

# Aviation Scoping Document

## Response from HACAN

**HACAN is the organisation with several thousand members which represents residents under the Heathrow and City Airport flight paths.**

HACAN has been in existence since the late 1960s. Initially most of its members lived in the boroughs closest to Heathrow. However, as the problem of aircraft noise has spread, HACAN has become a regional organisation with members across London and the Home Counties. Although noise is still the main feature of HACAN's work, in recent years it has tackled other impacts of Heathrow, notably climate change and air pollution, and has done significant work on the contribution of Heathrow to the economy.

Earlier this year HACAN began to represent residents under **London City Airport** flight paths after it merged with Fight the Flights, the campaign group which had opposed the increase in flights at London City.

This response is divided into several sections:

1. The Economics of UK Aviation
2. The Economic Role of Heathrow
3. Alternatives to Flying
4. Tackling Noise at Heathrow, with a short section on Air Pollution
5. Climate Change
6. Heathrow Conclusion and a Proposal
7. The Impact of London City Airport

Section 4 includes reference to two separate reports we are submitting to the Scoping Document consultation. This is the work we have done jointly with BAA and AEF (the Aviation Environment Federation) with regard to noise metrics and flight paths. They are highlighted in this response in grey shaded boxes and will be forwarded separately in a few weeks time. Section 4 also has a short section on consultative committees.

# **1. The Economics of UK Aviation**

**This section covers questions 5.1 – 5.4 and 5.9 – 5.11 in the Scoping Document**

HACAN recognises the importance of aviation to the UK economy. The Scoping Document is right to stress that “air transport provides the international connectivity the country needs to succeed in a competitive global economy.” Heathrow, as Britain’s premier international airport, as it only truly hub airport, has a particularly key role in providing this connectivity.

HACAN has a direct interest in the economic benefits that stem from a successful Heathrow. Our members live and work in London and the Home Counties.

Given the importance of to the economy of aviation, and of Heathrow in particular, it is critical that the Government makes an independent assessment of the relationship between aviation and economic prosperity. The previous Government failed to do this. Its 2003 White Paper was based on *The Contribution of the Aviation Industry to the UK Economy*, a report by Oxford Economic Forecasting, largely funded by the aviation industry with its forward written jointly by the Chief Executive of the Airport Operators Association and the Chairman of the British Air Transport Association. It was the fatal flaw at the heart of its aviation policy.

We welcome the recognition in the Scoping Document that, despite the importance of aviation to the economy, “unconstrained growth of aviation is not an option.” We endorse the view that “the right balance must be struck between the economic, social and environmental costs and benefits of aviation.” Given this, we welcome the acknowledgement that Government needs to “address the question of how we prioritise available capacity where demand exceeds supply”. We will say in our submission that priority should be given to business trips. We will argue, however, for a free-market approach where the role of government is largely confined to setting the regulatory, fiscal and environmental framework within which the industry should operate.

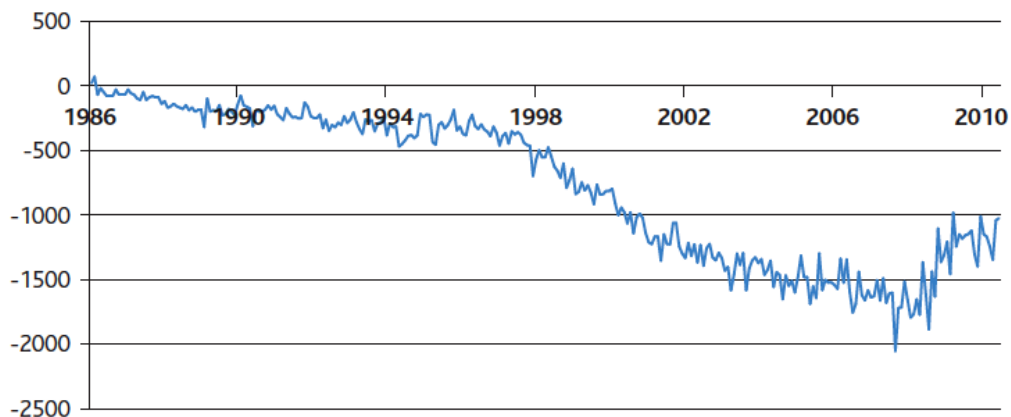
## **1. Prioritise Business Trips**

It is of course a little artificial to separate all business trips from all leisure trips as inward-bound tourist trips are important to the economy. Nevertheless, it is right to consider business and leisure trips separately. There is a strong case to prioritise business trips. There are two main reasons for doing so.

