

LAANC

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Dear xxx

Transport Select Committee on Aviation Strategy

Please find attached a submission by The Authorities' Aircraft Noise Council (LAANC) in response to the call for evidence for the inquiry by the House of Commons Select Committee on Transport into the Government's strategy for aviation.

LAANC is an umbrella local authority organisation which represents the interests of two dozen Local Councils comprising Boroughs, Unitary Boroughs, London Boroughs, County and Parish Councils serving a wide area around Heathrow Airport.

The Constitution of LAANC covers environmental issues as well as aircraft noise and represents a very large community many of whom have direct contacts with Heathrow.

The main points that LAANC wishes to make to the committee are summarised below. Detailed responses to the committee's questions are attached as appendices.

Main Points:

It should be acknowledged that the provision of capacity cannot (within the current UK aviation regulatory framework) be guaranteed to produce increased connectivity for UK plc. This is especially the case at Heathrow. In LAANC's view the Government need to identify if further regulatory powers need to be taken (for example, reintroducing some form of Traffic Distribution Rules) to ensure that government can play a part in maintaining connectivity. The choice of where planes fly to currently is made by neither the airport owner nor the Government. It is made by the airlines who naturally prioritise the more profitable routes.

LAANC believes that the key issues for the Government in developing future policy are the requirements for runway capacity and the case for connectivity. In respect of Heathrow it has suited the Heathrow owner to conflate the two issues. It suits Heathrow's business model to claim that additional capacity is best located at their airport – as opposed to those of rival owners – for example Gatwick or Birmingham. It also suits the operator to claim that the UK economy requires additional hub capacity and that that too can be located at Heathrow. Yet as the Mayor of London has shown there are other potential sites for a hub airport in the South East which would not be constrained in the same way as Heathrow which is set in the most densely populated part of the country.

The current DfT Aviation Framework consultation document confirms that London is already one of the best connected cities in the world and has adequate supply of airport and runway capacity for the short to medium term (up to 2030). The capital has five airports (Heathrow, Gatwick, Stansted, Luton and London City) which together serve more routes than any other European city. There are other "near London" airports, currently under used (e.g Ashford and Manston) which have adequate runway length to contribute to the London airport system. Overall the United Kingdom position is very strong the UK being directly connected to more than 360 international destinations. Using

available airline seat kilometres as a connectivity metric, only the Chinese and US aviation networks are more extensive than the UK.

LAANC urges the government to take action to ensure that aviation forms part of an overall UK strategic national integrated transport infrastructure framework that encompasses airports, roads and rail, including any potential high speed rail. It is difficult to see how the decision already taken for a preferred high speed rail route with a spur to Heathrow can be taken forward at this stage when the decision on where any future aviation hub might be will not be taken before 2015 at the earliest.

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. UK policy on aircraft noise is currently to 'limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise.' Successive governments have used the 57LAeq decibel contour as a benchmark for identifying onset of significant community annoyance. This covers an area of 106 square kilometres and a population of 224,500 where people live. The Government now admits that community response to aircraft noise has changed over the last 30 years and that this 57LAeq contour is out of calibration. It also concedes that the failure to update social surveys and community response data since the 1985 ANIS and in particular the failure of the ANASE study has led to a breakdown of trust with communities affected by aircraft noise – particularly when the headline results of the ANASE study have been shown to be in line with other independent studies in Europe.

UK aircraft noise policy needs to acknowledge the impact of aircraft noise on people's health and wellbeing. The noise climate around Heathrow is simply too noisy already for too many people, the Aviation Framework Consultation document admits that Heathrow has a significantly greater noise impact per flight than any other major European airport. However even this admission does not adequately describe the disruption to sleep from being awakened by the first arrival of the day at 4.30am for example or the constant passage of flights overhead during the day at 90 second intervals. The current noise metrics also are unable to recognise the value of predictable periods of respite during the day

A more accurate measure of community exposure to aircraft 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.

LAANC supports the government's proposals to extend fifth freedoms, review the current runway slots mechanism and access to other UK airports. LAANC believes all of these measures will be helpful in incentivising the best use of regional airports, which in turn provide the opportunity for relieving the pressure at congested south east airports.

LAANC supports the Mayor of London's proposal that runway utilisation at any of the London airports should be at no more than 75% in order 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.

Currently it seems there is no overall agreement within the airlines about how much or where extra runway capacity is needed. 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.

An international hub needs to be situated where there is sufficient land to facilitate its function as a hub. LAANC believes that on environmental grounds alone Heathrow should be excluded from the review of airport capacity which is to be undertaken by the Davies Commission. There are equally strong operational reasons why a new expanded hub airport could not be sited at Heathrow. The Mayor of London has estimated that based on forecast growth a third runway would be full by 2030. The hub airport model has an insatiable demand for additional runway and terminal capacity. The many connecting flights which feed the long haul routes all need to arrive within a narrow time frame

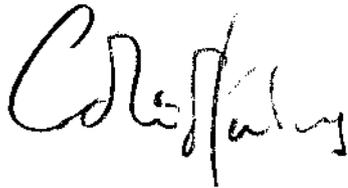
if passengers are not to be left waiting for hours for their transfer flight. Successful hub airports make sure they have additional runway capacity to cope with these 'waves' of arrivals. It is why three runways will never be enough at Heathrow.

Comparisons with key competitors are always made to support Heathrow's case for expansion – but the nearest, Charles de Gaulle, has four runways (and is located away from the capital), Frankfurt has four runways and Schiphol has six. There are simply no circumstances in which a four-runway Heathrow would ever be acceptable. It would give rise to a host of new flight paths over residential areas on all sides of the airport and in so doing unreasonably impact upon new communities not currently affected by aircraft noise.

Key recommendation

LAANC 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 bring to large areas of London, is not rational in any future aviation policy.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Colin Stanbury', written in a cursive style.

Colin Stanbury
Director LAANC