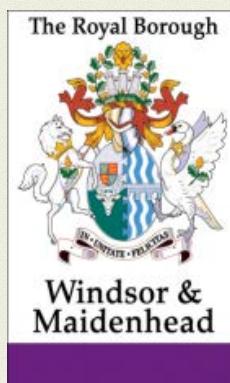


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27<sup>th</sup> September 2013

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**Re: Heathrow Airport Submission To The Airports Commission: ‘A New Approach – Heathrow’s options for connecting the UK to growth’**

Dear Sir(s),

I am instructed by the Royal Borough of Windsor and Maidenhead to submit the following response setting out the concerns of the Council to the response document submitted by Heathrow Airport to the Airports Commission (Commission) entitled: ‘A New Approach – Heathrow’s options for connecting the UK to growth’.

### **Introduction**

By way of background information the Airports Commission is advised that:

- This Council has submitted two previous responses to the Commission, both of which have been acknowledged.
  - One relating to Discussion Paper 04 ‘Airport Operational Models’ (17/07/13); and
  - A subsequent response (6/09/13) relating to Guidance Document 05 ‘Aviation Noise’.

Both of these responses made it unequivocally clear that the Borough fully supported a sustainable aviation industry whilst also detailing the very significant adverse local impacts that arise from existing operations upon the local environment.

- A copy of the Cabinet report considered on 26/09/13, together with additional comments expressed at that meeting is attached in **Appendix 1**.
- The following Motion was debated at a full council meeting held on 24/09/13; “*While recognising Heathrow’s importance to the local economy, the new runway proposals by Heathrow Airport Ltd to the Davies Airports Commission, especially the South West option, is unsustainable and a blight on property. This Council resolves to instruct the Aviation Forum to make the Airports Commission fully aware of this Council’s continuing strong opposition to H.A.L’s new runway proposals.*”

The motion was unanimously agreed.

It is against this background and recent developments that this submission is being framed.

## **Response**

Historically, the Borough has always adopted a robust position on the more negative aspects arising from local operations at Heathrow Airport, taking up a strong community advocacy and leadership role and adopting influential positions on several inter-local authority consortia that are committed to balancing the competing interests in seeking to secure sustainable solutions to airport development and operations. Indeed, the Borough considered and responded to a similar DfT consultation (*Adding Capacity At Heathrow*) in 2008 objecting strongly to proposals seeking a third runway and sixth terminal at Heathrow, together with operational changes to increase runway capacity at Heathrow. Following widespread condemnation and objections the current government rejected the proposals. There are strong similarities between all the current options, particularly those relating to the North-west and North runway options being proposed by Heathrow Airport to those previously considered.

Heathrow's long-term options submission to the Commission essentially puts forward three conceptual options for the development of one or more runways at Heathrow. It seeks to promote Heathrow's case for maintaining a dominant global aviation hub with the size and scale to provide the long-haul connectivity in the longer term as new markets open up in developing countries.

The Borough believes that Heathrow's submission is predicated upon their belief there is choice between one of the world's most successful hub airports in Heathrow and a compelling need to build upon its strength, or '*we can start again from scratch*'. They argue their proposals 'offer a new approach to an old problem' and will connect the UK to growth more quickly and at lower cost whereas building from scratch will cost more, take longer and will not deliver an airport that's in the right location to help the UK win the global race.

The Borough notes the Heathrow submission puts forward three geographical options for a third/fourth runway and associated terminals i.e. North-West; South-West; and North configurations.

All options would deliver a projected capacity of up to 740,000 flights per annum (pa), an increase of some 260,000 pa above the T5 capped level of 480,000 pa and serving 130 million passengers per year in 2040. Heathrow argue this would provide 'sufficient' capacity, for the foreseeable future and could be further developed into four runways as/when required. This is of concern as quite clearly this is essentially safeguarding further development proposals for a future 4<sup>th</sup> runway and additional terminal options despite repeated undertakings that such further development would not be brought forward or necessary by the operator. These undertakings were subsequently endorsed by Government policy.

As stated above, the Borough considered similar proposals (in principle) following a major DfT consultation in 2007 for a third runway and Terminal 6. The Borough was both robust and resolute in its outright objections to the proposals based on the expansion having an immense effect on everyone living in the Royal Borough and other communities around Heathrow. A copy of the Borough's response is attached as **Appendix 2**.