**a. It is business connectivity which is critical to the economy.** In a mature economy transport links are not the only consideration, and often not the main consideration (1), for a firm in deciding where to locate to do business, but they can play an important role. Over the coming decades the UK will want to ensure that its air connectivity to key business centres is good, in particular to countries with fast-developing economies like China and India. That doesn't mean that the UK should aim for direct links to every major city in these developing economies. That is unrealistic given the need to constrain growth. It is equally unrealistic to think for our major European competitors will be able to do so. Given the public opposition to new runways in Europe, it is unlikely many more will be built. Direct flights from Europe to other continents are likely to be limited to their largest cities. For the rest, some interchange seems inevitable. In the light of that, we should regard major new airports like that at Dubai as an opportunity, rather than a threat. These are airports specifically designed to facilitate an easy and quick interchange for inter-continental passengers. They can provide the links between Europe and a whole range of cities in other continents. As such they can and will enhance business connectivity.

**b. Many leisure trips are a drain on the UK economy.** This is because of the tourism deficit which has developed in recent years, almost entirely due to the growth of short-haul, budget flights.

**Figure 1: Tourism's Trade Imbalance –UK spend abroad, less foreign spend in UK**



Source: Government Tourism Policy, DCMS (2011), page 16

Currently, the UK runs a tourism trade imbalance – the difference between the spending of UK residents abroad and that of foreign visitors to the UK – of around £12 billion, down from a peak of around £17 billion in early 2008 (with seasonal spikes of up to £20 billion) – see Figure 1. The graph reveals a very clear trend: the UK ran a modest deficit throughout the late 1980s and much of the 1990s, but in the late 1990s, as low-cost air travel began to boom,

there was a relentless increase in the tourism deficit, with more and more discretionary spending being exported. Only the London area has regularly shown (a small) surplus. This means that recent growth at regional airports has taken out more money and jobs from the local economy that it has brought in (2). Since there is no prospect in the foreseeable future of visiting tourists exceeding the number of UK residents holidaying abroad using cheap flights, there are strong economic reasons to curb these flights.

### **How to Prioritise Business Trips**

There are ways by which the Government can create the right framework to prioritise business trips. The price mechanism is the key as business travel is much less price-sensitive than leisure travel. There are a number of measures which can be taken:

- An annual rise in Air Passenger Duty to match the rate of inflation plus at least 1%, so that all flying becomes more expensive;
- Air Passenger Duty on short-haul flights is increased to approach that charged on long-haul flights; there may even be a case of just one rate of Air Passenger Duty;
- A fast, affordable railway which competes effectively on price with short-haul flights;
- Slot auctioning at Heathrow as a mechanism to encourage airlines to prioritise the most profitable flights;
- The introduction of a flat-rate noise tax on all aircraft landing at airports – this is likely to hit short-haul flights most as they tend to make more trips and, critically, leisure passengers on those flights as their trips are the most price-sensitive;
- Work internationally and across Europe to end tax-free fuel on aviation and the situation where aviation pays no VAT in most countries;

This sounds like a lot of extra taxation. However, it must be borne in mind that aviation is currently under-taxed, with its tax-free fuel, zero-rated VAT status, etc. Carefully targeted fiscal measures, brought in over a period of years so as not to harm an economy coming out of recession, could deter outward-bound leisure passengers without harming business.

## 2. The Economic Role of Heathrow

**This section covers questions 5.11 -5.14 and 5.23 in the Scoping Document**

We welcome the decision to rule out a third runway at Heathrow (and new runways at Gatwick and Stansted) and to retain runway alternation at Heathrow.

We will argue that Heathrow can remain a critical asset to the UK economy and important to business connectivity without expanding. To achieve this, Heathrow needs primarily to be seen as a business airport, serving the needs of business (including inward tourism) and attractive for business people to use.

There are a number of questions to consider:

**a. Heathrow has an important ‘hub’ function but the economy of the UK is not dependent on it becoming a bigger hub.**

Bob Ayling, the former Chief Executive of British Airways, has argued that Heathrow should concentrate on direct flights as “a sensible approach and a good basis for planning the future of Heathrow, leaving Paris and Amsterdam to invest in the costly capital assets of a hub (2).”

The CE Delft Report (4), *The economics of Heathrow expansion*, was quite clear that the further growth of Heathrow as a hub was not critical to the economy because of the importance to business people and foreign tourists of London as a destination. This negates the main argument for any hub airport: that the transfer passengers which it may attract can provide extra revenue which enable airlines to run more frequent services profitably to a greater range of destinations. What CE Delft has shown is that enough passengers are coming to London to visit or to do business here to make key business routes profitable without an increased reliance on transfer passengers.

The fact that Heathrow’s success is not dependent on ever more transfer passengers using it as a hub is borne out by the figures. According to CAA statistics, while the percentage of transfer passengers has risen in recent years, the number of destinations served by Heathrow has fallen. In 1995 transfer passengers made up almost 26% of total passengers numbers; in 2009 it was almost 38%. In that time the number of destinations served fell from 227 to 180. There is not, therefore, this correlation at Heathrow between transfer passengers and destinations served that so many in the aviation industry would claim.

