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South East England Councils' consultation response Draft Airports Policy Statement: new runway capacity and infrastructure at airports in the South East of England

1. Introduction

- 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 some 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. The potential to further increase the South East's global competitiveness via airport expansion is therefore an area of significant interest to SEEC. 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 To avoid increasing the problems of more traffic, more pollution and greater pressure on local services the Government needs to ensure that the Airports Policy Statement (APS) takes a much broader approach to mitigating negative impacts. For example, it should:
 - Take a wider approach to transport investment and look at how much-improved surface access and alternative routes for non-airport traffic can form part of a more strategic investment plan
 - Take a more comprehensive view of 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
 - Set out more clearly performance targets for noise, air pollution and public transport access, how these will be measured and the penalties for exceeding targets. These steps are essential to ensure environmental impacts are minimised for communities living close to an expanded airport.
- 1.4 We would be pleased to discuss points from the submission below with ministers or officials further, if that would be helpful.

2. Consultation questions

Need for additional airport capacity

Q1: The Government believes there is the need for additional airport capacity in the South East of England by 2030. Please tell us your views.

- 2.1 **There is broad SEEC support for expanding airport capacity to help maintain South East and UK global economic competitiveness and help create new jobs. However, it will be important that expansion is supported by significant national investment in better infrastructure to make sure that increased traffic congestion and poor services do not undermine economic growth prospects.**
- 2.2 There is also support for creating this new capacity in the South East, given the strength of the South East economy and its importance to the national Exchequer. An additional runway offers potential for the South East to capitalise further on existing strengths to deliver for UK PLC. The South East has a proven economic track record and acts as the engine room of the UK economy. In 2015 the South East economy generated £249bn in Gross Value Added – a sum larger than the combined total of £169bn from England's 8 Core Cities and larger than the combined total of £183bn from Scotland and Wales. The South East also offers an excellent

return on public investment, contributing a net 'profit' of £80bn to the Exchequer over the 10 years 2002-12 – the largest in the UK and higher than London's net contribution.

- 2.3 Although there is broad support for increasing aviation capacity in the South East, SEEC members are clear that expansion must be supported by a comprehensive programme of nationally-funded infrastructure and service investment to avoid damage to the South East's economic profitability or to residents' quality of life. This investment will be required to maintain the South East's economic success and therefore its ability to help fund the Exchequer's ability to spend nationwide.
- 2.4 Underinvestment in supporting infrastructure and services must be avoided to make sure the economic value of airport expansion is fully realised. A failure to invest adequately in reducing congestion, pollution and pressure on essential services will undermine the attractiveness of the South East as a location for business and may result in companies choosing to locate in competitor countries rather than in the UK.

The Government's preferred option: Heathrow Northwest Runway

Q2: Please give us your views on how best to address the issue of airport capacity in the South East of England by 2030. This could be through the Heathrow Northwest Runway Scheme, the Gatwick Second Runway scheme, the Heathrow Extended Northern Runway scheme or any other scheme.

- 2.5 SEEC member opinion remains divided on the merits of expansion at Heathrow or Gatwick.

Impacts and requirements

Q4: The government has set out its approach to surface access for a Heathrow Northwest Runway scheme. Please tell us your views.

- 2.6 **SEEC members believe the APS needs to take a wider perspective on transport to support an additional runway. This should include more ambitious targets for public transport surface access and setting airport expansion needs in a wider, fully integrated strategic transport investment programme.**
- 2.7 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. An additional runway will have national benefits, so supporting transport schemes should be funded nationally rather than locally. All pre-negotiated mitigation works, including up-grading local road and rail networks, should be forward funded by Government or by the airport operator.
- 2.8 The APS should set higher targets for surface access by public transport to help mitigate the impact of increased passenger and freight trips to an expanded airport. For example, raising Heathrow's target for passenger public transport access by just 5% between 2030 and 2040 will not make significant inroads into reducing car travel. Penalties for failure to meet targets should also be considered. Targets for public transport access should be set for major geographical areas within the airport's catchment. This will help ensure public transport access improves from across the South East, not just from London. 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.
- 2.9. 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 categorised in the APS as essential immediate needs, rather than desirable future requirements:
 - 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 Ministers to consider how the commitment to this scheme can be brought forward as soon as possible and not 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.

