

APPENDIX 2: SUBMISSION OF EVIDENCE TO THE TRANSPORT SELECT COMMITTEE ON AVIATION

From:
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Dear Committee Member

Introduction

Thank you for the opportunity to participate in this Inquiry. I am submitting this evidence on behalf of the London Borough of Hillingdon. I have been the Leader of the London Borough of Hillingdon since 2000 and am a local councillor for the Ickenham Ward. I am one of the key partners of the 2M Group, an all-party alliance of local authorities concerned about the environmental impact of Heathrow operations on their communities. The Group, which took its name from the 2 million residents of the original 12 authorities, now represents a combined population of 5 million people and was successful in 2010 in overturning plans for a third runway at the airport. The Group is not anti-Heathrow but works together to improve the environment and protect the quality of life for local people.

My response is set below in an Executive Summary and under the specific questions that the Committee has agreed to pursue.

Executive Summary

The main points and key recommendation for action by the Government or others which I would like the Committee to consider for inclusion in its report to the House are as follows:

Main Points

- a) It should be acknowledged that the provision of capacity is not necessarily synonymous with increased connectivity, especially at congested airports like Heathrow. The Government need to identify what interventions they are able to impose upon airlines to ensure they play their part in maintaining connectivity. If not, local communities could be subjected to yet more increases in noise and pollution to find that airlines simply fly to the same destinations at a greater frequency.
- b) Aviation must form part of an overall strategic national integrated transport infrastructure framework that encompasses airports, roads and rail, including any potential high speed rail. Without such a framework, airport growth will remain

constrained by poor transport links to the detriment of the national economy and continue to have adverse social and environmental impacts to the detriment of local communities.

- c) If the Government is determined to postpone the decision on airports until post 2015, it should also call a halt on the proposal for HS2, as it currently stands, and align the two strategies accordingly.
- d) Airports cannot be allowed to have increased capacity at any cost. There must be sufficient weight given to complying with relevant European environmental legislation on issues such as local air quality and ensuring the avoidance of significant adverse noise impacts in order to protect the health and well being of local communities.
- e) A more accurate measure of community exposure to noise must be adopted as soon as possible, including recognition that the frequency of flights is an important aspect rather than just the noise of an individual flight, plus accounting properly for the impacts associated with noise at different times of the day, especially night noise.
- f) I would support the investigation by Government into measures such as extending fifth freedoms, reviewing the current slot mechanism and offering bilateral partners unilateral open access to other UK airports, to ensure best use of regional airports to relieve the pressure at congested south east airports.
- g) The provision of resilience must be built into the operating model of any airport. I would support the Mayor of London's proposal that any runway utilisation should be at no more than 75% to avoid congestion on the ground, congestion in the air and to improve the passenger experience in terms of the airport's ability to recover from disruption.
- h) Before any decisions are made on the provision of extra capacity or whether the hub model is the correct operating model for increasing capacity and maintaining connectivity, the impacts of various changes should be appropriately taken into account including new technologies such as video-conferencing; substitution of short haul for rail trips; increasing oil prices; constraints in terms of reducing climate change emissions; and the impact of new generation aircraft, such as the Boeing 787 which will have the ability to fly longer distances.
- i) An international hub needs to be situated where there is sufficient land to facilitate its function as a hub. It must have sufficient runway capacity; be managed at a level to ensure operational resilience; and be located so as to minimise harm to the environment and most importantly to local communities.

Key recommendation

I would ask the Committee to recognise that a third short runway at Heathrow is not likely to be sufficient in the long term and there will inevitably be pressure for a 4th runway. There is insufficient land for Heathrow Airport to expand to meet the long term requirements of a hub airport. To attempt to propose airport expansion in such an already congested location, with the devastating impacts arising from the demolition of homes and the loss of communities and the unacceptable levels of noise and air pollution that this would be bring to large areas of London, is not logical or rational in any future aviation policy.

Question 1 - What should be the objectives of Government policy on aviation?

a. How important is international aviation connectivity to the UK aviation industry?