There are more figures which re-enforce the point. CAA statistics show that the majority of transfer passengers using Heathrow are travelling on routes that are already highly profitable. In 2007 the top 10 routes for transfer passengers were New York, Manchester, Edinburgh, Chicago, Hong Kong, Los Angeles, Dublin, Paris, Glasgow and Toronto. The routes most dependent on transfer passengers were to Bishkek, Freetown, Providenciales and Yerevan – not key destinations for UK business.

More transfer passengers at a bigger Heathrow would almost certainly increase the profits of BA and BAA. They will therefore, no doubt, be making submissions to you that a bigger hub is essential to the UK economy. But, what might improve the profitability of some parts of the aviation industry does not mean it is essential for the health of UK plc. We believe the evidence shows it is not.

**b. Heathrow is just one of the airports serving London**

London is already the best-connected city in the world. In 2009, the last year for which full figures are available, over 130 million passengers used London's five airports - more than any other world city. Paris was London's closest European competitor with just under 86 million passengers using its airports. We appreciate that for many inter-continental business trips Heathrow is the only viable London airport. Also we are not arguing for growth at these other airports. We are simply recording a fact that is often overlooked: that all London's airports need to be considered when assessing its connectivity. It may be worth the Government looking into the viability of better surface connections between the airports.

**c. Heathrow is better-connected to the world's key business destinations than any of its European competitors**

HACAN contributed to a new report *International Air Connectivity; How well connected is the UK?* published by AirportWatch. It assessed the current international air connectivity of key UK airports compared with rival airports in Europe by counting the number of destinations served by each airport, the number of planes to each of those destinations during one week in the month of July 2010. It only looked at departures.

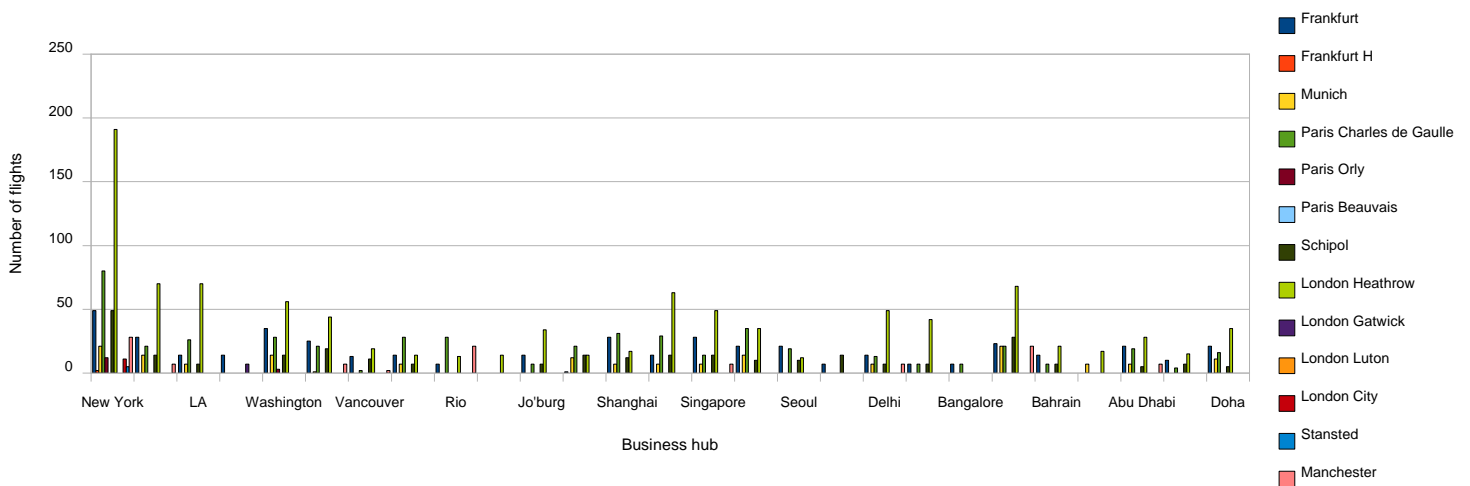
**The link to the report:** [http://www.aef.org.uk/downloads/Business\\_Connectivity\\_Report\\_August2011.pdf](http://www.aef.org.uk/downloads/Business_Connectivity_Report_August2011.pdf)

**A summary of the key findings of the report on the next page**

## A summary of the key findings of the report

- Heathrow is in a class of its own as far as its inter-connectivity to the key business centres of the world is concerned, with more flights to these business destinations than any other airport in Europe – in fact, more than the combined total of its two nearest rivals, Charles de Gaulle and Frankfurt. Heathrow had 990 weekly departures to key business destinations, Charles de Gaulle had 484 and Frankfurt 450.
- Heathrow is in a league of its own with its inter-connectivity to the key business centres of North America and the Gulf States.
- All London's airports had 1113 departure flights to the key business destinations compared with Paris's 499, Frankfurt's 443, and Amsterdam's 282.
- London as a whole had a greater number of flights to the world's destinations than the other cities surveyed, though it served slightly fewer of them than Paris.
- London had the highest number of flights to the key markets in Asia, the Middle East, North America and Australasia; this is largely because Heathrow has a much wider spread of destinations outside Europe than its European rivals.

