

**From:** Terry Gould  
**Sent:** 17 July 2013 14:20  
**To:** 'airport.models@airports.gsi.gov.uk'  
**Cc:** Cllr Lenton; 'Carwyn Cox'; Mike McGaughrin; 'aviation.policyframework@dft.gov.uk'  
**Subject:** Airport Operational Models (and Noise) - Submission to Airport Commission

**Attachments:** RBWM SUBMISSION TO AIRPORTS COMMISSION v4 FINAL.doc; meetings\_130411\_cab\_brief\_night\_flying (2).doc; Final APF Cabinet June 13.doc; Aviation Policy Framework Comparison.docx

*Dear Sirs,*

*I am instructed by the RB Windsor and Maidenhead to forward this general submission from this Council detailing its views on a number of issues in respect of the aviation debate.*

*By way of context and background information, Cabinet members considered reports on both consultation documents prior to the finalisation and publication of the Aviation Policy Framework. Cabinet also considered a report on the final APF in which a comparative study was considered between the previous response to the consultations made by this Council to the Department for Transport and the final document. Such are the concerns with respect to the Framework document that the Council is keen to ensure the Airport Commission is aware of these concerns prior to completion of its deliberations as they represent a number of fundamental issues that are of great significance to local residents.*

*A copy of these reports, together with the most recent report (27<sup>th</sup> June 2013) are attached for your consideration with this submission.*

*Contained within this report are the Council's views in relation to the Airport Operational Modes Discussion Paper 04.*

*In support of this submission, there also attached is a 'Local Issue' paper, together with a number of other supporting documents that are considered both relevant and necessary for the purposes of amplifying and elucidating the Borough's position on particular aspects that fall within the remit of the Airport Commission's deliberations.*

*The Council also intends to submit a response to the Airports Commission's Discussion Paper 05 'Aviation Noise' issued on the 5<sup>th</sup> July 2013 by the response deadline of 6<sup>th</sup> September 2013.*

*In the meantime, the Council wishes to record its appreciation for being afforded the opportunity of forwarding a comprehensive response on this incredibly important issue on behalf of the communities it serves.*

*The Council trusts these responses are constructive and contribute positively to the Airports Commission's deliberations on the future blueprint for the UK aviation industry and its essential role in maintaining the future vibrant growth of the national economy.*

*Yours faithfully*

*T.J.Gould  
Head of Public Protection  
RB Windsor and Maidenhead*

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# **RBWM SUBMISSION TO AIRPORTS COMMISSION**

## **INTRODUCTION**

### **Description of the Borough**

Just 12 miles to the west of London, the Royal Borough of Windsor and Maidenhead (RBWM) covers some 76 square miles and has a population of around 144,000, with approximately 5% from an ethnic minority. Situated due west of Heathrow Airport many of the communities lie under the two parallel runways and are affected by aircraft both taking off and landing.

A significant part of the RBWM is open countryside which is noted for its natural beauty, its wildlife and its historical and cultural associations as well as for the land uses it supports. Windsor is bordered by the Crown estate (95000 acres) which includes Windsor forest and the Great Park. To the north the National Trust holds more than 100,000 acres of land. 83% of the land designated as Green Belt.

RBWM has two urban centres of Windsor (c28,000) and Maidenhead (c52,000) as well as 14 outlying villages. There are 15 Parish and Town Councils. In addition to the indigenous population the RBWM receives approximately 7 million tourists per year. Central to the Borough's attractions are the historic town of Windsor, Windsor Castle, Windsor Great Park and Forest and the River Thames, which are the focus of numerous leisure and recreational activities.

RBWM is ideally located for business and travel. Communication links are excellent, with four major motorways, Heathrow and Gatwick Airports close by and four main line railway stations. Other major attractions include a highly skilled and qualified workforce; access to a large regional and European market of potential customers and good access to suppliers. The Royal Borough has enjoyed a continued period of sustained economic growth. Latest statistics show that a Gross Domestic Product per head for Berkshire was £19,008 compared to £13,731 for the South East and £12,548 for the UK.

## **BACKGROUND**

RBWM's principle objectives relating to aviation issues focus upon:

- Preserving and protecting the local environment and quality of life for its ~140,000 residents as well as visitors;
- Developing and protecting a vibrant tourist industry of currently around 7m visitors p.a.;
- Securing a thriving business community and;
- Developing and maintaining a sustainable community by striking a more equitable balance between the environmental, social and economic issues.

The Borough is extremely mindful of both the beneficial and adverse roles aviation has within the international, national and local contexts.

Historically, the Borough has always adopted a robust position against the more negative aspects arising from local operations at Heathrow Airport, taking up strong community advocacy and leadership roles in representing community interests on issues such as:

- Night flight restrictions;
- Noise mitigation regimes and schemes to ensure they lean more towards favouring long suffering local resident rather than passenger convenience

- or aviation industry interests. This includes advocating the need for more generous noise mitigation packages for local communities;
- The early abolition of the Cranford Agreement coupled with the introduction of Easterly Alternation to afford local residents periods of respite;
- Voicing strong opposition to unsustainable developments at Heathrow airport when deemed necessary. This includes proposals for additional runway(s) at Heathrow;
- Responding to various Government consultations; active engagement with local MPs and liaising with government agencies; aviation industry; pressure groups and other local authorities;
- Establishing a local stakeholder Aviation Forum for local residents to communicate and raise their views on aviation-related matters;
- Empowering local communities to voice their opinions on aviation issues through various channels, including more recently the Borough's recently launched *WideNoise* initiative.

