



**Surrey Heath Borough  
Council**

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**Service** Chief Executive

11<sup>th</sup> September 2019

Dear Sir/Madam,

## **Heathrow Airport Expansion Consultation**

Thank you for the opportunity to comment on the London Heathrow Expansion Consultation. This letter is Surrey Heath Borough Council's formal response. This response addresses the topics and proposals within the consultation that the Council considers would be likely to impact upon residents and businesses within Surrey Heath, as well as visitors to the Borough.

### **Our Preferred Masterplan**

The Council has reviewed the preferred masterplan proposals and is responding to the points that are relevant to Surrey Heath Borough. In relation to the masterplan proposals, the consultation asks, *please tell us what you think about any specific parts of our Preferred Masterplan or the components that make up the masterplan.*

#### *Roads*

The M25 is used by many residents of Surrey Heath both for commuting to their place of work or to reach other destinations in their leisure time. Equally it is used by people who live outside the Borough but visit Surrey Heath either for work or other purposes.

It is understood that the M25 will be diverted offline, meaning the existing motorway will remain open, whilst the new section of the M25 is built, which will be lowered into a tunnel under the proposed new runway. This is supported as it is considered that the impact on road users will be minimised. Where M25 junction realignments are proposed, the Council's preference is for them to be largely constructed offline. This approach is considered most desirable, as it will again seek to minimise the impact on road users.

It is understood that detailed highways modelling is being undertaken by Heathrow, but this will not be available until after the consultation period has closed. It is the outputs from the modelling that will provide a much more fine-grained level of information. This will need to be released expediently, in order for Surrey County Council as the highways authority for the area to interrogate and assess the information to fully understand the impacts on the highways network and mitigation measures needed.

The Council would also welcome further information from Heathrow on any potential impacts to road users arising from the construction of the new M25 motorway and associated junctions.

#### *Rail*

Rail access from Surrey Heath to London Heathrow Airport is currently poor. The route that involves least transfers between trains and provides the shortest journey time from any of the

three train stations in Surrey Heath (Bagshot, Camberley and Frimley), requires residents to access Feltham station and then continue their journey to Heathrow via the rail-air bus link. It is therefore not practical for residents to travel to Heathrow only by train.

It is noted that the consultation material advises, *“Heathrow is supporting and has safeguarded the on airport development needed for both Western and Southern Rail to directly serve the airport.”*

Further detail is provided in the *Preliminary Transport Information Report – Public Transport (Vol 5 of 6)*, where a Southern Rail Link to Heathrow is included as an alternative scenario. The document describes the proposal as a potential future rail scheme. It advises that the proposal is at a very early stage in its development and is therefore not included as a project scenario under Heathrow’s expansion in order to ensure that the analysis presented in the study is based on a conservative view of future rail capacity.

Indicative proposals show that a southern rail link would join the existing line at the current Heathrow Terminal 5 station and would connect to the southwestern mainline (London Waterloo to Southampton) near Byfleet. Possible connections are also shown on the London Waterloo to Reading line, near Staines upon Thames and Virginia Water stations. A Virginia Water connection is strongly supported by Surrey Heath, as this would provide residents of the Borough with vastly improved rail access to Heathrow and the journey would involve the lowest number of changes. If a connection at Virginia Water is not taken forward, it is the Council’s view that a connection should be provided at Staines upon Thames, as an absolute minimum.

Overall, the implementation of a southern rail connection would benefit a large population in close proximity to Heathrow, for whom it is not currently feasible to access the airport by rail. This would also contribute to Heathrow Airport’s commitments in its Sustainable Transport Plan and help achieve compliance with the government’s sustainable transport requirements set out in the Aviation Policy Framework. It is for these reasons, as well as the benefits to the Borough’s residents, that Surrey Heath strongly supports this proposal. The southern rail link should therefore be included in this and future consultations as a project scenario, rather than as an alternative scenario. Heathrow should work with stakeholders such as the Department for Transport, Network Rail and South Western Railways in order to ensure the project is developed and implemented.

