

Our Ref: (S)971
21st October 2013

Airports Commission
Sanctuary Buildings
20 Great Smith Street
London
SW1P 3BT

Dear Sir,

IET response to aviation capacity in the UK: emerging thinking

The IET is pleased to respond to the 7 October 2013 speech by Sir Howard Davies, Chair of the Airports Commission setting out the Airport Commission's emerging thinking on airport capacity in the UK, which sets out the counter-arguments against airport expansion in the south-east, namely:

- There will not be sufficient growth in demand to justify further expansion;
- The market will be able to accommodate expected demand growth by using existing spare runway capacity;
- Continuing growth in aviation would not be consistent with the achievement of the UK's statutory climate change targets;
- The government should manage demand growth by supporting the use of airports outside the south east of England.

This response has been compiled on behalf of the IET Board of Trustees by the IET's Transport Policy Panel.

If the IET can be of any further assistance please do not hesitate to contact me.

Yours faithfully,



Paul Davies
Head of Policy
The Institution of Engineering and Technology
Email pdavies@theiet.org Telephone: 01438 765687

To take each of the arguments in turn, the IET offers the following comment and suggested areas for further investigation:

There will not be sufficient growth in demand to justify further expansion

The report clearly demonstrates that whilst air transport growth predictions, like economic growth predictions have been overly-optimistic due to the indexation used by DfT, the predicted trend remains upward. The IET supports the suggestion that doing nothing to address the capacity constraints in our current airport system would not be the right approach. To build upon the argument that the likely effect would be to restrict passengers' choices and it could have unintended consequences for the efficiency and resilience of UK airports, the reality is now that poor customer experience during bad weather due to over-scheduling of already busy airports happens today even before the anticipated growth demand arrives. More could be made of the current shortcomings in resilience to further build upon the argument for improved capacity at the largest airports.

The market will be able to accommodate expected demand growth by using existing spare runway capacity

The IET also welcomes the market analysis including the propensity to fly for residents in the Greater London area as proof that the south-east is where the investment and returns will be made, although to ensure access to the wider UK population, domestic interconnecting flights will be required to ensure that the causation and correlation linked to trade between nations is cascaded to the UK regions. The arguments that regional airports can take up the slack by using Middle-Eastern hubs to connect to the Asia-Pacific region is valid however, this is not going to be consistent with the objectives of carbon-emission reduction if the door-to-door passenger journey is considered as a whole.

Continuing growth in aviation would not be consistent with the achievement of the UK's statutory climate change targets

Optimising the impact of emissions caused by the air-transport industry must tip the balance towards where carbon emissions are essential (powering the aircraft), and the impacts of the surface access contribution to the equation minimised. The topic of surface access is explored rightly and makes a joined-up connection to the HS2, though any benefit for the south and south-west for accessing London's major airports where the recommendation for capacity looks set to be made does leave a gap for further analysis.

The IET would welcome investigation on where journeys can be switched from road to rail and the impact that would have for the emissions savings that could be made toward the end-to-end aviation climate impact. Can tolls or other road-charging frameworks, or subsidised public transport encourage greater use of the most efficient surface access mode, not just for passengers but airport workers also? The system as a whole from a passenger and ancillary services perspective must be considered rather than isolating the calculations on emissions impact to the flight itself.

The government should manage demand growth by supporting the use of airports outside the south east of England.

The IET welcomes the early analysis has suggested that even with a significant differential of APD between regional airports, the effects would not necessarily be substantial, and there could be perverse consequences. The distribution of demand to some destinations across a number of airports could see a higher number of smaller flights being needed to achieve the same degree of national connectivity, and would run counter to the emission reduction targets.

It should be noted that an HS2 link to Birmingham Airport would provide additional aviation capacity for the South East. Birmingham Airport would then be about 40 minutes away from Euston whereas Stansted Airport is currently 47 minutes from Liverpool Street. Also HS2 might

reduce the requirements for internal UK flights, releasing capacity for medium and long haul flights.

Conclusion

As a holding statement to prove that all avenues are being fully explored and recognising that doing nothing is not an option, the speech delivers on those fronts. The IET awaits with interest the interim report to see whether the operational improvements the commission outlined include any of the responses to the Draft Aviation Policy Framework, in particular, Airport Collaborative Decision Making. This has the potential to deliver marginal improvements by encouraging all partners to work transparently by sharing information to reduce wasted capacity and improve resilience, but this will not be a transformational improvement:

“In our interim report we will look carefully at the possibility of operational improvements which may deliver some modest additional capacity – although that will have to be balanced against the desirability of improving resilience at our most congested airports.”

The most contentious issue of aircraft noise is left out of this statement, and the IET Transport Policy Panel will respond to further consultation in this area.