



OAKLEY GREEN RESIDENTS  
ASSOCIATION  
WEST WINDSOR RESIDENTS  
ASSOCIATION



## AIRPORTS COMMISSION

# RESPONSE TO THE CONSULTATION ON THE TWO OPTIONS TO EXPAND CAPACITY AT HEATHROW

*The Commission's Questions invite views and conclusions in respect of the three short-listed options to be submitted by 3rd February 2015*

*Q1: What conclusions, if any, do you draw in respect of the three short-listed options?*

Heathrow is already the noisiest airport in the United Kingdom and Europe from Commission's own evidence. The detrimental impact of its present operations on many tens of thousands of residents living in West London is unacceptable and these proposals will create the same conditions for the many tens of thousands of residents living to the west of the airport.

It is noted that the Commission finds that both proposals deliver 'significantly adverse noise and air pollution' outcomes, without mitigation'.

The Commission's findings that these are balanced by the economic benefits and the outcome is therefore 'neutral' is difficult for those adversely affected to understand, particularly given the breach of World Health Organisation guidelines on acceptable environmental limits, that each of the two proposals would cause.

This principle could logically balance the loss of residents' lives against an economic benefit and judge the outcome to be neutral. Lives have a quantum value which, no doubt, would fit the required calculations but this conclusion would not be acceptable.

This issue is further developed in the answer to Question 3.

In any case, there can be no justification for inflicting these 'adverse' outcomes upon so many tens of thousands of population in order to secure a neutral result.

### **NORTH WEST RUNWAY PROPOSAL ~ TWICE AS MANY FLIGHTS OVER WINDSOR**

1. The new North West Runway Proposal is sited just 1045 metres north of the existing North Runway. It is also ends 1500 metres west of it and planes will therefore be approximately 280 feet lower and far noisier, as they pass over Windsor, Eton and Datchet, to land at the airport.
2. Take off heights will vary but it seems unlikely that aircraft taking off on the proposed North West runway will reach a sufficient altitude to allow them to diverge from the straight out flight path much before Windsor and Eton.

## **Response to the Airports Commission (cont'd)**

3. Two of the three runways will be used concurrently and the number of flights could rise by 54% or more. Those living under and between the flight paths to two runways, will have prolonged periods in which planes will be passing overhead every 30 to 40 seconds, with increased noise levels.

### **EXTENDED (HEATHROW HUB) PROPOSAL ~ TWICE AS MUCH NOISE LEVELS**

1. The Extended (Heathrow Hub) Proposal will extend the existing North Runway, so that its western end for landing will be 2750 metres nearer to Datchet and Windsor. Planes will therefore be approximately 480 feet lower, as they pass over these residential areas, to land at the airport.
2. Planes taking off will start 3650 m nearer to Datchet and Windsor and aircraft will be unable to attain sufficient altitude to diverge from the straight out departure before they pass over these areas.
3. Take offs over Cranford will start 950 metres nearer to Cranford than is the case with the current situation.
4. As a result, the Extended Runway (Heathrow Hub) proposal will deliver noise levels that rise to fourfold the present level in Datchet and double that in Windsor.
5. Aircraft departing LHR have to attain at least 500ft before diverging from the extended centre line of any runway. Departures from the extended 27R would also have to satisfy the performance criteria to cover a subsequent power loss to one of its engines and the subsequent much reduced rate of climb that would ensue. These complicated calculations take many factors into consideration. Windsor, and therefore Windsor Castle, is situated on raised ground meaning that they are likely to become a hazard for such problem departures.

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 Gatwick Option needs to be developed to better serve the 'hub' mode of operations that appears to be presently favoured by British Airways.

Q3: Do you have any comments on how the Commission has carried out its appraisal?