### **Travelling to and from Heathrow – Surface Access**

The Surface Access Proposals cover seven key areas. The Council has reviewed these and is responding specifically to the proposals that are considered to impact Surrey Heath. The consultation asks whether respondents have any comments about the surface access proposals. The following commentary covers the proposals considered to be relevant to Surrey Heath and provides the Council’s overall response to this section of the consultation. Some elements of this section have crossover with the ‘Our Preferred Masterplan’ section of the consultation. Therefore, the comments made by the Council in relation to the ‘Our Preferred Masterplan’ section also apply to relevant topics included within the Surface Access section.

#### *Public Transport*

It is noted that the proposed southern rail link to Heathrow is acknowledged as a committed improvement in this section of the consultation. However, the consultation material clearly states that this is not part of Heathrow’s expansion proposals, although it does commit to working with the promoters of the scheme. It is the Council’s view that as a lead beneficiary of the proposal, London Heathrow should be taking a more active role in promoting and securing the southern rail connection, through working with the government and other relevant stakeholders to ensure that it is progressed through to implementation.

### *Bus and coach Corridors*

The Council strongly supports the following statement in the consultation material, in relation to bus and coach corridors,

*“We will work with operators to introduce new bus routes to improve links to the south and west of the airport in areas including Maidenhead, Bracknell, Surrey Heath and Elmbridge and ensure that passengers and colleagues from our surrounding communities can reach the airport without having to rely on their car.”*

In addition, it is noted that the consultation material recognises there are currently weak public transport links to the south and southwest of the airport, relative to other areas surrounding Heathrow. Accordingly, support is given to the statement in the Preliminary Public Transport Report – Introduction (Vol 1 of 6), which recognises,

*“Heathrow will also work with bus operators to secure the delivery of new direct bus routes to the airport for areas not currently well served by public transport. Targeted corridors for these routes include... Camberley and Bagshot.”*

Surrey Heath is an area in relative close proximity to Heathrow that does not currently benefit from a direct bus service. It is therefore welcomed that this has been recognised by Heathrow in the consultation and efforts are being made to address the matter. It is considered that this would significantly decrease the number of car journeys to and from Heathrow by residents of the Borough, contributing to reduced congestion on the local highways network. In addition, it would also decrease taxi journeys, and enable more residents who do not own a car to reach Heathrow.

Also in relation to the proposed new bus services, one of the initiatives in Table 3.26 of the Preliminary Public Transport Report – Introduction (Vol 1 of 6) states, *“Heathrow proposes to deliver new express bus routes to the south to help improve bus service frequencies and reduce journey times for colleagues from Staines, Egham and Camberley. Operating hours are proposed to cover key colleague shift patterns to ensure colleagues can use the new services outside of peak transport hours.”*

However, Graphic 3.25 (Proposed Improvements to Bus Services) of the same report includes a new bus route to Camberley but does not show a proposed express route to Camberley or any other destinations within Surrey Heath. The Council therefore seeks clarification on whether both a new bus service and an express route are proposed to Surrey Heath, or only a new bus service, without an express route.

Further details about the proposed bus route to Camberley should also be provided. It would be helpful to know where the proposed pick up and drop off points will be located within Camberley and Bagshot, which are the two destinations shown on the bus route in Surrey Heath. Surrey Heath would support siting the main stop for the service in Camberley at the bus stops near Camberley Station. Furthermore, information should be provided about the frequency of the proposed bus service. It is suggested that it would be desirable to have at least one bus running in each direction, per hour. Finally, an indication of the operating hours would also be helpful. Due to some passengers taking very late evening or early morning flights, and staff at Heathrow working various shift patterns, it would be preferable if the service could run on a 24 hour basis.

### *Road User Charging*

The consultation advises that Heathrow will introduce the Heathrow Vehicle Access Charge (HVAC) following the opening of the third runway (around 2026). This will mean all passenger cars, taxis and other private motor vehicles will be subject to a charge when entering the airport’s car parks and terminal forecourts.

