

Spelthorne Borough Council's response to the Draft Airports National Policy Statement (February 2017)

This response is set out under the questions in the government's consultation document on the Draft Airports NPS.

Question 1: The Government believes there is the need for additional airport capacity in the South East of England by 2030. Please tell us your views.

It is agreed there is a need for additional airport capacity in the South East by 2030.

Question 2: 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 Government's preferred scheme), the Gatwick Second Runway scheme, the Heathrow Extended Northern Runway scheme, or any other scheme.

It is agreed that the government's preference for the Heathrow Northwest Runway is the most appropriate to meet the aviation capacity identified and, through developing Heathrow with its important 'hub airport' function, provides the greatest advantages to the national economy and gives greater flexibility in terms of noise mitigation through runway alternation when compared to an extended Northern Runway option.

Question 3: The Secretary of State will use a range of assessment principles when considering any application for a Northwest Runway at Heathrow Airport. Please tell us your views.

There are some issues that arise from the assessment principles and in particular a fundamental concern about the 'red line' area used to define the Development Consent Order area. Whilst the new runway and associated terminal will fall within the red line boundary there will be expansion of supporting activities in the wider area directly related to the airport and these will also have traffic and associated air quality implications. There will also likely be a demand for additional development land which should be considered as part of the proposal. It is important that the Policy Statement is cast in terms that allows the full impact of expansion to be assessed not only to ensure all relevant issues associated with the additional runway are properly considered but also to ensure that inadvertent opportunities for legal challenge of the outcome of the DCO process are not unnecessarily created.

For this reason it is important that a boundary is drawn to include space for all the direct airport activity that will be generated and secondly that the assessment principles enable full consideration of the wider impacts of the airport expansion in the surrounding area. This will be important for a number of the assessment principles including transport and air quality.

It will be important that the expansion of the airport is aligned to the sustainable development of the wider sub region which is administered by a number of authorities so that the wider

impacts of expansion are properly planned for. There should be consideration within the document as to how this is best achieved.

In the immediate areas of the airport Heathrow Airport Ltd have expressed a wish to enhance the whole area around the airport consistent with the airports status as a world class airport. Currently the red line boundary is drawn too tightly and therefore does not include the full extent of the area that needs to be considered. That boundary has been drawn particularly tightly on the south side of the airport within Spelthorne.

At present there are no mechanisms specified by which improvements/mitigation measures in the wider area will be secured.

Question 4: The Government has set out its approach to surface access for a Heathrow Northwest Runway scheme. Please tell us your views.

Firstly the full impact of airport expansion needs to be taken into account when assessing the adequacy or otherwise of surface access arrangements and not just development within the currently tightly drawn 'red line' area identified in the draft Policy Statement. It will be important that the surface access impacts of airport expansion are not confined only to traffic accessing the airport itself and the 'red line' area but also takes account of traffic generated by supporting operations/businesses off-airport. Given the potential scale of alterations to existing transport links to accommodate the new runway, particularly to the M25, the evaluation of design options should be required to take into account the scale of potential disruption during construction when deciding what options are most appropriate.

Secondly reference is made in the document to the improved rail access that could be gained from both the Western Extension and the Southern Rail Access. At present these are simply expressed as possibilities in the draft Policy Statement rather than essential requirements. With the Terminal 5 development there were at the time a number of important supporting proposals such as the Southern rail link and off- site landscaping for example but these were not a formal part of the scheme and consequently were never delivered. There is an opportunity through the Policy Statement to identify explicitly supporting transport infrastructure that is essential and a prerequisite to the airport's successful expansion thereby ensuring certainty about its delivery. Without this certainty there is a significant risk that the necessary levels of modal shift needed to avoid unacceptable levels of congestion in those areas nearest the airport, including Spelthorne, will not be delivered. Spelthorne supports a Southern rail link so long as any environmental impacts are properly mitigated.

Question 5: 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?

As referred to under question 3 it will be important to ensure comprehensive landscape mitigation and enhancement is required by the Policy Statement.

In particular, please tell us your views on:

5.1. Air quality supporting measures

It is essential that air quality impacts are fully addressed. Firstly it will be important that the scheme is assessed against the government's emerging Air Quality Plan to be published in July 2017 and not the existing 2015 Air Quality Plan.

As referred to under question 3 the air quality impacts of both the new runway and associated growth in the wider area must be considered. It will also need to include mechanisms whereby long term monitoring and compliance with clear targets can be achieved. Without this an unfair burden will be placed on surrounding authorities to resolve through their air quality plans impacts that are the responsibility of HAL.

5.2. Noise supporting measures

Aircraft noise is a matter of considerable concern to many local residents. It is considered important that noise performance targets are set to provide a clear basis against which monitoring and any necessary mitigating action can be undertaken.

5.3. Carbon emissions supporting measures

No specific comments

5.4. Compensation for local communities

It will be important that local communities are adequately compensated for the adverse impacts of not only the proposed expansion of the airport but the adverse impacts of the existing airport by good physical mitigation and enhancement. Heathrow Airport Ltd have expressed a wish to enhance the area but this needs to be made a requirement in the Airports National Policy Statement.

Question 6: The Government has set out a number of planning requirements that a Heathrow Northwest Runway scheme must meet in order to operate. Please tell us your views. Are there any other requirements the Government should set out?

There should be greater clarity on the sanctions that will be in place should the applicant fail to deliver on the requirements that are agreed as part of the development.

The Western Connection and Southern Rail Access should be essential requirements of the scheme

Question 7: The Appraisal of Sustainability sets out the Government's assessment of the Heathrow Northwest Runway scheme, and considers alternatives. Please tell us your views.

It will be important that the full impact of the expansion of the airport is appraised including areas outside the 'red line'.

Question 8: Do you have any additional comments on the draft Airports National Policy Statement or other supporting documents?

None

Question 9: The Government has a public sector equality duty to ensure protected groups have the opportunity to respond to consultations. Please tell us your views on how this consultation has achieved this.

It will be for the government to satisfy itself it has met these requirements. We are not aware of any particular failings.