### **NOISE NUISANCE ~ NO ACCEPTED METHOD FOR MEASURING NUISANCE**

1. The method used by the Government to measure noise does not reflect the level of disturbance. The use of average noise level measurements is of particular concern, as it does not represent the high levels of noise experienced daily.
2. Similarly, the Commission determines the extent of the impact of aircraft noise by measuring the number of people affected by a given average noise

## Response to the Airports Commission (cont'd)

contour. This ignores the number of people affected by the totally unacceptable high levels of noise generated by each proposal.

3. Even when N70 data is considered for level of disturbance every day, the number of flights is set too low, at more than 50. How many people will be affected by more the 250 to 300 flights at N70 around Colnbrook, Datchet, Horton and Cranford?

The Commission's documents reflecting the assessment of noise refer to the three current methods of assessing noise. The first two (Laeq and Lden) have the disadvantage of averaging the impact. The third (N70) measures the impact of the number of flights that have a maximum noise measurement of 70db.

The problem is they choose to report the number of people affected by more than 50 flights with a 70 dB reading. The number of people where a greater number of flights occur cannot be shown.

In the case of the extended proposed Northern Runway, for example, that measurement indicates approximately 200,000 people are affected. Clearly a smaller number around Datchet, Colnbrook, Cranford and Horton will have a significantly higher number of flights with a reading of 70db or more. They receive no consideration and the suggestion is that a measurement reflecting their predicament should be used to determine if the Commission considers their environment to be tolerable.

This plainly cannot be correct and demonstrates the urgent and absolutely essential need for a further study and adoption of an equitable aircraft noise assessment scheme to be adopted by the UK Government.

4. It may be argued that some existing areas are already affected by such intolerable conditions but how many new airport developments have previously been allowed with the express intention of creating such an intolerable environment with such a high intensity of flights?
5. Parliament has acknowledged that the frequency of flights as well as the intensity of noise needs to be considered and we are still awaiting a response that can be used to inform the debate on noise nuisance. The previous ANASE report was rejected by Government, with the result that no accepted basis for measuring noise nuisance has been employed. As a result, 33 year old criteria, taken from the 1982 ANIS study principles, still apply to UK aviation noise matters.
6. For these reasons, the limit of 480,000 air traffic movements at Heathrow should be retained until such a noise study is completed and adopted.
7. The importance of a proper period of relief from incessant disturbance from aircraft relief is currently accepted. In each of the two proposals, the relief

## **Response to the Airports Commission (cont'd)**

periods have been at least halved from the current expectation and many cases are virtually non-existent.

### **AIR POLLUTION & HEALTH ISSUES ~ ALREADY IN EXCESS OF WHO LIMITS**

1. It is understood that Nitrogen Dioxide air pollution in parts of Windsor and Bray exceeds the World Health Organisation's safety limits. It is the same in places around Heathrow and at Junction 13, Wraysbury, on the M25
2. Nitric Oxide is 300 times worse than CO2 in its effect on global warming.
3. It is widely acknowledged that atmospheric pollution from airport operations has a detrimental impact on the health, particularly in relation to cardiovascular diseases.
4. In the first three weeks of September last year 9100 flights passed over Windsor to land at Heathrow. That was one every 80 to 90 seconds during daylight hours.
5. The schoolchildren of Hounslow go out to play and the noise and pollution in the air is horrific. They go home and the noise and the air pollution is horrific. This will be the situation in Wraysbury, Datchet and Windsor, if either of these two proposals is adopted.
6. The proposition that the adverse environmental impact of Heathrow's operations should be offset by a reduction in pollution from other sources means that the pollution around HR can rise even more.
7. The use of emissions trading, to accommodate high pollution zones, is unacceptable. Due to the wide scale impact of Heathrow's flight operations, pollution from aircraft affects many thousands of people. Traffic generated from the airport operations does likewise. Mitigation measures are meant to deal with the pollution, not constitute a financial penalty which allows the pollution to continue.
8. It is therefore essential that a far more rigorous assessment of the air pollution issues should be undertaken.
9. The Commission should not consider expansion of Heathrow unless it can be demonstrated that air pollution is kept within the World Health Organisation recommendations.