Business Destinations



### d. There is an argument business will benefit from fewer aircraft using Heathrow

This is the case put by former BA chief executive Bob Ayling. He argues that the big disincentive to business people using Heathrow is not the number of destinations it serves but

the delays at the airport. He puts this down to the fact that it is operating close to capacity: “instead of operating at 99% capacity, Heathrow should be operating at 80% (3).”

This Government deserves credit for recognizing that what is needed is a “better not bigger” Heathrow. It is taking important steps to try to ensure that the airport functions more smoothly. But, we would argue, that Ayling’s basic point remains: there will only be a step-change in the efficiency of Heathrow if the number of planes using it is reduced. In practice, this is not easy to do because of the EU’s reluctance to reform the process of buying and owning slots. However, given the gains that would accrue to business (as well as the environmental and quality of life benefits which we detail further on) from fewer flights using Heathrow, we suggest that the Department for Transport makes it a matter of priority to look at ways in which this can be done.

### **Slots**

For some years now the UK Government has favoured a policy of slot auctioning. It would have particular benefits for Heathrow. It would allow the overall number of slots to be reduced. This would cut the number of flights using the airport, thus improve the operational resilience of the airport. Slot auctioning could also raise money for the Government. Slot auctioning would also force the airlines to decide how much they needed a particular slot. It would eliminate the practice, seemingly all too-prevalent at present, of airlines operating certain flights, merely to retain their slots.

In practice, however, slot auctioning would be difficult. It would require EU agreement. No other countries are pressing for it. Without that pressure the European Commission will not initiate proposals. However, there are possible steps the UK Government could explore. It could possibly charge an annual fee for the continued use of slots at Heathrow. It could vary the charges according to the noise and emissions produced from aircraft using the slots. It could reduce slot charges if most seats in a plane were full. We would recommend that Department for Transport, as a matter of priority, carry out a short options study as to the possibilities that may be open to Government.

### **3. Alternatives to Flying**

**This section covers question 5.39 in the Scoping Document**

The Scoping Document rightly identifies rail and video-conferencing as potential alternatives to flying. We look at each in turn.

#### **a. Rail**

In 2006 HACAN produced a short report (5) which found that 100,000 flights a year – more than a fifth of the total using Heathrow – are to destinations where rail could provide a viable alternative. As the UK and European high-speed rail networks expand, this number will increase. All these flights will not of course be replaced by rail but it indicates the potential there is for a switch to rail. To maximise the potential, prices on rail would need to be compatible with air. This gives added weight to the argument that ways need to be explored of ending the tax subsidies enjoyed by aviation and, indeed, whether further tax-breaks could be given to rail travel.

There has been significant debate around the building of a second high-speed line (HS2) in the UK that would reduce journey times between London and major cities in the Midlands, the North and Scotland. HACAN supports the principle of a high-speed rail line on the condition it leads to a noticeable reduction in air travel. It is crucial, though, that the concerns of the local communities affected by it are central to any plan. If tunnelling is required to reduce the impact of the new line or the stations it serves, tunnels should be built.

If high-speed rail meant there were fewer short-haul flights using Heathrow, some of the slots could be used by new, inter-continental services from the fast-developing economies of the world but it would also provide an opportunity to take some slots out-of-service so as to reduce the number of flights using the airport to improve its efficiency and resilience.

#### **b. Video-Conferencing**

Whereas high-speed rail requires major new infrastructure and can only ever compete with short-haul flights, business travel can be avoided altogether by holding virtual meetings using video, audio or web conferencing over existing broadband infrastructure. As internet speeds increase, and both hardware and software evolve, the videoconferencing (VC) experience is improving all the time. In particular, so-called ‘telepresence’ – premium VC where

participants appear as life-size in a room configured like a normal meeting room – now offers a high-quality alternative to travel to many smaller meetings.

The financial benefits to companies that can reduce employee travel are very significant – as it saves not only on air fares but hotel costs and insurance; it also avoids the loss of working time while travelling, and can improve the work-life balance of employees who would otherwise spend many nights away from home.

