

## **Response to the Airports Commission's 'emerging thinking'.**

We understand the purpose of setting out the emerging thinking and it is helpful to see what is in the minds of the Commission.

We agree that the summary of the issues is broadly correct, but it is about the relative weight to be given to each of the issues that will test the Commission and the remit it was given when it was set up. We also feel that there are some significant issues which are not addressed in the emerging thinking.

The remit was about making recommendations on how to maintain the UK's position as a hub for international air traffic. The commission's emerging thinking that emissions trading can be used to address aviation growth will transfer the pollution burden of air travel (and transfer passengers) to other sectors of the UK economy where carbon savings must be paid for by the non-travelling public. The impact of emission trading and not managing the impact of air traffic will clearly have a very significant and disproportional impact on other consumers who will have to pay more to subsidise air travellers, many of whom are just in transit and not adding value to the UK economic output. The impact on the UK, both to the people who live here and to those who trade here is very significant if the overarching goal is to maintain the UK's position as a hub for international traffic. There is already significant concern and the government is promising action on "green taxes" in light of recent public concern about fuel bills. Unless this is accounted for in the remit of the Commission, then the recommendations will in our view be heavily distorted and not produce a sound basis on which to form future decision making

In the emerging thinking no reference is made to the health or social impacts of people who have to live in areas that are affected by the consequences of air travel. The recent British Medical Journal report (footnote 1) relates to the health impacts of Londoners who suffer from noise, which are not accounted at this stage. We note that the report suggested that policy decisions need to take account of some potential health related concerns, following the finding of associations between aircraft noise with the risk of stroke, coronary heart disease or cardiovascular disease. Taken together with the issue that the 57Leq metric under-represents significant annoyance, we recommend that there should be a revisit of noise effects and mitigation with a refreshed study along the lines of ANASE, in which a weighting is given to the frequency of aircraft movements, and not just their volume. The consequential impact of aircraft noise on the people is that it becomes an economic impact on the UK Health Services.

One aspect of ensuring that people live healthy lives and can enjoy activities and maintain fitness is through access to parks and open spaces. However in this Borough, although we are fortunate to enjoy well above average parks and open spaces, which also attract many visitors from the wider region and from around the world, many of these respite spaces are blighted by the noise of aircraft flying into or out of Heathrow. This has both a health and a social cost which are not reflected in

any of the emerging thinking. These factors should inform any judgement and recommendations as they impact significantly on people who live in the affected areas and economically on UK PLC.

The incident of a Boeing 777 only just making it over the perimeter fence at Heathrow serves to draw attention to other 'near misses' at Heathrow. Also the risk of flying large planes over urban areas should not be underestimated. As a local authority we are aware that debris from planes has fallen onto property in the Borough, leaving the local community to pick up the cost. When stowaway bodies fall in our streets, it is a traumatic stress for all of us. With the urban density under the flight paths, it is not a question of 'if' but 'when' there will be a serious incident. The possibility of further such incidents can only increase if Heathrow were to expand, with a greater frequency of flights. We wish to resist the chance that this risk should get worse and ideally we would like the risk to reduce. On that basis we therefore wish to resist any new runways or any increase in capacity.

With capacity in mind, we understand that the issue of 'Operational Freedoms' at Heathrow has now been passed to the Commission, for consideration, together with the CAA's final audit. It is plain, from both reports, that the evidence for any benefit is very thin. Even though the Freedoms are more to do with resilience than extra capacity, the impact is significant when it comes to the loss of respite for our residents. In our view it is important that the Commission should not accede to the proposal from HAL that the Freedoms should not only be made permanent but extended beyond the scope of the trials. In addition, needless to say that an extra runway or two at Heathrow would also add another dimension to the loss of respite, which would again have consequential adverse health impacts and be quite intolerable.

Although there has been significant modelling undertaken to inform the Commission, we ask that the Commission look carefully at the impacts of both the emissions trading and the health and social impacts above and how they are reflected in the model and to test the sensitivity if the weights of the relative issues were to change. Without this it is impossible for the Commission to provide robust recommendations on the future of air traffic in the UK

We can understand that the emerging thinking seeks to address the issues of runway capacity and the principle of a Hub or hub airports. The concept idea of hub airports is not disputed, but the successful hub airports in the USA, are usually dominated by one of the airline consortiums and each major consortium usually has its own hub. In thinking about successful hubs and the UK's position we recommend that the US model be considered rather than trying to make just a single hub airport for the UK. It is not clear at this point whether the thinking is to provide a hub or hubs or is this deliberately ambiguous?

(Footnote 1) British Medical Journal (published 8 October 2013 - BMJ 2013;347:f5432) – an investigation into the association of aircraft noise with risk of stroke, coronary heart disease, and cardiovascular disease.