



Department
for Transport

Consultation on revised draft Airports National Policy Statement Response Form

On 25th October 2016, the Government announced that its preferred scheme for adding new runway capacity in the South East of England was through a Northwest Runway at Heathrow Airport and this would be subject to consultation through a draft Airports National Policy Statement (“draft Airports NPS”). The draft Airports NPS was published on 2nd February 2017, launching a 16 week period of public consultation (the “February Consultation”).

In the consultation document for the February Consultation, the Government explained it would continue to update the evidence base which was considered when it selected a Northwest Runway at Heathrow as its preferred scheme. The intention had been to publish this during the February Consultation but there was no suitable time to do so. The aviation model has been developed to incorporate the latest market data and to produce an updated set of demand forecasts. In July 2017 the Government also published the UK Air Quality Plan which sets out a range of measures to bring nitrogen dioxide air pollution within legal limits in the shortest possible time. The Government has revised the draft airports NPS to take account of this updated evidence base, and made other amendments as a result of either consideration of consultation responses or a change in the Government’s policy. The Government is therefore undertaking a short period of further consultation.

How to respond:

Online: www.gov.uk/dft/heathrow-airport-expansion

Email: RunwayConsultation@dft.gsi.gov.uk

Post: **Freepost RUNWAY CONSULTATION**
(no stamp or further address required)

Respond by:

19 December 2017

October 2017

Before answering any of the questions please read the consultation document for the further consultation which can be found at:

<http://www.gov.uk/dfh/heathrow-airport-expansion>

For the reasons explained in the further consultation document, the Government proposes to make changes to the draft Airports NPS and some of the documents which were published alongside it. The changes have been published along with the supporting documents set out in the table on pages 7 and 8 of the further consultation document.

Have your say: Do you have any comments on the revised draft Airports NPS or any of the documents set out in the table on pages 7 and 8 of the further consultation document?

ABOUT YOU

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Are you responding on behalf of an organisation or group? Yes No

If yes, please state the name of your organisation or group* Spelthorne Borough Council

*Please note: if you are providing a response on behalf of an organisation or group the name and details of the organisation or group may be subject to publication or appear in the final report

FOR ORGANISATIONS: What category is your organisation?

Please tick the relevant box

- Statutory body
- Local authority
- Community group
- Environment group
- Airport
- Airline
- Air Navigation Service Provider
- Other Transport Provider (e.g. bus, train)
- Small Business
- Medium Business
- Large Business
- Business umbrella body
- Air freight business
- Other, please state

HOW DID YOU HEAR ABOUT THIS CONSULTATION?

Please tick the relevant box

- Contact from Department for Transport
- Press advert Local newspaper story
- Local authority engagement Social media (Twitter, Facebook etc)
- National news story (national newspaper, BBC News, Sky News, ITV News etc)
- Informed through stakeholder group (business group, campaign group etc)

CONFIDENTIALITY AND DATA PROTECTION

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA), and the Environmental Information Regulations 2004).

If you want information that you provide to be treated as confidential please tick the box below.

Please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals with, amongst other things, obligations of confidence.

In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances.

The Department for Transport will process your personal data in accordance with the DPA, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

I wish my response to be treated as confidential

Please write your reasons below. Please attach additional pages as required

CONSULTATION QUESTION

Question: For the reasons explained in the further consultation document, the Government proposes to make changes to the draft Airports NPS and some of the documents which were published alongside it. We published these changes on 24 October 2017, along with the supporting documents set out in the table on pages 7 and 8 of the further consultation document.

Do you have any comments on the revised draft Airports NPS or any of the documents set out in the table at pages 7 and 8 of the further consultation document?

Please provide as much detail as possible in the box below. Please attach additional pages as required.

Advisory Note: If you responded to the February Consultation, you do not need to repeat points made previously, as we are considering these in full. Please note that when we consider responses to this further consultation, we may not be able to cross-refer to earlier responses because of the large numbers involved.

Spelthorne Borough Council's consultation response:

The Government has stated the view that the Heathrow Northern Runway scheme can be delivered without impacting the UK's compliance with legal air quality limits and within the UK's climate change obligations. Access to the airport for passengers, employees and freight without reliance on additional vehicle movements will be key to achieving these objectives. Spelthorne Borough Council considers that public transport accessibility south of the airport, preferably by way of a light rail scheme proposed by Spelthorne Borough Council should be an essential component of a wider sustainable transport scheme for Heathrow.