The Borough was positively relieved when the current government subsequently rejected the proposals for a third runway and sixth terminal at Heathrow.

This latest set of proposals, whilst appreciating fully they are both 'outline and conceptual' in status are perhaps of even greater concern given the even greater potential negative impacts that are likely to ensue; and particularly in view of the repeated previous re-assurances given to local communities that there would be no further significant development at Heathrow. The full impacts of the current proposals will clearly not be known prior to any approval decision

relating to the viability of Heathrow's submission and the necessary detailed impact assessments are conducted, evaluated and made public.

The Borough wrote to Heathrow Airport on 13/09/13 seeking further information relating to the potential impacts of their submitted options on the basis that 'some' information must be available to be able to draw up such proposals even though they are conceptual at the current time. Understandably given the timescales since making the request the information has not yet been received. The Borough contends that until such time as fully independent, impact assessments have been carried out no further consideration should be given to any of the three options submitted to the Airports Commission and they should be eliminated forthwith. If it is considered inappropriate to eliminate all three options then we suggest that the SW option should be eliminated forthwith since this runway is technically unworkable as explained in several other submissions of which we are aware.

The Borough wishes to raise four further points for the Commission to consider:

***i. The apparent assumption that the current level of disturbance is acceptable and that the number of aircraft contributing to that level of disturbance can be ignored.***

Clearly the current level of disturbance from existing operations is far from acceptable, a point made in previous submissions by the Royal Borough.

Table 2.1 of the Airport Commission Paper 5: 'Aviation Noise' indicates that Heathrow operations currently cause three times as many people to fall within the 55Lden contour as the next most affected airport in Europe (Frankfurt). Even assuming the most optimistic anticipation of noise reduction at Heathrow there will still be two and a half times as many people around Heathrow affected as are currently affected at Frankfurt. This clearly demonstrates that Heathrow is totally unsuitable for further expansion, does not have the ability to compete with other European airports in terms of long term expansion and that all proposed mitigation procedures e.g. higher approaches, should be concentrated on further reducing the environmental impact of Heathrow at its current level of operation. According to Heathrow's own projections they can accommodate a further increase in passenger numbers with no increase in aircraft movements.

***ii. That a single dominant hub is good for the economy; and***

***iii. That Heathrow is ideally situated to be developed as the hub.***

The premise that a single dominant hub is required needs to be challenged for the reasons set out in the Borough's previous response (17/07/13) and also **Appendix 3**.

Because:

- a) It constrains competition and therefore is subject to causing an increase in fares rather than a reduction.
- b) If one accepts the single dominant hub premise but also accepts that Heathrow is environmentally unsuitable for further expansion, this itself presents a danger to Heathrow, West and Central London /Heathrow and Thames Valley economies. These are good reasons, as we have demonstrated before, for not accepting the single hub concept.
- c) Soliciting support for a single hub showing that it permits service to more airports is persuasive, but it ignores the possibility that competition will attract more custom and that the projected increase in passenger numbers will allow the operation of flights with fewer connecting flights. It should also be noted that Gatwick can be expanded with minimal environmental impact compared to Heathrow. A planning application for a second runway made now would pave the way for a development that could minimise delay and take effect immediately soon after the expiry of the 2019 legal agreement. We understand development of a second runway at Gatwick before 2019 is now strongly supported by West Sussex County Council.
- d) Reference to airlines having previously tried to use Gatwick more extensively without success has much to do with the 2019 restriction on not expanding

Gatwick and the previous owners failing to do the work necessary to allow it to compete on even terms. Both of those barriers can now be considered to be removed.

- e) The establishment of a second hub with a different Alliance to the One World Alliance dominating Heathrow would be consistent with the original intent of the Competition Commission in requiring that BAA (as it then was) should sell Heathrow and Gatwick airports

**iv. That the passenger data provided e.g. passenger capacity estimates, can be relied upon.**

At the time Terminal Five was being considered it was estimated that approx 90 million passengers could be accommodated with no increase in flight numbers. Given recent developments and growth patterns (still only just 70 million) this calls into serious question the reliability of projections and concerns as to whether Heathrow's current "high level" estimates are any more reliable.

