



Campaign Response Text:

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.

I do not believe the Commission makes a convincing case for building a new runway, at either Heathrow or Gatwick.

There is far too much uncertainty.

There are too many different scenarios, ranging from a small amount of growth in air traffic demand, to a huge amount. This covers the Commission from future accusations of not having taking factors into account etc, but it makes future estimates of demand little better than an educated guess by anyone familiar with some of the airport issues. It is, of course, impossible to predict the future.

The extent of social and environmental damage - not to mention the carbon emissions - from building a new runway should not be contemplated, when accurate prediction of air travel in the future is absent. Too much in the documents (for instance, on future aircraft carbon efficiencies or existence of genuinely low carbon biofuels) is just optimistic speculation.

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 UK has enough airport capacity to deal with reasonable levels of air passenger growth, if the airlines could be persuaded to use the existing airports in a more efficient manner. As it is, they like to base themselves at Heathrow, and to a lesser extent, at Gatwick. This does not have to be inevitable. Indeed, the government is strong on rhetoric about assisting development in the regions. That would mean more traffic for regional airports. However, this consultation focuses just on how the amount of air travel can be concentrated in a small corner, in the south east. That is unhelpful to regional policy, in my opinion.

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.

The Commission has been thorough, in most of its work. However, it has been too keen to look at economics only. It could be accused of "knowing the price of everything, and the value of nothing." Though looking at every aspect, from an economic point of view, has its own value - I believe the analysis to be too much focused on money, rather than more social and environmental harms.

For instance, in the case of Gatwick, analyses talk about replacing ancient forest with new forest. That is, by definition, impossible. Maybe in financial terms, it can be made to work. The practical biology makes this a nonsense. Ancient forest cannot just be rapidly recreated.

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

On the issue of health, there are glaring omissions in the analysis, highlighted by Hillingdon Borough Council. The Commission should have looked at health more specifically and committed to undertaking some form of Health Impact Assessment. For this not to have been done is a huge omission. Health Impact Assessments should be carried out at the earliest stage possible. For the Commission to say that this should be done at the planning application stage is completely unacceptable. That would be a serious case of "shutting the stable door after the horse has bolted."

On the issue of climate, the whole Airports Commission analysis is deeply flawed. You will have received the comments from AEF (the Aviation Environment Federation) setting out what should have been done, to show how a runway could be built, and UK aviation might possibly be fitted within its carbon target.

The AEF asks the Commission to explain why its CO₂ emissions forecasts are lower than the Government's latest forecasts, what assumptions have been made and how sensitive the results are to them. None of this has been made clear.

The AEF asks the Commission to set out in meaningful detail what policy developments would be required in order to limit emissions to the aviation cap while building new capacity. None of this has been made clear.

And they ask the Commission to fully include the economy-wide cost of keeping national aviation emissions to within 37.5 Mt in its cost benefit analyses, in line with the recommendations of the

Committee on Climate Change. The AEF says this analysis should be presented prominently in the final report.

The manner in which the Commission often mentions the possibility of a 2nd new runway, not merely the first one being considered at present, indicates (in my opinion) a failure of the Commission to understand, or to take seriously, the issues of carbon emissions from UK aviation. It is inconceivable that it could even talk about a 2nd new runway, if there was any genuine commitment by the Commission to try to keep UK aviation within the cap that the Committee on Climate Change has recommended.

The Commission's failure to produce air quality data or analysis in time for the consultation is deeply regrettable. Air quality is, as the Commission has itself said, a possible "make or break" issue for Heathrow. And yet there has been no proper detail submitted.

The Commission has also added documents, during the consultation period. That means anyone efficient enough to submit their comments early would not have been able to see these, or include anything relating to their content in their submission. Adding of extra documents is not permitted in proper consultations, by statutory bodies, councils etc.

See also a recent briefing on carbon emissions and a new runway at AirportWatch briefing on CO2 emissions and new runway January 2015 <<http://www.airportwatch.org.uk/wp-content/uploads/AirportWatch-briefing-on-CO2-emissions-and-new-runway-January-2015.pdf>>

Other comments

Q8: Do you have any other comments?

The Commission was too hasty (I appreciate that the Commission was given this brief, by the Government, with the intention of recommending a new runway, and removing the troublesome nature of this recommendation from them) in advocating a new runway.

The practical reality, in terms of climate, shows that a new runway should not be allowed - due to the serious threat of the carbon emissions it would be responsible for not only breaching the UK aviation carbon limit (37.5 Mt CO₂) - and therefore, also of breaching the UK's legally binding carbon target for 2050.

In a democracy, and in an area as crowded as the south east of England, I do not believe a runway can be built - the amount of harm done to people living near it, or those affected more widely by noise etc, - is just too great, for marginal economic benefits.

It should not be possible to inflict this extent of nuisance, upset, disturbance, annoyance, damage to health, and destruction of local character and communities, upon people in a democratic country. So much more so, when this is to be inflicted on people for little better reason than to boost the profits of foreign investors. That is, in my view, shocking. The self interest and profits of big business should not be able to trump the common good.

We claim to be a proper democratic country, in which the welfare of citizens, and their opinions are properly taken into account.

It is very much to be hoped that the, frankly obscene, advertising and PR campaigns run by Heathrow and by Gatwick, hoping to drum up support for their runways from the general public, will be discounted by the Commission.

In a "David and Goliath" battle between the airports, and between the airports and the communities, it is impossible for ordinary people to fight as visibly, with adverts etc, as these two mega- companies with their vast advertising budgets. I believe the Commission does appreciate the problem, and the access to PR budgets, highly paid campaign staff etc, that the airports have - and the local communities do not have.

The option of no new runway should be reinstated.

The actual work of the Commission should have been, in my view, to see whether there should be a runway or not. For reasons of political necessity, the Commission has instead seen its work as where a runway should be built. This error can still be rectified.

There should be NO runway at Heathrow, and there should be NO runway at Gatwick.

There should be measures to increase the efficient use of the huge amount of airport capacity that exists in the UK.

The brave, and right, decision by the Commission would be to advocate no new runway. That would be in the best interests of the country. It would require courage, and a volte face. However, as the Commission has now painted itself in to a corner, of the false choice between Heathrow

and Gatwick, that may be difficult.

I hope these comments will be taken into account when considering the Commission's next moves, and its statement to government - some time after the election.

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