Surface Access

We agree that without effective mitigation, expansion is likely to increase congestion on existing routes and have environmental impacts such as increased noise and emissions.

We feel that it is appropriate that the airport surface access strategy reflects phasing over the expansion development (i.e. construction phases), implementation and operational stages.

The draft Airports NPS stipulates that the airport surface access strategy must contain specific targets for maximising the proportion of journeys made to the airport by public transport, cycling or walking. These should apply to both the workforce and passengers, and should consider modal shares across geographical areas as well. Heathrow Airport Ltd has acknowledged that there is a significant potential for mode shift in Spelthorne as it has a higher proportion of people accessing the airport as lone car drivers due to poor public transport connectivity. This has been compounded recently by severance of one of the four bus routes (the 441 serving a route from Staines Bus Station to Heathrow Airport), leaving only two routes through the borough that provide hourly services and a third less frequent route. Enhanced mitigation should be provided to reduce the disparities in public transport available in surrounding

communities. We would want to see public reporting on performance against modal share targets including subdivision by geographical area.

The applicant should upgrade and enhance local roads that enable the Northwest Runway to operate. The Northwest Runway scheme shifts the surface access to the Airport from the north to the south via Junction 14 of the M25 and southern road tunnels to the Heathrow West and East terminal areas from the Southern Perimeter Road. The main landside link between the two terminals will also be via the south of the airport rather than the north. The applicant's surface access proposals will impact on the existing and surrounding transport infrastructure. This will be particularly felt to the south of the airport in the Spelthorne and Hounslow areas. Taken together with airport parking proposal to the south of the Airport, there is significant potential for inappropriate local re-routing across the Borough of Spelthorne which could substantially increase Heathrow related traffic on local roads not referred to in paragraph 5.18 of the draft Airports NPS [such as B3003/ B378, A244 and A30, plus local roads such as Long Lane and Bedfont Road], where improvements and mitigation will be necessary.

The draft Airports NPS does not require the applicant to secure all surface transport schemes that form part of the surface access strategy submission. This surface access strategy has assumed new rail infrastructure connecting the Heathrow West terminal area (i.e. T5/T6) to the Windsor Lines and included a four trains per hour service in their core assessment. If the Heathrow expansion via the Northwest Runway is not conditional to providing this surface transport scheme then the impacts on trunk routes and local roads from the south of the airport will be greater than has been assessed to date. The applicant has estimated that Heathrow West will receive 65-70 million passengers per year by 2040, and we believe that a southern rail access is essential to deliver the additional transport demands generated by airport expansion. Spelthorne Borough Council are promoting a new light rail scheme that will assist Heathrow in servicing future passenger and workforce needs whilst mitigating air and noise pollution through modal shift.

Air Quality

We agree that increases in emission of pollutants during the construction or operational phases of the scheme could result in the worsening of local air quality. Since the February 2017 consultation, the Airports Commission has reviewed whether the Heathrow Northwest Runway scheme would be capable of being delivered without impacting the UK's compliance with air quality limit values. The revised draft Airports NPS outlines that development consent will be refused unless the applicant is able to demonstrate that the scheme will not affect the UK's ability to comply with legal obligations. In terms of decision making, the Secretary of State must be satisfied that, with mitigation, the scheme would be compliant with legal obligations.

We agree that environmental statement should assess any likely significant air quality effects including residual effects following mitigation. The focus of the draft Airports NPS (and the ancillary 2017 Plan Update to AQ Re-analysis) is very much on UK compliance with legal obligations but many pollutants exert an effect on human health (and/ or on the natural environment) at exposures that are below the national air quality objectives. Worsening of local air quality below compliance levels can still be assessed to have a moderate or substantial impact, which could be locally significant.

We agree that mitigation measures should comprise measures to improve air quality in pollution hotspots beyond the immediate locality of the scheme as air quality impacts are likely to be over the wider area.

Heathrow Airport has made a public pledge to have no increase in landside airport-related traffic. However, the scheme could redistribute the location of the airport-related traffic around the airport. The Northwest Runway scheme shifts surface access to the Airport from the north to the south via Junction 14 of the M25 and southern road tunnels to the Heathrow West and East terminal areas from the Southern Perimeter Road. Within the applicant's submission, Junction 14 is described as the main entry into the airport via the realigned A3113 (Airport Way), serving a new entrance to the Heathrow East and Cargo terminals as well, and also as the main exit from the airport for traffic from that area. The main landside link between the two terminal areas following expansion will be via the south of the airport rather than the north. The A3113 and Southern Perimeter Road form the northern boundary of the Borough of Spelthorne. Even if Heathrow Airport achieve their pledge of no additional airport related traffic, the scheme will result in significant additional traffic flows across the north of Spelthorne.

