

**The Mayor of London's Response to the  
Government's Draft Aviation Policy  
Framework**

**October 2012**

# Foreword by the Mayor

It is a year since I last published a report on aviation and responded to the Department's previous consultation on the matter, a year in which our rivals have continued to erode our advantage and in which the Government has continued to make little progress towards a solution for the impending crisis. After much delay, the Government published its Draft Aviation Policy Framework, in which it rightly identified maintaining and improving the UK's connectivity as a principal objective – something which can only be successfully achieved by delivering a new hub airport.

Yet this draft framework singularly fails to tackle the issue of hub capacity or set out a process for achieving this. Instead, we have been graced with the establishment of a commission to determine how to maintain the UK's status as an international hub. However worthy its chair – Sir Howard Davies – or whatever its detailed scope – still to be determined – it is wholly unacceptable that the Government has decided upon a timescale which would see their final report made available only in 2015, after the next general election. The issue is pressing and every moment we delay, our rivals build their connectivity at our expense.

This document constitutes my detailed response to the Government's consultation on the Draft Aviation Policy Framework and addresses the key policy messages that emerge directly and indirectly from the document, including consideration of how and where to deliver new hub capacity. I will continue to work with the DfT, the Davies Commission, the House of Commons Transport Committee and others, but the urgency of the problem has forced me to accelerate the work that I will do to develop a credible solution.

The draft framework rightly has a strong focus on the harmful impacts of noise on those living around airports, although my response calls for the framework to go further in protecting the public by instituting a stricter and more intelligent noise regime. 28% of Europeans affected by unacceptable levels of airport noise live near Heathrow – and this would only worsen if the calamity which is the third runway were to be resurrected.

However, it is not only the noise and air pollution which Heathrow inflicts that make it an unsuitable location for a hub airport; its constrained size means that there is no scope for the growth in air traffic that our country needs. A third runway would have an intolerable impact on the area whilst not meeting the needs of London and the UK's business and leisure travellers. The draft framework recognises that there will be a 'capacity challenge at the biggest airports in the South East' beyond 2020. As my response makes abundantly clear, the finalised framework must be rooted in the reality that the capacity challenge is with us already. If we act now we can have a viable solution in place within the next two decades that will avert disaster. However, if the Government fails to strengthen the framework with bold and long-term policies, generations to come will not thank us for frittering away their futures for our short-term convenience.

**Boris Johnson, Mayor of London**

# Chapter 1. Introduction

1. In July 2012 the Department for Transport published their 'Draft Aviation Policy Framework' for consultation. This builds on the many hundreds of responses the Department received to their 2011 consultation on the scoping document 'Developing a sustainable framework for UK aviation'. This includes the Mayor's own comprehensive response<sup>1</sup>. The Policy Framework, planned for adoption in March 2013, will establish the Government's overall objectives for aviation and the means to achieve them.
2. This document, which constitutes the Mayor of London's response to the Draft Aviation Policy Framework consultation, contains detailed answers to the questions posed. The Mayor is fulfilling two primary roles in responding to this aviation consultation. The first is to represent his constituents who are affected by the adverse impacts of airport operations. The noise and air pollution that are a regrettable feature of modern airports can and do affect hundreds of thousands of people, eroding their quality of life. The Mayor will not accept any policy approach that does not seek to absolutely minimise these impacts on local communities.
3. The Mayor's second role is to secure London's future economic growth and prosperity, delivering jobs. London is the driving force of the UK economy, producing 21.5% of the UK's Gross Value Added in 2010<sup>2</sup>. Aviation is key to promoting the city as a place to do business, to live, study and visit, both now and in the future. Connectivity with the rest of the world is an essential part of London's attraction, providing the links that give British business access to valuable trade opportunities across the globe while paving the way for inward investment into the UK. Moreover, global connectivity also brings important social benefits for a country with such an international fabric – 36% of Heathrow's passengers in 2011 were travelling to see friends and relatives<sup>3</sup>. The Mayor is clear that it is his duty to respond to the Government candidly when he feels that national policy will hinder the Capital's development and jeopardise the country's economic growth.
4. The Mayor's response follows the structure of the draft framework, responding to each question posed by the Government directly, and setting out the key policy messages associated with the issues and questions.
  - Chapter 2 deals with the benefits of aviation, building on the recognition in the framework of the UK's need for connectivity, to outline the consequences of not investing in a new hub airport as well as the benefits of doing so.
  - Chapter 3 addresses the global climate change impacts of aviation and how the framework must acknowledge that managed growth in the number of flights is not necessarily incompatible with tackling climate change.

- Chapter 4 is concerned with the noise and other harmful local environmental impacts of aviation, issues on which the Mayor calls for more stringent measures to be put in place and properly enforced.
  - In Chapter 5, on working together, the Mayor backs the framework's objective to strengthen and streamline collaborative processes, particularly in light of Heathrow's location within the GLA boundary.
  - Chapter 6 looks at the planning process and outlines a route in which a new hub airport could be delivered.
5. As well as the consultation response, the Mayor will work with the recently established Davies Commission and with the House of Commons Transport Committee in its deliberations on the subject. Following his work to identify the most suitable locations for a new hub airport, the Mayor intends to commission an extensive study into the feasibility of constructing an airport at a number of locations.
  6. Initial findings suggest that based on a number of criteria including spatial, environmental and surface access, a location to the east of London would be most appropriate – options include an Inner and Outer Thames Estuary location as well as Stansted. The Mayor's view is that it is vital that the final Aviation Policy Framework sets out a clear path to the establishment of a new hub airport for London.

# Chapter 2. The benefits of aviation

## 2.1. Summary of the Mayor's Position

The connectivity offered by aviation is vital for the economy of both London and the UK. The Mayor welcomes the recognition of this in the draft framework.

Hub capacity is central to delivering this connectivity. London has reached a critical position with regard to the availability of hub airport capacity, the benefits of which underpin London and the UK's economic prosperity, both now and in the future. The need for substantial additional hub capacity is pressing.

There is no quick or easy answer. The third, shorter runway at Heathrow that some propose would not be significantly faster to develop than a new hub airport and in any case would not provide sufficient hub capacity to meet future need.

The proposed third runway at Heathrow already challenges the constraints and location of the site. To meet growth in aviation demand, further expansion would be required, and this is simply not possible at Heathrow.

The only effective solution is the construction of a new hub airport with at least four runways, preferably located to the east of London. This would meet our long-term aviation needs, accommodating the growth predicted by the Government's own forecasts, while also acting as a major catalyst for the economic regeneration of the Thames Gateway and much of the wider London and southeast region.

In the short-term, steps can also be taken to help support the ability of point-to-point airports such as Gatwick and Stansted to capture some of the longhaul routes that might otherwise be lost. This must, however, be in the context of a commitment to delivering a new hub airport that is the only credible solution for the need for hub capacity in the medium-to-long term.

## 2.2. Aviation's contribution to the UK economy

7. The Draft Aviation Framework rightly recognises the significant contribution that aviation makes to the UK economy. This includes the impacts within the sector relating directly or indirectly to British airline and airport activity, but also the benefits to the wider UK economy, not least in enabling trade and inbound tourism.

8. Business travel in particular provides a multitude of economic benefits, boosting productivity and attracting capital flows from abroad. It is estimated that foreign direct investment contributes more than £52bn each year to the London economy alone<sup>4</sup>.
9. Air freight is also an important element of aviation's economic contribution. In 2005, freight carried by air accounted for around 25% of the UK's total visible trade by value and 55% of the value of UK manufactured exports to non EU countries<sup>5</sup>.
10. Also noteworthy are the social benefits for the UK economy, enabling UK residents to visit friends and relatives and offering them a wider range of holiday opportunities.

