

**Richmond Heathrow Campaign**

Response to Consultation

by

Airports Commission

on

Additional runway capacity at  
Heathrow and Gatwick

3<sup>rd</sup> February 2015

## **Richmond Heathrow Campaign**

This submission is the response from the Richmond Heathrow Campaign (RHC) to the Airports Commission's *consultation on additional runway capacity at Heathrow and Gatwick (11 November 2014 to 3<sup>rd</sup> February 2015)*. Hereinafter we refer to the Airports Commission as the Commission. We do not consider that the contents of this submission are confidential and we have no objections to its publication.

### **Richmond Heathrow Campaign**

The Richmond Heathrow Campaign represents three amenity groups in the London Borough of Richmond upon Thames: The Richmond Society, The Friends of Richmond Green, and the Kew Society which together have over 2000 members. The members of our amenity groups are adversely affected by noise from Heathrow Airport's flight paths, particularly at night. Noise levels around Heathrow are too high and while the trend is for quieter aircraft the reduction in noise levels in recent years has been slow and offset by more flights. We favour a ban on air traffic at night at Heathrow. We are opposed to the introduction of mixed mode and to the development of additional runways at Heathrow. We nevertheless recognise the importance of air transport and the need to make a positive contribution to the Airport Commission's work.

### **Scope of Our Response**

We confine our response to the Heathrow Airport Limited (HAL) proposal for a north west runway and the Heathrow Hub Limited (Hub) proposal for an extended northern runway. We provide detailed responses on the following appraisal modules: noise, surface access, air quality, carbon emissions, safety, wider economy and financial deliverability. We do not have the resources or sufficient time to comment on bio-diversity, water and flood risk, place, community, quality of life and local economics (including direct employment and housing) all as defined by the Consultation.

RHC has submitted to the Commission both short/medium term proposals and longer term proposals which encourage better use of existing airport capacity so as to provide for, inter alia, passenger growth without runway growth over the foreseeable future. We have also responded to all the Commission's discussion papers.

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*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.*

RHC's overall conclusion is that Heathrow expansion either by way of a northwest runway or extended runway does not add value to the wider UK economy and by re-distributing passengers and flights from the regions results in economic dis-benefits. At the same time the environmental noise costs are substantial with disturbance extending to as many as 1.5 million people if noise levels were to be measured at WHO standard levels which RHC strongly recommends. We are particularly concerned at the lack of definition of future flight paths and respite that until resolved will blight much of west London for years to come.

RHC believes that the value of international transfers is substantially overstated and with it the single airport hub concept. We believe a dispersed model that makes best use of all five London airports without any new runways is the best solution. The fact that Heathrow's additional capacity is likely to be largely underwritten by re-distribution from the regions confirms our belief that no new runways are needed in the southeast, at least in the next 35 years examined.

We believe that five London airports should provide a viable competitive model that is superior to concentration at a single airport.

There is also great uncertainty in either Heathrow option being financed without requiring very substantial Government assistance. In addition, there is uncertainty regarding the impact of carbon emissions, air pollution and surface access congestion.

We believe consideration should be given to spending some of the money required for Heathrow's expansion on better surface access for all five London airports and suggest this would produce a better return for the money spent and materially improve passenger experience and needs.

*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.*

The Annexes attached to our response contain such comments as are relevant to this question.

*Q3: Do you have any comments on how the Commission has carried out its appraisal? The appraisal process is summarised in section two.*

- 3.1 There is a substantial volume of detail and we have found it difficult to follow the trail from the technical reports to the business and sustainability assessments and then the high level consultation document itself. Specifically:
- some of the technical reports do not integrate well (the silo effect),
  - it is difficult to follow the path upwards from the technical reports to the business and sustainability assessments,
  - it is difficult to follow the path downwards to the technical reports from the higher level reports,
  - the tangible topics, such as surface access, appear in a large number of assessment sections which results in extensive duplication but difficulty in amalgamating each topic

into a comprehensive and relatively simple conclusion.

- 3.1 The decision process has divided the expansion decision into two decisions - the need for a net additional runway and the choice of project. Unfortunately, this two stage process results in the second stage focusing on the incremental differences rather than the absolute value (cost/benefit) of each of the alternative projects. For example, the Commission has not completed a number of studies on flight paths, surface access etc but claims that the absence of detail does not invalidate a comparison between projects. That may be so in an incremental approach but not in an absolute approach. The absolute approach has been left behind at the interim report stage.
- 3.2 There has been insufficient time with limited resources to read let alone assess all the material.
- 3.3 There are significant gaps in the appraisal, some of which the Commission says it still working on, and others which seem to be missing altogether.
- 3.4 The Commission says (para 2.12) that it has led on the surface access but is therefore also appraising its own proposals.

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

- 4.1 The Annexes attached to our response contain such comments as are relevant to this question.

*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?*

We attach 7 Annexes that examine:

Annex 1	Noise
Annex 2	Surface Access
Annex 3	Air Quality
Annex 4	Carbon Emissions
Annex 5	Safety
Annex 6	Wider Economy
Annex 7	Financial deliverability

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

The Annexes attached to our response contain such comments as are relevant to this question.

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

The Annexes attached to our response contain such comments as are relevant to this question.

*Q8: Do you have any other comments?*

We appreciate the substantial amount of work the Commission has undertaken in examining the issues.