Surrey Heath acknowledges there may be benefits arising from the introduction of the HVAC, in respect of vehicular emissions and congestion reductions, and increased use of public transport. However, the Council advises that alternative modes of sustainable transport such as

the proposed bus link to Camberley and the southern rail link should be in place prior to the implementation of vehicular charging. Without alternative public transport, it would be unreasonable to charge passengers arriving by car, who do not have other feasible means of accessing Heathrow. Furthermore, the charges should be proportionate and not excessive, so a balance can be struck where car journeys are discouraged, but passengers who may be restricted to vehicular access are not penalised. In particular, accessibility for residents who are less able and would have difficulties changing trains should be given due consideration.

## **Future Operations**

### *Operational Framework for use of the three runways*

It is noted that Heathrow's commitment is to expand whilst affecting fewer people with noise than occurred in a baseline year of 2013.

Currently the airport favours a westerly operations preference whereby one runway is used for landings and the other for departures, with a reversal at 3pm. This arrangement was overlaid by The Cranford Agreement which restricted this switch when operating on easterlies. (No use of northern runway for departures in the daytime). Additionally at the end of a week a complete switch over occurs such as to give local communities respite from aircraft in the morning one week and in the evening the next.

Although we note that the Cranford Agreement has now ended, Heathrow is unable to implement alternation on easterlies as necessary infrastructure work is yet to be carried out. With the expansion and completion of the work it would be able to alternate runways on east and west operations thereby giving respite to communities east and west of the airport and to those underneath the corresponding flight paths over Berkshire and Surrey. This we see as a benefit to our community since it would alternate the noise generated by the noisiest activity (departures) over this area.

It is noted that the operation of three runways creates potential opportunities in the provisions of community respite through alternation. We support the airspace redesign that develops a structure that allows flight paths from each runway to be in their own distinct area as it appears that when not being used its corresponding flight paths also switch off. When combined with runway alternation it provides respite for our community extending to areas well beyond that offered by the current two runway operations. However both the airspace redesign and flight path expansion process lies with the CAA and will not be completed prior to the consent. We would want a detailed impact assessment of the changes in noise from overflying experienced on the ground within this Borough as a result of the airspace redesign prior to the consent process.

As regards changing the switch over time we would prefer an equal division of aircraft before and after. This appears to be offered by retaining the existing time at 15:00.

### *Night Flight Proposals*

We note that the existing last scheduled arrival is 23:05 and departure 22:50. Earliest morning arrivals and departures are 04:45 and 06:00. There is additionally a night quota period between 23:30 and 06:00 which restricts night movements to 5800 per year maximum. There is therefore no current ban on night time arrivals but control by restricted numbers.

Currently scheduled flights operating between 23:30 and 06:00 are all early morning arrivals with the majority after 05:00 being long haul from Asia and Middle East.

The Council supports the proposal of a 6.5 hour ban between 23:00 and 05:30 within which time reduced operations would apply together with a recovery period. This recovery relates to schedule recovery from delays built up by technical issues.

Currently there are no restrictions on a recovery period and we support the view it is incompatible with a night ban. We would want to see a change from unrestricted recovery to recovery with restrictions since such will provide greater certainty around when aircraft will and won't be overhead.

We also support the tightening of the quota control limit, development of a noise envelope (although this is perceived to affect those in the immediate Heathrow vicinity only), together with a tightening of the rules for dispensation arrivals and departures.

We note that in the whole the preferred proposals result in an increase in the time that movements are restricted over that which currently exist.

Surrey Heath would support a comprehensive review of Heathrow's landing fees, in order to achieve night flight noise reductions. The implementation of lower landing fees for only the quietest aircraft to operate at the airport should be continued and extended as far as possible, to incentivise predominantly the quietest types of aircraft to operate during the night time period. This approach could be reinforced by the introduction of fines or significant fee increases for older, noisy aircraft landing at night, so that it would not be viable for such flights to be operational within the night time period. Therefore, as well as incentivising quieter aircraft, there would also be a deterrent for noisier, more disruptive aircraft.