### **SAFETY – THE COMMISSION SHOULD THINK AGAIN ABOUT THE RISKS**

1. The Terminal Five Planning Inspector, Roy Vandermeer, found and reported that:  
*The risk of a major air crash involving many casualties on the ground raises questions about the future role of Heathrow. From this and other public safety points of view, development at either Gatwick or Stansted would be*

## Response to the Airports Commission (cont'd)

*preferable to that at Heathrow since approaches to both do not pass over extensive, built up areas.*

2. On 17<sup>th</sup> January 2008, British Airways flight 38 crashed on the runway at Heathrow, having suffered fuel starvation on its approach over West London.
3. On 24 May 2013, a British Airways flight from London to Oslo was forced to make an emergency landing at Heathrow after both its engines suffered damage of some kind, causing one engine to catch fire.
4. It is only a matter of time before an aeroplane does not make it to the runway and there is a major air crash in a residential area. It actually happened in Queens New York in 2001 and in New York in January 2009, when the plane ditched in the Hudson River.
5. If the proposed expansion of Heathrow goes ahead, the number of flights each year can increase to 730,000 from the current 480,000. This 52% increase will be accompanied by a greater risk of a disaster occurring over the residential areas surrounding the airport.
6. There is also the matter of terrorist threats and the possibility that a 'showcase attack' on Windsor Castle would be better facilitated by either of the two Heathrow options under consideration.

The closer proximity of the western end of the runways to Windsor Castle in each option means that it is likely that aircraft taking off will follow a straight out flight path as they pass over Windsor. A terrorist attack, such as a bomb, at this point in the flight, carries the risk that the plane would impact on the Castle and the town. At present, flights normally divert away from the town and overflights of the Castle are infrequent.

The response to Question 8 contains Diagram 2. This illustrates our assessment that the alignment of the approach to the proposed Northwest Runway is separated from the North Terrace of Windsor Castle by just 650 feet or 200 metres. The Monarch's private apartments are located nearby. The height of planes landing on this runway is approximately 990 feet above the Terrace level.

In the event of difficulties such as adverse weather, instrument failure or engine failure, there is a risk that a plane would come down on the Castle or the town.

7. The Commission should examine in greater detail the risks and consequences of such events and its findings should figure prominently in the consideration it gives to the options. The public will be keen to understand how it addresses such an important subject.

## **Response to the Airports Commission (cont'd)**

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

1. There is no accepted basis for judging the adverse effects of noise nuisance, as detailed in the response to Question 3. This undermines the credibility of the Commission's work and the public's readiness to accept its conclusions.
2. Safety issues need a lot more consideration, as detailed in the response to the previous Question. The Terminal 5 Planning Inspector gave careful consideration to these matters and was unequivocal in voicing his concerns and in making his recommendations.

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?

1. As noted in the response to Question 1 and developed further in the response to Question 3, the principle that adverse outcomes are acceptable if benefits accrue cannot be applied without moderation. If the adverse outcomes cannot be mitigated so that they become tolerable, the principle is unacceptable.
2. This issue could be addressed if there were an accepted set of principles for judging the effect of noise disturbance and if conformity with international standards for noise and pollution were shown to apply to the proposals.
3. This is a major concern because, without these accepted criteria, the findings of the Commission will be seen to be based on questionable principles.

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

### **HOUSING AND INFRASTRUCTURE ~ NO CAPACITY FOR ADDITIONAL NEEDS**

1. The Airports Commission estimates that 70,000 new homes will be needed, if either of the two proposals to expand capacity at Heathrow is adopted. This number of new homes will accommodate almost a quarter of a million additional people, with consequent needs for infrastructure and services.
2. Land in the Thames Valley and in the London Boroughs is already under immense pressure to accommodate current needs and there is already a considerable threat to the Green Belt, in attempts to meet this demand.
3. The infrastructure that would be needed to serve the needs of this extra population would be considerable. Existing public services, such as schools, clinics, hospitals, policing and local councils, would be hugely overstretched and the additional road and transport infrastructure would impose a massive additional burden.

