

ROYAL BOROUGH OF WINDSOR AND MAIDENHEAD

RESPONSE TO DAVIES AIRPORT COMMISSION Re: Aviation capacity in the UK: emerging thinking

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<p><i>(AC) committed at the start to an open and consultative approach, and have lived up to that commitment. We have met stakeholders from all sides of the public debate – from environmental NGOs and local campaigners, through Parliamentarians, local politicians and devolved governments, to engine and airframe manufacturers and airport and airline executives. We have held a series of public meetings, have visited many of the existing airports and possible sites for new ones, and have visited or met managers of a number of complementary and competing airports overseas. We have issued five substantial consultation papers, on demand forecasting, air connectivity and the economy, climate change and the airline industry, on the vexed question of the respective roles of hub airports and point to point routes, and on noise and aviation.</i></p>	<p>The Borough warmly welcomes the commitment to an open and consultative process. Indeed the AC will be aware from the Borough’s three extensive submissions with respect to:</p> <ul style="list-style-type: none"> - the APF consultations; - references to the issues of hub status/ the critical importance of investing in efficient and effective infrastructure and connectivity; growth and meeting necessary demand; and - noise and environmental aspects. <p>The Borough’s submissions have argued the case for moving away from a perceived fixation on a single, monopolistic hub (Heathrow Airport) and also advising and reinforcing the importance of a number of environmental issues that currently exist, together with the concerns of resulting negative or unsustainable impacts arising from any future growth at Heathrow airport relative to the economic, social and environmental problems</p> <p>Indeed, the Borough has sought to charter a course that it believes is wholly complementary to the open and consultative approach of the AC by engaging directly with local residents through a novel approach of evaluating some of the negative aspects of aviation at the local level through empowering local</p>

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	residents in the process.
<p><i>Developing major infrastructure projects, whether road, rail or air-related, or in other sectors such as energy, is never easy. Those who live or work near an airport will often benefit from the employment or the connectivity that it provides. But they will also often experience a significant impact on the quality of their local environment, particularly as a result of aircraft noise. In contrast, the much larger numbers of people who live elsewhere and enjoy the airport's convenience and facilities from time to time, will not experience such effects and will not obviously contribute to offsetting them.</i></p>	<p>In one of the Borough's previous responses to the DfT in response to the Aviation Policy Framework, RBWM stated: "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 infra-structure on the mainland can only complement the UK's aspirations to successfully access global markets and the new expanding economies.</p> <p><u>The investment in the integration of UK infra-structure must be the over-riding priority</u> 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".</p> <p>An immediate requirement in this context would be a very firm conditional recommendation coming from the AC calling for better public transport investment to improve access to Heathrow, Gatwick and Stansted to improve their attractiveness, accessibility and contributing to improvements in air quality through reducing traffic congestion. Improvements in infra-structure is a pre-requisite for future long-term success and needs to be an unequivocal commitment at the earliest date e.g. the Interim report.</p>
<p><i>The remit we were given requires us to make recommendations on how to maintain the UK's position as a hub for international air traffic. We will say more later about how we will define that</i></p>	<p>The Borough would repeat its earlier submission on the matter of hub status. Heathrow is currently the only hub airport in the UK. This is</p>

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<p><i>objective more precisely, taking account of changes in the competitive environment for airports. But we should emphasise now that we are trying to make recommendations which will respond to the long-term needs of the UK economy, where connectivity by air is a crucial factor. A trading nation like the UK must maintain strong air links with its most important markets today, and in the future. That is especially true of an economy which depends heavily on the service sector, which is strongly influenced by the need for face to face contact.</i></p>	<p>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 arguably 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. Such an approach necessitates considering 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. Integrated connectivity by air <u>and</u> land is a crucial factor for protecting the long-term needs of the UK.</p>
<p><i>Set out our views on short-term measures that might be taken to make better use of existing airport capacity. That includes looking at potential measures to improve surface access to south east and some regional airports. Such improvements could make a difference to the utilisation of runway capacity. We have also said that we would propose a short-list of options for new or expanded capacity in the longer term, following a call for proposals which we issued earlier this year.</i></p>	<p>The Borough continues to urge a balanced consideration of the following:</p> <ul style="list-style-type: none"> - Acknowledgement that in terms of environmental impacts, current level of activity is unacceptable relative to Heathrow airport; - The introduction of mixed mode operations at Heathrow is not an environmentally viable solution to increase runway capacity, as neither is a new runway; - Runway alternation is urgently required to the Western side of Heathrow. This necessitates the abandonment