Of course, not all business travel can be avoided in this way, and physical travel will still be necessary for larger and longer meetings, or for meeting clients for the first time. And it is sometimes argued that VC actually generates more travel by creating new business opportunities, and that this effect offsets any reduction. This might be the case if there is no imperative to reduce air travel, but where there are sound environmental or financial reasons to do so, VC is a crucial tool to maintain business connectivity while flying less.

New research published by WWF (6) suggests that, following the recession, businesses are making a permanent commitment to fly less. Nearly half of UK businesses said that they had cut business flights over the past two years and, of these, 85% said they don't intend to return to 'business as usual' flying. Nearly all companies which have reduced their flying say it's possible to stay profitable and competitive while flying less. Together, these findings suggest that future business flying will not return to pre-recessionary levels.

The key findings of the report were:

- 47% of companies have reduced the number of business flights they've taken in the past two years
- Of those companies which have cut their flying, 85% do not intend to return to 'business as usual' flying
- 86% of companies are either reducing their carbon footprint from business travel or intend to do so
- 63% of companies that responded now have a policy in place to reduce business flights, or are intending to develop one

The main benefits cited by UK businesses of changing travel practices were cost savings and reduced carbon emissions, but these were quickly followed by the ability to work during travel disruptions, having less staff away from the office and greater staff productivity.

The switch away from flying – which saw 87% of companies surveyed increasing the use of audio-conferencing, with video and web-conferencing use increased by 75% and 63% respectively – was reportedly driven from the top with businesses making board-level decisions to reduce business flights. Domestic and short-haul flights have proved easier to cut for businesses than long-haul flights, with improvements to the UK and European train networks resulting in a modal shift from planes to trains. The notion that people have to fly more to grow their business has been firmly grounded.

There are good reasons to have a proactive strategy to support video-conferencing:

- Business travellers subsidise leisure passengers in many airline price models. Reducing business air travel will therefore force leisure airfares to rise, restraining demand without the need for politically difficult tax rises.
- Maintaining strong virtual connections improves the resilience of British business to shocks such as the 2010 volcanic ash-cloud (when VC-enabled businesses suffered far less than competitors, and overall VC use increased dramatically) or any future oil price shock.
- Government itself can save significant time and taxpayers' money by substituting virtual meetings for air travel.

## 4. Tackling Noise at Heathrow

**This section covers questions 5.43, 5.44 and 5.46 in the Scoping Document**

We welcome the clear recognition in the Scoping Document that noise is a real problem: “aviation has significant local environmental impacts, especially on those living close to airports or under flight paths”. Equally welcome is the recognition that “there is a fairly broad consensus that night noise is the least acceptable impact of aircraft operations.” Perhaps for the first time noise is being given a central position in the development of aviation policy. This is important. HACAN particularly welcomes the retention of runway alternation at Heathrow which provides many residents with a half day’s break from the noise (though, with the flight paths close together over West London, there are residents who live between the runways who can hear aircraft all the time). It is critical that runway alternation is not “eaten into” with concessions to the airlines permitting planes to land on the “wrong” runway during busy periods.

Given this recognition of the noise problem, it is important that the Government does not miss the opportunity to deal with it as effectively as it could. There are signs from the Scoping Document that this may not happen.

**There needs to be a clear recognition it is the increase in *number* of flights that is causing the problem.** This is the common message coming from communities around both large airports like Heathrow and smaller ones like London City. The problem is particularly acute in the areas where aircraft noise had previously been negligible. There seems to be a ‘tipping point’ – different for each person – where a situation moves from tolerable to disturbing.

In the Scoping Document there is only the barest acknowledgement of this central problem, as part of a sentence in paragraph 4.9. The paragraph majors on the fact that “the number of people within the 57dBA contour around Heathrow has shrunk since the 1970s from two million to 245,000” - due to quieter planes and improved operational procedures – before adding “although we recognise that this has been accompanied by an increase in the frequency of flights.” This comes very close to covering up the noise problems faced by residents today.

**HACAN has produced or commissioned a number of reports which outline the current noise climate faced by residents. We outline the problems and indicate possible solutions.**

**a. The noise indicators used**

The traditional method of measuring noise does not accurately reflect the way people hear aircraft noise. Noise is averaged out over a 16 hour day; then averaged out over a year or part of a year. But it doesn't show what matters to people: the *actual* noise they hear as a plane passes over. Nor does it give enough weight to the *number* of planes passing overhead. Under the method used, four hours worth of noise from Boeing 757s at a rate of one every two minutes is the same as two minutes of one very loud Concorde followed by 3 hours 58 minutes of relief (7). Clearly, not the reality. It is why the statement in the Scoping Document – “the number of people within the 57dBA contour around Heathrow has shrunk since the 1970s from two million to 245,000” – is so irrelevant to the current situation.