1 The Government's draft Aviation Policy Framework consultation states that international aviation connectivity is important to the UK. It follows, therefore, that the aviation industry has a role to play in ensuring that the UK remains a well connected nation. However, the question itself asks whether international connectivity is important to the UK aviation industry.

2 Our experience at Heathrow doesn't allow the conclusion to be drawn that international connectivity is necessarily important to the aviation industry. Increases in capacity have not been synonymous with the provision of increases in connectivity.

3 When permission was given for the building of Terminal 5, it included a capacity increase up to 480,000 Air Transport Movements a year. Despite the increase in flight numbers, over time there has been a decline in destination choice with airlines simply operating more profitable routes at a higher frequency. The number of destinations served has dropped from 227 in 1990 to 180 today, despite the permitted increase in capacity. (page 24, All Party Parliamentary Group Inquiry into Aviation Policy and Air Passenger Duty (APPG Report), August 2012).

4 Maintaining diverse international connectivity for the UK has therefore been sacrificed for frequency on the same profitable routes. As this experience indicates, maintaining connectivity cannot be left to the airlines. This aspect is highlighted in the APPG report:

"airlines cannot be expected to substitute established and successful routes which provide an economic return for unproven new routes." (page 24)

5 Given this statement, if diverse international connectivity is vital to the UK economy, there do not appear to be the appropriate Government interventions available to ensure that airlines play their part in maintaining and increasing international connectivity, nor any means of ensuring consolidation where slots are being used uneconomically and to the detriment of the UK's international connectivity. There is no evidence to suggest that the repeated calls for capacity increases are a guarantee of better international connectivity. This is especially relevant at congested airports such as Heathrow.

b. What are the benefits of aviation to the UK economy?

6 I have not focussed on this question.

c. What is the impact of Air Passenger Duty on the aviation industry?

7 I have not focussed on this question.

d. How should improving the passenger experience be reflected in the Government's aviation strategy?

8 Whilst the provision of a good passenger experience is an important aspect for UK business, and its reputation internationally, sufficient weight needs to be given to protecting the needs of the local communities in close proximity to large airports.

9 Whilst the provision of jobs to local communities is a positive aspect of close proximity to an airport, the negative impacts such as increased pollution; increased noise; transport congestion on road networks; and over-crowded public transport can outweigh any benefits.

10 The Government has a duty to protect the health and well being of local communities, as well as having a legal obligation to comply with relevant European environmental legislation on issues such as local air quality. This needs to be reflected, and given sufficient weight, in any future aviation strategy. This aspect must not be sacrificed by simply putting in measures and policies to prioritise improving the passenger experience.

e. *Where does aviation fit in the overall transport strategy?*

11 At present, aviation doesn't fit in the overall transport strategy. This is something that needs to be addressed urgently. Aviation must form part of an overall strategic national integrated transport infrastructure framework that encompasses airports, roads and rail, including any potential high speed rail.

12 As an example, decisions on High Speed 2 (HS2) have already been made for a preferred westerly route from London to incorporate a spur to Heathrow, described in the HS2 Decision documentation as the country's major hub airport. This is not aligned to the timescales for the Independent Commission chaired by Sir Howard Davies to look at the requirements for future aviation capacity, including the potential for a new hub airport, which will not report until 2015.

13 Should the Independent Commission Review recommend a new hub airport in a location other than Heathrow, then the HS2 route and appropriate links would need complete re-assessment because it would not need to go west from London in order to link with Heathrow airport. If the Government is determined to postpone the decision on airports until post 2015, it should also call a halt on the proposal for HS2 as it currently stands and align the two strategies accordingly.

Question 2 - How should we make the best use of existing aviation capacity?

a. *How do we make the best use of existing London airport capacity? Are the Government's current measures sufficient? What more could be done to improve passenger experience and airport resilience?*

14 There are airports that are currently not at capacity which could be used to take the pressure off congested airports, such as Heathrow. The Government has suggested extending the fifth freedoms policy to Gatwick, Stansted and Luton. This policy grants rights to allow an airline of one country to land in a different country, pick up passengers and carry them on to a third country. By extending it to include Gatwick, Stansted and Luton, there are likely to be new services attracted to these airports and additional stop-over flights, which would support London's and the UK's aviation connectivity and the UK's economy. The Government has also suggested other measures such as offering bilateral partners unilateral open access to UK airports away from the congested South East airports and reviewing the slot mechanism. I consider such measures are worthy of investigation.