### 2.3. Connectivity

*Consultation question: Do you agree with our analysis of the meaning and value of connectivity set out in this chapter?*

11. Aviation connectivity is absolutely key to the economic and social well-being of the UK for the reasons cited. The Framework rightly recognises that good connectivity is a combination of number of destinations and frequencies, and that some destinations are of particular importance, for example emerging economies.
12. The Mayor is in full agreement that future connectivity to both established and emerging markets will be key to the UK's future economic success.
13. The UK's historically strong aviation connectivity notwithstanding, one should not be complacent about the extent to which the UK has been able to serve the emerging economies over the last decade. Relatively good connectivity to India and Hong Kong masks a much weaker picture to Brazil, Russia and Mainland China. Similarly, focusing on places served daily underestimates the importance of the growing regional centres in these countries which cannot yet support daily frequencies but which are already served by our rivals – and are without direct services from the UK.
14. The Mayor shares the Framework's concern that Heathrow's capacity constraints have pushed airlines to focus on a smaller number of very profitable routes. This has been to the detriment of UK domestic and emerging market destinations in particular.
15. The Mayor would caution against overestimating the extent to which UK non-hub airports can serve longhaul destinations. While their reach is likely to increase, for the most part this will be limited to feeder services to foreign hubs such as those in New York and Dubai.
16. The Mayor supports the objective that the UK should remain one of the best connected countries in the world. Nonetheless, it is very clear that the short, medium and long term strategy set out in the Framework will not, alone, be sufficient to achieve this.

**Key policy message: The significant contribution that aviation makes to the UK economy is rightly recognised, and the Mayor fully supports the connectivity objectives of the framework; however, a new hub airport is the only way of providing for the future connectivity the UK needs**

17. Ultimately, only an effective, capacity unconstrained hub airport for London will deliver the connectivity the UK economy needs. The draft policy framework rightly recognises that a hub airport, able to tap into a critical mass of origin/destination and transfer traffic, is key to maximising this connectivity, particularly to longhaul destinations. The transfer traffic in particular enables the hub to offer many more routes and frequencies than could otherwise be supported by point-to-point traffic alone.
18. To address the hub capacity needs of London effectively, the hub airport needs to meet a number of criteria including:
  - Sufficient runway, apron and terminal capacity to support the predicted level of demand effectively and develop an extensive route network;
  - Maintaining no more than 75% runway utilisation to avoid queuing of planes on the ground and in the air and ensure resilience in the face of disruption; this also allows the hub to operate around defined waves, maximising the efficiency of airline operations while increasing the transfer opportunities open to passengers;
  - State of the art modern passenger facilities – including dedicated facilities for premium passengers – to attract passengers and airlines alike;
  - Ease of making connections to minimise transfer times and ensure its attractiveness for connecting passengers versus other hubs;
  - A journey time to central London of ideally half an hour and no more than 45 minutes – commensurate with international best practice, ensuring London’s attractiveness as a place to visit and do business in versus rivals; and
  - Absolute minimisation of local environmental impacts.

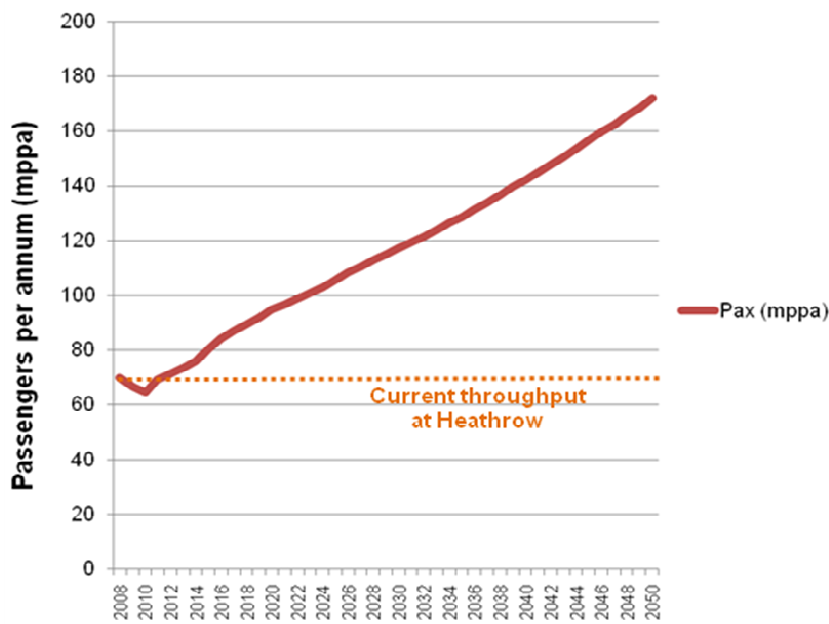


Figure 1: DfT 2011 Heathrow capacity unconstrained demand forecasts

19. The scale of a future hub airport reflects the size of the capacity challenge that the UK faces. The DfT's 2011 'capacity unconstrained Heathrow demand forecasts' (Figure 1, above) indicates the very significant increase in passenger traffic that a future hub would have to support. Opening in the late 2020s, it could expect to launch at a size of around 100mppa, rising to up to 180mppa by 2050.
20. Possible runway configurations that can accommodate this include 4 fully separated runways operating in mixed mode, or 3 pairs of runways operating in segregated mode. Either scenario requires an approximate airport footprint of around 10km x 7km, including allowances made for ancillary and cargo facilities. By comparison, Heathrow occupies just 12 km<sup>2</sup> in a location that is severely constrained.
21. The Southeast of England is one of the most densely populated areas in Europe, and it is simply impossible to build this size of airport in most of the locations under consideration.

**Key policy message: A limited number of sites meet the spatial requirements for a new hub airport**

22. The availability of land (with the appropriate geography and not already used for densely populated urban settlement) effectively rules out several locations for a future hub airport, including Heathrow, Gatwick, Luton and Southend.
23. For the hub airport to deliver maximum economic benefit, it will also need to be able to operate without stringent night restrictions hampering effective operation of the airport. Several key longhaul routes in particular require very early morning arrivals, if they are to offer optimal timings for both passengers and airlines. Moreover, the potential for air freight activity at the airport will be severely curtailed if there are



restrictions on night movements. The extent to which a particular location can support 24-hour operations will largely depend on its potential local noise impacts, the detail of which is addressed in Chapter 4.

## 2.4. Improving performance, resilience and the passenger experience

24. In general, the Mayor welcomes moves to improve airport performance and capacity utilisation, but only on condition that they be achieved without adversely impacting local residents.
25. In particular, given the disproportionate noise impact of Heathrow airport, the Mayor cannot accept any change that increases these impacts on Londoners. The Mayor is deeply concerned by the potential negative consequences for local residents that will flow from the cessation of the Cranford Agreement. The Mayor expects the data to be made freely available to ensure that the impacts on residents affected by this change can be fully understood.
26. Similarly, many Londoners are concerned that the tactical measures being employed as part of the Operational Freedoms trial will have a detrimental impact on their quality of life. The Mayor will study the results of the trial carefully, but if the trial is to have the full confidence of local communities, it is imperative that it is conducted in an open, transparent manner.
27. In particular, having the data independently supervised and requiring BAA to release hourly data for the trial as well as detail about complaints received would enable a fuller understanding of how exactly the tactical measures are being used. This would, in turn, allow for a proper determination of their direct impacts on operational effectiveness, the environment and local communities.

### *US pre-clearance and Border Controls*

28. There is certainly potential for US pre-clearance to facilitate travel to – and thus tourism from and trade with – one of the UK's major economic partners. It could also help attract transfer traffic from rival hubs without such arrangements in place. Nonetheless, it must be pursued in a way that does not lead to unnecessary disruption for passengers or for the wider operation of the airport and with an appropriate strategy for the associated costs that does not place a disproportionate burden on passengers.
29. The Mayor appreciates the importance of efficient border controls and urges that sufficient resources are committed such that the scenes this Summer of people queuing for hours to enter the UK are never again repeated.
30. Similarly, the rigidity, lack of customer focus and expense of the current visa regime places the UK at a huge disadvantage, particularly against Schengen countries. The problem is becoming increasingly acute in hampering Britain's ability to attract business and tourist visitors from emerging economies.

31. If the UK cannot get its border controls and visa regime right, it will significantly harm its ability to attract trade, tourism and inward investment.

## 2.5. Encouraging new routes and services

***Consultation question: Do you support the proposal to extend the UK's fifth freedom policy to Gatwick, Stansted and Luton? Please provide reasons if possible.***

32. To the extent that extending the UK's fifth freedom policy to Gatwick, Stansted and Luton would support their role in the interim, the Mayor would welcome the move – until new hub capacity in the southeast is delivered. Nevertheless, it should be noted that the success of such efforts will also depend on securing the agreement of the third country to be served.