## Response to the Airports Commission (cont'd)

4. Heathrow claims it will get 50% of its passengers using public transport. There is no evidence of how this very ambitious target can be achieved and its current efforts to do so have been unfulfilled. They speak of introducing a congestion charge for passengers but this is likely to be very unpopular.
5. The reliance on a modified revival of the former Airtrack rail scheme connecting to the Staines Southern Railway Station, to increase the use of public transport, is totally unrealistic. The Southern Rail network from London Waterloo to Staines, Reading, Guildford and beyond was built when there was very little road traffic and features a host of level crossings which, when closed more frequently, would unacceptably increase road congestion. The Airtrack scheme demonstrated that the A30 crossing at Sunningdale would have doubled the closure time of that important trunk road to 42 minutes per hour. The A30 is in heavy use and provides alternative access to the already congested M3.

The consequence is that the mitigation that has been allowed to the Carbon Impact of the Heathrow Proposals cannot realistically be delivered and the Carbon Impact becomes 'Highly Adverse'.

6. The Commission's methodology seems to employ the criterion that 'one bad outcome is in principle equal to one bad outcome' and therefore the proposal is deemed to be neutral and may be accepted. The logic is not compelling because, as detailed in the response to Question 3, there is no accepted basis for quantifying the nuisance and damage to human wellbeing that noise causes.

Furthermore, air pollution is already present at unacceptable levels and the measures proposed to manage it do not eliminate the 'hot spots' where it is known to be present.

### **SUSTAINABILITY**

Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

The Commission Consultation Document describes it as:

*An opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have.*

7. The two Heathrow proposals impose upon tens of thousands of population unacceptable noise and air pollution for which mitigation measures will deliver very limited redress which is effective only if the population stays indoors.

## **Response to the Airports Commission (cont'd)**

8. Immense amounts of work will be necessary over many years to provide the accommodation and infrastructure that would be needed to service either proposal to expand capacity at Heathrow.
9. The cost of these works does not fall on Heathrow Airport Ltd but on the national and local governments and on others.
10. The cost of the two proposals far exceeds that of the Gatwick proposal, which, the Commission recognises, provides better value for money.
11. These two proposals cannot be regarded as being sustainable.

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

### **AIR TRAFFIC CONTROL INPUT TO THE WORK OF THE COMMISSION**

1. There needs to be a substantial input from the body responsible for air traffic control, NATS.
2. It appears that these proposals regarding the expansion of Heathrow have not taken into consideration the complex air traffic control changes that would be required. It is very likely that a large number of the statistical figures regarding the increased number of movements are far too optimistic, with the result that these proposals are not as viable as predicted.
3. It is understood that the London Airspace Management Programme (LAMP) is having huge problems in trying to address present day problems with aviation activity. This uncalibrated problem must be a huge objection against Heathrow and its conflict with an increasingly active London City Airport adds to these concerns.
4. Air traffic control viability is absolutely paramount for safety and therefore to the credibility of any Commission Report. Without this credibility the whole process becomes worthless.

### **THE PRESUMPTION FOR BALANCING ADVERSE IMPACTS AGAINST ECONOMIC BENEFITS IS NOT ACCEPTABLE**

5. The Airports Commission has balanced the adverse impact that these proposals will have on the life of residents with the economic benefits that they might bring and concludes that there is parity between the two outcomes. The Commission has not demonstrated the basis for reaching this conclusion. It is essential that it should do so.
6. It is not acceptable that tens of thousands of residents, whose lives are already adversely affected by activities at Heathrow, along with many more thousands, should be subjected to worsening noise and air pollution,

## Response to the Airports Commission (cont'd)

exceeding WHO guidelines.