15 The provision of resilience must be built into the operating model of any airport. At Heathrow the number of air transport movements has been set too high, i.e. at the actual capacity limits of the runways, as opposed to an operational capacity which would allow for the provision of resilience. This is considered to be unacceptable for two reasons. Firstly, appropriate limits on air transport movements at airports would ensure greater resilience and thereby improve the passenger experience in relation to punctuality and delays and also have environmental gains in aspects such as reducing stacking in the air and congestion on-airport. Secondly very high air transport movements has detrimental impacts on the surrounding communities, who have to cope with the extra measures which are put in place by airport operators to cope with congestion and improve resilience.

16 A recent statement from the Mayor of London (speech to Business Leaders, City Hall, 4th Oct 2012) has proposed that any runway utilisation should be at no more than 75% to avoid congestion on the ground, congestion in the air and improve the passenger experience in terms of the airport's ability to recover from disruption. I would support this view.

b. Does the Government's current strategy make the best use of existing capacity at airports outside the south east? How could this be improved?

17 I have not focussed on this question.

c. How can surface access to airports be improved?

18 Currently different aspects of transport are looked at in isolation, for example, the high speed rail route and link to Heathrow has been given approval, yet the aviation strategy in relation to the potential expansion and location of future hub capacity is currently postponed to post 2015. There must be a strategic national integrated transport infrastructure planning framework. Without such a framework, airport growth will remain constrained by poor transport links to the detriment of the national economy and continue to have adverse social and environmental impacts to the detriment of local communities.

19 In terms of regional access, although an airport will have a clear objective to improve surface access for its passengers and workers, this must be delivered as an integral part of the whole surrounding road and public transport network, to ensure implementation of the best option for the region and local communities.

20 Heathrow airport is situated in a congested part of west London with motorways, local roads and public transport networks, including rail and tube lines serving central London, west London and the Thames Valley Corridor as well as several local borough networks. The development of the airport and its associated surface access infrastructure has been piecemeal. The result is a very congested road and public transport network, with traffic serving a large international airport having to compete with all other transport users. The consequences of a busy international airport in a very densely populated area include both congested road networks, resulting in unacceptable levels of air and noise pollution, and also unsatisfactory public transport, with commuters competing for space with airport passengers and luggage. Whilst further improvements to surface access may be feasible at Heathrow, they are limited given the existing congestion and the density of development in the area.

Question 3 - What constraints are there on increasing UK aviation capacity?

a Are the Government's proposals to manage the impact of aviation on the local environment sufficient, particularly in terms of reducing the impact of noise on local residents?

21 Where an airport is located in a densely populated area, environmental constraints pose a serious limit on its ability to increase capacity. At Heathrow, both air and noise pollution levels exceed acceptable limits. Where local communities in close proximity to an airport suffer from unacceptable levels of noise and air pollution, benefits in technologies such as quieter aircraft cannot be used as an opportunity to increase flight numbers but must be directed towards improvements in the health and well being of local residents. Due to the constrained nature of the airport location, Heathrow has developed to operate at capacity with no resilience. It is not acceptable to increase the burden on local communities by introducing extra measures to attempt to make an inappropriately located international airport more effective.

22 The wrong location for an international airport becomes its own constraint in terms of future growth. Heathrow is a two runway, segregated mode operation airport with an annual aircraft movement limit of 480,000. Its operation already causes intolerable levels of noise for swathes of Londoners, and, due to its congested urban location, is a main contributor to levels of air and noise pollution above health based standards for surrounding communities. In order to maintain its international hub status, Heathrow will inevitably require 4 runways and therefore continued incremental growth will not be practicable or sustainable in the future.

