



## **Transport for London Consultation on the Criteria for New Aviation Capacity – Response from H&F Council**

### **1. Introduction**

- 1.1 H&F Council welcomes the opportunity to respond to the TfL consultation on new aviation capacity criteria for the capital. As a West London local authority we have significant social, economic and environmental interests in the future capacity of London's airspace and the means by which additional capacity might be delivered.
- 1.2 This response addresses the six criteria that are subject to the online consultation questions.

### **2. H&F response to consultation questions**

#### ***Economic criteria***

- 2.1 We consider that economic criteria are important in assessing aviation capacity and we agree that the proposed criteria would meet the requirement to maximise economic and social benefits. We further agree with the proposed metrics and do not believe that any further criteria are necessary.

#### ***Airport infrastructure criteria***

- 2.2 We consider that airport infrastructure criteria are important in assessing aviation capacity but we have concerns as to the selection of 2C. Night operations without stringent restrictions are not appropriate in areas of high density populations, such as West London. As such, we recommend that criteria 2C is amended to read "Enables night operations without *causing adverse community impacts*" and that an additional metric is added that measures the population affected by night flights.

#### ***Airspace criteria***

- 2.3 We consider that airspace criteria are important in assessing aviation capacity and we agree that the proposed criteria would meet the requirement to support the effective and safe operation of the airspace. We further agree with the proposed metrics and do not believe that any further criteria are necessary.

***Surface access criteria***

- 2.4 We consider that surface access criteria are important in assessing aviation capacity and we agree that the proposed criteria would enable passenger, staff and freight access from an optimal catchment area whilst being underpinned by a sustainable mode share. However, we believe that another criterion should be added, “good bus and coach access and, for more locally based staff and passengers, walking and cycling access”.

***Environmental criteria***

- 2.5 We consider that environmental criteria are very important in assessing aviation capacity. We believe that specific reference is made to the Government’s Noise Policy for England under criterion 5B. The criterion could mirror the wording of the climate change commitment proposed in 5A, i.e. that this criterion be amended to read: “Compatible with the Government’s Noise Policy for England commitments”. The corresponding Target/Metrics column should also include the following metric: “Able to avoid significant adverse impacts and minimise adverse impacts on health and quality of life”.

***Deliverability criteria***

- 2.6 We consider that deliverability criteria are important in assessing aviation capacity and we agree that the proposed criteria would demonstrate the capability of being delivered and funded, whilst representing value for money. We think that the metric for criterion 6C, however, should make specific reference to taking account of the costs of environmental impacts as set out in criteria 5A to 5E in relation to commercial viability.

**3. Further comment**

- 3.1 H&F Council wishes to reiterate its position on addressing the issue of aviation capacity in London and the South East. It is right that this issue is looked at but expansion at Heathrow is the wrong answer. A ‘pint-sized’ third runway that could not take laden 747s or A380 Airbuses would not trigger economic growth nor adequately increase the capital’s air capacity. It is this Council’s view that an entirely new airport with four runways east of London is likely to be the long term solution to Britain’s hub airport problem.