***Consultation question: Are there any other conditions that ought to be applied to any extension of the UK's fifth freedom policy to Gatwick, Stansted and Luton?***

33. Once London gets the new hub airport capacity it needs, the connectivity and competition benefits of fifth freedom liberalisation at other London airports will be greatly diminished. Moreover, there is a risk that such routes might undermine the launch of the new hub airport.
34. As such, it would be desirable to place time limits on the extension of the fifth freedom policy to Gatwick, Stansted and Luton. To maintain the attractiveness of the proposition, those airlines who take advantage of the fifth freedom rights for a substantial period could be offered similar rights at the new hub airport once it opens.

### *Airport slots*

35. The Mayor is generally supportive of moves to facilitate the more efficient functioning of slot allocation. In the highly capacity constrained environment of Heathrow, the benefits of the EU proposals would be limited, but they could assist other airports, notably Gatwick, in supporting new routes in the short-term until a new hub airport can be built.

### *Passenger Service Obligations and Route Development Funds*

36. The Mayor recognises the disbenefits to the UK regions and the UK as a whole as regional city after city has lost their direct connection to Heathrow, the UK's gateway to the world. This has reduced the potential connectivity benefits of a London hub airport for the UK regions. Moreover, passenger flows from the UK regions through foreign hubs and the consequential 'import' of air services has increased.
37. One should, however, be wary of the market-distorting effects of using Passenger Service Obligations (PSOs) to prioritise certain routes – which could be at the expense

of no-less important international routes. It is also unclear whether the PSO regulations could be used to support flights to a particular airport rather than a particular city.

38. Ultimately, PSOs are not a solution to London's hub capacity constraints which can only be addressed with a new hub airport for London.
39. In principle, the Mayor does not object to the use of Route Development Funds by smaller airports in the UK regions, but these must be extremely limited in their use so as not to distort the market or support fundamentally unviable routes.

**Key policy message: A new hub airport can be supported by increasing the longhaul role of other London airports in the interim**

40. In the context of a hub airport at Heathrow which is full, it is becoming increasingly difficult to secure the capacity to launch new longhaul point-to-point routes and frequencies. The only sustainable solution for providing this capacity in the medium-to-long term is a new four-runway hub airport for London.
41. In the short term, there is nonetheless a need to mitigate the consequences of our failure as a nation to take the right strategic decision in recent decades. This could see other non-hub airports including Gatwick, Stansted, Luton and Birmingham help serve a proportion of longhaul traffic, effectively 'spillover' routes and frequencies which cannot be accommodated at Heathrow. Though sub-optimal and requiring the full co-operation of airlines, it could improve London's connectivity in the short term. It would not, however, alter the need for an effective sustainable long-term solution in the form of a new hub airport.

## **2.6. Supporting airports in Northern Ireland, Scotland, Wales and regional airports in England**

42. The Mayor supports the development of regional UK airports to serve local markets, while emphasising that these can never be a substitute for developing hub airport capacity in the southeast. Regional airports cannot draw on the critical mass of demand – or the economic profile – that is needed to support the wide range of routes and frequencies a hub can provide, particularly longhaul.

### *Wider Economic Context*

43. The Mayor welcomes the recognition of the role that enterprise zones can play in maximising the catalytic effects of airports in attracting business and supporting growth. Moreover, this applies just as much to the southeast as beyond and in particular should be a key element of any plans for a new hub airport for London.
44. A future hub airport has a valuable role to play as a force for regeneration and development, the full potential for which can be best realised if located in proximity to areas of high deprivation and unemployment.

45. Moreover, such hub airport development needs to be part of a national strategy for long-term growth, positioning the UK for success in a more competitive and more decentralised global economic landscape.
46. A future hub airport will have significant resource needs, in particular easy access to labour and also to land (both to house the labour force and also businesses attracted to the airport's hinterland). It is estimated that a future hub airport will require its hinterland to support 150,000 extra jobs and 100,000 extra homes.

**Key policy message: A new hub airport could form part of a broader economic strategy for growth**

47. Locations to the east of London, with access to the relatively underdeveloped and deprived areas around the Thames Gateway, will have an advantage in terms of supporting the hub's development and maximising its wider economic benefits. The Thames Gateway has been identified by Government as an area suffering from lower average skill levels amongst residents and comparatively high unemployment<sup>6</sup> - with several areas amongst the most deprived fifth in England<sup>7</sup>.
48. By contrast, Heathrow's location towards the relatively 'overheated' Thames Valley - with more limited access to unoccupied labour and land - might constrain its potential. One recent study indicated that "traffic congestion on the trunk and local highway networks of the Thames Valley is impacting on business efficiency"<sup>8</sup>.
49. Of the potential locations east of London that have been considered, the areas around Manston and Lydd face a particularly significant challenge in offering adequate capacity for the population and employment growth. This could limit the opportunity to maximise the economic benefits of a new hub airport in either of these locations.

*Extending regional liberalisation policy*

**Consultation question: Do you agree that the Government should offer bilateral partners unilateral open access to UK airports outside the South East on a case-by-case basis?**

50. If it can be demonstrated that such a move would increase the longhaul connectivity of the UK's regional airports - and would not harm the ability of UK carriers to gain access to new markets themselves - then the Mayor could, in principle, support such a move.

*Maintaining a viable network of General and Business Aviation*

51. The Mayor recognises the part played by General and Business Aviation across the UK and their need for a viable network of less congested airports and aerodromes. Nonetheless, scheduled passenger and freight services will need to continue to take priority at the busiest UK airports.

## 2.7. Integrating airports in the wider transport network (short term)

52. The Mayor supports improved surface access to airports and the particular role of rail to provide improved connectivity and increased capacity to airports. Nonetheless it is important to ensure that any investment is commensurate with passenger demand and the future role of the airport and that the airport operator bears an appropriate share of the costs.

## 2.8. Integrating airports in the wider transport network (medium and long term)

53. The Mayor strongly welcomes the stated aim that the national strategies for aviation and high speed rail be aligned.
54. It is nonetheless important to affirm that a high speed rail strategy is not a substitute for an aviation strategy and that the development of a comprehensive UK high speed rail network, whichever airports it serves, will not obviate the need for new hub airport capacity in the southeast.
55. The Mayor reiterates his support for HS2, subject to the appropriate mitigations against the impacts on local people being put in place. Moreover, he recommends proceeding with the full 'Y' network from day 1, in part given the valuable journey time benefits to Scotland and Newcastle cited, key to maximising the air-to-rail mode shift benefits of high speed rail.

### *Surface access to a future hub airport*

56. Also welcome is the recognition that plans for an HS2 spur to Heathrow airport will need to be reviewed in light of any future proposals for the development of hub airport capacity in the southeast. Surface access to such a future hub airport will be key to its success.
57. Connections to a wider catchment area will be important for the future hub and both HS2 and HS1 can maximise the airport's reach and support air-rail mode shift. Access to the immediate hinterland will also be important to access employment and support local regeneration.
58. More generally, the rail and road networks will need to be established to connect the airport to the wider South East. Excellent surface access will need to be provided to certain particularly key locations – most importantly, central London – but also, notably, the 'West and Southwest of London wedge', an area with a high proportion of residents with a propensity to travel.

### **Key policy message: A new hub will require the appropriate surface access connections to London, but also to the rest of the UK**

59. Sufficient rail capacity will need to be provided, with work to date indicating that a 180mppa airport with a world-class public transport mode share could generate

estimated *one-way peak rail* flows in the region of 15,000 passengers to/from the airport per hour.

60. Though there is variation between different rail corridors in terms of their spare capacity, none of them could accommodate the passenger flows a new airport would entail (alongside expected background growth). As such, whichever location is chosen, a new dedicated rail link will be required.
61. Moreover, this dedicated, high-speed link will need to provide an attractive journey time – ideally under 30 minutes from airport to central London – with 45 minutes the absolute maximum.
62. Southampton, Manston, Lydd and Birmingham are notably weaker on grounds of distance from central London, with a commensurately higher journey time by rail and road and are deemed to be *sub-optimal* compared to the other options.

# Chapter 3. Climate Change Impacts

## 3.1. Summary of the Mayor's Position

The Mayor is in full support of the Government's objective to ensure that the aviation sector makes a significant and cost effective contribution towards reducing global emissions.

