



Havering
LONDON BOROUGH

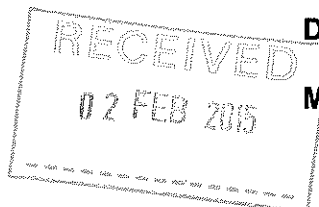
LONDON BOROUGH OF HAVERING

Town Hall | Main Road | Romford | RM1 3BD

Sir Howard Davies
Airports Commission Consultation
Free Post RTKX-USUC-CXA
Po Box 1492
Woking
GU22 2QR

Date: 29 January 2015

My Reference: RR/pd



Dear Sir Howard,

Airports Commission Consultation - response from London Borough of Havering

Thank you for providing London Borough of Havering with the opportunity to respond to the Commission's work on the three short listed options for airport expansion following the interim report published in 2013.

Havering has not so far made representations or submissions to the work of the Commission. Nevertheless, it has maintained a 'watching brief' role on aviation matters both to ensure that the borough benefits from its advantages but also to ensure that aviation does not impact adversely on Havering as a place where people want to live and businesses want to invest.

The focus for Havering in recent months for aviation has been London City Airport (LCA) for the reasons I have set out below. It will be clear that the matters we have commented on in regard to LCA are very relevant to the work of the Commission.

As far as the Davies Commission is concerned, I am aware that Transport for London (TfL) is likely to submit a wide ranging response for the Mayor which will go beyond just transport and will highlight, for example, how the proposals should be assessed against strategic planning policy considerations and how the options should be underpinned by robust analysis in respect of employment, housing and surface transport. I understand that TfL are also likely to raise concerns about the consultation process linked to the Commission and the 'accessibility' of the many and lengthy technical reports supporting the Commission's work especially for ordinary Londoners. Some of these points are very similar to our own comments to London City Airport (see below).

Havering broadly supports the comments we expect TfL to make given the importance of this topic and that the positive and negative impacts of increased aviation capacity are felt by many who do not live in the immediate vicinity of London's main airports,.



**INVESTORS
IN PEOPLE**

The remainder of the comments below focus on those matters which are of particular concern to Havering. In summary, these involve :

- adverse impacts from noise and disturbance
- the implications for, and from, flight paths and airspace management
- linkages to other infrastructure
- the importance of transport linkages being taken into account

It is acknowledged that each of the options put forward by the Commission are some distance from Havering and what they will mean in terms of flight movements has not been established. However, some residents in Havering consider that the current flights linked to London's airports already have an adverse impact when they fly over Havering. Residents have highlighted noise, disturbance and fumes as the unpleasant adverse effects of the current flights over the borough so the potential impacts from increased airport capacity are a real concern.

It is because of this that we want the Commission to be aware of, and understand Havering's concerns so that they can be taken into account when the Commission makes its recommendations to Government on how best to provide additional airport capacity.

Havering responded recently to the London City Airport (LCA) consultation on possible flight path changes as set out in the RNAV Replications project.

The Council considered that the consultation was unsatisfactory because it was very restricted and 'low-key' meaning that most of our residents were largely unfamiliar with the proposals. Much of the information was very technical and some residents were not able to understand the potential implications for Havering. Havering asked for an extension to the consultation and for the airport to engage more meaningfully with the community so that the proposed navigational changes can be understood.

We understand this week that the RNAV Replications consultation is not to be re-opened which is very disappointing.

Havering also recently responded to the latest City Airport Development planning applications submitted by LCA for proposed infrastructure facilities to support the approved airport expansion.

The Council objected to the planning applications and identified several reasons why it is very understandable that our residents are very concerned about these proposals :

- although the proposed facilities are in line with the approved expansion of the airport, the number of flights to and from London City Airport including flights over

Havering will significantly step up in the next few years. Residents say they are experiencing noise and disturbance from aviation **at its current levels** and is already unacceptable

- the proposed changes in the navigational regime may focus adverse noise impacts on particular areas of Havering (especially in the north of the borough and over Hornchurch)
- there is uncertainty over future flight path arrangements for the south east generally in the light of recent airspace management initiatives by the National Air Traffic Service (NATS). This may mean increased flights over Havering (some of which may be linked to other airports)
- there is no certainty that all of the increased flights making use of London City Airport (or other airports) will be the most up to date aircraft so the stated improvements in environmental impacts from more 'environmentally friendly' aircraft are not necessarily assured.
- the wider on-going debate ensuring that there is adequate airport capacity is likely to be indicative of more flights overall in the future. Indeed, if the 'pick-up' in the economy is sustained, it is possible that aviation activity may return to the levels before the downturn started

Havering's concerns on noise and disturbance from existing flights and proposed expansion of LCA are shared by other Councils in east London. It is understood that London Councils' response to the Commission will highlight concerns on noise and disturbance. It is also noted that Transport for London's response will focus in detail on the noise implications of the various options and highlight the difficulties of securing agreement on assessing and understanding these particular impacts.

As mentioned earlier (above), Havering residents say that they are already affected by flights linked to Heathrow and London City Airport. Part of the 'stacking space' linked to existing flights arriving at London Heathrow (the Lambourne 'stack') is located over the northern part of Havering. Other parts of Havering are beneath the arrival and departure corridors for aircraft linked to the current use of London City Airport.

It is both surprising and unsatisfactory that the Commission's work does not currently encompass looking at the management of flight paths and airspace linked to London's airports and how these may impact on increased capacity.

Havering would very strongly urge the Commission to work closely with the National Air Traffic Service (NATS) and to jointly undertake further analysis of potential flights paths and the associated environmental impacts from airport expansion before making final recommendations are made to the Government.

Havering has commented in some detail to the London Mayor recently about the timely provision of infrastructure to support London's growth over the next thirty years. Havering considers strongly that the Commission's further work must encompass ensuring that any recommendations for airport expansion should be underpinned by a robust analysis of existing and future transport links to the airport(s) particularly in regard to surface public transport facilities.

In this regard, Havering is concerned about the poor 'fit' between the proposed expansion of London Heathrow and the planned provision of Crossrail services. The Council is a strong supporter of the Crossrail project and it is working closely with Crossrail, Transport for London and Network Rail to ensure that the project delivers significant transport and economic benefits for Havering and the wider London area.

Nevertheless, I share the concerns of other Council Leaders in east London that it is highly unsatisfactory that Crossrail services from east London and Shenfield will not be direct through to Heathrow and will involve passengers in changing trains before arriving at Heathrow to board a Crossrail train from Abbey Wood. This is highly unsatisfactory for residents and business travellers making journeys to and from east London. The delay and the inconvenience for travellers significantly reduces the benefits of this major transport project and conflicts with the 'whole journey' approach to travel that is widely regarded as good practice these days.

Havering wishes to be kept informed about the progress of the Airport Commission's work.

Yours Sincerely,

[Redacted Signature]

[Redacted Title]