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Mr John Holland-Kaye

Chief Executive,

Heathrow Airport Limited

Sent via email to expansion.feedback@heathrowconsultation.com

27 March 2018

Dear Mr Holland-Kaye

South East England Councils response to Heathrow Airport Expansion consultation

1. Introduction and Summary

- 1.1 We respond on behalf of South East England Councils (SEEC). SEEC is the cross-tier voice of local authorities in the South East, representing 9.1 million residents. We are a voluntary membership body, bringing together county, unitary and district councils to promote the views and interests of all tiers of local government across the South East, an area comprising 74 local authorities.
- 1.2 The South East has a proven track record as the engine room of the UK economy, but recent economic evidence shows this cannot be taken for granted. **The potential to further increase the South East's global competitiveness via airport expansion is therefore an area of significant interest to SEEC, although member opinion remains divided on the merits of expansion at Heathrow or Gatwick. Importantly however, SEEC members are clear that this potential to create new jobs and economic opportunities must not be gained at the expense of increased congestion, greater noise or air pollution and reduced quality of life for South East residents.**
- 1.3 Although there is broad support for the principle of increasing the South East's total aviation capacity, SEEC members are clear that expansion must be supported by a comprehensive programme of private and Government-funded infrastructure investment to avoid damage to the South East's economic profitability or to residents' quality of life. As neighbours to the airport, the risks of more traffic congestion, more pollution and greater pressure on local services – during and after construction of any expansion at Heathrow – are major concerns to South East local authorities, their residents and businesses. These must be addressed more fully in Heathrow's expansion proposals.
- 1.4 Our response to your consultation highlights the importance and challenges of ensuring Heathrow's proposals support South East economic success for the benefit of the whole UK and include a comprehensive mitigation package for potential adverse local impacts. **We focus on three key issues where Heathrow's proposals need to take a more proactive approach to mitigating potentially negative impacts:**
 - **Clearer and more comprehensive proposals for transport investment, including much-improved road and rail surface access and routes for non-airport traffic.**
 - **Clear performance targets for noise and air pollution, to be independently enforced. These are essential to ensure environmental impacts are minimised for communities impacted by an expanded airport, locally and over a wider area under flight-paths.**
 - **Proposals for how Heathrow will work with the public sector to secure the non-transport infrastructure that will be needed to support local communities – for example funding for the schools, health, waste and other public services required by new residents moving into the South East to work at an expanded airport.**Individual member councils will also respond reflecting their specific views.

2. Response to consultation:

Context - challenges for sustaining a successful South East economy

- 2.1 **There is broad SEEC support for expanding South East England's airport capacity to help maintain South East and UK global economic competitiveness and help create new jobs, although member opinion remains divided on the merits of expansion at Heathrow or Gatwick. It is, however, vital that any expansion is supported by significant private sector and national Government investment in better infrastructure to make sure that increased traffic congestion, pollution and poor services do not undermine economic growth prospects. We believe your proposals need to address these issues more specifically.**
- 2.2 The South East has a highly successful economy and has been globally competitive for many years, but new evidence shows this must not be taken for granted:
- i. **The South East has traditionally generated the highest net profits for the Treasury, bringing significant national benefits as these 'profits' are used by Government to support investment in infrastructure and regeneration elsewhere in the UK. However, new data for SEEC shows South East profitability falling behind other areas, reinforcing SEEC member concerns that inadequate infrastructure funding is holding back our economic potential.** While the South East contributed the highest net financial surplus to Treasury of £154.4bn from 2000/01 to 2015/16, our net returns were £21.6bn lower than London over the last 3 years. This means the South East economy is failing to deliver its full potential to help Treasury fund infrastructure and public services UK-wide.
 - ii. **The South East is a global air, sea and rail gateway for businesses and travellers from cities and other areas UK-wide, but routes are ever-more congested.** Also, as we focus on securing the best possible future for Britain outside the European Union, it is critical to ensure the South East can compete internationally for foreign investment. Incoming businesses need to see better road and rail links to key gateways, including Heathrow, that enhance the South East's excellent strategic location, or they will choose to locate in competitor countries.
 - iii. **However, if (i) and (ii) above are to be achieved, there is a critical need to tackle the estimated South East infrastructure funding gap of £15.4bn by 2030.** If not urgently addressed, this will undermine future long-term national economic success and the South East's ability to facilitate further housing and economic growth. For Heathrow, inadequate infrastructure would mean poor transport connections to an expanded airport and much needed homes for airport and supply chain staff would not be built as sites would not be accessible or serviced.
- 2.3 As your consultation acknowledges, Heathrow's benefits do not end at the airport boundary – but neither do the potentially negative impacts. Addressing the challenges is vitally important to South East residents and businesses. They want to see positive action to tackle the problems they face every day such as transport congestion, pollution and overstretched infrastructure and utilities, to support a strong, sustainable economy and the homes we need. **We focus on three key issues, below, where Heathrow's proposals need to take a more comprehensive and proactive approach to mitigating potentially negative impacts, and to ensure there is full benefit from any Heathrow expansion for local communities as well as the national economy.**
- Roads and public transport surface access (Consultation sections 2.4-2.6 & 4.3)**
- 2.4 **SEEC members believe Heathrow Airport Limited needs to set out clearer and more comprehensive proposals for transport investment, including much-improved road and rail surface access and routes for non-airport traffic.**
- 2.5 A step change in investment is required to reduce transport congestion and the negative impacts this has on the South East economy, businesses, residents and air quality. Local authorities and LEPs have limited funds for transport investment and should not be expected to cover the costs of improvements/ mitigation measures required as a result of aviation expansion. **All pre-negotiated mitigation works, including upgrading local road and rail networks, should be forward-funded by the airport operator, or through the airport**

operator securing national Government funding, given the expectation of national benefits from expansion.