### **EXPANSION OF HEATHROW WILL STIFLE COMPETITION & PROVIDE NO RESILIENCE WHEN THINGS GO WRONG. GRANDFATHER RIGHTS SHOULD BE ABOLISHED**

1. Just five years ago, the UK's regulatory watchdog, the Competition Commission, ordered BAA, now known as Heathrow Airport Limited, to sell Gatwick, Stansted and either Glasgow or Edinburgh airports, amid concerns about its dominance of the market. These proposals will once more allow Heathrow to dominate the market in the UK.
2. It is not true that a single hub is best for the UK economy and for meeting the needs of travellers. New York is served by Newark and Kennedy airports. Having more than one hub meets their needs and delivers a competitive market.
3. Airline alliances each need their own hub. The UK needs more than one, dominant alliance and this would be possible with several hubs around London, serving the needs of travellers and providing competition.
4. They would also provide alternative airline operations when things go wrong.
5. The need for such a dominant hub as an expanded Heathrow would be is not accepted. For example there are 27 daily flights from Heathrow to New York which are only viable because they carry almost 40 percent of transfer passengers, most of whom contribute nothing to the UK economy but add considerably to the complication of the operation at peak periods. The "grandfather" right for airlines to retain slots needs to be reviewed.
6. Heathrow has got a huge wasted capacity due the overall average used seating capacity of all aircraft using the airport is just over 70% and if something were done to maximise seat take up, and reduce the 27 daily flights to both New York and Paris the airport would have a very substantial spare capacity to open up other routes and give more flexibility.
7. If say a 90% seat take up was possible there would be nearly a 20% extra capacity available i.e.  $480,000 \times \text{one fifth} = 96,000$  flights. At present, this will not happen because the grandfather rights on slots give the 'owning' airlines the right to fly wherever they wish from them with however many passengers as they wish, and to deny competitors access to those slots they accept having to fly aircraft at less than capacity.
8. Notwithstanding that these slots have a high financial value, the Commission should recommend that legislation is introduced to outlaw this practice to:

## **Response to the Airports Commission (cont'd)**

- a) prevent restrictive practices & promote competition on a level playing field
- b) maximise use of strategically important assets
- c) reduce the demands for use of more land for airport expansion
- d) reduce the number of flights to every parties' benefit including operators having to fly (and fuel) fewer aircraft - except [partially] the airlines which would have to surrender the grandfather slots in return for some realistic purchase fee
- e) maximise use of airport facilities
- f) free up slots for flights to / from alternative destinations
- g) All of this would be in the public interest.

It is time to bite the bullet to cease this very harmful restrictive practice.

The current, airline owned company which allocates any free slots would have to be replaced by an independent government agency to allocate slots impartially and transfer use fees to the relevant airport after retaining a small percentage to cover its costs.

Q8: Do you have any other comments?

### **WHAT ABOUT RUNWAYS 4, 5 AND 6? WE CANNOT TRUST HEATHROW'S FIGURES**

1. Back in 1978, the Terminal 4 public inquiry was assured that no further capacity would be needed.
2. In 1995 the Terminal 5 inquiry was assured that a 3rd runway would not be needed. Sir John Egan, BAA's Chief Executive, wrote to residents in surrounding boroughs and said "T5 does not call for a third runway" (BAA's 'Dear neighbour' letter to residents in a wide area around Heathrow; 16 May 1995).
3. In another 'Dear Neighbour' letter to residents (April 1999) Sir John Egan wrote: "We have since repeated often that we do not want, nor shall we seek, an additional runway. I can now report that we went even further at the Inquiry and called on the Inspector to recommend that, subject to permission being given for T5, an additional Heathrow runway should be ruled out forever. In May 2003, just four years later, BAA admits publicly that it wants third runway at Heathrow
4. How can we trust their predictions? It seems obvious that they will not be satisfied until they have runways 4, 5 and 6, to compete with Schiphol, in Amsterdam (6 runways), Charles de Gaulle, Paris (4 runways) and Frankfurt (4 runways)