**Noise Mitigation**

Heathrow contends that moving the runways further west would result in aircraft being 300 ft higher over London for each mile the runway is moved and would significantly reduce noise over London. Consequently this would suggest the North-West and South-West runways would cause the aircraft to be several multiples of 300ft lower over Datchet and close to Old Windsor respectively, resulting in even more disturbance to local communities in relatively quiet parts of this Borough.

The relevant noise mitigation of the hugely increased and totally different noise burden which would be inflicted upon these and other communities should be based on modern European and/or WHO standards. Please note, this topic has been covered in previous submissions by this Borough.

The Borough notes the Heathrow options all state: *'We have maintained the principle of runway alternation to provide periods of respite from noise for all communities around Heathrow'*. The Borough is concerned that this statement does not provide any guarantees that this will be the case.

Firstly, it is up to the Commission to deliberate and decide upon noise mitigation as part of the short-term capacity issue and therefore this may not be the case for the longer-term options. Secondly, it is difficult to see how a three-runway (or four) airport will be able to operate a system of alternation on all runways.

Thirdly, the Commission has still to decide on whether mixed mode operation is an acceptable option on one or more runways. To repeat the borough's position, any introduction of mixed mode operation would be severely detrimental to all communities around Heathrow, severely limiting the introduction of full scale alternation, particularly to the west of the airport.

**Other Concerns**

The Borough would also wish to draw the Commission's attention to a number of particular independent submissions that have been made by a number of local communities and individuals who have raised a number of concerns over these latest proposals. Notably, Wraysbury Parish Council which has recently submitted very substantial reasons for justifying its outright objections to the proposals given the *'catastrophic damage to the historic parish of Wraysbury'* in respect of the South-West option.

The Borough is aware that raised objections have centred around:

- Destruction of the village of Stanwell Moor (not in RBWM).
- Destruction of the quality of life in the village of Stanwell, which is directly in line with the proposed runway.
- Ripping the heart out of the historic riverside village of Wraysbury, cutting it in two, and destroying dozens of homes in the Staines Road area.

- Adverse impacts upon Bedfont, Old Windsor, Windsor Great Park and Englefield Green from noise and pollution.
- Wraysbury's exceptional community, with its remarkable variety of sports and social clubs and societies, will collapse, as long established community minded families are replaced by short term airport tenants.
- Draining of two vast reservoirs and needing to be partially rebuilt to accommodate the location of the SW runway option, leaving London perilously short of water storage capacity until a suitable location for and new reservoirs are built and linked to serve London.
- Disruption arising from the need to re-route the M25 (Europe's busiest road) through a tunnel beneath the runway; reconfigure gradients, relocation of Junction 13 (one of the most congested parts of the M25) and further interchanges near T5.
- Demolition of some 850 homes including properties in Wraysbury, Horton and Hythe End.
- The vital Windsor - Staines upon Thames railway line will need to be diverted and tunnelled.
- The busy B376 road serving Wraysbury and Datchet would need the same work.
- A key element of the lower Thames Flood Alleviation Scheme is planned to pass through Wraysbury. It will probably need to be buried in a culvert beneath the runway.
- The Environment Agency places a high risk of flooding in this area, which seriously questions the feasibility of tunnelling or other work to lower either the railway or the M25 under the runway.
- A number of rivers (River Colne Brook, the Wraysbury River and the River Colne,) and several minor but important watercourses, (the Horton and Wraysbury Drains and the County Ditch), will need to be buried in culverts beneath the runway.
- Three large Sites of Special Scientific Interest (SSSI) that enjoy international protection under the Ramsar Convention, will be destroyed.
- It is likely a former landfill site, that accepted baled putrescible waste up until approximately 25 years ago, will need to be disturbed and/or removed.
- The South Western Runway will destroy the historic tranquil, National Trust owned Thames side Ankerwycke Estate. Ankerwycke contains the 'Ankerwycke Yew', one of the 50 Great British Trees, as designated by the Tree Council. It is over 2,000 years old. Next to the Yew are the ruins of medieval St. Michael's Priory. It is reputed that King Henry VIII courted Queen Anne Boleyn under the boughs of the Ankerwycke Yew. The Magna Carta was sealed nearby on Magna Carta Island by King John.
- Most of these items would add years of delay, enormous disruption to the public in general, the M25 and other essential transport systems, all at enormous unnecessary expense to the runway project.