Modelling commissioned by Spelthorne Borough Council, using ADMS-Airport by CERC [as per the Airport Commissions modelling] for the Spelthorne area for 2011 and 2015 indicates an existing shadow of exceedance of the annual mean nitrogen dioxide air quality objective within Spelthorne to the south of the A3113, the southern runway and the Southern Perimeter Road. Redistribution of road traffic from the north of the airport onto southern routes could exacerbate pollutant levels within and result in the spread of this shadow – thereby potentially putting a greater number of properties in Spelthorne into an area of exceedance.

The 2017 Plan Update to Air Quality Re-analysis only considered the impacts of airport options at receptors alongside roads where the Government's PCM model predicted an exceedance, or a risk of exceedance, of the limit value in 2030 (based on current traffic flows/ distribution). The change in concentration due to the Heathrow Northwest option has only been modelled at specific links on the A4 and A40, both to the north of the airport. It is noted that the PCM model does not include links on the M25 motorway, or the Southern Perimeter Road. The applicant's assessment in the environmental statement should consider air quality impacts associated with all main roads across the wider area (all around the airport) and local roads in the immediate vicinity of the scheme.

The PCM model baseline projections significantly underestimate nitrogen dioxide levels in comparison to local monitoring. For example, the PCM model baseline for a link on the A308 at the Crooked Billet junction with the A30 and A3044 south of the airport is 34.8 ug/m³ annual mean nitrogen dioxide for 2015. Monitoring at this road link by Spelthorne Borough Council recorded an actual nitrogen dioxide annual mean in 2015 of 53.4ug/m³. The air quality analysis behind the draft Airports NPS finds that a high risk of exceedance exists when modelled concentrations lie within 10% of the limit value. Local air quality monitoring in the Spelthorne area has recorded pollution hotspots alongside roads with current exceedances with the potential to remain in exceedance between 2025-2030, even without the Heathrow Northwest Runway expansion scheme.

The 2017 Plan Update to Air Quality Re-analysis concluded that, with the implementation of actions as set out in the plan, the Heathrow Northwest runway option would not impact on modelled compliance with limit values in any potential opening year from 2026 onwards. Given the inherent uncertainties in air quality modelling, there remains a risk that the option could delay compliance with limit values. That risk remains high up to 2029 even if the Government's 2017 Plan actions are fully implemented. This is because of the timing and effectiveness of the Government's actions to reduce vehicle emissions and the effectiveness of the Real-Driving Emissions legislation. The report states that compliance is not dependent upon assumptions about the option or direct mitigation and that impacts near the airport do not, in general, affect zone compliance. However, once again the impact assessment should not just consider compliance with limit values but also consider the health implications of worsening local air quality even under those limits. There are inherent uncertainties in air quality modelling. The overall uncertainty given was +/- 29%, which suggests that any analysis of impacts is highly uncertain and that the UK Government's 2017 AQ Plan to tackle poor air quality is open to challenge. We agree that additional measures aimed at targeting high nitrogen dioxide concentrations at local level and across the wider area must be secured to potentially mitigate the risks.

Paragraph 5.38 of the draft Airports NPS puts forward a list of possible mitigation measures. The measure of structured landing charges to reward airlines for operating cleaner flights already exists, but the differential charge per tonne of NOx is not sufficient to act as a real driver. Therefore the detail of the mitigation measures put forward by the applicant will be critical to their effectiveness at driving emission reductions.

Another of the possible air quality mitigation measures listed in the draft Airports NPS is an emissions-based access charge. Whilst we are supportive of a Heathrow Low Emission Zone in principle, this must not create displacement into surrounding areas and inappropriate parking in local roads. The applicant's submission states that there is an opportunity to ring-fence revenue in the form of an enhanced 'Super Public Transport Levy Fund'. We strongly believe that this should be used to support funding for major surface access schemes such as the light rail scheme being proposed by Spelthorne Borough Council, and to fund sustainable transport projects in the wider area to the benefit of local communities. Currently the Sustainable Transport Levy operated by Heathrow Airport Ltd is only accessible to projects that directly benefit Heathrow. Widening this would enable local authorities in the area to progress air quality action planning measures to tackle poor air quality from other sources, in turn helping reduce the significance of airport emissions and increasing headroom to air quality limits.