RBWM has also aligned itself with several inter-agency/local authority consortia that are committed to balancing the competing interests in seeking to secure improvements for local residents. The RBWM is an active member of several Local Authority consortia, the key ones being:

- 2M (founding member)
- Heathrow Airport Consultative Committee (HACC) and its associated Noise & Track Keeping Working Group
- SASIG (Strategic Aviation Special Interest Group) – a Local Government Association body
- LAANC (Local Authority Aircraft Noise Council)
- Local Authority Air Noise Working Group (Technical officers group).

RBWM was initially the strategic lead authority for the Terminal 5 Inquiry for the Air Noise topic and part of the LAHT5 (Local Authority Heathrow Terminal 5) consortia, preparing and presenting both strategic and local evidence at the T5 Public inquiry. RBWM was also responsible for jointly commissioning evidence from WHO (Prof Bergitta Berglund) on Community Noise Annoyance (since adopted as the WHO standards) and Dr Stephen Stansfeld (formerly) of UCL undertaking what is now a celebrated study into the effects of aircraft noise upon the learning acquisition of school children; and for coordinating the main body of evidence on Air Noise (Topic 5) and Vortex for the Inquiry.

RBWM is currently the key local authority on aviation matters to the west and outside the London Borough areas in relation to many aspects and impacts arising from activities at Heathrow Airport.

Despite the proliferation of collaborative arrangements and affiliations, the RBWM considers itself to be independent on many of these issues but it does share a commonality of concern with other local authorities around Heathrow and more importantly, those of its own local communities, in relation to some of the proposals set out in the Department for Transport's (DfT) Aviation Policy Framework. These concerns are further amplified throughout this summary submission. Additionally, there are a number of 'principles' of a more generic nature the Borough feels it must continue to raise at the highest levels of government at every opportunity.

## AVIATION POLICY FRAMEWORK: OVERVIEW

A comparative summary has been undertaken of the Borough's response to the second stage consultation i.e. the draft APF vis-à-vis the resulting APF position. This confirms there is generally a high degree of consistency between the Borough's comments and the final APF. However, it is nevertheless particularly disappointing to note that where there are differences it is where the APF has been dismissive, ambiguous on a number of issues that are of such key significance to Borough residents and many other communities who live adjacent to busy airports, or lacking clear definitive statements of intent. This is clearly evidenced in the accompanying document to the final APF entitled: *'Draft Aviation Policy Framework Consultation: Summary of Responses'*. **Appendix 1** attached is RBWM's *'APF Comparison'*.

It is understood the APF is to provide the framework within which the Airport Commission must operate. Such is the scope and scale of a number of variances between the APF and the Borough's position, the Borough feels compelled to record its disappointment of these issues on behalf of its local communities hoping these will be re-considered upon recommendations from the Airports Commission in the final decision making processes.

Further, the Borough believes some statements within the APF represent a significant distortion and inconsistency with a number of existing and emerging government policies e.g.

- Sustainability / Climate change obligations and agendas.
- Noise policy, particularly in relation to references and definitions such as: *'Bearing down on noise'*, *'Excessive noise'* and *'Striking a balance'*.
- A complete disregard of the conditional basis upon which the T5 permission was granted, ignoring the very intention of the conditions attached to that permission together with the statements about the future development of Heathrow Airport.
- The apparent dismissal of the ANASE study and the absence of a credible, calibrated methodology for assessing community annoyance.
- Avoidance of an unequivocal statement committing the UK to working towards achieving and complying with a number of EC Directives and Guidelines (e.g. WHO Community Noise) for assessing impacts.
- An obvious bias towards further airport development at Heathrow and a concentration on the South East.

RBWM is also deeply sceptical over a number of the supporting APF framework guidance documents and casual statements relating to:

- Air quality standards being met despite the anticipated scale of the projected expansion and growth in aviation; lack of clear policy direction; and some serious doubts concerning the veracity of the modelling assumptions.
- The uncertainty, lack of clarity, projected timescales and general lack of direction of specific development proposals that can be supported by necessary surface access infra-structure (i.e. road and rail) and controls to enable and cope with the additional demands in relation to internal connectivity.

These are explained in more detail in the accompany Appendices.

Accordingly, the Airports Commission are invited to revisit the Royal Borough's submissions to the two consultation phases in relation to the preparation of the final APF that were intended to provide balanced arguments on those issues of greatest interest or concern to its local residents.

In the Council's response to the second phase consultation regarding the Aviation Policy Framework (APF) in respect of the Connectivity considerations, the Council was particularly mindful of the primary objective of:

***'One of our main objectives is to ensure that the UK's air links continue to make it one of the best connected countries in the world. This includes increasing our links to emerging markets so that the UK can compete successfully for economic growth opportunities'.***

The Council unequivocally supports this position in principle.

Connectivity is 'the' key to any future national APF, in terms of global and UK connectivity. Connectivity should relate to an integrated approach covering all modes of transport to ensure efficient dispersal of passengers and services as near to the point of requirement and demand as possible. The APF states:

*"We are securing investment to provide world class national and international connectivity; harnessing technology to ensure our transport system is smart and sustainable and ready for the future; and putting the customer and business at the heart of transport"*

This is a national 'strategic' aviation framework that needs to incorporate and include all transport operators and modes of transport. Early investment in inter-airport infrastructure on the mainland can only complement the UK's aspirations to successfully access global markets and the new expanding economies.

**The investment in the integration of UK infra-structure must be the over-riding priority** if the longer term ambitions are to be realised and succeed. The market will determine those areas that will expand; reduce internal uncoordinated competition between the regions and share the burdens and rewards.

Heathrow is currently the only hub airport in the UK. This is arguably self-limiting and a constraint to wider growth. The recent focus on the myriad of options for Heathrow airport is diverting attention away from the primary consideration of what is beneficial for 'UK plc'. There appears too much focus on Heathrow expansion and generally in the South East. Consequently, there needs to be a re-think on this historical strategy as it might prove to be too inflexible and even out-dated given the anticipated rapid changes in global markets and mobility expectations (i.e. leisure). The UK must have a balanced aviation industry that is dynamic, flexible and responsive to growing markets and emerging economies. This necessitates regionalisation and optimising the development opportunities of airports outside the South-East such as Manchester, Birmingham, the North East and Scotland; capitalising on existing capacity and offering greater choice to both passengers and business.