The Mayor wishes to reaffirm his support for the recommendations made by the independent body that advises the Government on climate change. The Committee on Climate Change (CCC) states that 'given prudent assumptions on likely improvements in fleet fuel efficiency and biofuels penetration, demand growth of around 60% would be compatible with keeping CO<sub>2</sub> emissions in 2050 no higher than in 2005<sup>97</sup>.'

The aviation industry must continue the good work that it is doing to minimise its environmental footprint. We cannot plan on the basis of 'silver bullets' offering a step change in the environmental performance of aviation. Rather, the view of the Independent Committee on Climate Change is that continued improvements can be achieved.

Nonetheless, Heathrow airport presents a significant challenge in terms of emissions, which could be addressed by the development of a new, operationally efficient, capacity-unconstrained hub airport in a different, suitably selected location.

## 3.2. Policy measures

63. The Mayor fully agrees with the Government's overall objective to ensure that the aviation sector makes a significant and cost effective contribution towards reducing global emissions.

## 3.3. Action at a Global, European and National level

64. Action must be taken at the appropriate level. The larger the geographic scope of a specific measure, the greater its impact and the less it will inhibit the competitiveness of those nations adopting it. The UK must remain competitive in the global market to retain and increase its associated economic and social benefits.
65. The Mayor strongly supports the Single European Sky (SES) initiative and the associated Air traffic movement Research (SESAR) programme and their potential to realise substantial improvements in air traffic control efficiency with a corresponding climate change benefit.

66. The CCC has demonstrated that substantial growth in the UK aviation industry is permissible within global climate change targets, if the industry continues to make improvements in aircraft design and performance.
67. The central case put forward by the committee was that UK-wide our airports can accommodate in the region of 150 million more passengers per annum by 2050 over current levels – while still adhering to our emissions commitments. This is compatible with development of a new hub airport.
68. However, any UK cap on aviation must be applied with care if is not to have perverse impacts. For instance, a UK air traffic movements cap crudely applied would mean a passenger travelling from Edinburgh to Tokyo via Heathrow counting as three (UK) movements – but via Amsterdam just once. The latter is clearly not three times better for the environment than the former, yet a cap applied in this way would incentivise traffic to use foreign hubs. This would cede the associated connectivity uplift and economic benefits abroad.
69. It is important to recognise there can be environmental benefits from consolidating demand at a hub. Concentrating growth at a hub airport can be a sustainable long term method of limiting widespread environmental impacts. Indeed, an effective hub airport can typically expect to see larger planes and greater load factors – improving their relative environmental efficiency per passenger.

**Key policy message: A new efficient hub airport can minimise the environmental impacts that directly result from Heathrow’s operational constraints**

70. It is important to recognise there can be environmental benefits from consolidating demand at a hub. An effective hub airport can typically expect to see larger planes and greater load factors – improving their relative environmental efficiency per passenger.
71. One could also achieve a valuable reduction in emissions with an operationally optimised hub airport – specifically, one with minimal capacity constraints. Heathrow is operating at up to 99%<sup>10</sup> capacity and this has significant environmental consequences. At busy times, incoming aircraft can spend 30-40 minutes in stacks circling London. The CO<sub>2</sub> emissions of aircraft stacking at Heathrow represent an amount equivalent to around 10% of the total CO<sub>2</sub> emitted during the landing and take-off cycle (LTO) of aircraft arriving and departing at Heathrow<sup>11</sup>. The additional capacity provided at a new hub airport would therefore help deliver environmental improvements, as aircraft would no longer be required to circle before a landing slot came available.
72. The Mayor acknowledges the impacts associated with the construction a new hub airport, but believes that the long term environmental and economic objectives of both London and the UK can only be sustainably achieved with a radical new solution to hub airport capacity serving London, beyond Heathrow.



### *Alternatives to air travel*

73. The Mayor supports the development of competitive rail-based alternatives to aviation, as highlighted in the Framework. This could potentially provide an attractive substitute to domestic and short European flights; it can also help reduce the overall environmental impacts as the network expands.
74. Alternatives to travel will only ever help at the margins. The advent of electronic communications and video-conferencing has not reduced the need for travel – it has merely displaced the patterns of travel that people make.
75. Government has the ability to assert the importance of reducing global emissions, and the UK's stance in responding to climate change. This can influence consumer behaviour, but also encourage airlines and those supporting the industry to improve their own environmental performance.

### ***Consultation question: Do you have any further ideas on how the Government could incentivise the aviation and aerospace sector to improve the performance of aircraft with the aim of reducing emissions?***

76. A wide variety of approaches have significant potential to achieve reductions in aviation emissions. The Mayor is committed to working with Government, industry and other agencies to do this. This includes:
  - maximising aircraft efficiency,
  - improving propulsion technology and aerodynamics,
  - enhancing the feasibility of alternative fuels,
  - ensuring good surface access to airports by sustainable modes, and
  - optimising air traffic control regimes.

# Chapter 4. Noise and other local environmental impacts

## 4.1. Summary of the Mayor's position

The Mayor fully agrees with the Government's objective to limit, and where possible, reduce the number of people in the UK significantly affected by aircraft noise. Heathrow airport is responsible for more than a quarter of all those affected by aircraft noise in Europe – some 725,500 people<sup>12</sup>. We must strike a balance – between the needs of London, the South East and the UK as a whole for a hub airport which can safeguard jobs and facilitate economic growth – and the impacts such an airport might have on its local populations and environment.

The Government are questioning whether it should retain the current 57LAeq decibel contour as the level marking the onset of significant community annoyance. The Mayor believes that this should be reviewed and serious consideration should be given to establishing a new noise threshold based on the European standard of a 55Lden decibel contour, which also takes into account night time noise. It is essential to remember that the harmful impacts of airports such as Heathrow and London City are not limited to those who are affected by a noise level of 55dB and above. In reality, many millions of Londoners living all over the city are adversely affected by aircraft noise.

The very serious noise and air quality impacts of Heathrow are substantially worse than any other UK airport and pose a very serious challenge to address. It is inconceivable that any expansion at Heathrow be allowed to proceed, risking significantly exacerbating the already burdensome impact on local communities and consequent adverse health impacts.

The Mayor will continue to undertake work to determine the optimal location and layout of a new hub airport that can absolutely minimise the noise and air pollution impacts on local populations.

## 4.2. Impact on local communities

77. One of the Mayor's key priorities is to reduce the impacts of aviation noise on Londoners. More than a quarter of all those affected by aircraft noise in excess of 55dB  $L_{den}$  in Europe are affected by Heathrow – some 725,000 people. This is more than the four main rival European hub airports combined<sup>13</sup>.

78. Moreover, Heathrow's noise impact on local communities is around eight times greater than the next UK airport (Manchester, affecting 94,000 people) and almost 60 times greater than the next London airport (London City, affecting 12,200 people).

### 4.3. Managing noise

*Consultation question: Do you agree that the Government should continue to designate the three largest London airports for noise management purposes? If not, please provide reasons.*

79. The current Noise Action Plan (NAP) regime gives some cause for concern. Noise Action Plans must adhere to the requirements and aims of the Environmental Noise Directive (END), and promote continued noise management. The Mayor is concerned that all airports serving London allow, or actively plan for increases in aircraft noise based on 2006 baseline levels.
80. Definitive guidance – from either the EU, the UK, or both – must set noise threshold levels at UK airports. The integration between different airports is also key. In the case of Heathrow and London City airports, noise maps have been drawn separately. Residents across London are in fact being exposed to noise levels higher than those reported. In locations of significant overlap, joint noise contours should be developed and produced.
81. The Mayor is also aware that airport operators are currently in charge of monitoring their own noise management and the effectiveness of their actions. This can lead to commercial, rather than environmental, factors driving their action plans.

**Key policy message: The three main London airports should continue to be designated for noise management purposes, with their target setting and monitoring overseen by an independent expert panel**

82. London's aviation noise climate is already too severe. There is a strong case that the existing noise limitations at Heathrow are too lenient and should be more restrictive.
83. The Government should continue to designate the three largest London airports for noise management purposes, and the Mayor would strongly support a higher level of control and compliance monitoring.
84. The Mayor is aware that elsewhere in Europe Noise Action Plans (NAPs) are drawn up by an independent third party. Accordingly, the Mayor urges the Government to draw lessons from that approach and consider establishing an independent expert panel to set noise targets and actions, and to monitor subsequent compliance.