- 2.6 **Whilst road improvements are an important key focus of the consultation, Heathrow's proposals should also give much more proactive priority to surface access by public transport – in particular rail. This can help mitigate the impact of increased passenger and freight trips to an expanded airport – and should include actions to ensure rail transport access improves from across the South East, not just from London.** We are concerned that whilst roads feature up-front in the consultation, rail transport is given less prominence in the 'surface access' section towards the end. Rail should be given at least equal priority as the road proposals. Such an approach is needed to resolve current major gaps in public transport. At present there is little take up of public transport access from parts of Hampshire and Kent as journeys to Heathrow from these areas can take longer than travelling to Heathrow from Sheffield or the Wirral. Heathrow should work with councils in the South East to identify priorities and effective solutions.
- 2.7 **SEEC members are also clear that the final decision on an extra runway should not be used as an excuse to delay investment in surface access improvements to Heathrow that are already developed and are needed immediately.** For example, the two projects below should be progressed as essential immediate needs, rather than desirable future requirements (and your case for a third runway even-further strengthens the need to get these investments underway):
- The case for investment in the Western Rail Link to Heathrow is based on the needs of the current two runway airport. This was endorsed by the Airports Commission, so SEEC urges the Airport to work with local and central government to consider how the commitment to this scheme can be brought forward as soon as possible and not solely linked to further runway expansion.
 - Similarly there is a current need for improved Southern Rail (SRA) access to Heathrow. Again this was recommended by the Airports Commission, has been taken up by Network Rail and should not be dependent on delivery of a third runway. SRA is vital to improve public transport access from key population centres in Surrey and Hampshire before any airport expansion. SRA also has potential to provide through-services to link to Crossrail and Paddington.
- 2.8 **There is also a need to look more widely at transport investment needs beyond the immediate vicinity of the airport.** A fully integrated, wider strategic transport network is needed to ensure that non-airport 'through' traffic has access to viable alternative routes to avoid adding to congestion around an expanded airport. This is particularly important given your proposals, which would impact on the M25 and surrounding roads.
- 2.9 Heathrow also needs to set out how it will ensure the impacts of proposed major repositioning works on key 'through' routes around and near to the airport – including M25, A4, A3044 - will not create further congestion and delays for South East businesses, residents and workers during potentially lengthy construction.

Environmental protection (Consultation sections 4.2 & 4.4)

- 2.10 **SEEC members want to see Heathrow Airport Limited provide a stronger package of environmental protection measures. These include:**
- **Working with councils in the South East across a wide surrounding area when assessing the reach of harmful airport impacts, including air pollution, noise pollution and transport congestion.**
 - **Alternative mitigation factors that will be needed if assumed advances in technology (eg. vehicle emissions) are delayed or do not happen.**
- 2.11 Responding to last year's Airports National Policy Statement, SEEC emphasised to Government the importance of effective monitoring and enforcement of environmental impacts, to deliver public confidence and reassurance. To help address South East concerns about negative environmental impacts of expansion, Heathrow Airport Limited should ensure it makes clear proposals to mitigate potential adverse effects on air quality,

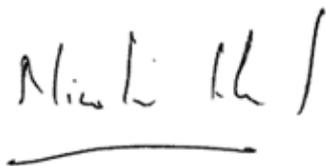
noise and carbon emissions. SEEC has called on Government to ensure targets for reducing noise and pollution are backed up by penalties for failure to meet the targets.

Community Infrastructure

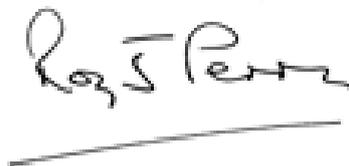
- 2.12 **Currently absent from the consultation, Heathrow Airport Limited should also set out how it will work with the public sector to ensure effective planning and delivery for community infrastructure needs. This includes schools, health, utilities and local services - such as waste and leisure - that will be required by new airport and supply chain employees and their families moving into the South East to work at an expanded airport.**
- 2.13 Urgent consideration needs to be given to quantifying the increase in services and infrastructure that will be required, and a forward-funding plan is needed to ensure they can be delivered in advance of the demand arising. South East local authorities would welcome the opportunity to work with Government and Heathrow Airport Limited to help develop plans to meet these wider community needs and discuss how best they can be funded.

We look forward to continued engagement with you on these important issues.

Yours sincerely



Cllr Nicolas Heslop
Chairman, South East England Councils
Leader, Tonbridge & Malling Borough Council



Cllr Roy Perry
Deputy Chairman, South East England Councils
Leader, Hampshire County Council