Evidence on the need for additional capacity at Heathrow and the South East is often contradictory. The Council is conscious, for example, of reports suggesting there is already sufficient existing capacity, seemingly suggesting the problem being the dominance of individual airports at the expense of other airports which are seeking to expand and to serve specific market niches and local economies. This might suggest the issue is one of re-allocation and/or diversion of demand. A refreshed focus upon improving UK's internal connectivity in the first instance is likely to facilitate and stimulate such a shift.

As the chapter states: *'The UK is currently one of the best connected countries in the world'*. Arguably, the same cannot be said about the UK's relative internal transport connectivity.

As recognised in the draft APF *'London is already an exceptionally well served capital city with five airports that together serve more routes than any other European city'*.

Collectively, the five London airports serve more routes than any other European city, account for 974,376 flights (46% of the UK total); and 135,511,952 pax (60% of UK total – May 2013). In this respect all the airports serving London should be considered as part of the London system (as opposed to the single Heathrow hub) in particular Stansted and Gatwick in addition to Heathrow and that it is London itself that should serve as the main hub for the U.K. The location is likely to always require certain constraints to safeguard local communities from the more adverse impacts. The development of Gatwick and Stansted (built and justified as London's 3<sup>rd</sup> airport) needs to be positively encouraged to develop to ensure London can retain its status and keep up with its European and global competitors.

Intra-airport connectivity must therefore be the key focus otherwise the likely scenario is a continuation of the present i.e. there is insufficient utilisation of existing capacities and over provision on 'popular' routes that is having the effect of reducing the frequency of flights to emerging markets. For example, too few destinations and connections to the PRC, now the world's second largest economy and other BRIC destinations.

We fear the consequences of not doing so simply represents a dominant anti-competitive self interest that distorts the arguments in favour of a single hub airport at Heathrow versus (any) other options. The UK needs to maintain its position if it is to compete successfully for economic growth opportunities. This infers there needs to be a shift in mindset and instead to consider what sort of hubs Gatwick and Stansted might be as this will influence and affect the surface connectivity needs.

The APF refers to the development of high-speed rail (HSR) as significant in terms of improving connectivity. However it is important to note that the agreed Phase 1 route of the current HS2 scheme only links London to Birmingham Airport (to date) and there have been several studies questioning the economic benefits and level of job creation that HS2 might yield.

There remain other opportunities worthy of consideration for improving connectivity, such as electrifying the route from Reading to Birmingham Airport and improving the East Coast Mainline and including a link to Doncaster Sheffield Airport, as well as other similar inter-modal capital investment.

Such an approach fits well with the Airport Commission's timeline of **Medium term options** definition as set out in Guidance Document 01.

The proposal to extend the UK's Fifth Freedom Rights policy to Gatwick, Stansted and Luton is viewed as an absolutely essential policy change to what is currently in effect a totally out of date restrictive practice upon these and other airports which has no place in today's world of open competition.

Fifth Freedom Rights extends the choice available to passengers and improves the efficiency of airline operations by increasing capacity utilisation of aircraft. The proposal correctly states that reciprocal rights would be required and foreign airlines should not be subsidised. In reality, the statement “*the UK has long had a general presumption in favour of liberalising fifth freedoms from airports outside the South East*” appears not to be applied. It would appear inconsistent not to extend this policy to all other airports in the South East other than Heathrow Airport; or indeed any other regional airport that would benefit from these freedoms.

This provides an unfair competitive advantage to Heathrow to the detriment of the other SE airports and therefore constrains market development and growth at the other airports. The negative consequences of this are to amplify the demand and focus on Heathrow. As stated previously, this is a ‘UK plc’ APF.

Allowing foreign airline operators to carry passengers between Gatwick, Stansted and Luton Airports and another country, under Fifth Freedoms regulations would create opportunities for regional airports to benefit from increased activity and to contribute to increasing connectivity of the UK.

The Royal Borough of Windsor & Maidenhead (RBWM) recognises the importance of connecting with the BRIC and other emerging economies in order to stimulate growth in the domestic economy, and to ensure the UK maintains a strong and well connected economy in the long-term.

A complementary condition of Fifth Freedoms could be a requirement to have a stringent and robust environmental mitigation package that is consistently applied at all airports e.g. quietest aircraft; noise mitigation schemes; operational procedures; noise levels; air quality – similar in principles and composition to the T5 planning conditions.

The Slot allocation system needs to be reviewed, particularly in respect of “grandfather rights”. Future focus and priority must be given to ensuring good connectivity with BRIC and other emerging economies together with reversing the UK tourist deficit.

If Gatwick is to be developed as an Inter-continental hub, a rail connection to Ebbsfleet needs to be considered, together with improvements from locations West and North of Gatwick.

The Council is unlikely to be supportive of any policy that impacts negatively on regional airports. It is hoped that sufficient research has been conducted into the benefits and costs for regional airports in bringing forward proposals for the Commission’s consideration.

## **Discussion Paper 04: Airport Operational Models**

Turning to Discussion Paper 04 ‘*Airport Operational Models*’, RBWM would be grateful if the following comments can be considered as part of the formal response to this particular document given its relevance to the above comments relating to ‘connectivity’.