#### 4.4. Noise envelopes

***Consultation question: Do you agree with the proposed principles to which the Government would have regard when setting a noise envelope at any new national hub airport or any other airport development which is a nationally significant infrastructure project?***

85. The Mayor agrees with the proposed principles of noise envelopes, although steps must be taken to ensure that such any new regime does not expose individuals to a greater level of noise burden. Such arrangements should have extensive and transparent data collection, analysis and reporting arrangements.
86. As highlighted in the consultation document, there are several means of employing noise envelopes. Currently, Heathrow uses a noise envelope dictated by a cap on flight movements. As recognised by the Framework, this approach does not incentivise airlines to introduce quieter aircraft as quickly as is reasonably practicable. An alternative method of setting a noise envelope could be to peg it against the number of people affected by noise at a specified level. This could allow the benefits to be shared between the airport and local communities.

#### 4.5. Policy objectives

***Consultation question: Do you agree with the Government's overall objective on aviation noise?***

87. The Mayor fully agrees with the Government's objective to limit, and where possible, reduce the number of people in the UK significantly affected by aircraft noise.

88. He agrees that aviation noise should be managed in accordance with the Government's overarching policies on noise that are clearly stated in the Noise Policy Statement for England (NPSE).
89. Current Government policy, as set out in the 2003 White Paper, prevents a net increase in the number of people affected by the noise contour at Heathrow. The Mayor fully supports this and believes that Heathrow's noise climate is already too severe. Noise impacts must be controlled and mitigated. Where meeting this objective comes at the expense of individuals, appropriate compensation must be provided.

**Key policy message: Minimising the number of people affected by aircraft noise is best achieved by relocating the UK's hub to a less densely populated area**

90. The Mayor favours an approach that minimises the total number of people affected by aircraft noise. The only long term solution to achieve this is to relocate the UK's hub airport to a less densely populated area.

*Consultation question: Do you agree that the Government should retain the 57 dB LAeq, 16h contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance?*

*Consultation question: Do you think that the Government should map noise exposure around the noise designated airports to a lower level than 57 dB(A)? If so, which level would be appropriate?*

91. The use of 57dB  $L_{Aeq, 16h}$  as an indicator of the onset of significant community annoyance is based on the Aircraft Noise Index Study (ANIS), published in 1985. The Mayor recognises that there has since been further research into assessing community attitudes towards aircraft noise which have indicated that findings from the ANIS report may be outdated and therefore require revisiting. The European Environment Agency (EEA) published a *Good practice guide on noise* in 2010, where it was estimated that the percentage of people highly annoyed by aircraft noise is 27% for 55 dB  $L_{den}$ , 18% for 50 dB and 12% for 45 dB.
92. The most recent major survey into the effects of aircraft noise exposure was commissioned by Department for Transport in 2007, entitled *Attitudes to Noise from Aviation Sources in England (ANASE)*. The objectives were to reassess community attitudes towards aircraft noise and their correlation with the  $L_{eq}$  noise index currently in use. Key findings showed that annoyance levels does increase with noise levels and air traffic movements (ATM). Sensitivity testing and analysis supports the general consensus that there is a higher intolerance of aircraft noise in the present day due to higher standards of living.
93. The debate around the suitability of using  $L_{Aeq}$  as a measurement for average noise levels for intermittent events such as aircraft noise is increasing. ANASE showed that people are more sensitive to aircraft noise at specific times of the day, yet research has shown that the  $L_{eq}$  indicator is not sensitive to changes in the number of aircraft movements. It is found that a doubling of air traffic movements only equates to an

increase of 3dB  $L_{eq}$ . This figure is not representative of the potential disturbance a doubling of aircraft movements can cause.

94. The Framework rightly recognises that the usage of noise metrics 55dB  $L_{den}$  alongside 45dB  $L_{night}$  instead would align with the aims of the Environmental Noise Directive (END) and therefore allows performance comparison between competitive airports. Research has also shown that producing contour maps based on  $L_{den}$  values are more representative of varying noise sensitivities during the day due to the weighing system employed. An additional benefit of using  $L_{den}$  values is that this is consistent with the majority of European airports, enabling benchmarking.
95. Previous residential surveys however, have highlighted shortcomings of using just  $L_{night}$  as an indicator of noise impact at night. Sleep disturbance is primarily due to peak noise levels yet the resultant  $L_{night}$  value often does not illustrate these peak levels because of the disproportionately long averaging period. The Mayor agrees with the Directive 2002/49/EC that additional metrics, such as SEL or  $L_{Amax}$  should be used '*for night period protection in the case of noise peaks*'. For example, a N70 limit of 25 would mean that local residents would not be exposed to more than 25 events of over 70dB(A) within one night. This would not only more accurately measure the negative noise impacts at night, but also provide transparency and a degree of certainty of noise expectation for the local residents.
96. The value that people assign to predictable periods of respite from aircraft noise must also be appropriately recognised.
97. Noise contours offer an extremely useful tool for identifying, managing and limiting the number of people who are very significantly affected by aircraft noise. However, in truth, much of London is overflowed by aircraft at altitudes less than 7,000 feet, and noise can be significant. For example, Londoners living in Hampstead, Greenwich, Lambeth and the City – all outside the existing Heathrow noise contour – are routinely disturbed and woken by aircraft noise.
98. The noise management limitations currently in place, particularly at Heathrow, are too lenient and must be revised to ensure that a high quality of life for local communities is attained.

**Key policy message: The Government must develop a new, improved noise metric**

99. The Mayor strongly supports the development of a new noise metric that more fully represents noise sensitivities during the course of a day, and overnight.

#### **4.6. Actions**

100. Local communities and the general public must have full confidence in the noise monitoring, recording, and review system.
101. Local authorities are well placed to ensure transparency in the reporting process and that local circumstances are accounted for.

102. Consistency in exposure to noise and a long-term plan is important and can help minimise unexpected disturbances.

**Consultation question: Do you agree that noise should be given particular weight when balanced against other environmental factors affecting communities living near airports?**

103. The draft framework identifies noise as the main environmental consideration for residents living near airports. Noise should be given particular weight, as not only can it severely impact quality of life, there is also strong evidence of its effects on learning and general health and wellbeing.

104. The environmental burden of disease caused from aircraft noise can be expressed in disability-adjusted life years (DALYs), an approach being developed by the World Health Organization (WHO). DALYs are the sum of the potential years of life lost due to premature death and the equivalent years of “healthy” life lost by virtue of being in states of poor health or disability. The WHO have calculated that aviation across Europe, results in nearly 60,000 DALYs lost annually by highly sleep-disturbed individuals and over 100,000 DALYs by highly annoyed people<sup>14</sup>.

105. A crude calculation based on the proportion of people across Europe affected by aircraft noise would suggest that Heathrow is responsible for around 17,000 DALYs lost annually by ‘highly sleep-disturbed’ individuals and over 28,000 DALYs by those ‘highly annoyed’.

**Consultation question: What factors should the Government consider when deciding on how to balance the benefits of respite with other environmental benefits?**

106. There is no straightforward quantitative method of capturing the benefits of respite, but it is quite clear from past surveys and questionnaires that residents place great value on the respite periods. We have observed for example, concerns from shift workers who rely heavily on periods of respite to sleep.

107. Schools have highlighted the importance of respite periods. It allows for planned outdoor learning activities for instance. It is widely acknowledged that the loss of respite periods disadvantages children in education.

108. It is absolutely essential that any investigation into reducing the frequency or length of respite periods is made on the basis of a full and proper appraisal of such impacts. It is not sufficient to merely use the number of complaints registered with the airport as an indicator of potential impacts.

**Key policy message: Respite periods are highly prized by those affected by noise and must not be sacrificed for the sake of wringing out more capacity at Heathrow**

109. The periods of relief from aircraft noise that runway alternation at Heathrow offers are essential for residents. Any loss or degradation of such respite periods would have a material impact on the quality of life of thousands of people.

110. The Mayor opposes the introduction of operations at Heathrow that would compromise respite periods for the sake of wringing out a modicum of extra capacity. Any benefits would be disproportionate to the detrimental environmental effects on local communities.
111. With specific reference to the introduction of mixed-mode operations at Heathrow, this measure will only release limited additional capacity and will distract attention which should instead be focused on delivering a new hub airport.