23 The constraints of noise, air pollution and operational resilience on increasing UK aviation capacity are discussed in more detail below.

i) Noise impacts

24 Heathrow is unique in Europe in terms of the magnitude of the noise impact on the surrounding densely populated area, with thousands of people living on a daily basis with an aircraft overhead every 90 seconds and with flights that disturb sleep from as early as 4:30 am. The levels of air pollution are above those set for the protection of health and the surrounding roads and public transport networks are congested. This has been the case for a number of years and it was these conditions which helped the Coalition Government decide that expansion in this location was not tenable.

"The quality of life impact of a third runway with up to 220,000 more flights over London every year, would be massive and there is no technological solution in sight to ensure planes become quiet enough quickly enough to make this burden in an way tolerable. So we need another solution..." (our emphasis), Theresa Villiers, Transport Times Conference, April 2012

25 Where an airport is located in a densely populated area such as London, its growth will be seriously constrained by the requirement to meet the Government aviation policy objective to reduce and limit those impacted by noise, and, to meet the National Noise Policy Statement for England objective to avoid significant adverse impacts on the health and well being of local communities, becomes a constraint on growth

26 Heathrow Airport accounts for approximately 70% of people in the UK exposed to aircraft noise, and the noise impact from this one airport easily exceeds the combined impact of all the other hub airports in Western Europe. The European Union Noise Directive requires the use of the 55 dB L_{den} contour which also takes account of the differing impacts at different times of the day, night noise being the most intrusive. The outdated DfT measure of 57dB LA_{eq16h} , uses a higher noise level and is measured as a straight average over a 16hr day. The extent this difference has on the estimation of the impact on local communities is discussed below.

27 The DfT measure (57 dB LA_{eq16h} contour) for Heathrow in 2010 covers an area of 106.3sqkm in which 224,550 people live, the EU Noise Directive criteria (55 dB L_{den} contour) covers an area of 222.3 sq km in which 712,100 people live. It is totally unacceptable to use out-dated metrics. A more accurate measure of community exposure to noise must be adopted as soon as possible, including recognition that the frequency of flights is an important aspect rather than just the noise of an individual flight, plus accounting properly for different times of the day, especially night noise. I have attached a technical paper which gives evidence to support our view (Appendix A)

b) Local air quality

28 Local air quality is a significant constraint to expansion at Heathrow with levels in the surrounding communities exceeding European health standards. The annual mean nitrogen dioxide standard was required to have been met by 2010. The UK Government Air Quality Plan which was submitted in September 2011 to the European Commission as part of its legal obligations for meeting air quality limits has predicted that this area will not be in compliance with this standard until at least 2020. This would appear to be unacceptable.

29 The previous Government's proposals for expansion of Heathrow (Adding Capacity at Heathrow, 2008) relied heavily on assumptions that significant improvements in road vehicle technology would create the necessary level of "headroom" in which more flights could be added. This reliance has proved to be misplaced. As the Government Air Quality Plan submission to Europe has reported, limits will not be met, even under present operating conditions, until at least 2020. Given the legal significance of the UK Government being in breach of the legislation to meet European Union limit values for local air quality, this becomes a serious constraint on any future capacity increases in urban locations such as Heathrow.

c) Operating at capacity without resilience

30 Because Heathrow is operating at capacity, the airport has no operational resilience. To allow an airport, which is an uncontrolled source of emissions, to operate at capacity in such an urban location has proven to be a mistake to the detriment of local communities who have suffered as a result.

31 Measures are currently being tested at Heathrow to improve resilience through trials of operational freedoms, but it is the local communities who will again bear the brunt of this with encroachments into much valued respite periods being one of the potential outcomes.

32 I support the Mayor of London's recent view that maintaining runway utilisation at 75%, as opposed to the 99% at Heathrow, could bring about improvements in congestion on the ground; reduce stacking in the air; and improve the passenger experience in terms of speedier recovery from disruption. Maintaining resilience becomes a constraint in terms of increasing capacity because in order to operate more efficiently, the current levels of air transport movements at Heathrow need to be actually decreased not increased.

b. Will the Government's proposals help reduce carbon emissions and manage the impact of aviation on climate change? How can aviation be made more sustainable?