There is another flaw in the way noise is measured. The UK has traditionally argued that aircraft noise only begins to disturb people when it averages out at 57 decibels – known as 57db Leq. The World Health Organisation disagrees. Its research shows that people start to get moderately annoyed when the noise averages out at 50 decibels, and severely annoyed at 55 decibels (8). A recent guide from the European Environment Agency backs this up (9). In its guidance the Agency specifically mentions that authorities should use up-to-date annoyance thresholds (which indicate that the public are more annoyed about aircraft noise now than they were in the pre-1990 studies which the UK still relies on).

When drawing up their Noise Action Plans all EU member states were required to use a method known as Lden. It still retains the concept of averaging but refines it so it is more meaningful. Authorities were required to take separate measurements for day (7am -7pm), known as L-day, for evening (7apm – 11pm), L-evening, and night (11pm – 7am), L night. In order to make the measurements correspondent more closely to how people hear noise, the authorities were required to add 5db on to L-evening and 10db on to their L-night figure. This is to reflect the lower background noise levels at these times. They then were required to combine L-day, L-evening and L-night to get L-den which should be the basis of the new contour. And it needed to be a 55 decibel Lden contour rather than a 57 decibel one. **The difference between the number of people affected at Heathrow by the traditional 57Leq contour (245,000) and the 55Lden contour (over 700,000) was startling. The latter much more closely reflects the reality on the ground.**

The difference should have acted as a wake-up call to the previous Government that it was formulating noise policy on something approaching a fact-free basis. It didn't. The previous Government did, though, commission the ANASE Study. Somewhat controversially, it rejected the study at the last minute, alleging some methodological flaws. ANASE had re-enforced the Lden finding (and people's experiences) that relying on the 57Leq to measure noise was not capturing the full reality of the situation. And that it was the number of planes rather than the noise of each plane that was causing the big problem.

The current Government, therefore, inherited an aviation noise policy based on a study published nearly 30 years ago in the 1980s when flight numbers were a fraction of what they are today. Its new aviation policy is a chance to review the way noise is measured and to, where necessary, update and change it to meet the realities of today. That may or may not require a new ANASE-type study but it does require noise policy to be based on the most up-to-date research and data which exists rather than a 30 year-old study.

**HACAN has worked with BAA to develop more meaningful noise indicators. This work will be forwarded separately in a few weeks. It recognises that an 'averaging out' method needs to be retained as it is in common usage internationally but proposes supplementary measures are introduced to make noise measurements more meaningful, understandable and transparent.**

#### **b. Capturing the spread of the noise**

The most notable feature of the last 15 or so years has been the way the problem of aircraft noise has spread to areas many miles from Heathrow. The basic change occurred in 1995/96 when, in order to cope with the volume of aircraft using the airport, the centre-line where aircraft landing at Heathrow begin to join their final approach path was effectively extended (without consultation or compensation). At a stroke, the noise climate changed for hundreds of thousands of people.

This is what people said at the time:

*"It was as if someone somewhere had flicked a switch.....suddenly the occasional drone of a plane became a remorseless whine as they ploughed over our rooftops every 90 seconds. It was like an aerial motorway, open from early morning until at least mid-evening."*

*"We have inadvertently become the new neighbours of Heathrow"*

A major report HACAN commissioned from the respected consultants Bureau Vertitas, published in 2007, found that in places over 15 kilometres from Heathrow “aircraft noise dominated the local environment.” It talked about “an almost constant background of aircraft noise” in Kennington Park, close to the Oval Cricket Ground. The report is summarized at <http://www.hacan.org.uk/resources/reports/hacan.flight.paths.study.pdf>

**b(1). Capturing the concentration of the noise**

In recent years a new factor has worsened the noise climate still further for many of these communities some distance from Heathrow. The flight paths appear to have become more concentrated along particular corridors. The result is that some communities can experience as many as 40 planes an hour, without the break that runway alternation affords many residents closer to the airport. There is considerable evidence that constant noise of this sort impacts on peoples’ health (8). These two links to short reports produced by HACAN illustrate the extent of the problem:

<http://www.hacan.org.uk/resources/briefings/hacan.briefing.no.longer.wl.problem.pdf>

<http://www.hacan.org.uk/resources/reports/flight.paths.residents.experiences.pdf>

Concentration has also become a problem for communities under the take-off flight paths. The Noise Preferential Routes (NPRs) have been in existence for many years but it is only in recent years that aircraft have increasingly adhered to the centre-line of the NPRs. This is of course what they should do but few residents are aware of that. What is best practice for the industry has created a real problem for many communities.

HACAN has been in discussion with BAA and the Civil Aviation Authority to look at practical ways in which to bring some relief and predictability to residents by reducing the concentration. At present it is Government policy to concentrate flights wherever possible. That may be appropriate for some airports. At Heathrow it is creating noise ghettos where tens of thousands of people live, including some of the most densely populated and deprived wards in the country. We believe the Government should move away from concentration as a blanket policy and allow individual airports more flexibility.