Impacts on SSSI

Spelthorne Borough Council is deeply concerned about effects to Staines Moor SSSI from the proposed diversion of the River Colne. As a unique wetlands site, which we manage, we would be concerned by any change to the flow of water to this site and the inevitable subsequent effect to the natural habitat and associated wildlife. Similarly, any infrastructure construction, e.g. rail, should be specifically planned so as to protect the environment of the SSSI.

Any development should take every possible precaution to ensure that any work upstream of Staines Moor does not have a detrimental effect on the Staines Moor

section of the River Colne or on Staines Moor's status as a SSSI. All possible efforts must be made to ensure that the flow of the river through Staines Moor is not altered in any way that may disrupt this valuable floodplain grazing marsh and its associated grazing and wildlife.

We require assurance that any effect to the site will be negligible and need much more detail on the proposed/potential changes to the river route prior to any detailed design stage. In our view, the commitment in the consultation documents that 'The design of the runway should aim to reduce or avoid impacts on water at the Staines Moor Site of Special Scientific Interest' does not go far enough and we must insist that the design of the runway should aim to avoid any impacts on the Staines Moor Site of Special Scientific Interest.

In relation to surface access proposals potentially affecting the boundaries of Staines Moor SSSI and Wraysbury Reservoir SSSI, Spelthorne Borough Council require more detail on how these sites would be affected prior to the detailed design stage. Likewise we require details of the impacts of surface water run-off along with potential for flooding. These must be designed to protect those sites.

In proposing any changes which could affect these SSSIs it is essential that all key stakeholders have been properly consulted.

Impacts of Noise

Limits of Appraisal of Sustainability - The AoS considers matters in the round and does not provide information about:

- a) The impact expected at a more local level such as, for example, the changes in number of people affected by noise in Spelthorne;
- b) The actual changes in noise level that are expected to arise at any given location as a result of implementing any of the proposals. Such information, together with the period of time over which the level would be expected to change, is material to the consideration of the scale of noise effects and the overall impact assessed for a particular option;
- c) Measuring the effects of aircraft noise using noise metrics other than LAeq,16h. Government policy identifies noise assessments around airports should reflect the sensitivities of the local population, and that some consideration should be given to the frequency of flyover as well as average noise level.

Given that the primary objective of the AoS is to compare and contrast the overall environmental impacts, including noise, arising from the three short listed schemes, this limitation can be accepted. However, the information currently available falls far short of what would be required of an Environmental Impact Assessment.

Paragraphs 4.12 to 4.18 of the NPS sets out the need for a full and comprehensive Environmental Impact Assessment (EIA) to be attached to any application for a third runway at Heathrow. Paragraph 5.51 and 5.52 identify the matters that will have to be included in, and the approach to be taken to, the noise assessment that forms part of the submitted Environmental Statement.

Spelthorne Borough Council should have the opportunity to review the ES Scoping Report and submit a response to ensure that all noise factors relevant to the borough are properly taken into account.

Air Noise

On 20th October 2017, the Government published a Consultation Response on UK Airspace Policy, which states that the policies set out within the document should be viewed as current government policy. That policy includes the statement that adverse effects are considered to be those related to health and quality of life. They shall be assessed using a risk based approach above Lowest Observed Adverse Effect Level (LOAEL). In order to properly assess the potential adverse effects of airspace change, 51 dB LAeq,16h will be regarded as the LOAEL for daytime noise from airborne aircraft.

Appendix A-4 assesses airborne aircraft noise levels down to 54 dB LAeq,16h but no lower. In paragraph 4.5.9 it aims to provide justification for this approach, pointing out that identifying a LOAEL for aviation noise is not straightforward and that at relatively lower noise levels (by implication below 54 dB) it is difficult to both estimate and measure noise exposure at greater distances from airports where airport noise levels are closer to those of other noise sources.

This is not a convincing argument. The survey work which underpins the findings of the 'Survey of noise attitudes 2014: aircraft' (which was carried out by the CAA and underpins the policy adoption referred to above) is heavily based on responses from people living around Heathrow Airport (almost 77% of the total). This means that very heavy reliance is placed on the response of people living around Heathrow in determining the general attitude of the UK population to aircraft noise. In addition, more than 50% of those respondents are exposed to daytime aircraft noise level below 54 dB LAeq,16h.

