

Ealing Council
Perceval House
14-16 Uxbridge Road
London W5 2HL

t 020 8825 5000

RESPONSE TO THE 'UTILISATION OF THE UK'S EXISTING AIRPORT CAPACITY DISCUSSION PAPER'

Introduction

1. Ealing Council provides the following submission having consulted across the range of Council services. The Council appreciates the benefits of our proximity to Heathrow, creating opportunity for residents and businesses. We also recognise that for some residents there is an adverse effect, and therefore we continue to seek to mitigate any further risks to residents and businesses arising from any future decisions.
2. Ealing continues to participate in the Airport Commissions ongoing consultations, and welcomes any future opportunity to respond, or to provide more specific information that may assist the Commission in this process.
3. The focus of this discussion paper is the connectivity and capacity provided by airports other than those short-listed by the Commission for further consideration as long-term capacity options (not Heathrow or Gatwick)
4. Ealing would like to take this opportunity to respond to 3 key questions set out in the consultation document. A response to all consultation questions is not provided given that DP6 has a primary focus on the role of non-London airports. However, Heathrow and Ealing (among other west London authorities) clearly benefit from the connectivity these airports provide.

Question 1 - Non-London airports; connectivity and utility to the UK

The Commission asks

Is the Commission correct to identify a reduction in air connectivity between the UK regions and the London airport network over the last decade? How do recent new routes to the capital, and the stabilisation in passenger numbers on domestic routes to and from London since 2010, affect this analysis?

5. Over past few years it is evident that there has been a reduction in connectivity between Heathrow and regional airports. Consequently, at Heathrow airlines

have re-designated slots that previously served the regions to more profitable routes serving North America and the Far East.

6. Ealing believe there is a risk that artificial and unsustainable growth may be promoted by the reasoning that Heathrow should expand because of demand from other regions. It remains to be evidenced that communities in the regions are demanding connections to Heathrow rather than their behaviour being driven by affordability and convenience.
7. The potential expansion of Heathrow would create approximately 260,000 additional slots. There would appear to be no mechanism whereby re-designation of such slots is prevented, therefore a slot allocated to the regions discussed in this paper may not be safeguarded, and become re-designated at a later date to accommodate more profitable routes. The probability of slot reallocation increases once Heathrow becomes capacity constrained again; something that the airport itself admits is highly likely. Consequently the future loss of regional connectivity appears inevitable with limited options for a permanent solution.
8. Ealing would like the Commission to consider the wider transport policy. Perhaps instead of encouraging more short-haul regional flights a more appropriate question might be whether we should be encouraging more use of sustainable transport such as rail as current Government policy dictates (as we referenced in our last submission to the Commission).
9. Better surface transport access to all airports may help to facilitate increased passenger numbers. Further, connections delivered by HS2 and other rail investments (Northern Hub, electrification) are likely to increase the attractiveness and environmental benefits of rail travel.

Question 2 - Planning Constraints

The Commission asks

Is there a current case for lifting planning caps for any airports in London or the South East? If not now, when should these caps be reviewed?

10. Ealing would express concerns over the lifting of planning caps for any airports in London or the South East, without consideration of the material issues surrounding the imposition of the cap in the first instance.
11. At Heathrow the 480,000 ATM limit was placed on the airport for a very specific set of reasons; giving the local community some certainty of position in relation to air quality, noise and traffic congestion (surface access).
12. This planning cap was recommended by the Planning Inspector as part of his decision regarding the Terminal 5 inquiry. To quote the Inspector

Paragraph 97 of the Decision Summary.

In the absence of effective controls the picture would be different and the balance in respect of Terminal 5 would become much more difficult. In this respect, I place particular weight on limiting the number of aircraft movements to 480,000 ATM's, the imposition of a LAeq 16hour 57 dB(A) contour cap of 145 km2 and the introduction of stricter controls on movements at night particularly early morning arrivals. If these controls were not imposed the balance would, in my view, tilt against Terminal 5. While I recognise that all controls on operations at Heathrow, as at any airport, must be open to review if circumstances change dramatically, the imposition of the conditions I propose would provide a clear baseline against which the impact of such changes could be judged. The absence of a clear baseline caused great public concern in this Inquiry.

13. If the Commission considered recommending the removal of this planning cap then there would be one less control available on an undesirable situation and would result in making Heathrow even more unsustainable than it currently is, particularly in relation to air quality.
14. A similar cap on ATMs was put in place at Stansted to ensure that the surrounding communities and local environment could cope with the noise generated by the number of aircraft flying overhead.
15. The Commission confirmed earlier this month that they will be maintaining the existing restrictions on night flights at Heathrow. The current arrangements for night flights will now remain in place until 2017. A further review, to coincide with the publication of the Commission's final report in 2015 would be welcomed, if the Commission is minded to further secure the night time flight planning caps.

Question 3 - Impact of Commission final report

The Commission asks

Are there any topics or areas of further study beyond those set out in the Appraisal framework that would allow the Commission to understand the impact of development at Heathrow or Gatwick on the other London Airports?

16. The Council asked in its last response to the Commission (on the Appraisal Framework) for a comprehensive health and social impact assessment to be included in the Appraisal Framework, as we believe this is essential to understanding the actual community impact of any proposals for new runways. We are disappointed that that this point has not been taken forward by the Commission and reiterate our request.
17. If the Council can assist the Commission further with evidence, or elaborate further on this submission please do not hesitate to contact the Council's named contact officer [REDACTED] who will ensure this matter is responded to by the relevant departmental lead.