### **THE CREATION OF A SINGLE HUB AT HEATHROW IS UNFAIR TO THE REST OF THE UK**

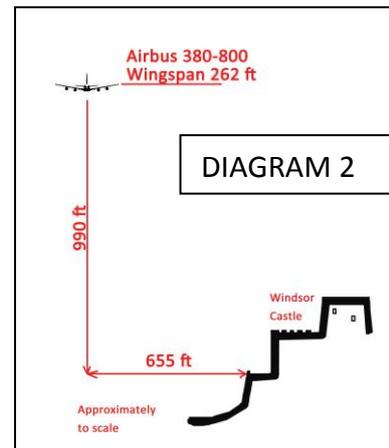
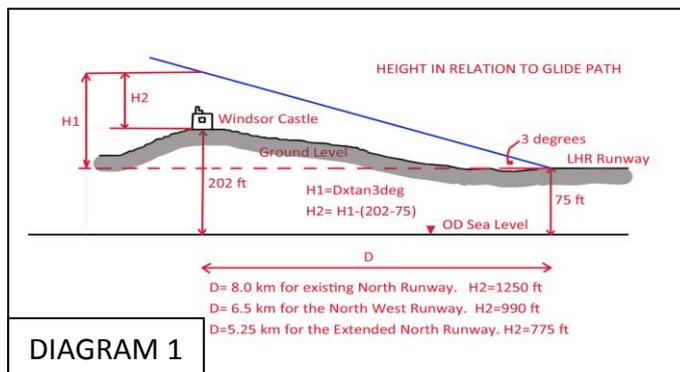
1. The proposal to create a single national hub at HR is unfair to the rest of the country. Once again, massive improvement in infrastructure would be

## Response to the Airports Commission (cont'd)

focussed in the South East, whilst the rest of the country looks on and their economies falter.

2. Only last week, the headlines were NORTH SOUTH DIVIDE GETS A LOT WORSE. SOUTHERN TOWNS BOOM WHILST NORTHERN ECONOMIES CONTRACT (The 'i' newspaper 19th January).
3. A measure of this is that average gross weekly earnings in the in the North East were recently reported as being only 64% of those in London.  
([http://www.huffingtonpost.co.uk/john-mills/uk-inequality\\_b\\_5567318.html](http://www.huffingtonpost.co.uk/john-mills/uk-inequality_b_5567318.html))
4. The Commission estimates the cost of the North West Runway proposal as being £18.6 billion, whilst the Extended Runway will cost £13.5 billion. In contrast, the cost of the Gatwick proposal is £9.3 billion and is reported to be better value for money in relation to the additional capacity it generates.
5. Ultimately, these costs have to be delivered from the economy and it makes no sense to waste these vast sums on Heathrow, just to boost the balance sheets of its Spanish owners. Gatwick makes far more sense and the surplus cash is desperately needed for investment elsewhere in the country.

### THE IMPACT ON TOURISM EARNINGS IN WINDSOR



1. The Inner Ward is the heart of Windsor Castle. It is approximately 202 feet above sea level.  
Its distance from the Extended Runway proposal is 5.5 km.  
Its distance from the North West Runway proposal is 6.7 km.  
Heathrow's runways are approximately 75 feet above sea level.  
Landing planes presently pass over Windsor town centre at a height of approximately 1250 feet.

#### 2. The Extended Runway Proposal

If the Extended Runway is built, landing planes will pass over Windsor town centre at a height of approximately 775 feet. That is 475 lower than at present. (See diagram 1 above)

The Aviation Commission estimates that average noise levels will double to 59 Leq. Actual noise levels are considerably more and it will be impossible to speak or to be heard in the town and the Castle, when planes are passing

## Response to the Airports Commission (cont'd)

over.

Departing planes will be close to the Castle before they have reached sufficient height to be able to bear off of the straight line of take-off. Again, the noise will be intolerable

### 3. The North West Runway Proposal

If the Northwest Runway is built, landing planes approaching the existing North Runway will continue to pass over Windsor at approximately 1250 feet, at approximately 80 second intervals in peak periods.

