Dear Sir,

In response to your recently published reports, I would like to make some observations.

ENVIRONMENTAL

The Environmental Impact report's main consideration covers ecology and landscape. It is extraordinary that there is no mention of the environmental impact of pollution from aircraft that pass directly over London. To provide a balanced debate, the Airport Commission must address the CO2 emissions and health hazards on the population within the flight path over London, and estimate the cost of this to the economy and the NHS.

It is understood that aircraft passing over London are required to increase engine reverse thrust power, so as to be able to respond to an emergency over a populated area. This uses more fuel and creates more pollutants. In contrast, aircraft landing in the Thames Estuary have the opportunity to save fuel while landing as they are able to glide.

It is estimated that Heathrow would be back to 98% capacity 3 years after completion of the third runway proposal, therefore all those aircraft having to use two or three stacks over Kent and Essex will continue, and this a huge pollution generator that would be mitigated through implementing the Thames Estuary Airport, and is ignored in the reports.

The socio economic cost of noise over populated London is also ignored in the report. Removing such noise from London's residents could increase productivity and well being, and even raise life expectancy.

There also needs to be a comparison between car pollutants at Heathrow and at the proposed Thames Estuary airports. Heathrow has a high percentage of passengers who drive to the airport, and as congestion is high, traffic is slow. This creates a massive pollution problem. In contrast the Thames Estuary, with superior rail connections, predicts a higher percentage of people arriving by public transport than Heathrow does, whilst those arriving by car will not be stuck in traffic.

The effect of the economic cost of CO2 and noise must be addressed in order to make a valid comparison. The cost of this 'saving' for London's health (potentially including EU fines for failing to meet emission standards in London) can offset the estimated £2bn cost of creating a new wildlife habitat. Therefore the financial implication of the environmental effect could be cost neutral, and should be taken account of by the Airport Commission.

AIRPORT RELOCATION PRECEDENT

Several international airports are mentioned as having successfully relocated to a new hub airport. The respective Governments recognised that the previous airports were in the wrong location, and in order for the City and the airport to both expand, then the airport had to be moved.

It is not reasonable to cite the fact that Heathrow has a far higher number of passengers per annum as a reason to reject the Thames Estuary plan as relocation will be too difficult. The airport debate has been in existence for circa 60 years, and it is only the inaction of successive UK Governments that has forced Heathrow to grow within its location rather than move several decades ago.

Other Governments had this foresight, and as such their airports have seen extraordinary growth. Since the time of relocating the airports, Hong Kong's passenger numbers have grown by 110%; Munich's by 225%; Denver's by 70%; Athens' by 10%; and Oslo by 62%. Such growth rates are difficult to happen at Heathrow, although there is vast potential to increase passenger numbers at the Thames Estuary.

When making such comparisons between other airports annual passenger numbers, the Airports Commission must also look at the resilient capacity of the airports. All of the airports mentioned will have high levels of capacity relative to Heathrow, or even an expanded Heathrow. For instance, where Heathrow is running at 98 / 99% capacity, it demonstrates a very high risk and inefficiency, which carries an economic cost that has to be taken into account. These comparisons (especially between an expanded Heathrow and a new Thames Estuary airport, must be on a like-for-like basis).

The comparison reports make no mention of Kuala Lumpur International Airport, that offers a better example than say Athens, which was included within the list. This airport relocated 35 miles from the Sultan Abdul Aziz Shah Airport and is far larger in scale than Athens.

The relevance of the distance between the old and the new airports is overblown. The cost of moving 1 mile or 70 miles does not rise equally per mile. The majority of the cost will be the same, with only transportation of goods rising.

The relevance of the distance of the new airport to the city centre rail hub is also overblown. For example Kuala Lumpur International Airport is 35 miles and has a journey time of 28 minutes, which is the same journey time from the Thames Estuary Airport to Kings Cross station, albeit the distance is nearly 30% greater. Modern high speed rail enables greater distances to be covered in the same time, although the reports appear to disregard this.

SS RICHARD MONTGOMERY

This wreck from the Second World War is a liability, and both the UK and US Governments should jointly shoulder responsibility as both carry blame for the accident.

Time is ticking on the wreck, which can only deteriorate further. The monitoring only happens to allow residents on the coast to be evacuated, or to implement emergency procedures to contain the potential explosion. Experts agree that doing nothing about the wreck is not an option, and the more time that passes, raises the risk. The only unknown is when action will need to be taken.

Therefore to state that the SS Montgomery raises substantial risk to the Thames Estuary Airport is not right, and this risk should be disregarded as it is known about, and has to be dealt with by the Government some time in the future regardless of the new airport happening or not. However, the Thames Estuary Airport offers the opportunity to provide necessary funds to deal with this issue, which would otherwise be a required cost for the UK Government.

IMPACT ON RELOCATION FROM HEATHROW TO THAMES ESTUARY

It is inaccurately stated that workers at Heathrow Airport would have to travel further to get to work at the Thames Estuary Airport. What study has been conducted into where Heathrow's workforce lives? What study has been conducted as to the elasticity of these workers relocating closer to the Thames Estuary? The majority of these workers located to Heathrow as they were able to find work there. Why do the reports not consider it feasible that the same would be true of the Thames Estuary? Moving closer to the new airport would offer new housing stock, new schools and other infrastructure, and has the ability to raise the workers living standards. If Heathrow expands, the majority of workers could see their journey times rise as the roads will become more congested than they currently are. What study has been conducted to demonstrate this?