***Consultation question: Do you agree with the Government's proposals in paragraph 4.68 on noise limits, monitoring and penalties?***

112. The Mayor supports a strong approach, and agrees with the proposals suggested in paragraph 4.68 of the consultation document. He can see no reason why the arriving aircraft should not be subject to a similar regime, particularly given that they can have a greater effect than departing aircraft. Although the noise generated by the aircraft is less, landing aircraft typically approach at a much shallower angle (circa 3 degrees). They therefore cover a larger area at a lower altitude – aircraft approaching Heathrow are typically lower than 2000m more than 10 miles away from the runway.
113. A comprehensive review of the current systems in place is long overdue, particularly with the technological advancements since the 1990s. Aircraft are quieter and the limits and penalties enforced should reflect this. Breaches to the noise limits should be met with higher fines, so as to act as a deterrent.
114. Current noise limits, monitoring and penalty systems in place are too lenient. Breaches to these limits and regulations must be dealt with in a manner which deters further violation.
115. Furthermore, greater transparency in the review and monitoring of noise limit breaches would be welcome. Local communities and residents must have the confidence that airport and aircraft operators are taking the issue seriously.

**Key policy message: The penalty regime imposed following noise limit breaches should be strengthened**

116. The existing penalty regime imposed following breaches of noise limits is too lenient, and at Heathrow, there is no reason why it should not apply to arriving aircraft as well as those departing.
117. If an aircraft creates more noise than is allowed, the airline is fined up to £1,000. In most cases, this is less than the cost of a single business class seat on a longhaul flight.
118. The Mayor strongly supports an independent review of the current penalty regime and its sanctions.



**Consultation question: In what circumstances would it be appropriate for the Government to direct noise designated airports to establish and maintain a penalty scheme?**

119. A penalty scheme is important at the busiest airports to influence airline behaviour, if set at the appropriate level. The local community should benefit from any fines the industry incurs as a result of noise limit breaches. However, the priority must be to reduce the number of breaches and safeguard local communities.
120. It would be beneficial to provide greater clarity and information to the local communities, which could include benchmarking or a league table of airlines and airports and a more transparent procedure for obtaining grants from the community benefit funds derived from fines.
121. Landing aircraft can have a greater noise impact than departures. The Government should introduce a penalty scheme which includes arriving aircraft – it currently only covers departures. The scheme could, for instance, encourage better use of Continuous Descent procedures and help to ensure that aircraft do not deviate from the normal glide slope, i.e. fly closer to the ground.

**Consultation question: In what circumstances would it be appropriate for the Government to make an order requiring designated airports to maintain and operate noise monitors and produce noise measurement reports?**

122. Although the CAA and ERCD (Environmental Research and Consultancy Department) currently calculate noise exposure for the three main London airports, there are concerns that the degree of monitoring and measurement of noise is not sufficient to accurately analyse the negative noise impacts on local communities.
123. A more formalised approach to noise monitoring would be beneficial, underpinned by a commitment to regular noise monitoring and annual objectives for key targets including arrivals noise, ground noise and night noise. There should be transparent reporting of the results, with the data also being used to validate the noise modelling outputs on which noise contour mapping is based.
124. Concern has also been raised about the locations of the permanent noise monitors. These are neither strategically placed nor geographically spread, compared to those at other major European airports, and are instead only concentrated at either end of each runway.
125. Whilst multiple mobile monitor units are placed in other locations, only a few of these are typically used - and only during summer periods or in response to complaints in a residential area. For example, in 2011, Heathrow only used 5 of the 25 mobile monitors available .

**Key policy message: Government should require major airports – Heathrow in particular – to ensure that noise monitors are sited appropriately so as to comprehensively capture the noise impacts on communities**

126. The Mayor questions whether the current placement of noise monitors and the associated monitoring of noise levels in the surrounding areas at Heathrow allows for full accountability and accurate monitoring of aviation noise across those areas affected.

127. The Mayor notes that other European airports have larger, better distributed networks of noise monitors to better capture the noise impacts on local communities and that the Government should look to follow their example.

***Consultation question: How could differential landing fees be better utilised to improve the noise environment around airports, particularly at night?***

128. The draft Framework rightly recognises that the current ICAO noise certification classification is too broad for effective use for differential landing fees. Further splitting of each classification – as is adopted at Heathrow – is sensible.

**Key policy message: There is a case for aircraft charges to be set in proportion to their negative externalities**

129. A fee regime that could accurately reflect the true cost of a specific movement would be welcomed. Fees that vary by noise and emissions incentivise the use of quieter, cleaner aircraft; fees set by weight incentivise efficient use of aircraft while fees that vary by time can incentivise a more efficient use of available capacity. Although the scope for fee variance at an airport operating at or close to capacity throughout much of the day is limited, the Mayor supports the concept of managing air traffic movements in accordance with their negative externalities – their ‘true cost’.

130. It is essential that any such charging regime recognises that beyond a set ‘cost’ or level of disturbance, no movement is acceptable. The Government should consider whether the threshold in place today should be tightened.

***Consultation question: Do you think airport compensation schemes are reasonable and proportionate?***

131. Compensation schemes vary from airport to airport due to a number of reasons. For example, Nice Côte d’Azur airport has an extremely generous compensation scheme covering the 55 dB(A)  $L_{den}$  area, but it is also surrounded by sea on three fronts.

132. Many of the current UK schemes are neither reasonable nor proportionate. Heathrow has one of the least generous compensation schemes, covering only those within the 69 dB  $L_{Aeq, 18hr}$  excluding a significant number of dwellings and other noise sensitive buildings. Heathrow airport previously proposed a new criterion for their compensation scheme, which would cover a larger area but with the level of assistance banded along the 63, 66 and 69  $L_{den}$  contours.

133. The Mayor is still concerned that this excludes a significant number of households and would strongly support a reassessment of airport compensation schemes which must ensure they are indeed reasonable and proportionate.

**Consultation question: Do you agree with the approach to the management of noise from general aviation and helicopters, in particular to the use of the section 5 power?**

**Consultation question: What other measures might be considered that would improve the management of noise from these sources?**

134. The Mayor recognises that the noise generated by helicopters and other general aviation activities can sometimes be a particular problem for Londoners.

135. Police and air ambulance helicopters are not required to follow designated routes. They account for a large proportion of helicopter traffic, particularly at night.

136. It would be useful to ascertain the increase in noise level and health impacts since the change in the minimum altitude of helicopters from 1500ft to 1000ft in 2005.

137. The Mayor supports the formation of an accessible complaints system, and better monitoring thereof. Currently, there are no formal complaints procedures or a central organisation to which the general public can log their complaint. Although the Battersea heliport, Ministry of Defence, Metropolitan Police and CAA all accept complaints, it has been difficult to ascertain the full extent of the problem.

138. Greater use of incentives could help encourage the technological development and use of quieter helicopters.

139. The Mayor also advocates a reassessment of the current regulation of helicopter noise in London and believes tighter control should be employed in the future.

**Consultation Question: Do you have any further ideas on how the Government could incentivise the aviation and aerospace sector to deliver quieter planes?**

140. Manufacturers and airlines acknowledge the need and positive impact of achieving further reductions in noise and emissions. To make further progress, significant changes in technology advancement are needed. Considering the UK's leading position in aerospace, the Government can potentially exert a strong influence on the industry, backed up by funding for research-related projects and technology demonstrators, to accelerate the introduction of quiet aircraft initiatives. Tighter, carefully drafted, national and international regulatory controls on noise emissions could provide a key driver for this process.

**Key policy message: Heathrow faces a serious challenge to address its critical noise impacts and it is inconceivable that any expansion be allowed to exacerbate them**

141. Taken together, it is clear that no airport in Europe can compare with Heathrow for the severity of its noise impacts on hundreds of thousands of people. This is only in small

part due to its size, but is mostly a function of its location in a densely populated urban area. Addressing and managing these impacts poses a very serious challenge given the current scale of airport activity, with no easy solutions available.

142. In this context, it is inconceivable that Heathrow could be allowed to expand its operations and exacerbate what are, by some margin, the worst noise impacts on local communities of any airport in Europe.