**Question 1:** *Do you consider the analysis supports the case for increasing either hub capacity or non-hub capacity in the UK? Is there any additional evidence that you consider should be taken into account?*

**Response:**

It is unclear how precisely hub or non-hub capacity is to be provided. Once a slot is granted it is understood it is the airline who determines how they make use of it. It



would appear that with the increased range of new aircraft and a natural preference, particularly among business passengers, for point-to-point travel, together with the likelihood of increased low cost leisure travel there will be an increased demand for travel to be point-to-point. Table 4.1 appears to indicate the necessity to consider providing for increased hub activity at additional airports rather than concentrating on a single dominant hub.

Although the report refers to benefits of scale in a single hub this is not an overriding factor if an Alliance/s can be attracted to an alternative purpose built airport for their operations and it is made clear that the current dominant hub will continue to operate under current “constraints”.

**Question 2:** *To what extent do the three potential futures outlined in this chapter present a credible picture of the ways in which the aviation sector may develop? Are there other futures that should be considered?*

**Response:**

There clearly is ‘no one size fits all’ solution as the mix of options which already exist, will be required and are likely to prevail. Therefore, in devising and directing a strategy for the UK, we would respectfully suggest a better option would be to consider a 3-tier system as follows:

1. Continuation of the ‘Focal airport(s)’ i.e. Heathrow may be one of these at constrained to its current capacity.
2. Incentivise and enable the development of additional purpose-built multi-hubs, strategically positioned around the UK with Fifth Freedom Rights; inter-connectivity; and retention of Alliances; and
3. Proliferation of Point-to-Point services as the market demands.

Clearly the drivers are likely to be: affordability (price elasticity of the costs of flying); accessibility; convenience; choice; levels of disruption and waiting times; connectivity and ease of transfer – air and surface access.

**Future 1:** The main reason for splitting the ownership of airports was said to be to increase competition. If the aviation market is able to support two or more focal airports this would encourage competition and facilitate the forging of Alliances. In this scenario the passenger would benefit.

Predicting future Alliance conglomerations seems a fruitless exercise but in view of British Airways huge investment and 55% share of flights relating to Heathrow it would seem logical that its One World Alliance would continue to operate mainly from there.

**Future 2:** Seems entirely plausible particularly if an alliance is formed between Middle East and Pacific Rim interests.

**Future 3:** A significant integration between low-cost and full service models seems unlikely without a significant change to the operating models of one or the other or both. Restrictions applied currently to low-cost travel, e.g. baggage, would make it difficult to book a through flight on a transfer basis. Under these circumstances the need for a specific dominant focal airport would be likely to decrease.

**Question 3:** *How are the trends discussed in this chapter (e.g. liberalisation, growth of low-cost carriers, consolidation of alliances, and technological changes) likely to*

*shape the future of the aviation sector? Do they strengthen or weaken the case for developing hub versus non-link capacity?*

**Response:**

As previously stated it is unclear how one develops hub vs. non-hub capacity other than the provision of facilities to develop or constrain the capability to handle transfer passenger demand will depend on the type of airline/alliance and operation that one hopes to attract to make use of that airport. The trends discussed would appear to lend themselves to development of a number of focal airports rather than a single dominant focal airport. The increase in range of new aircraft, the overall forecast increase in basic demand, as well as an increase in low-cost airline activity appears to offer the possibility of more point-to-point travel and therefore a reduction from the current high level of transfer passenger activity at Heathrow with its inherent problem of excessive peak period activity.

**Question 4:** *What are the impacts on airlines and passengers of the fact that the wave system at Heathrow operates under capacity constraints?*

**Response:**

The attention is again heavily slanted towards and has undertones of justifying the expansion of Heathrow Airport i.e. no imaginative change of approach. The evidence of and consequences upon airlines and passengers at a constrained airport are well established. A solution and priority must be to free up or optimise all existing available capacity in the short term but not at the expense of long established environmental operating procedures.

Capacity constraints clearly impacts on the extent to which the peak demand can be catered for. In many way that is no bad thing since the level of transfer passengers is already at around 38% although there is some benefit to the UK economy in terms of purchases at retailers serving the airport terminals and providing maintenance and support services . It is true that some routes are dependent on transfer passengers to be viable but other routes, e.g. New York are served excessively as a result of catering for transfer demand.

The comment in Para 2.9 of Discussion Paper 4 that airlines transferred from Gatwick to Heathrow because it was the busier of the two airports suggests that any further expansion of Heathrow would lead to even less competition.

Perhaps therefore a more pertinent question is: *'where is there scope to increase capacity and is there evidence for expansion and development of additional 'hub' capacity at these airports? And, what would be the impact if efficient intra-connectivity was provided between all the 'London-based' airports? Perhaps the 'spoke' element should increasingly include surface access (in all its forms) rather than merely air transfers.*

It is noted with interest Para 3.31 of Discussion paper 04 cites 'dual hub systems'; and Para 3.32 acknowledges multi-hub success in Germany. This is consistent and supports the approach being suggested above, but with more than 2 hubs, providing even greater passenger choice and market opportunities.

**Question 5:** *How does increasing size and scale effect the operation of a focal airport.. Is there a limit to the viable scale of an airport of this kind?*

**Response:**

See above. It is probably self limiting at the expense of greater passenger choice and market opportunities; benefits a greater number of airline alliances that can service high-yield local origin and destination demand at the various airports.

Increasing the size and scale of a focal airport increases its capability to cope with peak periods but makes that airport increasingly dependent on transfer passengers. As the scale of operation at Heathrow has expanded it has seen a percentage increase in transfer passengers considerably in excess of the percentage increase in total passengers.

Depending on its location it can have an increasingly adverse impact on the local environment and its neighbours as well as imposing possibly unacceptable pressures on local services. Prior to the economic recession there were grave concerns that the business activity generated in a large area around Heathrow was creating an unsustainable over-heated economy with escalating office, housing and staff costs, which is a situation which could return if other hubs are not promoted. The environment should be considered by ensuring that any airport permitted to build additional runway should be required to consider the need for runway alternation in assessing its handling capacity

The most critical aspect of all is that any increase in the dominance of a given airport will inevitably have an adverse impact of any similar airport wishing to provide effective competition.