What comparison has been made to significant corporate relocation moves, where thousands of workers have moved much greater distances?

The reports to the Airports Commission only consider the increase in journey times for workers currently working at Heathrow and travelling to the Thames Estuary. There is no mention of any study looking into the benefit to the broader population that is far in excess of the number of Heathrow workers, that would have improved journey times to their own places of work.

For instance, there are more than 90,000 vehicle movements a day on Hammersmith Flyover alone. Removing airport related traffic would severely improve the flow of traffic on the M25 and the M4, thereby increasing the economic benefit for a broader section of the populous, rather than just the narrow measure of those actually working at the airport. To provide a fair comparison, this should be addressed.

LIKE FOR LIKE COMPARISON

The Airports Commission has stated that there is a need for a fourth runway to be built by 2050, in addition to a single runway at either Heathrow or Gatwick today. Only the Thames Estuary Airport meets this requirement today.

Seeing as this expansion is already known about, then why are all of the cost comparisons between a Thames Estuary Airport, and a single extra runway? To be on a level playing field, a fourth runway at Heathrow needs to be costed today. This includes the requirement to expand the M25 and M4 motorways, and should look at the pollution and health aspects for London's population.

It is wrong to only put the 3rd runway proposal to the public. Were a 3rd runway to be approved, then the chances of Heathrow securing the 4th runway are substantial, so this expansion has to be considered today or the public are being misrepresented.

PROXIMITY AND TRAVEL TIMES TO AIRPORTS

What research has been conducted into the travel times for the population in the south east to get to either Heathrow or the Thames Estuary, assuming the infrastructure plans have been implemented?

Heathrow is only convenient for those living in west or north London, or west, north-west, or south-west <u>of</u> London, with the majority of these passengers having to travel by car along a highly congested road network that has to accommodate freight traffic as well.

Heathrow is not easy to get to from south or east London, and journey times & population maps need to be produced for all airport location submissions. For instance, to get to Heathrow from Clapham Junction takes between 1 hour and 1 hour 20 minutes for the 17 mile journey, when it would take less than 1 hour for the 45 mile journey to the Thames Estuary Airport.

The future population growth of London also needs to be taken into account when making such a strategic and longterm infrastructure decision. For instance one third of all residential development land is to the east of London, mainly located within the Thames Estuary. The City is moving east, and yet Heathrow is not able to cater for this growth, hence average journey times to Heathrow will only deteriorate once this housing and population shift is taken into consideration.

HEATHROW COMPENSATION

There is mention that the owners of Heathrow might need to be compensated up to £21bn for the compulsory purchase of the land. Substantial compulsory purchase projects have precedent, including the Olympics 2012, HS1 and HS2, and entering into the necessary commercial negotiations of closing Heathrow would have been factored into the price, so it is wrong to overstate this as being a risk.

What the reports ignore is that the land required for the Thames Estuary Airport would be substantially cheaper, being valued at existing uses of agricultural or scrubland prices in the very low thousands per acre, opposed to the millions per acre at Heathrow. Under CPO powers, the owner of the property being acquired can either accept the financial compensation or take a suitable alternative property. It has therefore been wrongly (and overly) stated that Heathrow Airport Holdings would chose to abandon the UK and would not accept the offer of the alternative location at the Thames Estuary, which would arguably provide them with better facilities and would be the best airport in Europe. The cost of providing the Thames Estuary Airport has therefore been overstated, and this should be addressed when making the comparison.

Where the Government also gains planning consent for a mixed use masterplan on the Heathrow land for up to 200,000 housing units, then substantial cash can be generated, and can offset the cost of road and rail infrastructure to the new Thames Estuary Airport. This appears to have been ignored in the provision of the Thames Estuary Airport, which consequently over-inflates it's cost relative to expanding Heathrow.

The reports clearly state that Heathrow would have to be closed were the Thames Estuary Airport to proceed. Therefore when assessing the Thames Estuary Airport, full consideration has to be given to Heathrow's future use as it is intrinsically related.

LNG FACILITY ON ISLE OF GRAIN

Were there to be a mass explosion or fire at this facility, then what impact would there be to flights flying east to west to Heathrow and to Gatwick? The reports only look at the proximity to the Thames Estuary Airport, and do not consider that flights to Heathrow and Gatwick may also need to be re-routed or closed.

Were an aircraft to be used to fly into this facility then that could happen whether the Thames Estuary Airport existed or not. An aircraft landing on the City of London could have far more catastrophic loss of life than the remote Thames Estuary.

Also, if such a fire did break out, then what are the consequences as the report does not consider this other than stating it'd be a major operational impact? Would it make the airport unusable, and if so, for how long? Would the fire be so intense that the entire airport would need to be rebuilt as it might slip into the sea? And to provide a comparison with Heathrow, what would be the effect if the fuel depot at Heathrow were to be destroyed, or an uncontrollable fire broke out in a terminal building. Has this been factored into the Heathrow expansion proposal, especially as Heathrow is far more compact than the Thames Estuary plans, and contains many buildings dating from the 1970's.

Heathrow was closed for an entire week in 2010 due to a volcano erupting in Iceland. This event was not planned for and caused untold disruption. Being at close proximity to the LNG plant would ensure that there is a back up plan. One would also expect that there are emergency plans for the LNG facility, especially as it is of such national importance, and hence it should be relatively safe as it will have unprecedented levels of protection.

I trust that these comments will be reflected upon, and I look forward to hearing about a more balanced debate and enquiry into the different airport expansion plans, putting the options on a level playing field.

Yours faithfully,

[redacted]