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Freepost LHR EXPANSION CONSULTATION

29<sup>th</sup> January 2018

Dear Sir/Madam,

### **Heathrow Expansion Public Consultation**

Thank you for the opportunity to comment on the London Heathrow Airport Expansion and Airspace Change Consultation. This letter is the Council's formal response.

#### **Part 1 - Airport Expansion**

The Council has reviewed the three options presented in respect of the positioning of Heathrow's third (North West) runway. Whilst the Council does not specify a preferred option for the runway's positioning, it is considered desirable that a finalised option is selected as soon as is practicable, in order to provide clarification and certainty for the affected communities.

Section 2.4 of the consultation illustrates the proposed realignment of the M25 through tunnelling under the proposed new runway. Residents of Surrey Heath are likely to be impacted by these proposals, as the M25 is a key strategic route within relative proximity of the Borough. The Council recognises the benefits of completing works to the M25 that are adjacent to the existing road, and acknowledges that this proposal would be likely to minimise disruption to traffic, during its construction period.

Of the two options presented for the configuration of the M25's realignment, the Council considers that the inclusion of collector-distribution roads parallel to the M25 (Option AB2) would be most desirable. This is in view of the safety benefits arising from the separation of the six lanes on each carriageway of the M25, providing two sets of three lanes in each direction. It is considered that this would reduce the potential for motor traffic accidents arising from vehicle movements. However, the Council wishes to emphasise that should Option AB2 be progressed, clear and well displayed overhead signage for both the M25 and collector-distribution roads should be provided, to ensure motorists are given advance notice of junctions and destinations, delineated by the relevant lane. Correspondingly, it is considered that updated information pertaining to the proposed reconfiguration of the M25 is provided for satellite navigation systems, to ensure any amendments to the road layout are promptly supplied to motorists.

The Council acknowledges that wider benefits may be provided by London Heathrow's proposed Surface Access Strategy. In particular, it is recognised that the target for at least 50% of surface access passengers to use public transport for arrival or departure from Heathrow by 2030 (rising to 55% by 2040), could alleviate congestion on the surrounding road network, and correspondingly, bring about improvements to air quality. In respect of ongoing parking provision at London Heathrow, the Council supports Heathrow's commitment not to increase pollutants arising from road traffic related to journeys to and from the airport. It is considered

that the intention to retain the cap on the existing number of parking spaces, at 42,000, will help minimise increases in road traffic and corresponding pollutants.

The Council is fully supportive of proposals to introduce a Southern Rail Link from Heathrow Airport, providing connections to the South Western Railways Network. This would benefit residents of the Borough, with improved rail access from Surrey Heath to Heathrow and the possibility of reduced journey times and fewer station transfers. Furthermore, improved rail access could help to decrease the overall number of motor vehicle journeys, providing relief to the M3 improvements to the air quality Surrey Heath. The proposed development of a Modal Hub to consolidate freight operations is also supported by the Council. The Council's preference is for Option B, which would position the proposed Hub alongside the Southern Rail Link and cargo centre, thus minimising road traffic on the M25 and roads surrounding Heathrow, generated from both freight and passenger journeys.

Heathrow's aim to incentivise both the more efficient operation of aircraft on the ground and the upgrade of airlines' fleet, providing cleaner, quieter aircraft is welcomed by the Council. However, the Council requests that in preparation of Heathrow's future approach to air quality, the current position of air quality at Surrey Heath's highways network is given full consideration. This includes an Air Quality Management Area in place on the M3 between junctions 3 and 4 in the Borough, and the A331 in the west of Surrey Heath, where exceedances of the annual mean NO<sub>2</sub> limit value have been identified through Defra's air quality modelling. Regard should be had to this in Heathrow's future approach to air quality and emissions, generated from both ground and air traffic.

The consultation outlines how the planned expansion of London Heathrow will result in a loss of housing in certain communities adjoining the airport. The Council anticipates that any loss of housing arising from Heathrow's expansion would need to be addressed through new residential development to compensate for the loss, to ensure the objectively assessed needs for the relevant Housing Market Area(s) are met. If the loss of housing is addressed as a wider strategic issue, the Council considers that it should not impact housing requirements beyond the Heathrow and Slough Travel to Work Area, which does not include Surrey Heath, as defined in Figure 13.1 of the consultation document, 'Our Emerging Plans'.