**Question 6:** *Would expanding UK hub capacity (wherever located) bring materially different advantages and disadvantages from expanding non-hub capacity? You may wish to consider economic, social and environmental impacts of different airport operational models.*

**Response:**

*(See also answer to question 1).*

It is unclear how precisely capacity can be provided to serve a given purpose i.e. hub or non- hub, other than constraining the airport or limiting the terminal facilities etc that would facilitate the transfer of passengers. It questions the purpose that would be served other than to limit excessive costs. Clearly the operation of low cost point-to-point may well require more night flights in order to provide the number of turnarounds to make the operation viable.

In our view there is a need to provide additional airport capacity and infrastructure capable of offering the appropriate facilities to provide for competing hub operations. This requires expansion of Fifth Freedom Rights and the provision of facilities to insure that various airports can compete effectively.

The position taken by some interested parties for dealing with airport capacity and only consider the merits of a dominant hub compared with point to point operations is not sensible. There should be the provision of at least two competitive hubs to serve London and one in the Midlands or North of England. Also further capacity should be allowed for in the vicinity of London to ensure operational flexibility in adverse weather conditions or events such as recent cancellations of hundreds of flights at Heathrow due to aircraft fire incidents, and also to serve the anticipated increase in demand for low cost flying.

**Question 7:** *Do focal airports and non-focal airports bring different kinds of connectivity and, if so, which users benefit the most in each case?*

**Response:**

Non-focal airports offer the benefit of point-to-point flying, a growing trend and strong preference amongst passengers, which is likely to escalate if passenger numbers increase in line with growth forecasts provided there is sufficient demand in that airport's catchment area for a given frequency of flights over the required route structure. The lack of a need for connections reduces the level of peak period activity albeit there is likely to be favoured periods in the day for certain departures.

Focal airports require and provide for transfer passengers enabling the operation of flights that would not otherwise be viable without them. If capacity is not constrained such airports enable an increase in the operation of frequencies over high yield routes.

**Question 8:** *What would be the competitive effects (both international and domestic) of major expansion of hub capacity, and what are the associated benefits and risks?*

**Response:**

There would be considerable benefits in increasing hub activity at additional airports. This was the very purpose of addressing the previous monopoly controlling those airports. Those airports and the facilities serving them would need to be developed in order to allow proper competition. In particular the UK needs a competitive approach to open up more routes to serve the Pacific Rim, Middle East, South America and Africa in the medium to long term.

A dominant hub would not provide for real competition, over the longer term and would be likely to incur an unacceptable environmental impact ultimately resulting in a constrained operation, albeit at a higher level.

**Question 9:** *To what extent do transfer passengers benefit UK airports and the UK economy?*

**Response:**

This issue was explored in depth at the T5 Inquiry and little appears to have changed. The main benefit to the UK economy would appear to be for the profits and turnover from retail trade at airport terminals, the operation of some routes that would not be viable without them together with maintenance and support services.

**Question 10:** *Is there any evidence that the UK (or individual countries and regions within the UK) are disadvantaged by using overseas focal airports?*

**Response:**

Not known

**Question 11:** *What specific characteristics of the UK and its cities and regions should be considered? For example, does the size of the London origin and destination market and the density of route networks support or undermine the case for a dominant hub?*

**Response:**

There is little doubt the UK SE region is dominated by finance and high value trade. These airports need to focus primarily on these established sectors and trade routes. The provision of additional capacity in the Midlands and North of the UK would likely be more aligned to manufacturing industries. It is therefore vital that these areas are developed to target the developing global markets for such commodities e.g. China, Brazil and SE Asia. Other airports are more relevant to point-to-point services being more closely aligned to the Leisure industry. Clearly, this is not to over-simplify the situation, but more to develop a strategy that aligns to the strengths of particular regions.

**Question 12:** *Could the UK support more than one focal airport? For example, could an airline or alliance establish a secondary hub outside London and the South East, for instance in Manchester or Birmingham?*

**Response:**

There are good reasons to presume that additional focal airports should be provided to serve not only Manchester or Birmingham but also London. As indicated previously the necessary facilities would need to be provided to enable an alliance to compete properly from another focal point. The problem of attracting an alliance to move to a different focal airport would need to be recognised such as the moving of staff and facilities and the need to develop a new catchment area as well as the loss of established route connections in the initial phases of the move. These costs could possibly be offset by sale of current slots, lower landing fees during the initial move and other considerations such as APD differentials. Other incentivisation instruments could be devised and implemented to effect the desired changes.

**Question 13:** *To what extent is it possible to operate a successful 'constrained' focal airport by focusing on routes where feeder traffic is critical and redirecting routes which are viable as point-to-point connections to other UK airports?*

**Response:**

It seems unlikely that an airport/Alliance would willingly accept the costs of splitting its operation in the manner suggested but there is no doubt that airlines/ Alliances would consider the viability of moving to a purpose built (new/expanded) airport if it became known that their current airport would continue to be constrained. All this is subject to recognition of the cost involved in effecting that change.

Work undertaken by AEF/WWF/Hacan Clearskies appears to demonstrate that in the medium term, based on current capacity, constraints and growth projections there appears to be adequate airport capacity to cope with the level of demand for the medium term timeline. It is more a question of how such spare capacity can be harnessed and efficiently utilised in an acceptable timescale.

## LOCAL ISSUES PAPER

At the local level, the Borough, as stated, is principally concerned about the negative aspects arising from operations at Heathrow Airport. Generally these relate to excessive noise and its consequential impact upon local residents.