In addition, landing planes approaching the new North West Runway will pass almost directly over the North Terrace of Windsor Castle at a height of approximately 990 feet, which is 260 feet lower than the planes using the existing North Runway. (See Diagram 2 above) They too will pass over at approximately 80 second intervals in peak periods.

Both runways will be used concurrently for long periods on a daily basis, meaning that planes pass over the Castle and the town at approximately 40 second intervals, alternately at 1250 feet height on the existing North Runway and at 900 feet height on the North West Runway.

Actual noise levels under the flight paths are grossly in excess of the 56 Leq figure that is quoted by the Commission and a 40 second interval between flights on the two runways will mean that it will be impossible to speak or be heard in the town or the Castle.

### 4. The Impact on the Historic Town and its Economy

Windsor Castle, the Queen's favourite residence, is also the largest and oldest occupied castle in the world. It is at the forefront of international media interest especially during major celebrations such as The Queen's Diamond Jubilee in 2012.

The Royal Borough's 2013 'Economic Impact of Tourism' report contains the findings of a study commissioned by Windsor & Maidenhead and undertaken by Tourism South East.

According to the report, 6.9 million tourism day trips were made to the Borough. In addition 1.9 million visitor nights were spent in the Borough.

Total expenditure by visitors to Windsor & Maidenhead is estimated to have been in the region of £472,696,000 in 2013. Tourism is estimated to have supported 6,976 FTE jobs, 12.9% of the total employee jobs.

Whilst a proportion of these earnings will have come from LegoLand & Ascot Racecourse, the major portion will have come from Windsor, the town and the Castle. It is a huge tourist attraction throughout the year.

As noted elsewhere in this submission, the average noise indices used by the Airports Commission in its Consultation Document convey little of the nuisance caused by noisy planes passing overhead at intervals of just over a minute, for hours on end.

## **Response to the Airports Commission (cont'd)**

Both these proposals to provide additional capacity at Heathrow, the North West Runway and the Extended Runway, will dramatically increase the intensity of the noise nuisance from planes landing at Heathrow and its frequency. In addition, due to the closer proximity of the western ends of the runways, planes departing in a westerly direction will in all likelihood pass directly over the town, something they only occasionally do at present. The noise and frequency of these flights will cause a major nuisance to visitors and residents alike.

This is likely to have a significant adverse impact on the willingness of tourists to visit the town and the Castle, with proportional loss of earnings and employment.

Due to its elevated position, the Castle is likely to suffer most from these impacts and it may no longer be desirable for it to be the principal residence of the Monarch and her family. This would further adversely affect tourists' desire to visit the town and therefore the value that it brings to the economy.

### **THE COMMISSION'S CONCLUSIONS**

1. Both these proposals to expand Heathrow will blight the lives of tens of thousands of residents living to the west of the airport and damage the local economy in Windsor.
2. They are not sustainable and would impose a considerable burden on housing and infrastructure, which would involve massive expenditure that would not be met by Heathrow Airport Ltd.
3. The operational viability of the air traffic management issues has not been shown to be viable and there are major concerns that it may not be so.
4. The safety issues arising from expansion are a major concern for those living in the West of London and in residential areas to the west of the airport.
5. The cost of providing additional capacity by expanding Heathrow is considerably greater than do so at Gatwick and deprives the UK economy of several billions of pounds, which are desperately needed for other purposes.
6. The Commission's findings that adverse pollution and other issues are balanced by the economic benefits and the outcome is therefore 'neutral' is false, given the extremity of the adverse issues, particularly given the breach of World Health Organisation guidelines on acceptable environmental limits, that each of the two proposals would cause.
7. Both proposals to expand Heathrow present a threat to residents' 'human rights', as defined by standards set by the World Health Organisation and other European bodies. This threat is massive, tangible and avoidable. It is also disproportionate in relation to the overall benefits that would accrue from either proposal.

**Response to the Airports Commission (cont'd)**