This leaves Appendix A-4 at odds with the information set out in the tables on pages 42 to 46 in that noise exposure at the higher adverse effect levels, SOAEL and UAEL, are clearly set out, but no reference is made to the LOAEL.

There is an argument that providing information about noise effects down to 51 dB LAeq,16h is not essential in this comparative study since all three schemes have been assessed against the same standards. However, there is no doubt that such information would have greatly enhanced the study and better informed people living in areas adversely affected at the lower noise levels. This clearly applies to Spelthorne.

Ground Noise

Paragraph 4.11.7 of Appendix A-4 identifies that there is no definitive agreement on assessment methodology for airport ground noise and that ground noise has been assessed by reference to the geographical areas exposed to noise levels above 57 dB LAeq,16h. As airborne aircraft noise is assessed using specific modelling techniques and against noise standards that are partially set by government policy, it is correct that there will be more variation in how ground noise assessments are carried out at different airports.

However, there is accepted good practice in relation to the assessment of ground noise. That would normally involve an assessment that includes noise levels below 57 dB. Therefore, the area covered in the A-4 noise assessment may not be extensive enough.

WHO: Guidelines for Community Noise, 1999 identify that during daytime and evening periods 55 dB LAeq is the threshold for serious annoyance while 50 dB LAeq is the threshold for moderate annoyance in outdoor living areas. Since airport ground noise is relatively steady the WHO standards can be used in its assessment.

By assessing only down to 57 dB LAeq,16h, there is the risk that Appendix A-4 is not considering the whole population who might reasonably be expected to be adversely affected by aircraft ground noise.

Mitigation

The Government has stated that it recognises aircraft noise is of significant concern for affected communities and that noise mitigation will be required for expansion and modernisation of Heathrow Airport. Spelthorne Borough Council agrees with the Government in respect of the need for noise mitigation (paragraphs 5.53 to 5.67) and in particular for 'respite' and a proposal to ban scheduled night flights for a period of six and half hours between 11pm and 7am. Spelthorne Borough Council supports detailed noise mitigation measures being developed subject to consultation with local communities and other stakeholders.

Paragraph 5.243 of the draft Airports NPS sets out the provisions within the community compensation package to which Heathrow Airport has committed.

These include:

- a) Following a third party assessment, to provide full acoustic insulation for residential properties within the full single mode easterly and westerly 60 dB LAeq,16h noise contour of an expanded airport;
- b) Following a third party assessment, to provide a contribution of up to £3,000 for acoustic insulation for residential properties within the full single mode easterly and westerly 57 dB LAeq,16h or the full 55 dB Lden noise contours of an expanded airport, whichever is the bigger;
- c) To deliver a programme of noise insulation and ventilation for schools and community buildings within the 60 dB LAeq,16h noise contour.

Single mode contours are those experienced when aircraft are operating in either a westerly or easterly direction. They are not provided within the Airports Commission compendium of results Parts E-02 to E-20 as referred to in appendix A-4. However, there are some anomalies arising from the choice of single mode metrics to define qualification for compensation:

It is not possible to correlate single mode aircraft noise levels with effects on health or levels of annoyance generated in the exposed population, as no studies of this metric have been undertaken. SoNA 2014: aircraft clearly identifies that the best correlation of community response to aircraft noise is with the aggregate noise levels experienced during a full 92-day summer period. Therefore, application of a scheme based on a single mode threshold would be offering compensation by way of enhanced insulation at noise levels for which the public reaction is simply not known.

People living to the east of the airport would be protected to a lower aggregate noise level than people living to the west of the airport. Put another way, since people living to the west of the airport are exposed to the highest noise levels (on departure) approximately twice as often as those living to the east, they will have to be exposed to higher long term noise levels before they qualify for sound insulation compared to those living to the east. This is inequitable.

In the Consultation Response on UK Airspace Policy of October 2017, the Government identified in para 2.39 that future policy may require airspace change promoters to consider compensation for significantly increased overflight, based on appropriate metrics, which could be decided upon according to local circumstances. Spelthorne Borough Council will require that a proper assessment of overflights is made and adequate corresponding compensation offered when a detailed application is made and an ES submitted.