#### 4.7. Air quality and other local environmental impacts

*Consultation Question: Do you believe that the regime for the regulation of other local environmental impacts at airports is effective?*

143. Improving air quality in London is a priority of the Mayor, and significant measures have been implemented to reduce emissions from transport sources and buildings over recent years. These include the introduction of the world's largest city-wide Low Emission Zone, age limits to retire the oldest taxis, introducing hybrid buses including the New Bus for London and programmes such as RE:FIT and RE:NEW to reduce emissions from public buildings and homes.
144. The UK air quality legislative regime is driven primarily by the European Union 2008 Air Quality directive. The existing regime is appropriate but more needs to be done to improve its application and ensure it is factored in to decision-making. Reflecting the approach taken by several local authorities, the Mayor would propose new independent regulator with an air quality remit and able to push for further improvements at Heathrow.
145. Achieving EU limit values for air pollutants will be hugely challenging, but we must continue to work towards achieving them as soon as possible to protect human health. The Mayor remains fully supportive of the Government's commitment to achieving full compliance regarding European air quality standards. This commitment must be reflected in the final Aviation Policy Framework and must be a key consideration in the assessment of future airport development.
146. For his part, the Mayor will ensure that minimising the potential health impacts from air pollution generated by aviation is reflected in his own studies. On this basis alone, given the size of the potentially affected population, Heathrow is not a suitable candidate for further expansion.
147. The Mayor is aware that emissions related to the aviation industry are not limited to that of the aircraft; the associated infrastructure and activities must also be taken into account. The local environmental consequences can be great and should be fully considered as part of any assessment into the impacts of an airport.

***Consultation question: Do you think that noise regulation should be integrated into a broader regulatory framework which tackles the local environmental impacts from airports?***

148. The environmental impact of air transport and airport development, such as noise and air quality, should be kept separate. This would ensure that continued importance is placed on reducing and mitigating these environmental impacts; it would also prevent a potential trade off between these issues. Integrating noise regulation into a broader framework may lead to a dilution of strong regulation on any one form of environmental impact.

**Key policy message: Heathrow's location exacerbates its local environmental impacts – moving the hub airport east could reduce health impacts of the hub 60-70%, while also addressing the existing breach of EU NO<sub>x</sub> emissions limits**

149. A recent study by the Massachusetts Institute of Technology (MIT)<sup>15</sup> has found that Heathrow's location exacerbates its local environmental impacts. Moving the UK's hub airport to the Thames Estuary would reduce the health impacts of the UK hub by 60-70% (versus a 3-runway Heathrow). This is because of Heathrow's position upwind of London's population centres (given the direction of prevailing winds), as well as extreme proximity to those centres.

150. Moreover, Heathrow airport is located in close proximity to a number of key road arteries – the M25, M4 and A30 – and airport-related traffic contributes to substantial flows on these routes. The result is significant road-based emissions in the vicinity of the airport.

151. The consequence of these road-based and aircraft-related emissions is that EU limits for NO<sub>x</sub> are already being breached at Heathrow. As well as subjecting local people to significant health risks, the UK is being exposed to potentially very substantial fines. A range of measures undertaken to date have not been sufficient to address this.

152. In this context, it is difficult to contemplate further expansion of Heathrow, particularly when a location to the east of London, such as the Thames Estuary, could dramatically reduce the health impacts associated with the UK's hub airport.

# Chapter 5. Working Together

## 5.1. Summary of the Mayor's Position

Aviation is vital to London and the UK's current and future economic prosperity and airports can deliver very considerable benefits for the local communities around them.

However, airports can also produce significant negative externalities, notably environmental but also congestion on local transport networks. This is why local collaboration is so important, as it gives local communities a voice in how the airport is run and developed over time.

It is key that the monitoring of airport noise management is subject to independent oversight, to ensure it commands the confidence of all sides. As such, the Mayor proposes that independent panels be established at each major airport for this purpose.

Strengthening co-operation between the aviation industry and local stakeholders should be seen as an important positive step.

## 5.2. The importance of local collaboration

***Consultation question: Do you agree with the Government's overall objective on working together?***

153. There is a continuing tension between the strategic economic benefits of aviation and its sometimes considerable impacts on local communities. This tension can only be eased through ongoing effective dialogue.
154. Even amongst the London airports, there is considerable variation in the effectiveness of existing local engagement, which would seem to a great extent to depend on the attitude to collaboration taken by the airport operator.
155. The Mayor encourages all airports to take a more positive and transparent approach towards local collaboration and is hopeful that some of the proposals contained herein will help promote the sharing of and adherence to best practice.
156. More generally, the Mayor welcomes the Framework's objective of strengthening and streamlining the way industry and local stakeholders work together.

### 5.3. Improving existing arrangements

157. The Mayor welcomes the Framework's promoting of greater transparency with the better provision of information to local communities. This is particularly important with regards to aircraft noise, normally the issue of greatest concern to local communities.
158. Moreover, it is vital that the information provided is usable by the widest possible audience; it should avoid impenetrable jargon and metrics whose meaning is difficult to fathom.

***Consultation question: Do you think Airport Consultative Committees should play a stronger role and if so, how could this be achieved?***

159. The Airport Consultative Committees (ACCs) are valuable in ensuring that the views of local stakeholders are heard on the airport issues that impact both users and neighbours of the airport.
160. The ACCs should strive for a membership representing a broad cross-section of local interests including local authorities and residents' groups. Local businesses can also contribute and the Mayor welcomes the suggestion that ACCs look to work more closely with Local Enterprise Partnerships (LEPs). The input of other representative business groups is also to be valued, particularly in those areas without an LEP in place.
161. Representing local people is central to the purpose of ACCs, yet many are unaware of their role. The ACCs should, in conjunction with its constituent local stakeholders and the airport, make greater efforts to promote itself to the local community: as a source of updates and a conduit for dialogue on airport issues.
162. The Mayor supports proposals to externally advertise the chairmanships of the ACCs, placing the ACCs on a firmer footing and emphasising their independence. It is important that the ACCs are fully engaged by their airport, particularly in the early stages of decision-making, so they have a genuine role in shaping outcomes.

***Consultation question: Is there a case for changing the list of airports currently designated to provide consultative facilities?***

163. With regard to airports and airfields located in the London area, the Mayor is not seeking any changes to the list of those designated to provide consultative facilities.

***Consultation question: Do you agree that the Civil Aviation Authority should have a role in providing independent oversight of airports' noise management?***

164. The Mayor would welcome moves to provide independent oversight of airports' noise management in the hope that this will ensure airports are held to account for noise issues and that over time will increase trust between airport operators and local stakeholders.

165. The CAA plays an invaluable role in overseeing UK aviation and it will continue to have an important responsibility for ensuring the effective functioning of the aviation market while protecting the interests of both passengers and local communities.

**Key policy message: Government must establish independent panels to oversee airports' noise management**

166. In light of the understandably high sensitivity about airport noise management, it is essential that its oversight is unquestionably perceived as independent, both from the airports but also from all arms of Government. Only with such independence can the oversight command the confidence of all stakeholders both inside and outside the industry.

167. That is why the Mayor proposes that an independent panel is established to undertake this role for airports above a certain threshold in size but certainly including London's five main airports. Similar to equivalent bodies that have been set up in countries such as the Netherlands, it will be well positioned to discharge its oversight duties in a spirit of transparency and impartiality to ensure it maintains the confidence of all sides.

***Consultation question: Is the high-level guidance provided in Annex E sufficient to allow airports to develop local solutions with local partners?***

168. The Mayor recognises the benefits of Airport master plans, Airport Transport Forums and Airport surface access strategies in supporting local dialogue and ensuring airport development is correctly positioned within a wider planning context.

169. The high-level guidance set out in Annex E would seem to be sufficient to capture the key local issues and stakeholders for engagement with the airport.

***Consultation question: Do you agree that master plans should incorporate airport surface access strategies?***

170. The airport surface access strategies are important documents for holding airport operators to account as they seek to improve the sustainability of how passengers and employees reach the airport.

171. It is necessary for surface access strategies to be sufficiently challenging and for major airports they should include explicit mode share targets.

172. Given the importance of surface access for airport operations and for their impacts on local communities, there would be a logic in having airport master plans incorporating the airport surface access strategies. Reducing the number of documents and consultation processes entailed should offer efficiencies for the airport operator and facilitate public engagement.

173. Nonetheless, airports must ensure that their airport surface access strategy is not diluted or in any way diminished as a result of its incorporation in the master plan.



***Consultation question: Do you agree that, where appropriate, the periods covered by master plans and noise action plans should be aligned?***

174. In a similar vein, aligning the periods covered by the master plans and noise action plans could make strategic sense and help simplify public engagement.