The key areas of greatest concern are;

- Night flight restrictions;
- The inadequacy of noise mitigation regimes and schemes that lean more towards favouring long suffering local resident rather than passenger convenience or aviation industry interests.
- The earliest abolition of the Cranford Agreement coupled with the introduction of Easterly Alternation to afford local residents periods of respite;
- The weaknesses of existing collaborative and consultation arrangements;
- Constant pressure for unsustainable developments at Heathrow airport in the wake of a record of '*broken promises*' by government; the aviation industry and airlines (note previous statements about not wishing to build a 3<sup>rd</sup> Runway; Glidewell Inquiry, (T4 will be the last); and T5 Inquiry statements);
- Uncertainty over future development proposals such as additional runways and the collateral damage upon the local environment that would ensure.
- Failure of successive governments to strike an equitable balance between the conflicting interests of the aviation industry's quest to expand and the quality of life, local environment and an already overstressed infrastructure within congested built up areas.

The Borough's strategy hitherto has been to:

- Respond to various Government consultations; seek the active engagement with and involvement of local MPs and Peers; and liaising with government agencies in seeking to redress the balance;
- Establishing a local stakeholder Aviation Forum for local residents to communicate and express their views and knowledge on aviation-related matters; public meetings and by raising awareness over key issues;
- Empowering local communities to voice their opinions on aviation issues through various channels, including more recently the Borough's recently launched *WideNoise* initiative;
- Working in partnership with other local authorities on areas of mutual interest.

The Borough's active and historical involvement with aviation issues has been focused on providing strong community leadership and seeking to mitigate adverse impacts upon local communities. A significant amount of funding has been spent on such matters.

A number of matters now being brought forward reflect upon those very same issues that the local authorities around Heathrow Airport sought to address through successive Night Flight judicial reviews, the T5 Inquiry and previous responses by this Council (and others) over a considerable number of years to a raft of government consultations, including the APF.

The T5 Inspector in framing his final report and his recommendations to the Secretary of State specifically highlighted a number of the issues that still remain unresolved yet are continuing to be brought forward by the aviation industry who

continue to strive and press for relaxation and/or modification irrespective of previous statements and commitments. We refer, of course to:

- no third runway;
- a cap on the noise contours;
- a cap on the number of permitted aircraft movements (480k atms);
- a review of noise measurement methodology;
- a review of certain operating procedures.

The Airport Commission will be well aware of the Inspector's decision to recommend approval of T5 was based on the premise that T5 would be the last significant development at Heathrow Airport. This should have been an end to the historical 'creeping incrementalism'.

Many of the Borough's communities continue to suffer the significant adverse effects from existing operations at Heathrow Airport such that any further increase in activity at Heathrow Airport will have significant knock-on effects for the Borough through potentially further over-heating the economy of the Thames Valley area and creating development pressures on the Green Belt. It will add to pressure on the housing stock including demand and inflationary impacts, increase demand for employment land, and place further pressure on the transport network and other infrastructure particularly that relating to the historic town of Windsor that can currently barely cope, despite the recession. This in our view is unsustainable and by definition short-termism.

RBWM remains concerned there is little objective evidence arising from the development of the APF document that provides firm assurances and comfort that these issues can or will be adequately accommodated in a sustainable way. The APF, in its present form, is failing to provide the necessary re-assurances to local communities.

### **Abandonment of the Cranford Agreement**

The original intention of the Cranford Agreement was to provide a measure of protection to the residents of Cranford given their proximity to the end of the northern runway. This was at a time when takeoff noise was the dominant source of noise and the numbers of over-flights were considerably less than they are present day. The development and technological advancement of aviation has changed the 'character' of the noise around Heathrow such that with the improvements to aviation performance and the increase in the number of movements, landing noise near defined flight paths has become the dominant factor. This is further exacerbated by there being no system of runway alternation on easterly operations as compared with the eastern side of the airport. On such days this results in around 650 aircraft directly over-flying one swathe across the Borough. During anti-cyclonic conditions with sustained periods this unrelenting level of disturbance is both wholly intolerable and inequitable.

The Borough is probably unique amongst those local authorities around Heathrow Airport in that it is supportive of the early abandonment of Cranford Agreement given the current lack of respite during intolerable easterly operations and the positive benefits that abandonment of the Cranford Agreement would bring in terms of sharing the 'existing' burden of excessive noise around the airport more equitably.

The Council is also mindful of the implications and threats arising from removing the Cranford Agreement in that it could lead to both the introduction of 'mixed mode' operations, as a relatively easy short term capacity 'fix' allowing increased

movements (i.e. enhanced runway capacity); and a likely strong public reaction in those communities where the pattern of noise exposure changes. It is a fact that abolition of the Cranford Agreement results in 'winners and losers'.

The derived community benefits of 'easterly alternation' through the abandonment of the Cranford Agreement is a subject close to the hearts of both this council and also thousands of local residents currently affected by easterly operations. The abandonment of the Cranford Agreement must bring with it the long awaited respite to the severe and intolerable nuisance caused to these many thousands of local residents in Windsor and nearby villages during easterly operations.

Abandoning the Cranford Agreement presents a dilemma for the Royal Borough of Windsor and Maidenhead because:

- Abolishing the Agreement would 'share' the excessive noise burden around the airport more equitably and thereby allow runway alternation to be introduced affording much needed respite to local residents. It would also inevitably 'shift' ~50% of the noise burden to other communities such as Old Windsor, Wraysbury and other parts of Windsor that are more aligned with the southern runway (09R). These types of operational changes always stimulate strong public reactions.
- The existence of the Agreement currently constrains the airport from introducing Mixed Mode operations. It is accepted this would be one way of optimising existing runway capacity. However, such a move would be strongly opposed due to the resulting increase in flight numbers over the current capped limit (480k atm) and the associated intensification of operations particularly the denial of alternation and any respite from incessant over flights resulting in consequential adverse environmental and infrastructure impacts. Furthermore, while Mixed Mode is operated on many airports, the huge volume and frequency of landings and departures at Heathrow potentially sets it aside from other airports due to the complexity and potential risks of such an operation.