- 2.10 There is also a need to look more widely at transport investment needs beyond the immediate vicinity of an airport. A fully integrated, wider strategic transport network is needed to ensure that non-airport traffic has access to viable alternative routes to avoid adding to congestion around airports. This should include investment in better transport links to other South East global gateways, such as Dover, Portsmouth and Southampton. Routes to these gateways are used by businesses, freight and travellers UK-wide and developing a strategic package of investment – for example improving alternatives to the M25 – would help avoid non-airport traffic being delayed by congestion around airports. SEEC has developed a package of strategic road and rail proposals that would provide alternative routes for travellers and long haul freight. The SEEC programme, set out in our [Missing Links](#) document, calls for improvements to the following routes with national benefits that would give better access to the South East's global gateways and relieve congestion on existing overcrowded roads such as the M25:
- A34/M3 and rail links to Southampton-Portsmouth from Oxford, West Midlands and beyond.
 - A2/M2 – links to the Channel Tunnel & Dover from London, the East, the Midlands and beyond.
 - A27/M27/A259 – a whole-route programme extending from Dover to Southampton-Portsmouth, through developing coastal economies.
 - Oxford to Cambridge, including improved A34/M40 link.
 - North Downs Rail – from Oxford, through Reading and Gatwick Airport to Ashford in Kent.
- 2.11 Government should also use the APS to allocate resources to a co-ordinating function to integrate delivery of a number of major national transport schemes that will impact on the South East. Minimising and phasing the impact of construction will be important to mitigate the effects of noise and congestion on local communities, for example from delivery of HS2, runway construction, Crossrail and planned M25 upgrades. Government support would also be welcome to help ensure an adequate supply of construction skills to deliver all these major infrastructure projects.
- Q5: The draft Airports National Policy Statement sets out a package of supporting measures to mitigate negative impacts of a Heathrow Northwest Runway scheme. Please tell us your views. Are there any other supporting measures that should be set out?*
- 2.12 **SEEC members want to see the APS package of environmental protection measures strengthened in several areas.** These include:
- The importance of considering a wider surrounding area when assessing the reach of harmful airport impacts. The APS should clarify the definition of the airport boundary and extend the area for assessment of air pollution, noise pollution and transport congestion.
 - The importance of considering alternative mitigation factors that will be needed if assumed advances in technology (eg vehicle emissions) are delayed or do not happen.
 - More explicit measures to ensure protected National Parks, AONB and Green Belt are not irrevocably damaged by airport expansion. This will need to be co-ordinated with any policy changes following consultation on the Spring 2017 housing white paper.
- 2.13 **Critically important in delivering public confidence and reassurance will be effective monitoring and enforcement.** While Government has said 'Heathrow Airport should be held to performance targets' for public transport use, this idea needs to be developed further. The APS also describes how an applicant can make proposals to mitigate potential adverse effects on air quality, noise and carbon emissions but needs to go further. Targets for reducing noise and pollution should be backed up by penalties for failure to meet the targets. The APS should also set out the need for introducing incentives to encourage airlines to adopt innovations that make flights quieter and cleaner.
- 2.14 A lead authority should be identified to take on the monitoring and enforcement role. This could be a single local authority or group of local authorities and the function will need to be properly resourced through the Heathrow Expansion Agreements. Once established, this monitoring and enforcement function will be able to take responsibility for any additional monitoring conditions imposed as a result of the planning process. It will be vital that the Development Consent Order includes an effective and properly co-ordinated enforcement regime.

- 2.15 **The APS also needs to address how to deliver and fund community infrastructure needs. This includes schools, health, utilities and local services - such as waste and leisure - that will be required by employees and their families moving into the South East to work at an expanded airport.**
- 2.16 Urgent consideration needs to be given to quantifying the increase in services and infrastructure that will be required and a forward-funding plan is required to ensure they can be delivered in advance of the demand arising. South East local authorities would welcome the opportunity to work with Government to develop plans to meet these wider community needs and discuss how best they can be funded.