#### *Early Morning Movements*

Currently there are no departures before 06:00 with one runway operating only for arrivals between 05:15 and 06:00. We support the proposal for a separate movement and quota count limit for this time period that applies in addition to the overall movement and quota count limits that apply across the night quota period during which there will also be restrictions on the type of aircraft used.

We welcome and note that there will thus be a hard stop on departures at midnight and arrivals at 23:30 meaning runways and thus flight paths will be quiet between 00:00 and 05:15 which is longer than that which currently exists.

However, we would suggest that any period of noise impacting residential areas before 6.30am is particularly disruptive to those who are affected. In our response submitted to London Heathrow's previous Airspace and Expansion consultation, the Council objected to Heathrow's preferred ban period of 11.00pm to 5.30am. We advised that, in the interests of Surrey Heath residents' quality of life, a ban period that ended no earlier than 6:30am would be more desirable than Heathrow's preferred ban period, ending at 5:30am. Surrey Heath would therefore still welcome an option that offered a 6.30am start time for scheduled flights.

#### *Directional Preference*

We understand that safety determines take off/landing are into the wind when a certain wind speed is reached. Below this speed we support a managed preference since it allows for a range of managed measures to be implemented depending on circumstances. Such would also permit rotation at night to effect community relief and also support that which shares more equitably the movements offered by easterly operations. We see the advantages as being extension of the respite hours to the community plus the benefits of avoiding a sudden surge of activity such as road traffic when operations start in the mornings.

#### *Early Growth*

We note the desire to realise the benefits of expansion by the increased use of the existing two runways before the third one is built.

We also note that the early air traffic movement growth coincides with airspace changes such as independent parallel approach, new departure routes, easterly alternation and steeper aircraft approaches. It is stated that growth will occur without a perceptible increase in noise. We do note that the effect will be more people being newly exposed to levels above 63dB<sub>A</sub>eq. To this we would welcome further information on the effect within this area as the January 2019 consultation on airspace change indicated exceedance of this level to be likely. Accordingly we would wish to seek that mitigation and compensation measures would be available for any of our residents affected above the stated limit.

We support the proposal for the increased air traffic movements to be phased in over time since such will allow all parties to gauge the effects before proceeding to further increase in numbers. However, we object to the possibility of Heathrow making provision for up to an additional 25,000 air traffic movements each year on the two existing runways, before the third runway is opened. This is on account of the significant increases to noise and overflight that this could bring to those living and working in Surrey Heath. Prior to the opening of the third runway we support the proposed ban on early morning arrivals before 05:15 as this would result in less overflights of this area where the current voluntary ban ends at 04:30. We also support Heathrow's proposal to attaining managed growth under an independent scrutinised environment panel that will ensure the commitment to reduce noise affected persons to below the 2013 level is met.

## **Managing the Effects of Expansion**

### *Noise*

We are pleased to note that the study area for the assessment of operational aircraft noise includes airspace over the Surrey Heath area. It is recognised that over Surrey Heath the noise from overflying aircraft will be dependent on the final airspace design and that the flight paths that are needed to operate the expanded airport will only be known after the consent is granted for the DCO. Design changes in flight path provision are under the auspices of and will be subject to future consultation by the Civil Aviation Authority. At that time the noise impact of the expansion by overflights of this area will have to be assessed against current operations and we would like to see compliance with relevant noise standards together with an impact descriptor of the changes that an increase in the number of flights causes locally.

Pending the evidence above being supplied with the flightpath redesign it is noted that using ten indicative airspace designs the expansion assessment predicts that early growth in aircraft movements will result in no likely significant effects on any receptors within Surrey Heath. (This means no levels from expanded operations are predicted to exceed 63dB<sub>L</sub>eq during the day or 55 at night). We note also that in future years, noise exposure is forecast to be lower than that in 2013 inclusive of the increased air traffic movements. We would like further clarification on this prediction bearing in mind the January 2019 consultation on design envelope expansion referred to the number of flights above 65dB<sub>L</sub>eq over this area to be potentially upwards of 20 per hour. Such is likely to produce a level over 63dB<sub>L</sub>eq in the daytime.

