieved with proper recognition of the need to provide that capacity with due consideration of any adverse impact on the environment.

Much has been written of balancing the overall impact of air pollution from aircraft with reduction in other industries, and that may be possible, but how can that address an excessive increase in pollution resulting from further air traffic and increased ground traffic in the vicinity of an airport where the operation is increased significantly? Seeking the appropriate location for providing increased capacity is vital if this is to be properly and fairly addressed.

Additionally, recent studies, including the American studies of cardiovascular problems in the vicinity of 89 airports, highlight the potential health problems that need to be considered related to noise disturbance from aircraft movements. The Inspector who approved the Fifth Terminal at Heathrow expressed major concerns about the adequacy of the current method of measuring noise and, as a result the Government of the day promised a comprehensive study to inform future aviation policy. That study (ANASE) indicated that the number of aircraft movements was of greater significance than previously allowed but the report was rejected because of perceived inadequacies in its compilation. No attempt appears to have been made to rectify those shortcomings and, as a result, we continue to rely on noise measurements that many informed people believe to be inadequate. In such circumstances any significant expansion in the vicinity of densely populated areas should be approached with extreme caution.

#### RELIEF FROM AIRCRAFT NOISE

As a residents association to the west of Heathrow, we recognise the benefits to those living to the east of Heathrow that have derived from the periods of scheduled relief achieved through runway alternation. When the winds are from the east we, in Windsor, have, to date, had no such relief and have suffered accordingly. The benefits of scheduled periods of relief cannot be overstated.

#### SHORT TERM SOLUTIONS TO INCREASE RUNWAY CAPACITY

Recent Operational Freedom Trials to improve operational performance at Heathrow appear to have been relatively inconclusive. In spite of that some people appear to advocate the introduction of mixed mode to increase short term capacity. This would remove the most important noise mitigation procedure currently available and would almost certainly lead to an even worse operational performance at Heathrow, than that currently experienced .Any requirement for increased short term capacity must be sought at locations with currently under-utilised runway capacity.

Such additional short term capacity should if possible be sought at locations where added medium to long term additional capacity is planned. It would be wrong to further develop a market at a location that does not fit the medium to long term plans.

#### ADDITIONAL OBSERVATIONS

There appeared to be nothing in the speech that recognises the need to consider the impact on local services, i.e. housing, schools, medical services, excessive impact on the local economy etc., that would be required to address any major airport development. To date this appears to have received inadequate consideration and should be urgently addressed

Signed

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