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By email

3 February 2015

CONSULTATION ON ADDITIONAL RUNWAY CAPACITY

Dear Sir Howard

This consultation response has been prepared jointly by South East England Councils (SEEC) and South East Strategic Leaders (SESL). Together we promote the views and interests of all tiers of local government across the South East, representing over 9.5 million residents – the largest population in the UK.

There is substantial interest from our members – as local political leaders – in the options for future runway expansion as all three shortlisted options will have a significant impact on South East local authorities, economically, socially and environmentally. Our response below focuses on consultation questions 1, 2 and 4. In particular, our members want to highlight two key requirements to be taken into account in the Commission's final recommendations:

- **The need for improved infrastructure over and above the proposals currently set out**
- **The need for protection of Green Belt and other protected land.**

Question 1: Conclusions on shortlisted proposals

- 1.1 Our members remain broadly supportive of the need for an additional runway at Gatwick or Heathrow to help maintain the UK's global economic competitiveness and secure new employment opportunities. As with previous responses from SEEC and SESL, member opinion is divided on the merits of Heathrow or Gatwick as the location for expansion and individual councils will respond to you on their detailed views.
- 1.2 There is, however, clear consensus on the need for substantial infrastructure investment in advance of expansion. Whichever runway option goes forward, our members want to ensure the South East economy and quality of life are not damaged by increased congestion, pollution, noise, loss of Green Belt and unsustainable pressures on public services such as schools and hospitals. Our members feel strongly that the infrastructure investment proposed for each of the three shortlisted options – particularly for transport infrastructure – lacks ambition and will not be sufficient to mitigate the road congestion, train overcrowding and pollution impacts of airport expansion in the South East. Without adequate infrastructure investment we risk damaging the UK's economic competitiveness and degrading the quality of life for residents across the South East.

- 1.3 SEEC and SESL members agree that airport expansion is important to maintain UK and South East economic competitiveness. If the South East was a standalone country, it would be the world's 30th biggest economy. It therefore needs significant infrastructure investment to maintain its position in the face of overseas competition. SEEC and SESL members believe the South East already has an infrastructure deficit, with a strained and overcrowded road and rail network that is beginning to undermine our global competitiveness. In 2011 motorways in the South East carried 25% of all motorway traffic in the UK (22.3bn kilometres) and the strain is showing as congestion rises, leading to increasing costs for business and the environment. The Freight Transport Association, for example, estimates that road congestion costs its members £1 a minute. Airport expansion without more ambitious transport infrastructure investment will exacerbate rather than alleviate the current problems of congestion.
- 1.4 Within the UK economy, the South East made the largest net contribution to the Treasury over 10 years from 2002-12, paying £80bn more in taxes than the area received in public spending. In the same period London made a net contribution of £74.8bn. Taken together the South East and London economies are the major drivers of UK PLC and support significant amounts of central government spending. The national economy cannot afford to surrender the economic potential of aviation growth to competitor countries – but to compete effectively and secure these benefits for the UK needs greater infrastructure investment. All three expansion proposals fail to put forward infrastructure improvements that will allow us to compete globally.
- 1.5 Recommendations on a new runway must be supported by a fully integrated and more ambitious approach to improving infrastructure for passengers, business, commuting, housing and environmental mitigation. Without an integrated approach to strategic infrastructure across all Government departments, we will fail to deliver successful expansion that genuinely enhances the UK's national and global economic potential.
- 1.6 Local authorities also have an important role to play in helping to plan and deliver local services to support the areas that will see growing numbers of residents. Airports Commission recommendations should highlight the need for Government to work closely with South East local authorities to ensure a fully integrated approach to managing the impacts of expansion on our communities.

Questions 2, 4: How shortlisted schemes could be improved/ Factors not fully addressed

- 2.1. We welcome the Airports Commission independent assessment of the three shortlisted schemes but our members feel the infrastructure proposals in each scheme, particularly around transport, need to be strengthened. We believe the Commission has a key role in considering the sustainability of aviation growth, so we want to see your final report making recommendations on additional infrastructure that will be needed to supplement the measures currently set out by the scheme promoters.
- 2.2 This response highlights three issues of particular concern to SEEC and SESL:
- Transport
 - Housing, Green Belt and Services
 - Noise and Pollution.
- Transport**
- 2.3 Our members are concerned that the extended baselines and surface access proposals for all three shortlisted schemes lack ambition. We believe more can be done to relieve road congestion and promote a modal shift to public transport where investment is provided to increase public transport capacity.
- 2.4 A step change in transport is needed both to improve surface access for travellers and to reduce the impacts of road congestion for businesses, commuters and local

residents. Action is needed to deliver access improvements that ensure your long term recommendations will be both sustainable and genuinely globally competitive.

