



From the Leader of the Council

Sir Howard Davies
Airports Commission

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Dear Sir Howard

Wandsworth Council's response to the Airports Commission's consultation

Firstly, I would like to extend my gratitude to yourself and your Commission's staff for the huge amount of work that has clearly been done to get us to this point - your work has helped to advance one of our country's most important, yet contentious, debates.

As a key member of the 2M Group of Councils, I fully endorse their detailed response that has been submitted to the Commission today. I therefore don't intend to repeat those points. Instead, I want to take the opportunity to raise several issues which Wandsworth residents and my fellow councillors tell me concern them most.

Night flights blight the lives of thousands of our residents. A recent Council poll reveals 84 per cent of residents believed that there should be no flights over people's homes before 6am. I listened with interest recently when the promoters of Heathrow Hub proposal told me that the extra daytime capacity created with a runway extension means that the 16 or so arrivals before 6am could be rescheduled to arrive after 6am. However, Heathrow Airport Limited remain resolute in their view that night flights are a commercially important part of Heathrow's operations. This assumption appears ripe for independent scrutiny. As such, I find it difficult to understand why the promoters been not been asked to submit alternate options for expansion that, like Frankfurt, would eliminate nightflights?

I am concerned that the Commission's work does not appear to challenge the illogical claims by Heathrow's promoters that adding over 200,000 flights a year **will produce a better sound environment for residents**. I contrast this with the position taken by Gatwick's Chief Executive, Stephen Wingate, who admitted at the Commission's Public Hearing that their proposals will result in *more* noise around the Airport than would arise in a future "do nothing" scenario. Both views cannot be right and this needs to be challenged.

Heathrow's claim to reduce the numbers affected by noise relies on measures such as moving to modern aircraft, or steeper landing approaches. Yet the independent aviation regulator – the CAA – states in their recent report *Managing Aviation Noise* that “despite incentives...there has been no evidence that airlines have changed their normal fleet replacement cycles” and “it is clear that benefits of [steeper] approaches are relatively small”.

87% of our residents state that regular respite is very important to them. One of the 3rd runway options for Heathrow is called the ‘respite’ option. It involves the use of new multiple curved arrival routes into Heathrow instead of the two relatively straight, single streams of aircraft used historically. There is nothing here to convince me that either HAL or the Commission has the power to ensure this elaborate and untested noise respite procedure is ever put into action. It is the National Air Traffic Services (NATS) that controls the sky and their primary concern is safety. This means that, even for the current two runway operation, the relatively simple respite arrangements which are so welcomed by local residents, are only adhered to around half of the time.

The CAA has advised previously that disruption to the published respite arrangements is normally due to air traffic control (ATC). If controllers have any concerns with wind conditions or anything else they are free to ignore the respite arrangements and land planes along the safest and most direct routes. I believe that if Heathrow expands to three runways and brings in a far more complex respite system it is logical to expect that air traffic controllers will overrule it on a regular basis.

I believe that the **Commission is in danger of recommending an option that might not be deliverable.** The significant community reaction to the new departure routes over Teddington, which were trialled before Christmas, seem to have caught both the CAA and Heathrow by surprise. I therefore question how the Commission can be confident that any respite plan as it is currently set out - which involves the creation of so many new flight-paths – will actually be delivered. I also question whether this approach, which amounts to burden sharing, is compliant with current Government policy.

I note that the Commission's own Risk Analysis of the three shortlisted schemes conclude that a 3rd runway at Heathrow (under any mode of operation) will require a redesign of the London Airspace system which would be in your own **words “a complicated process likely to require several years”**. I therefore believe that the risk of delivering a 3rd runway at Heathrow in manner that is socially acceptable is much higher than the Commission appears to accept.

I am disappointed that **HAL has not yet published maps of new flightpaths** which will be necessary to deliver three runways. This detail is essential to determine who will be affected by noise. How can residents be expected to respond to the consultation if this key information is not available to them? However, it's interesting that HAL are able to publish, on the last full day of the consultation, a new mitigation package for local communities that we simply can't scrutinise in the time available.

I am also concerned that Heathrow Hub's proposal should not be regarded as an alternative panacea for Heathrow expansion. As the Commission notes in its own Risk Assessment report, there is no direct precedent for the "in line" runway that is at the heart of the Heathrow Hub scheme. The initial view of the Commission is that significant work would be required to satisfy both UK and international safety regulators that the proposed runway infrastructure could be operated safely. It is therefore premature to assume that Heathrow Hub could deliver a Heathrow without night flights. It is also worth noting that the Commission is assuming that HAL would be the delivery vehicle for the extended runway scheme and HAL have been unwilling (to date) to make any concession towards a phased removal of night flights.

I sincerely hope that the Commission concludes that the price residents would have to pay for expansion at Heathrow is not only too great, but likely to be virtually impossible to deliver in a way which is socially acceptable.

Yours sincerely

A handwritten signature in black ink that reads "Ravi Govindia". The signature is written in a cursive style with a large initial 'R'.

Councillor Ravi Govindia
Leader of Wandsworth Council