33 I have not focussed on this question.

c. What is the relationship between the Government's strategy and EU aviation policies?

34 I have not focussed on this question.

Question 4 - Do we need a step-change in UK aviation capacity? Why?

a What should this step-change be? Should there be a new hub airport? Where?

The requirement for extra capacity

35 Before deciding on the need for a step change in capacity increases, there are a number of questions which require examination. Changes including new technologies such as video-conferencing; substitution of short haul for rail trips; increasing oil prices; and constraints in terms of reducing climate change emissions could all have an impact on the need for, and the magnitude of, any increases in capacity. In addition, the impact of new generation aircraft, such as the Boeing 787, which can potentially provide a point to point service over a greater distance, should be appropriately taken into account.

36 These issues need to be understood before any decisions are made on the provision of extra capacity or whether the hub model is the correct operating model for increasing capacity and maintaining connectivity.

The objective behind the need for capacity increases

37 If the Government objective is to maintain and improve international connectivity, there needs to be a recognition that extra capacity does not necessarily lead to extra connectivity. This has been proven by experience at Heathrow.

38 Airlines cannot be forced to either provide new routes or maintain existing ones where market forces dictate otherwise. There must be recognition of the risk that increased connectivity is not a guaranteed outcome, especially in situations where airports become quickly constrained, as would be the case of an additional short third runway at Heathrow. This aspect must be taken into account before decisions are made.

Hub location

39 The number of runways and the associated facilities to maintain a hub airport are larger than a traditional point to point airport, due to the nature of the hub operation and the requirement for feeder flights. Unless the hub airport is sited in a suitable location, maintaining its hub operation will become constrained by land availability and environmental issues, which is what has happened at Heathrow.

40 Heathrow is unusual in being a successful hub airport with only two runways and generally other successful hubs have more runways. In comparison, Schiphol has six runways; and Charles de Gaulle and Frankfurt have four. Given the pressure for future expansion to align with the predictions in aviation growth, and the need to connect with emerging markets such as Brazil, Russia, India and China, it is clear that there is growing concern that in order to maintain a successful hub operation, there is a need for more capacity and for additional runways. A third short runway at Heathrow is not likely to be sufficient in the long term and there will inevitably be pressure for a 4th runway.

41 The location of Heathrow Airport has become its own constraint. To attempt to propose airport expansion in such a congested location, with the devastating impacts arising from the demolition of homes and the loss of communities and the unacceptable levels of noise and air pollution that this would bring to large areas of London, is not logical or rational in any future aviation policy.

42 A hub airport needs to have sufficient capacity to allow for growth in the feeder flights which are needed to maintain the hub model of operation and for it to be operated at a level where there is operational resilience. I support the Mayor of London's view (Aviation speech, City Hall, 4th Oct 2012) that maintaining runway utilisation at 75% could bring about improvements in congestion on the ground, reduce stacking in the air and improve the passenger experience in regard to speedier recovery from disruption.

43 A hub airport must also be situated in a place which minimises harm to the environment, and, most importantly, people. West London is not somewhere that fits these criteria and a successful hub airport cannot be 'shoe-horned' into Heathrow.

44 If the UK requires a first class hub airport for London, then other options for its location must be appraised against the national Aviation Policy Framework, including wider objectives such as the well being and quality of life of local residents.

b. *What are the costs and benefits of these different ways to increase UK aviation capacity?*

45 Up to now the main evidence for increasing aviation capacity has been based upon economic gain. I support the draft Aviation Policy Framework approach of achieving a better balance than in the past between the benefits aviation brings and its impacts. The impacts must be accounted for at both a global level, and at a local level in terms of health and wellbeing of communities and the environment.

46 If this objective is taken seriously, it is obvious that increasing capacity at Heathrow is not the answer to increasing UK aviation capacity because this would result in the demolition of hundreds of homes; the loss of communities; increased noise for millions of people; and unacceptable pollution levels above European Union legal standards for health.