The Borough is similarly concerned about the problems created by any of the Northern runway options. These concerns are to those detailed in a previous submission to the DfT (2008) as outlined in **Appendix 2**. There are a number of very obvious reasons for the Borough's total opposition to these options, including the following:

- The destruction of communities and historic buildings;
- The disruption, diversion and tunnelling of considerable lengths of the A4 trunk road M4 and M25, possibly including a loss of the Colnbrook By-Pass,
- Relocation and reconstruction of the very complex M4 / M25 interchange;
- The far greater noise which would be suffered by this Borough's quiet communities of Datchet and Eton, the latter seeming incongruous in that the serenity of the internationally famous seat of learning of Eton College would be threatened by excessive noise;
- Air quality infringements and a failure to meet European air quality standards.

Common to all options is that any further significant development at Heathrow will have significant knock-on effects for the Borough through potentially further over-heating the economy of the Thames Valley area and creating development pressures on the Green Belt. Demolition of hundreds of houses will add to pressure on the housing stock including demand and inflationary impacts, increase demand for employment land, and place further pressure

on the transport network and other infrastructure. There is little objective evidence in the proposals that provides firm assurances that these issues can be adequately accommodated in a sustainable way.

Leading representatives of Old Windsor and West Windsor communities share these concerns.

The Borough fully supports the representations made to the Airports Commission by Old Windsor Parish Council and other parties.

The Commission is asked to consider a critique of the Heathrow submission that has been undertaken by the Borough's Policy team. A copy of that critique is attached as **Appendix 3**.

## **Conclusion**

The Borough is convinced that none of the options, in particular, the South –West option have been sufficiently thought through and would certainly not be an economically viable or practical option.

The adverse effects of airport operations upon the health and quality of life of local communities living around the Heathrow complex is the major consideration for the Airports Commission in determining whether there should be any further development at Heathrow Airport.

The Borough's view remains that:

- The current adverse environmental impacts to which the residents of the Borough are being subjected, is currently and continues to be unacceptable to the extent that their basic quality of life is adversely and severely affected;
- The current baseline method of assessment against which community impacts are being made is significantly flawed, crude and inadequate. It follows any assessments cannot give a complete and accurate picture of what life is really like living under the flight paths within the Borough, currently or as projected into the future. It is our view that many of the statements outlined within Heathrow Airport's Submission to the Airports Commission: '*A New Approach – Heathrow's options for connecting the UK to growth*' are overly optimistic and the severity of impacts are grossly under-stated.
- The submitted Heathrow options have little regard to the additional impacts that would ensue should any of the proposals be advanced. Previous decisions based on exhaustive technical assessments of the impacts caused by any further major developments at Heathrow have already demonstrated, beyond any doubt, the likely irreversible impacts that would arise from the seemingly unrelenting drive to periodically seek to erode previous government decisions and airport undertakings that have rightly restricted the development of the Heathrow site beyond its acceptable environmental, economic and social capacities.
- Any further significant development at Heathrow will hinder any future attempts to improve, and indeed are more likely to worsen the quality of life for many thousands of residents and communities living around Heathrow Airport. The Borough believes there are other more sustainable options that can be considered and developed that support fully the overarching aims of the Aviation Policy Framework that do not inflict so much irreversible damage.

***For these reasons the Borough urges the Commission to exclude all of Heathrow's expansion proposals at the earliest possible date to avoid any further community uncertainty, potential unrest and loss of property values and quality of life to local communities.***

For the avoidance of doubt the Borough continues to support the aims and objectives of the Aviation Policy Framework to create a sustainable aviation industry.

The Royal Borough of Windsor and Maidenhead would have no objections and would positively welcome this response being published on the Airports Commission website.

Yours sincerely

**T.J.Gould**

**Head of Public Protection  
RB Windsor and Maidenhead  
01628 693501**

Attachments:

- **Appendix 1:** Cabinet Report 26/09/13 - Heathrow Airport Submission To The Airports Commission: 'A New Approach – Heathrow's options for connecting the UK to growth'
- **Appendix 2:** RBWM response to '*Adding Capacity At Heathrow Airport*' issued by Department for Transport (2007).
- **Appendix 3:** Critical Response to '*Heathrow: A New Approach*' (Sept 2013)