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	<p data-bbox="1274 277 1666 312">of the Cranford Agreement;</p> <p data-bbox="1131 352 2047 571">The findings of the (Heathrow) Operational Freedoms Trials are 'inconclusive' :despite a truly enormous amount of effort to capture and present detailed data by Heathrow Airport Ltd, the Reports of both HAL and the CAA released on 18 October come to the same conclusion. Furthermore CAA state that none of the trail operations should be adopted.</p> <p data-bbox="1131 611 2047 829">The findings of the (Heathrow) Operational Freedoms Trials are 'inconclusive' :despite a truly enormous amount of effort to capture and present detailed data by Heathrow Airport Ltd, the Reports of both HAL and the CAA released on 18 October come to the same conclusion. Furthermore CAA state that none of the trail operations should be adopted.</p> <p data-bbox="1131 869 2007 1054">Representatives of this Borough were among the members of the airport's Noise & Track Keeping Working Group which monitored the data and in coming to the same conclusion are astounded to learn that HAL want to apply some of the failed operations into practice.</p> <p data-bbox="1131 1094 2040 1345">TEAM (Tactically Enhanced Arrival Mode) was introduced by NATS as an occasional practice of allowing simultaneous landings on both runways, with corresponding delay in take offs, to address incoming flight build ups within their mandate to manage flight movements. This gradually became more frequent and generated objections in relation to the erosion of the principles of Alternation and associated Respite periods</p>

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	<p>which Heathrow had consistently offered as means of balancing the detrimental effects of previous increases in activity. Despite this, TEAM* an escalation of TEAM, was trialled under Operational Freedoms, but did not produce any conclusive results – possibly throwing lower TEAM activity into doubt as well.</p> <p>HAL’s proposal to increase use of the existing TEAM procedure is totally unacceptable.</p> <p>The Early Vectoring of departure flights within the established Noise Preferential Routes caused such a high level of complaints that it was discontinued in the later trials. The objections of residents who had purchased properties which had not previously been overflown should be respected and HAL’s proposal to ignore the trial and introduce early vectoring should be refused.</p> <p>The Operational Freedoms Trials appear to have demonstrated that one of the main problems with Heathrow’s capacity relates to taxiway congestion restricting movement of aircraft within the airport itself.</p>
<p><i>Whether growth in aviation is consistent with other obligations, for example to play our part in tackling climate change.... and if so.... whether any significant expansion in airport or runway capacity is needed to accommodate future demand?</i></p>	<p>The Borough believes that the aviation industry should be taking responsibility and be obliged to finding its own solutions to reducing its impact upon climate change i.e. air quality and emissions.</p>

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<p><i>Official and industry forecasts of demand for air travel have been systematically over-optimistic. Successive Department of Transport forecasts have recently been reduced, since the financial crisis and associated recession.</i></p>	<p>The Borough welcomes the acknowledgement that there is a need to improve on the current forecasting approaches and that this will be addressed in the AC's interim report, for example by considering a greater range of scenarios than the DfT does currently.</p> <p>The Council accepts the contention that there will still be a need for more new routes to be opened up, including to emerging markets, as the UK's trading patterns evolve. However, the Borough does not subscribe fully to the view that that the weight of that increased demand needs to necessarily remain focused on London and the south east, as implied. This will largely depend on what other options, opportunities and facilitation are open to regional airports to allow their expansion in parallel and/or complementary ways.</p> <p>We have noted with interest the disclosure in the HS2 update that the increase in rail passenger kilometers during the last 10 years is in large part the consequence of the fall in Domestic Air passenger air kilometers due to the reduction in Domestic Air services consequential on lack of suitable airport capacity in the South East.</p>
<p><i>The persistent and tightening capacity constraints at key airports in the south east indicate that the market alone will not resolve this issue.</i></p>	<p>In truth this is a result of self interest, lack of open competition and an uneven playing field. Encouraging the development of regional airports and incentivising the flexible growth and re-allocation of flights would curb some of the '<i>persistent and tightening capacity constraints at key airports in the south-east.</i>' That the market may not completely resolve the issue is not a reason for not trying.</p>