Previous analysis confirmed the following outcomes if the Cranford Agreement was abolished:

- o There would be an overall improvement in the noise climate for Windsor at most times of the day of around 2-3 dB
- o For Old Windsor and Wraysbury, there would be an increase of up to 8dB during easterly operations, with a worsening in the early morning and evening period of around 2dB.
- o The introduction of Mixed Mode operations would have a radically adverse impact upon the communities of Old Windsor and Wraysbury (in particular) which does not exist at the current time.
- o Mixed Mode operations would result in a disproportionate deterioration in Old Windsor and Wraysbury relative to the improvement in Windsor. This is the major reason for RBWM's policy of being totally opposed to the introduction of Mixed Mode operations at Heathrow Airport.



***The ideal situation from a local community perspective would be to abandon the Cranford Agreement at the earliest opportunity, retain a movement cap, maintain segregated mode, introduce easterly alternation to provide some respite to all communities around Heathrow Airport and for Heathrow to provide additional noise mitigation and insulation measures to those communities like Wraysbury and Old Windsor that will be adversely affected by the abandonment of the Cranford Agreement .***

### **Noise Mitigation Proposals**

RBWM accepts there will always be some disturbance from operations at Heathrow Airport that will inevitably impact upon the quality of life of residents living in close proximity to the airport and/or to the flight paths. However, RBWM also believes that where there is no other viable alternative to reduce noise other than through noise mitigation then every measure should be taken to minimise the impact. This might be through operational controls or the physical separation of the recipient from the noise itself e.g. noise insulation schemes

RBWM responded to the 2011 consultation on post-Cranford operations which set out proposals for revising the then existing scheme of noise mitigation, a requirement under the EU Noise Directive because of the fundamental revisions to operations and the consequential change in environmental impacts upon some local communities. This was in relation to the increased noise that certain properties would be exposed to as a result of these changes.

EU Directive (49/2002/EC) relating to noise measurement requires a change to the noise measurement index, upon which noise contours are calculated, to include day, evening and night time weighted 'sensitivity' factors (i.e.  $L_{den}$  dB(A)). The Council is mindful of the fact this would have the effect of increasing the number of households within each contour area based on 2014 predictions imposing an additional financial burden. Clearly this is likely to severely impact upon the specification and generosity of such schemes in the current economic climate.

The Council notes that the APF refers to a revision of the existing scheme of noise mitigation. This is, in any event, a requirement under the EU Noise Directive because of the likely fundamental revisions to operations and the consequential change in environmental impacts upon some local communities.

The Council urges the Airport Commission to recommend the introduction of far more realistic and generous schemes in relation to:

- Daytime Noise Insulation Scheme
- Night time Noise Insulation Scheme
- Community Buildings Noise Insulation Scheme

together with the introduction of a more flexible, systematic and coordinated approach based on zoning linked to WHO-based noise thresholds with differential levels of eligibility for the Residential Noise Insulation and Home Relocation Assistance Schemes.

The council is aware the proposed scheme seeks to introduce a more coordinated

approach based on zoning linked to the noise contours ( $L_{den}$  63; 66; and 69 dB(A) ) with differential levels of eligibility for the Residential and Home Relocation Assistance Schemes. The Night Noise Insulation Scheme is currently under review pending the Government's review of night noise, delayed until late 2013.

The World Health Organisation (WHO) recommend a residential night time level of 55dB(A). In this context the threshold values for eligibility would appear not to be sufficiently robust in that they fail to meet an accepted and recommended standard based on sleep deprivation i.e. worst case.

The uncertainties around the likely introduction of introducing 'mixed mode' and any revised changes to the Night Noise Insulation Scheme (particularly relevant in this context) would suggest both the 'precautionary principle' and the 'polluter pays' principles need to be applied.

**The Airport Commission is urged to consider this as a substantive matter as part of its deliberations regarding any short-term proposals.**

### **'WideNoise'**

RBWM is committed to transparency, collaborative working, devolution and empowerment agendas and to 'Resident's First' principles. In considering these elements and given the perceived absence of credible community noise annoyance criteria, the Council recently launched (February 2013) the WideNoise project.

Essentially, *WideNoise* is a 'smart phone' application for monitoring noise levels that can be up-loaded, online on to an interactive GPS mapping system. The initial project is supported by the European Seventh Framework programme and is being conducted by 5 European universities. The UK participant is University College London (UCL).

Using smart phone technology that can be used by most up to date iPhone and Android devices, *WideNoise* is free to download and use. The software effectively converts the mobile phone into a sound level meter. In addition, the facility accommodates 'tagging', providing an option for a resident/user to add subjective text (emotion) about a particular incident e.g. annoyance characteristics, etc, as well as recording location, time and date, thus providing a contemporaneous record of a particular incident. The information can then be cross-referenced and validated with other more sophisticated systems if necessary.

Whilst the application is not regarded as a scientifically accurate device, its perceived value and usefulness is derived from the following:

- It 'legitimises' a resident's complaint;
- Provides an on-going record of indicative noise levels at particular locations;
- Facilitates community noise mapping;
- Enables a tool for visualising people's reactions to aircraft noise in the form of 'bio-mapping' or 'emotion mapping';
- Provides affected households an independent opportunity for using their own hands-on device to record their complaints or experience;
- Builds a useful and wider data base of *anecdotal* evidence relating to the severity (or otherwise) of the impact of aviation upon local communities;
- Offers the potential to widen and consider the application to other community noise sources, mapping and investigation techniques.

The Council is working in collaboration with UCL who are leading on this European project.