It is also noted that both adverse effects and beneficial significant effects are identified as possible from airspace designs outside of the ten considered. We consider that until the airspace design process is completed we are cautious as to predictions of the impact on the ground locally from over flights. To this our comments regarding the airspace design as regards health and quality of life for our residents caused by increased flight traffic in the January 2019 consultation remains valid. Accordingly we consider that the airspace changes process should be completed before the DCO to allow us to determine with certainty the likely effects of increased movements over this Borough.

We do note that some changes will be noticeable over Surrey Heath as a result of these airspace changes and that this will occur regardless of expansion and accept that any

additional air traffic movements would be spread across the operating day resulting most likely in very small changes to the overall noise level.

The major changes in noise levels both positive and negative occur the closer to the airport one gets for which Heathrow has proposed a raft of mitigation measures of which we support. In mind of the airspace changes we also support the proposal for further work by Heathrow including additional consultation with relevant groups, further data gathering and sensitivity testing to inform the effects of noise on the local area of Surrey Heath.

### *Air Quality, Climate Change and Carbon/Greenhouse Gases emissions*

We note from the consultation material that aircraft emissions of nitrogen dioxide and dust are advised to have low impact on ground level concentrations outside of the airport boundary. However, as advised in our response to the previous Airspace and Future Operations Consultation, it is noted that significant areas of the Thames Basin Heaths Special Protection Area within Surrey Heath will potentially be subject to increased overflight. The Thames Basin Heaths Special Protection Area is an area of international importance for nature conservation. It is home to endangered 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. The Council therefore requests that such protected areas continue to be taken into consideration by Heathrow in determining the future flight paths during the period for making increased use of the two existing runways and following the introduction of a third runway.

Emissions from all sources including traffic and construction to, from and at the expanded airport is considered within the consultation. As there is no defined threshold of greenhouse gas emissions which if exceeded could be called significant, we note that significance for the expansion has been determined by comparing the difference in greenhouse gas emissions aggregated over time between the future baseline and the expansion without any of the proposed mitigation measures in place. This is a fair method. The assessment concludes a significant negative effect emerges and we look forward to details as to how this will be addressed when the Environmental Statement is produced.

It is noted that that without mitigation the predicted increase in greenhouse gas emissions is not considered to be so significant such as to have a material impact on the ability of Government to meet its carbon reduction targets.

We welcome Heathrow's efforts to make the scheme carbon neutral by offsetting emissions from increased flights post expansion by carbon credits, and support the tariff structure that influences airlines to utilise more fuel efficient aircraft and explore how sustainability metrics could be used by the airport to govern time slots and stand allocations.

There are no significant effects from the expansion on climate change due largely to the embedded environmental measures currently undertaken. These include requirements for design standards across all asset groups.

We note that further assessment on the effects of the expansion on and from climate change will also be made when the Environmental Statement is produced.

### **Loss of Housing in Heathrow's Surrounding Communities**

The consultation outlines how the planned expansion of London Heathrow will result in a loss of housing in certain communities adjoining the airport. A Compulsory Purchase Zone has been designated, which includes housing and other land uses within villages to the northwest of the current airport boundary. 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, ensuring that housing needs are met within the impacted plan-making

authorities. If the loss of housing is addressed as a wider strategic issue, the Council considers that it should be met within the affected local authorities and their immediately adjoining authorities, where necessary.

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 has impacted on Surrey Heath's ability to meet its own housing need figure, and consequently the Council is working with the neighbouring authority of Hart District, to ensure unmet need from Surrey Heath is delivered. Accordingly, Surrey Heath is not in a position to assist with the delivery of unmet housing need arising from other plan-making authorities.

Surrey Heath Borough Council thank London Heathrow for the opportunity to respond to the Airport Expansion consultation. The Council wish to be notified of the outcome of this consultation and to be kept informed of future consultations released by London Heathrow in respect of its expansion, changes to airspace and future operations.

Yours faithfully,

Cllr Richard Brooks  
Leader of the Council  
Surrey Heath Borough Council

Karen Whelan  
Chief Executive  
Surrey Heath Borough Council