- 2.5 SEEC and SESL believe that more needs to be done to deliver better public transport and reduced road congestion as an integral part of airport expansion proposals. Our members want to see clear recommendations from the Airports Commission that Government must commit to more ambitious road and rail infrastructure investment in advance of runway development.
- 2.6 For example, we are disappointed by the low level of ambition shown in the shortlisted proposals for the percentage of passengers and staff arriving by public transport by 2030. As outlined below SEEC and SESL believe more can be done to increase the availability and attractiveness of public transport access – particularly by rail – for both Heathrow and Gatwick proposals. We also want to see greater investment in the road and public transport links between Heathrow and Gatwick. We were disappointed by the lack of significant proposals to address congestion on the southern (Surrey) quadrant of the M25. This route plays a key role in linking the two airports and, according to the Commission’s analysis, is expected to reach 125% capacity at junctions 13-14 even before an additional runway is considered.
- 2.7 It will also be important to improve the resilience of transport networks. Alternative road and rail access to both airports should be improved to provide secondary routes, which will allow access to be maintained in the face of major delays affecting primary routes. More analysis is required on options to improve resilience and the investment that will be needed to achieve this. Work is also required to assess and cost new local transport needs that will arise from significant increases in congestion from both increased airport traffic and thousands of new homes in the local authority areas surrounding the expanded airport.

Additional transport: Gatwick

- 2.8 In 2014 SEEC and SESL identified a number of transport infrastructure improvements that are already required to reduce congestion, promote public transport access and improve resilience – regardless of runway expansion. We are therefore disappointed to see only a small number of these projects included in the capital costs for surface access improvements for a second runway.
- 2.9 SEEC and SESL support proposals to improve the M23 and Brighton mainline but see these as minimum requirements under present conditions. Should Gatwick expansion go ahead and raise passenger numbers from 35m to 65m, we do not feel the relatively modest improvements proposed would be adequate to address the needs of an extra 30m air passengers and up to 18,400 additional homes in the area, which will generate both airport and non airport related journeys. Further investment is needed to deliver:
- Improvements to orbital rail access by providing faster, more frequent services with longer trains and new rolling stock on an electrified North Downs Line. This would give direct access to Gatwick from Reading and Ashford, Kent. A new rail spur linking the North Downs Line to the proposed garden city at Ebbsfleet would also be beneficial. These investments would encourage modal shift, release capacity on train journeys from to and from central London and relieve congestion on the M25 by providing direct rail access with no need to change trains in central London.
 - A second rail access route. Re-opening the Lewes to Uckfield line would provide a second option for direct rail access to Gatwick, offering an alternative route to reduce congestion on the Brighton mainline and ensure continued rail access when delays are experienced on the Brighton-London route.
- 2.10 If Gatwick expansion goes ahead we would like to see greater rail investment to encourage more rail access above the 43% estimated by Jacobs¹ by 2030. Our

¹ *Additional Airport Capacity: Surface Access Analysis, November 2014*

estimates (where Gatwick's 8% transit passengers are excluded from surface access figures) show that achieving 43% rail travel for the 59.8m non-transit passengers would still see over 34m passengers arriving by road by 2030. We would also like to see incentives for the airport to encourage staff to travel to work by public transport as Jacobs estimate 60% will still be travelling by car in 2030.

- 2.11 We also believe additional road investment would be needed for the M23, the strategic road network and local roads to adequately respond to increased traffic generated by an expanded airport and up to 18,400 new homes in the area.

Additional transport: Heathrow

- 2.12 In 2014 SEEC and SESL identified a number of public transport improvements that are already required to serve Heathrow – regardless of runway expansion. We support better rail access from the west and south but call for the Airports Commission to expedite and expand on these proposals:

- We welcome recognition of the importance of Western Rail Access (WRA) to Heathrow but believe this should be delivered as soon as possible and should not be dependent on additional runway capacity. With Heathrow's current 70m passengers a year, WRA has capacity to provide a step change in public transport access for up to 12m people from the South East, South West, Wales and beyond.
- We also called for significant improvements to public transport access to Heathrow from South West London, Surrey and Hampshire. While we welcome the proposal for Southern Rail Access (SRA), we are disappointed by the proposal's lack of ambition and want to see better direct rail access offered from the South East. Once again, delivery of SRA is needed now and should not be dependent on runway expansion. We also want to see an enhanced SRA scheme, which is able to offer better journey times from within the South East. Jacobs' assessment of surface access shows that SRA would bring a 36% increase in the UK population within 3 hours' travel of Heathrow. While this would give shorter journeys from the Wirral, Sheffield and Lincoln it would do nothing to improve the 3 hour journey times from parts of the South East, such as Dover and Chichester. Investment in an SRA project must be extended to provide better rail access from the wider South East.

