



Councillor Colin Ellar
Deputy Leader

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Sir Howard Davies
Airports Commission
Sanctuary Buildings
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Our ref:
Your ref:
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Dear Sir Howard,

Comments on Commission's Emerging Thinking

I am writing to convey some comments on the Airport Commission's "Emerging Thinking" on behalf of the London Borough of Hounslow.

The Council welcome the acknowledgment of the benefits brought to our community in terms of employment as a result of Hounslow's proximity to Heathrow airport. We also appreciate the recognition of the significant environmental impacts that our residents experience, especially noise and look forward to engaging further with the Commission on this issue.

Operational Freedoms

Since your speech on 7th October 2013 the Government has referred the matter of Operational Freedoms at Heathrow to your Commission. The Council has a number of concerns relating to potential implementation of these freedoms which we draw to your attention below:

The CAA report shows that the trials at Heathrow did not conclusively bring about any operational improvements; however, the report does indicate that the trials had a detrimental impact on the local community. Hounslow would like to know if the Commission will be undertaking further work to help quantify this detrimental impact, as suggested by the CAA, and if so, what will be the nature of this work? We believe that this work would need to happen before any consultation on operational freedoms is to take place so that a proper understanding and assessment of the costs and benefits can be undertaken.

The Heathrow report encourages the Commission to recommend the adoption of the Freedoms. It is Hounslow's view that if the freedoms are granted as Heathrow suggest, the airport will ultimately operate in mixed mode (within the 480,000 atm cap) leading to significant erosion of the respite periods with no discernible benefit to the airport in terms of resilience.

Whilst these final reports by Heathrow and the CAA are somewhat inconclusive, Hounslow believe that the instigation of operational freedoms should be dismissed because it would

appear that the community consequences of the implementation of the freedoms outweigh the operational benefits.

We are currently undertaking our own analysis of the freedoms trials and may submit further views on this matter under separate cover.

Surface Access

The Council look forward to engaging with the Commission's recommendations regarding surface access to airports. Recent research commissioned by the Council shows that the ability of the surface transport network to cope with present levels of travel is limited and is likely to face increasing pressure as the population of London increases.

Heathrow have relied on the existing and planned transport provision for an airport operating at 80 million passengers per annum. The additional third runway increases passenger numbers to 130 million passengers per annum. Consequently the Council is of the view that expansion at Heathrow cannot and therefore should not be considered as viable on the basis of the current proposals.

Aviation Forecasting

Hounslow agree with the aim of the Commission to improve passenger forecasting, especially as this has historically proved to be inaccurate. We applaud moves to factor in a greater range of scenarios and would like to know whether the Commission will be running a forecast of options in a carbon constrained scenario, particularly in relation to other sectors of the economy?

Climate Change

It is worth noting that the Committee on Climate Change stated that aviation emissions could be allowed to increase only if the country is able to completely decarbonise the rest of the transport sector as well as the entirety of the energy sector by 2030. The UK is not on track to make this happen and currently has no targets for the use of renewable energy beyond 2020. Hounslow would be interested to understand how the Commission believes that this situation will impact on airport expansion decisions?

We welcome the recognition that there is a need for a robust carbon price in the EU ETS and indeed a global deal on climate change, however both of these partial solutions may be many years away from fruition. What does the Commission propose should neither come to reality? Hounslow is also keen to know what would a potential framework for managing emissions look like. In particular, would the framework be able to cope should the EU ETS collapse completely or a global deal on emissions is not reached?

I trust that you find these comments useful and I look forward to reading the Commission's interim report.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Ellar'.

Councillor Colin Ellar

Deputy Leader, London Borough of Hounslow