The key drivers for the Borough's interest in this project relate to:

- It allows engagement of those communities who are at risk of being most affected by changes in aviation operations at Heathrow;
- Complements the Borough's own transparency, localism and Big Society agendas;
- As stated, legitimises local complaints that have hitherto been largely dismissed;
- Significantly widens the Borough's monitoring capability without incurring significant cost;
- Fulfils the council's commitment to raise the profile and publicity surrounding aviation issues at a time most needed; and
- Engenders a wider debate and active participation in aviation matters.

A copy of the initial results from February 2013 will be forwarded to the Airport Commission in due course and as part of the council's response to Discussion Paper 05 'Aviation Noise'.

Frequent exposure to aircraft noise has been proven through successive studies to have the potential of causing a range of negative public health impacts, other than simply 'annoyance'. The wider health impacts in the context of the World Health Organisation (WHO) definition of health include:

- Interference with communication
- Learning acquisition deficits e.g. impaired reading and comprehension
- Sleep disturbance and the consequential effects resulting from fatigue
- Performance effects
- Cardiovascular and psycho-physiological effects
- Annoyance
- Effects on social behaviour

While these are detrimental to the individuals concerned, it is important to note that collectively they are likely to have a considerable detrimental impact on the learning and business efficiency of UK plc as a whole, which is not helpful to the UK's place in the global economy.

### **Night Flying Restrictions**

RBWM is, as is well known from previous consultations on successive night flying restrictions proposals, totally opposed in principle to the concept of night flights. However, it is also cognizant of the economic arguments in support of some night flying, subject to restrictions.

Appendix 3 sets out the Council's response to the very recent Night Flying Restrictions consultation.

Public perception is that whilst the level of noise produced by individual aircraft has improved, the corresponding noise environment around Heathrow has got significantly worse on account of the sheer increase in the number of aircraft movements. A matter identified in the T5 Inspector's Report.

The current night flying regime limits are made up of two interchangeable components, the loudness of each aircraft and the number of flights i.e. repetitiveness of over-flights.

Removal of the movement limit would mean that further growth could be accommodated at night as and when daytime capacity is virtually exhausted. The fear is that the abolition of a specific movement limit would encourage further aircraft movements at night resulting in an inevitable worsening of the position for local residents.

The current aircraft movement capping limit for Heathrow is 480,000 movements per year. The current movement level is approaching 473,000 movements per year. Before the recession numbers rose close to 479,000. There is therefore little capacity left before the capping limits are in danger of being breached. Another concern with the removal of a specific movement limit is that once the principle is established that capping limits are not part of Government policy then existing limits are in danger of being left to market forces.

Central to the concerns of local residents is the Government's total lack of clarity in relation to:

- What is meant by '**excessive noise**'; and
- The statement '**bearing down**' on night noise.

In the absence of clarity it is not possible to know what the current and proposed Government policy objectives are in relation to both daytime and night time; and whether the policy objective of "bearing down on noise" will be met, or indeed is still relevant.

### **Additional Runways at Heathrow**

The council is strongly opposed to any further runway expansion at Heathrow Airport. Moreover, the Council is mindful of the evidence presented at the Heathrow Terminal 5 Inquiry and the fact that the Inquiry Inspector was unequivocal in his recommendation to Government (as indeed was the previous T4 Inspector in 1983) that: *'the total number of aircraft movements at Heathrow must be strictly controlled and a realistic cap imposed together with effective controls on movements at night...**Unless the controls I have proposed are imposed the impact of Terminal 5 would soon exceed that on which I have based my judgement. It would rapidly become wholly unacceptable whatever benefits it might bring...Nevertheless I agree with BAA that the evidence placed before me demonstrates that a third main runway at Heathrow would have such severe and widespread impacts on the environment as to be totally unacceptable***'.

The Council is concerned that some where in the mist of time, the significance of all these commitments and conditions have been lost. Irrespective of the economic climate (short-term in strategic terms) a number of current proposals currently being publicly aired go far beyond these determining factors and the current town planning limits which specify five terminals only and a ceiling of 480,000 annual air traffic movements (ATMs). In addition, the Council is concerned that the APF continues to rely on unproven, un-calibrated and flawed assertions; a lack of objective evidence; and is unsupported by any concrete commitments or proposals relating to how any expansion proposals at Heathrow Airport involving the construction of additional runways will constitute a sustainable development.

RBWM is deeply concerned that the very basis upon which community noise is measured and assessed is un-calibrated, outdated and non-compliant with EU requirements. It would appear the APF has totally dismissed the findings of the ANASE Study, a £1.4M, 6-year study undertaken by an internationally respected

group that found that community noise criteria should be based on LAeq.50dB(A) and not LAeq.57dB(A). The Council believes this was a deliberate ploy given the economic implications and damage to the economic justification for the proposals. The results of the ANASE Study were supposed to underpin the Government's noise policy. Consequently, the APF has no underpinning credible criteria for assessing noise impacts and the level of community annoyance.

The substantive points here are:

- If the base line assumptions are flawed (i.e. community annoyance calibration) then the evaluation of the whole noise impact and acceptability of proposals will be flawed;
- A new, independent survey is required.

## **Airspace**

The increase in the number of Air Traffic Movements with around 100 aircraft in the sky over South East England at any time during the day, has necessitated the start of a root and branch London Airspace Management Programme (LAMP) earlier this year which will take several years of re-programming and revision by Air Traffic Control. In view of the airspace congestion, further development and even more flights to and from Heathrow should not be tolerated as escalation of excessive pressure on ATC flight controllers would be a dangerous path to follow.

Finally, the RBWM would confirm it will be submitting a response to the recently released Airports Commission Discussion Document Paper 05 by the deadline date for submissions of 6<sup>th</sup> September 2013.