# Chapter 6. Planning

## 6.1. Summary of the Mayor's Position

The Mayor's role in setting out spatial and planning policy in the Capital through the London Plan makes planning an important topic of interest.

The Mayor agrees with the status of the Framework and recognises the importance of safeguarding for development and particularly the principle of 'developer pays' in terms of upgrading surface access links. The Mayor supports the objective of reducing the numbers of people living, working or congregating in Public Safety Zones in London.

However, the Mayor is of the opinion that the national interest requires a significant shortening of the current timetable. Moreover the Government should require the Davies Commission to publish its report earlier and to ensure sufficient appraisal and assessment work is undertaken that would enable a National Policy Statement to be put in place far earlier than is currently envisaged.

## 6.2. The framework in the planning process

175. The draft framework sets out the status of the Aviation Policy Framework when it is adopted as a finalised version. The Mayor supports the replacement of the 2003 Air Transport White Paper and its support for a third runway at Heathrow. Local authorities, including the GLA and the London Boroughs, will be bound to take this document into account when preparing their local plans and in determining planning applications. It is therefore important that the Department ensures that the framework takes into account the responses to this consultation.
176. The Mayor notes the sections on safeguarding land for airport development and public safety zones and has no specific comments other than to endorse the approach taken. He also notes the need to consult on any changes to airspace arrangements and will seek an improvement to conditions over London.
177. The draft framework rightly makes improved public transport mode shares a condition for airport development and restates the policy of 'developer pays' for improvements. The Mayor, through TfL, will work with airport operators to ensure that best value is achieved from any works undertaken on either the public transport or the road networks.

### 6.3. A National Policy Statement on Aviation

178. The Mayor firmly believes that the Aviation Policy Framework should naturally lead to a National Policy Statement (NPS) on Aviation specifically setting out the Government's support for a new hub airport and the associated regulatory changes. The findings of the Davies Commission on aviation will also play a key role in providing the evidence needed for NPS. In the absence of any impetus from the Government, the Mayor will continue to work on the case and specific options allowing the Department to show that all reasonable options have been considered before the publication of the NPS.
179. With an Aviation NPS in place there would be a clear route to the delivery of a new airport which could be delivered along with the associated surface access schemes through a Development Consent Order (DCO). This would significantly simplify the planning process and expedite the final delivery of an urgently needed piece of national infrastructure. This is in keeping with the National Infrastructure Plan (2011) which recognised that the UK's aviation hub status must be maintained.
180. Assuming that the adoption of the Framework takes place next spring and that the Davies Commission publishes its final report in 2015, a possible timetable for the delivery of a new airport is as follows:
- Adoption of the Aviation Policy Framework: Spring 2013
  - Davies Commission Reporting: Summer 2015
  - National Policy Statement designated following consultation and Parliamentary approval: Summer 2017
  - DCO application for new airport submitted: Summer 2018  
*(with pre-application work, including environmental impact assessment and consultation, taking place from Summer 2015 onwards)*
  - DCO decision: by Spring 2020, if statutory deadlines are adhered to
  - Construction commences: Summer 2022
  - Airport Opens: Summer 2029
181. In the Mayor's view, this timetable is too long and the Government should act to shorten it.
182. If the output of the Davies Commission were insufficiently comprehensive, then the appraisal and assessment work that is a prerequisite to putting the NPS in place (including the necessary consultation) would have to follow, likely adding around 2 years to the above timescales.

**Key policy message: Both a National Policy Statement and a Development Consent Order would be required to develop a new hub airport or a third runway at Heathrow; the differences in the construction process would mean a third runway could be no more than 1-3 years quicker to deliver compared to a new hub**

183. Whether a new hub airport or a third runway at Heathrow was pursued, both an NPS and a DCO would be required, within broadly similar timeframes. Given the constrained nature of the Heathrow site – and the need to keep the airport operational during construction – a third runway and its associated infrastructure could be no more than 1-3 years quicker to build compared to a new hub airport.

**Key policy message: Government must act to reduce the timescales by requiring earlier publication of the Davies Report and for it to lay the foundations for a National Policy Statement on Aviation**

184. The hub capacity challenge is pressing. The national interest requires a significant shortening of the current timetable. Government can contribute to this by requiring the Davies Commission to publish its report earlier and to ensure sufficient appraisal and assessment work is undertaken to enable a National Policy Statement to be put in place far earlier than 2017. This would allow the airport's opening to be brought forward from 2029.

## Chapter 7. Conclusion

The Mayor agrees with the Government objectives stated in their Draft Aviation Framework Document. However the success of the Government's new aviation policy rests on the detail of each and every policy designed to deliver these objectives.

The Mayor welcomes the opportunity to comment upon the issues set out in the document, and identify the key issues – such as our need for a new hub airport – which the Government must place at the heart of a new policy Framework.

Throughout this response, the Mayor has identified a number of policy messages associated with meeting the objectives identified, intended to capture the most important elements of each.

### Key Policy Messages – in summary

- **The significant contribution that aviation makes to the UK economy is rightly recognised, and the mayor fully supports the connectivity objectives of the Framework; however, a new hub airport is the only way of providing for the future connectivity the UK needs.**
- **A limited number of sites meet the spatial requirements for a new hub airport.**
- **A new hub airport can be supported by increasing the longhaul role of other London airports in the interim.**
- **A new hub airport could form part of a broader economic strategy for growth.**
- **A new hub will require the appropriate surface access connections to London, but also to the rest of the UK.**
- **A new efficient hub airport can minimise the environmental impacts that directly result from Heathrow's operational constraints.**
- **The three main London airports should continue to be designated for noise management purposes, with their target**

setting and monitoring overseen by an independent expert panel.

- Minimising the number of people affected by aircraft noise is best achieved by relocating the UK's hub to a less densely populated area.
- The government must develop a new, improved noise metric.
- Respite periods are highly prized by those affected by noise and must not be sacrificed for the sake of wringing out more capacity at Heathrow.
- The penalty regime imposed following noise limit breaches should be strengthened.
- Government should require major airports – Heathrow in particular – to ensure that noise monitors are sited appropriately so as to comprehensively capture the noise impacts on communities.
- There is a case for aircraft charges to be set in proportion to their negative externalities.
- Heathrow faces a serious challenge to address its critical noise impacts and it is inconceivable that any expansion be allowed to exacerbate them.
- Heathrow's location exacerbates its local environmental impacts – moving the hub airport east could reduce the adverse health impacts of the UK's hub by 60-70%, while also addressing the existing breach of EU NO<sub>x</sub> emissions limits.
- Government must establish independent panels to oversee airports' noise management.
- Both a National Policy Statement and a Development Consent Order would be required to develop a new hub airport or a third runway at Heathrow; the differences in the construction process would mean a third runway could be no more than 1-3 years quicker to deliver compared to a new hub.
- Government must act to reduce the timescales by requiring earlier publication of the Davies Report and for it to lay the foundations for a National Policy Statement on Aviation.

# Endnotes

- 1 To read the Mayor's response, visit <http://www.london.gov.uk/publication/mayor-responds-sustainable-framework-uk-aviation>
- 2 Regional Gross Value Added (Income Approach), Office for National Statistics, December 2011
- 3 CAA Passenger Survey Report, 2011
- 4 Think London, 52 Billion: The value of foreign direct investment to London, 2007.
- 5 Focus on Freight, Department for Transport, 2006
- 6 <http://www.communities.gov.uk/regeneration/thamesgateway/>
- 7 The English Indices of Deprivation 2007, Department for Communities & Local Government, 2008
- 8 Thames Valley Multi Modal Study, Atkins, 2003
- 9 Meeting the UK aviation target – options for reducing emissions to 2050, Committee on Climate Change, 2009
- 10 CAA Insight Note : Aviation Policy for the Consumer, CAA, 2011
- 11 TfL Research, 2011
- 12 Heathrow Airport: Environmental Noise Directive Noise Action Plan 2010-2015, Heathrow Airport, 2010
- 13 CAA Insight Note : Aviation Policy for the Environment, CAA, 2011
- 14 Burden of Disease from Environmental Noise, World Health Organisation, 2011
- 15 Air quality impacts of UK airport capacity expansion, MIT Laboratory for Aviation and the Environment, October 2012