**We have been working with BAA, BA and NATS to explore ways in which relief can be given to residents living under a fairly constant stream of aircraft. This work will be forwarded separately in a few weeks. The work will feature trials of how less concentration of flights within the NPRs could work as well as what practical measures might be available to ease the burden for people most affected by landing aircraft.**

### **c. Noise Envelope**

We are concerned about the idea of a ‘noise envelope’. It has been a useful idea to float as an attempt to only permit growth within agreed noise limits. We have, though, deep concerns about it. At Heathrow it is much better to stick with a cap on the number of flights. It more directly addresses the big problem for residents: the sheer volume of planes using the airport. It is simple to understand, implement and enforce and avoids the complex and controversial issue of how noise is measured. A noise envelope would have none of these features unless the noise limit it used was a cap on the number of flights.

### **d. The need to tackle helicopters**

Helicopter noise can be a major problem for many residents in London and the Home Counties, particularly those living under helicopter routes. The previous Government ignored the problem. The new aviation policy is an opportunity to remedy this. While we recognise that some control of helicopters will take place at a local level, we feel it is only the national government which has the powers to set an overall framework for helicopter operations. On any criteria it is difficult to justify the number of helicopters currently flying over London and the Home Counties. The investigation into helicopters carried out by the London Assembly in 2007 found that the majority of helicopters were being operated not by the emergency services but by private firms for leisure, business or advertising purposes. There is no evidence that the economy of London or the South East requires these helicopters. It would be a popular move (since most people do not use them) to cut the number of helicopters in the skies either through the introduction of some fiscal measures or even prohibiting them altogether. Emergency services would of course be exempt from all such measures. The practice of concentrating the helicopters on designated flight paths also needs to be examined.

### **e. Night Flights**

We will say more about night flights in response to the consultation due in Spring 2012. We are pressing for a ban on flights before 6am and a progressive reduction between 6am and 7am within a given timeframe. There are considerable health arguments to cut noise at night (11). We also argue that the economic benefits of night flights at Heathrow have been overstated. A report we published showed that banning night flights at Heathrow before 6am would actually *save* money because the reduction in costs of noise and health would exceed the benefits they bring to the wider economy (12).

### **f. The wider impact of Heathrow on other flight paths**

The number of aircraft using Heathrow has a knock-on effect on the flying patterns of planes using a number of other airports and airfields in the South East. City Airport is probably the

best example of this. The planes taking off from the airport are prevented from climbing as rapidly as they could because of the Heathrow planes overhead. It means, of course, that the noise for residents is worse than it otherwise would be. But London is surrounded by a large number of airports and airfields – Biggin Hill, Redhill, Farnborough, for example – whose flight patterns are likely to be affected by the spread of Heathrow aircraft.

## **Air Pollution**

**This section covers questions 4.19 and 4.22 in the Scoping Document**

Air Pollution continues to be a problem in the areas around Heathrow. It is caused by both the aircraft and the road traffic. If, as expected, the number of passengers using Heathrow rises (without the number of flights exceeding the current 480,000 limit), this will put more pressure on the air pollution limits unless there is a noticeable increase in the number of passengers using public transport.

## **Consultation Committees**

Across the country the set-up and performance of consultative committees varies a great deal. Some, such as the Heathrow one, perform a useful role. Others, such as the City Airport one, are too dominated by the airport and seem to hinder rather than encourage open debate and the free flow of information. But even the better ones tend to be unwieldy, with a remit that may be too wide. A good consultative committee can do certain things well: provide information; hold the airport to account; enable an exchange of views. It is less realistic to expect consultative committees, given the diverse range of their membership, to agree on bigger policy issues. The question therefore needs to be asked whether they should have a tighter, more realistic framework to enable them to do better the things that the good consultative committees already do well. Government also needs to look at replacing the guidelines which currently exist on how consultative committees should operate with something more mandatory to ensure the failing consultative committees are brought up to standard.

## **5. Climate Change**

**This section covers questions 5.30 and 5.31 in the Scoping Document**

HACAN welcomes the clear recognition of the importance of climate change in the Scoping Document which admits that aviation is likely to make up “an increasingly large proportion” of global emissions as other sectors decarbonise. The Scoping Document argues “the most effective way of reducing the aviation’s sector’s climate impacts is through concerted action at international level.” It also looks to cut CO<sub>2</sub> emissions through increased fuel efficiency, improved airspace management and, with some (very welcome) reservations, the uptake of biofuels. Nevertheless, we are concerned that, in its response to the Committee on Climate Change, the Government, is looking to mandating a given percentage of aviation fuel to come from ‘sustainable’ biofuels every year, possibly rising over time to 20% by 2050. If the problems associated with biofuels - their real and potential impact of on biodiversity, forests, farmland and scrubland, particularly in the Global South; the uncertainty around the extent they will reduce CO<sub>2</sub> emissions – cannot be overcome, then there is a danger that the aviation industry will have the means to continue to grow at the expense of people and the planet.