Furthermore, Surrey Heath is subject to numerous environmental constraints and contains large areas of the Thames Basin Heaths Special Protection Area (TBH SPA) and its 400 metre buffer zone, within which residential development cannot be permitted. In addition, the rest of the Borough is entirely within 5km of this designated area. There are also large areas of MOD land and the majority of the eastern half of the Borough is designated Metropolitan Green Belt. This impacts Surrey Heath's ability to meet its own identified housing need and accordingly limits the Borough's capacity to consider addressing unmet need arising from other authorities.

## **Part 2 - Airspace Change**

The fundamental components for airspace change contained within the Heathrow Expansion Consultation are future airspace design principles. The principles consider options for the design of future airspace, in association with Heathrow's future expansion.

### *Principle 1: Flight Paths*

The Council has considered the three Flight Path options presented by Heathrow and considers Option B as the preferred approach to future flight paths. Option B ensures that additional areas that have not previously experienced regular aircraft noise, such as Surrey Heath, would not be impacted, as far as possible. This is considered preferential to Option A which would concentrate flight paths within very specific areas, possibly resulting in frequent overflights for areas that were previously unaffected, and Option C which seeks to share the routes over a wider area, potentially impacting a greater number of communities in Surrey Heath.

*Principle 2: Urban and rural areas*

The two options presented in the consultation in relation to airspace over urban and rural areas have been reviewed by the Council, and it is recognised that there are benefits and disbenefits in both approaches. Much of the eastern part of Surrey Heath, which is closer in proximity to Heathrow than the west of the Borough, is rural. Much of Surrey Heath's rural landscape contains habitats of international importance, principally the Thames Basin Heaths Special Protection Area. Consideration should be given to these designated areas, which are home to wild bird species protected by UK and EU law, as designated in the EU Birds Directive. An important consideration for these habitats is air quality, and consequently, the Council requests that future flight paths should have due regard to these designations.

*Principle 3: Urban areas*

The Council recognises the merits and detriments of the two options presented: Option A – designing flight paths over parks and open spaces in settlements, avoiding residential areas, and Option B – designing flight paths over residential areas, avoiding open spaces. It is therefore considered that in the interests of communities who enjoy visiting local green spaces, but also reside within settlements, a balanced approach should be taken to future flight paths.

*Principle 4: Noise and Emissions*

The Council considers a pragmatic approach should be taken where balancing communities affected by noise, and emissions released as a result of avoiding overflying communities. It will be necessary to balance the additional journey times and distances against the number of people benefiting from reductions in overhead noise. Where flight paths are not excessively extended or altered, the benefits generated for communities may be found to outweigh the harm of additional journey times and fuel burn.

*Principle 5: Technology and Innovation*

The Council supports Heathrow's aim to work in partnership with airlines, ensuring they invest in older aircraft, and utilise Performance Based Navigation.

*Principle 6: Night flights*

Heathrow's commitment to encourage only the newest and quietest planes to fly in and out of the airport, particularly during the night period, is welcomed by the Council. The resolution to continue minimising land charges for quieter aircraft at night as an incentive is also supported by the Council. In addition, the Council supports Heathrow's pledge that the majority of future flights to the airport will be between the hours of 7am and 11pm, and the proposed extension of a night time flight ban from 5 hours to 6.5 hours. However, the Council objects to Heathrow's preferred ban period of 11pm to 5:30am. It is considered that, in the interests Surrey Heath's residents' quality of life, a ban period covering the morning hours from 12:00am to 6:30am would be more desirable than Heathrow's suggested ban period.

Surrey Heath Borough Council wish to be notified of the outcome of this consultation and to be kept informed of future consultations on Heathrow in respect of its expansion and changes to airspace.

Yours faithfully,

Cllr Moira Gibson  
Leader of the Council  
Surrey Heath Borough Council

Karen Whelan  
Chief Executive  
Surrey Heath Borough Council