



**Democratic Services
London Borough of Hounslow
The Civic Centre
Lampton Road
Hounslow
TW3 4DN**

Deputy Leader of the Council

Sir Howard Davies
Airports Commission
6th Floor
Sanctuary Buildings
20 Great Smith Street
London, SW1P 3BT
airport.utilisation@airports.gsi.gov.uk

Your contact: Councillor Amrit Mann
Mobile: 07866 784658
E-Mail: Amrit.Mann@hounslow.gov.uk

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Dear Sir Howard,

R.E: London Borough of Hounslow response to Discussion Paper 6: Utilisation of the UK's Existing Airport Capacity

This paper largely concentrates on activity in the UK regions so its contents have limited impact on the London Borough of Hounslow. However, we believe the three points outlined below are relevant to the Commission's work on this matter.

Connectivity

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.

Hounslow believe there is a risk that by reasoning that Heathrow should expand because of demand from the regions the Commission may be promoting growth that is artificial and unsustainable. 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.

If Heathrow is expanded creating approximately 260,000 additional slots, then a significant number can initially be assigned to connect with regional airports. Airlines would be allocated or would buy slots to fly to and from the regions but as things stand, the slots could be switched to a service to a more profitable location. There is currently no mechanism whereby a slot can be allocated to the regions and remain allocated to the regions. 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 available whilst airlines continue to prioritise slots based on the more profitable routes.

Hounslow would also like the Commission to consider a wider point about 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. 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.

Planning Constraints

Hounslow see no reason for 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.

At Heathrow the 480,000 ATM limit was placed on the airport for set of very specific set of reasons; giving the local community certainty in relation to air quality, noise and traffic congestion (surface access).

The Planning Inspector, as part of his decision regarding the Terminal 5 inquiry, recommended this planning cap. In paragraph 97 of the Decision Summary, he said:

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 atms, 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.

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.

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.

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?

The Council asked 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.

We hope you find these comments constructive and useful. Should you have any queries on the content of this response please do not hesitate to contact me.

Yours sincerely



Councillor Amrit Mann
Deputy Leader of the Council