

## **RICHMOND HEATHROW CAMPAIGN**

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15 March 2013

**Dear Sir/Madam**

### **CRITERIA FOR IDENTIFYING THE MOST PLAUSIBLE LONG TERM OPTIONS**

Please find attached to this letter a submission by the Richmond Heathrow Campaign (RHC) to the Airports Commission concerning the criteria to be selected for identifying the most plausible long term options for meeting the UK's aviation capacity needs.

We consider that transparent and impartial "sifting" criteria are an essential foundation upon which to build a consensus on the best way forward on these difficult issues.

Yours faithfully,

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# **Airports Commission Guidance Document 01: Submitting Evidence and Proposals to the Airports Commission**

## **AIRPORT CAPACITY IN THE LONGER TERM**

### **SUBMISSION BY THE RICHMOND HEATHROW CAMPAIGN ON CRITERIA FOR IDENTIFYING THE MOST PLAUSIBLE LONG TERM OPTIONS**

**March 2013**

#### **Introduction**

This submission is made by the Richmond Heathrow Campaign in response to the open invitation in the Airports Commission Guidance Document 01 to submit suggestions for the criteria (“sifting criteria”) that might be used to identify the most plausible options for meeting the UK’s longer term needs for aviation connectivity and passenger capacity.

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 2 000 members.

The members of our amenity groups are adversely affected by noise from Heathrow’s flight paths, particularly in the night period. We favour a ban on scheduled air traffic in the night period at Heathrow. We are opposed to the introduction of mixed mode on the existing runways at Heathrow in the short term; and to the development of additional runways at Heathrow in the longer term.

We nevertheless recognise the importance of air transport for London; and the need to make provision for handling the forecast increase in air passenger numbers. We therefore wish to make a positive contribution to the Airport Commission’s work.

#### **General Suggestions on Sifting Criteria**

We note that the Airports Commission will say more about the sifting criteria that it will use once it has had a chance to consider the Government’s Aviation Policy Framework, due to be published in March. We agree that it is important that the sifting criteria that the Commission finally adopts should be published, particularly in order to make the work of the Commission as transparent as possible.

We note that the terms of reference for the interim report of the Commission include an assessment of the evidence on the nature, scale and timing of the steps needed to maintain the UK’s global hub status. In our view, it would be unfortunate if the sifting criteria focuses on the maintenance of the global hub status as an end in itself to the exclusion of more fundamental ends (especially destination connectivity and passenger capacity). In particular, we hope that the sifting criteria will be informed by the responses to the discussion paper that the Commission intends to publish on arguments surrounding the concept of an airport hub.

We note the Commission’s concern that a “plethora” of proposals would create planning blight and anxiety in all the affected localities. But planning blight and anxiety would continue in the localities affected by those proposals that pass the sifting criteria for further consideration. We would be more concerned if, the sifting criteria limited the number of proposals that would receive further consideration, regardless of the merits of individual proposals. There is a risk that such a limit would mean the early rejection of new ideas in favour of well-worked proposals, the main components of which may have been considered and rejected in the past. Such an outcome would make it difficult for the Commission to build a consensus in support of its final recommendations.

### **Specific Suggestions on Sifting Criteria**

We make the following specific suggestions for the sifting criteria:

1. Each proposal should be considered on its intrinsic merits. The standing of its author or sponsor should not be a material consideration.
2. Each proposal should be considered in isolation and in combination with similar and/or complementary proposals.
3. Each proposal should be given a political weighting. We say this because a purely technical assessment may produce recommendations that are not acceptable politically (e.g. the closure of any of existing airport).
4. Each proposal should be considered for the delivery of the key end objectives (i.e. the meeting of the UK's long term needs for destination connectivity and passenger capacity). The incidental effects that are not relevant for the key end objectives (e.g. the provision of local employment) can be noted but should not be decisive in the ranking of proposals.
5. The criteria should include consideration of the extent to which market forces would be able to deliver proposals; or whether there are market imperfections that would prevent their delivery.
6. The criteria should include consideration of the impact of proposals on competition between airports and airlines, including the extent to which greater competition would help or hinder proposals.

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