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	<p>The restrictive practices associated with ‘grandfather rights’ in relation to airport slot allocations also needs urgent review and action to maximise the beneficial use of existing capacity – perhaps under an independent licensing system.</p>
<p><i>Private sector investors will not necessarily provide capacity to meet fully whatever level of unconstrained demand is forecast. Runways are expensive pieces of infrastructure; new airports still more so. Investors will not finance them without a strong likelihood of earning a return on their investment, which implies a high level of confidence that they will be well-used, since passengers are the ultimate source of revenue.</i></p>	<p>The Borough remains deeply concerned that this statement could be interpreted as implying development priorities will be based in the main on financial considerations and not take into account the associate or resulting environmental and social considerations.</p> <p>However the Borough is pleased that the costs of providing additional capacity and the possible problems of financing such capacity will be taken into account when considering the very high preliminary cost estimates for additional runways at Heathrow compared for example with the Gatwick estimates..</p>

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<p><i>We do not believe it would be responsible for any government to accept a massive expansion of aviation with no reasonable expectation of being able to deliver commensurate carbon emission reductions. We are in the process of updating the Committee on Climate Change’s analysis and will present our findings in our Interim Report. However, it seems unlikely that things have changed so much in the last four years that the fundamental message will be different. The question is whether the growth that the CCC has said is compatible with the UK’s climate objectives implies an expansion in runway capacity. The challenge, however, is to deliver the best solution for the UK overall, which has to be one that both achieves our carbon targets and delivers the connections that our economy and society demand. These are not irreconcilable goals.....Our provisional view, therefore, is that additional capacity will need to be provided, alongside an overall framework for managing emissions growth, if we are to deliver the best outcomes in both environmental and connectivity terms.</i></p>	<p>The Borough agrees with and welcomes this acknowledgement from the AC but expects UK climate objectives in this respect to be at the very least aligned with those in neighbouring European countries</p>
<p><i>There is a role for government in requiring or incentivising the redistribution of air traffic to airports outside the south east which have spare capacity and could comfortably cope with the increased demand we expect to emerge. This would both provide scope to accommodate demand growth and bring further benefits in terms of rebalancing the economy away from the most congested areas of the country, which is an objective of government policy. A number of regional airports have put forward specific ideas on how their capacity and utilisation might be enhanced.</i></p>	<p>Many passengers from elsewhere in the UK use south eastern airports. Because the lack of choice and access precludes them from using local/regional airports nearer to their source of origin. Therefore, restricting any preference to use an airport nearer to home.</p> <p>Some regional airports have indeed grown quickly in recent years, e.g. Manchester, Birmingham and Southend for instance, have established profitable niches in the national market. There is nothing to prevent that happening, and airlines have an incentive to run flights from regional airports, which offer</p>

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	<p>cheaper landing charges and, often, faster boarding times, with cheaper parking for passengers.</p> <p>The Fifth Freedom Rights system is not activated sufficiently to optimise and encourage airlines as it was intended and should be promptly actioned..</p>
<p><i>Some routes will only ever be available from the largest airports...such as, access to the international connectivity available in London and the south east.</i></p>	<p>Under the current arrangements this is likely to be true. It is the current regime and focus upon a single, dominant airport in the SE that is the source of the problem. This needs to change in the interests of UK plc and the passenger.</p> <p>The South East England Councils (SEEC) support the view there is a need to expand airport capacity to support future economic growth both in the South East and UK-wide and that doing nothing is not an option.</p> <p>It is vitally important that AC consider the feasibility of removing short haul and freight flights away from the strategic airports to free up both runway capacity and available slots and for facilitating an increased focus upon promoting growth through accessing developing global markets.</p> <p>The bulk of the aviation market is such that there are very few , routes where sufficient connectivity cannot be provided at say, Gatwick and /or Stansted as well as Heathrow</p>
<p><i>An attempt to rely only on runways currently in operation would be likely to produce a distinctly sub-optimal solution for passengers, connectivity and the economy.</i></p>	<p>The Borough generally agrees with this statement. It is more a question of ‘where’ these runways should be located in terms of demand and acceptability.</p>

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<p><i>On the arguments in favour of and against expanding capacity at the national level, I have not touched upon a range of important issues of relevance to the case for capacity increases at one location or another...for example in relation to noise or air quality, and also the potential positive effects of infrastructure investment on local and regional economies and employment.</i></p>	<p>To date little has been said about the issues of: Housing pressures; green belt development; over-heating of the local economies; noise; transport infra-structure and modes of transport</p> <p>These are issues which, together with cost, make the addition of even one more runway at Heathrow totally impracticable</p>