HACAN notes the Committee on Climate Change’s recommendation in its report to the previous Administration that Government must now plan to limit demand, either through economic measures or the planning system, to a 60% increase in passengers - or a 55 % increase in air transport movements (ATMs) - if it is to meet its climate targets. (The Committee was assuming a very large – and possibly, unrealistic – reduction in emissions from other sectors of the economy). The Government in its response to the Committee broadly endorsed this approach. In particular – and this is welcome – it said there will be no new runways in the UK and only incremental expansion to some existing terminals this side of 2050. It forecast that passenger numbers (currently 2011 billion) would grow to between 380 – 515 billion by 2050, that is between 1.5 – 2.3% growth, less than the growth of the past decade but still noticeable. The Committee’s remit was only to consider the impact on climate change. The Government will need to consider whether the sort of expansion the Committee suggested was possible to keep within climate targets – and its broad endorsement of it - is compatible with improving the noise climate. Our belief is that it is not.

## **6. Heathrow Conclusion and a Proposal**

**This section covers questions 5.24 and 5.26 in the Scoping Document**

The ultimate solution is for Heathrow to operate at 80% capacity rather than 99%. It would be good for business, the environment and local residents:

Bob Ayling, the former chief executive of British Airways, has consistently argued that the big disincentive to business people using Heathrow is not the number of destinations it serves but the delays at the airport. He puts this down to the fact that it is operating close to capacity: “instead of operating at 99% capacity, Heathrow should be operating at 80% (3).” He says that Heathrow should concentrate on direct flights as “a sensible approach and a good basis for planning the future of Heathrow, leaving Paris and Amsterdam to invest in the costly capital assets of a hub.”

If Heathrow operated at 80% capacity, it could cap aircraft numbers at 384,000 a year, below the number using the airport in the mid-1990s. For communities many miles from the airport aircraft noise would no longer be a problem as the extended flight paths would no longer be required. For people closer to the airport, the reduction in the number of planes would be noticeable.

For some time our view has been that the balance was about right in the early 1990s: the particularly noisy planes had been or were being phased out but the number of planes had not increased sufficiently to cancel out those gains. The balance between the economic importance of Heathrow and the needs of the local community was about right.

It would be possible to reduce the number of flights using Heathrow with investment in fast, affordable rail services, a strategy to, year-on-year, cut the tax-breaks the aviation industry receives and a reduction in the number of slots available at Heathrow. It would be ambitious, but achievable. It would ensure that Heathrow became a more efficient airport, better able to serve the needs of business; an airport which made an important contribution to meeting the Government’s CO<sub>2</sub> target; and an airport whose impact on residents across London and the Home Counties was cut to much more acceptable levels.

## 7. The Impact of London City Airport

The growth of London City Airport has produced real problems for many residents. The situation has been exacerbated by the detours over London aircraft using Heathrow are now making. The combination of City and Heathrow aircraft can result in noise levels in parts of East London being as high as those in West London. The Bureau Veritas Report HACAN commissioned found:

*In Poplar in East London it recorded 84 planes flying over in a two hour period, 45 Heathrow and 26 City Airport. The noise level of the Heathrow aircraft ranged from 60 – 69 decibels and the City aircraft from 64 – 82 decibels.*

<http://www.hacan.org.uk/resources/reports/hacan.flight.paths.study.pdf>.

It can also mean that on days when a gentle east wind is blowing places like Vauxhall in South East London can get over 50 planes an hour.

The increase in the number of jet aircraft (replacing the quieter turbo-propellers) using City has created two particular problems: noise levels for residents have increased and flight paths have had to be extended over new areas as jets require wider turning arcs than turbo-jets when taking off. This has brought disturbing levels of aircraft noise to many new areas, including places many miles from City Airport. This has included areas in Tower Hamlets, Waltham Forest, Redbridge and Havering. Measures to ease these noise problems need to be examined.

City Airport caters for the highest number of business trips (62%) on scheduled flights of any airport in the country. Most of these are short-haul. Potentially many of these could switch to a fast, affordable rail service. City brings little economic benefit to the local community. The number of local jobs it creates is small. Moreover, it blights huge swathes of land that, in the absence of the airport, is likely to have important development potential given its situation adjacent to the Thames, close to Stratford International and CrossRail. The argument that City Airport may be holding back the economic development of East London should at least be explored. It is by no means certain the closure of City would result in an overall disbenefit to the London economy. It would certainly improve the quality of life of many people, many of whom live in some of the poorest boroughs in the UK and for whom moving away is not a realistic option.

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