- 2.13 If either of the Heathrow schemes go ahead we would like to see greater rail investment to encourage more rail access above the 43% estimated by Jacobs by 2030. Our estimates (where Heathrow's 35% transit passengers are excluded from surface access figures) show that achieving 43% rail travel for 67.3m non-transit passengers would still see some 38m passengers arriving by road by 2030. We would also like to see more incentives on the airport to encourage staff to travel to work by public transport as Jacobs estimate 47% will still travel to work by car in 2030.

- 2.14 We also believe additional road investment would be needed for the M25, the strategic road network and local roads to adequately respond to increased traffic generated by an expanded airport and up to 70,800 new homes in the area.

Housing, Green Belt and Services

- 2.15 Estimates of additional homes required range from 150-18,400 for Gatwick expansion and from 22,900-70,800 for Heathrow expansion. These figures – on top of existing local plan housing provision – present significant challenges for South East local authorities. The current Airports Commission analysis simply divides new housing numbers equally between local authority areas but this is unrealistic as it appears to take no account of differing sizes of local authority areas, land availability, transport accessibility or protected sites such as AONB or Green Belt.

- 2.16 There are several areas where Airports Commission recommendations could help local authorities address challenges. For example:
- Additional housing will increase pressure for development on protected land such as AONB or Green Belt. This is unpopular with both local residents and Ministers,

who have recently highlighted the importance of Green Belt. In some South East authorities (eg Tandridge DC) over 90% of land is protected, significantly increasing the challenge of delivering additional development. Local authorities must have a key role in discussions on more realistic allocation of any new housing and the Commission must take care in its recommendations to Government to avoid adding to local tensions or bypassing the decision-making role of locally elected councillors.

- Green Belt and other protected land is an integral part of the South East's quality of life and one of the factors that attracts businesses to locate here. The Commission should ensure its recommendations do not inadvertently damage quality of life and should take every step to avoid or mitigate development on protected land.
- Local authorities will need adequate funding to provide the services needed to support the new homes required. It is important that the Commission makes the case for additional funding to enable local authorities to deliver services for thousands of new residents including social care, refuse collections, planning processes, local transport improvements and community facilities. Education alone will need significant investment, with some estimates setting out a need for up to 50 new primary schools and 6 secondary schools.
- Adequate central funding will also be required to deliver healthcare services. Significant investment will be needed to respond to estimates that up to 14 new GPs and 2 primary care centres would be needed in each of 14 local authorities.
- Airports Commission recommendations on local authority planning powers could also help councils deliver development on the ground where this is agreed locally. Giving councils 'use it, lose it or pay for it' powers over planning permissions would discourage land banking and encourage swift development of new homes once planning approval is in place.

Noise and Pollution

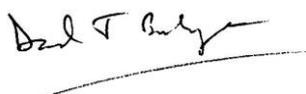
2.17 SEEC and SESL want to see the Commission making clear recommendations on how to minimise and mitigate the impact of noise and pollution from runway expansion. We recognise the Commission's work to date on different scenarios but want to see this consolidated into concrete recommendations in the final report on how to tighten regulations on noise, pollution and night flying to minimise disruption to residents living near a flight path. For example:

- Measures to incentivise airports and the aviation industry to expedite technical and operational changes to reduce the environmental impact of aircraft.
- How increased aviation capacity can support regulation of night flights, as has been achieved in other European cities.

Note on membership

South East England Councils and South East Strategic Leaders members represent county, unitary and district councils in the following areas: Buckinghamshire, Oxfordshire, Berkshire, Hampshire, Surrey, Kent, East and West Sussex, plus the unitary areas of Isle of Wight, Wiltshire, Swindon and Central Bedfordshire.

Yours sincerely



**Cllr David Burbage MBE, Chairman of South East Strategic Leaders
Leader, Royal Borough of Windsor and Maidenhead**



**Cllr Gordon Keymer CBE, Chairman of South East England Councils
Leader, Tandridge District Council**