



SASIG Response to the Airports Commission's Final Report

Introduction

SASIG is a special interest group of the Local Government Association focusing on strategic aviation; as such it is made up of representatives from Local Authorities across the country that have an interest in aviation-related issues affecting their area and communities. The aim of SASIG is to work to ensure that UK aviation policy is implemented in a manner that reconciles economic, social and environmental issues in a balanced and sustainable manner.

SASIG has followed the progress of the Airports Commission's work with interest and submitted responses to many of the consultation documents it published. We have now had a chance to consider the Commission's Final Report and supporting documentation carefully, and discussed them at length at our 6 November meeting. With both the Chancellor and the Secretary of State for Transport indicating a decision on South East capacity will be made before Christmas, we would like to take this opportunity to offer our views on this strategically important issue before the Cabinet sub-committee comes to a concluded view on the Commission's recommendations.

The membership of SASIG is drawn from a broad geographic and political spectrum of Authorities. Some are large county authorities, others metropolitan boroughs or district councils. A number are located close to the short-listed airports and therefore anticipate experiencing some of the environmental impacts of a new runway, whilst others represent more remote parts of the country and thus are typically keen to see domestic air links to the favoured airport maintained, expanded or introduced. Recognising the realities of these divergent perspectives, the Group has steered away from favouring one of the Commission's short-listed options over another and intends to maintain that neutrality. Instead, our discussions have focused on identifying the 'generic aspects' of any new runway development which all our membership would like to see the Government ensure and it is on these that we have concentrated below. Essentially, what follows is, therefore, a list of provisions we would like to see reflected in a National Policy Statement on aviation and any development approvals that are forthcoming based upon it.

Process for Securing Approval for Development

Before we highlight these provisions however, we would like to comment briefly on the process for securing formal approval for construction of a new runway and associated landslide and airside development.

SASIG believe that whether an NSIP Development Consent Order or a hybrid bill are chosen, the resultant process needs to ensure that there is committed and meaningful public consultation and engagement with local communities and the authorities that represent them. This consultation should allow, for example, for local input at an early stage in the DCO application/Bill process, as well as again at subsequent stages. It should also provide sufficient time for local input to be properly considered, developed and signed-off and then for the promoter to be required to demonstrate how those views have been taken into account.

Furthermore, if a National Policy Statement on Airports is to be published as a precursor to a DCO, it should set out the national need for new runway provision and be site specific as to where it should be located. It should also address:

- the wider infrastructure issues associated with expansion, including what is permitted at airports elsewhere in the South East
- what should be encouraged at airports serving other regions and nations of the UK; and
- the commitments of central Government to achieving these objectives, including investment in road and rail links serving both new capacity in the South East and airport growth elsewhere and statutory provisions to ensure enhanced domestic air access to the new South East runway from other parts of the UK.

SASIG Generic Requests

A) Regional Connectivity

SASIG believe that even though the Airports Commission's Terms of Reference required that consideration be given to the needs of the UK as a whole in its deliberations, its focus remained determinedly South East in its outlook, despite some concessions toward regional interests in the latter part of its deliberations and the Strategic Fit component of its appraisal framework. There is for example, no attempt to deal in any coherent way with what the implications of the short-listed options are for airports elsewhere in the country, nor indeed what is needed from them to complement the development of new runway capacity in the South East, wherever it may be. So although we strongly support the Commission's recommendations about the provision of enhanced regional air connections as part of the development, we remain of the view that the absence of any integrated national strategy dimension to its Final report was a major omission, and one which the Government needs to address.

In relation to UK domestic air connectivity, SASIG believes there must be a change in the Department for Transport 's (DfT's) interpretation of Public Service Obligation (PSO) regulations (e.g. on airport specific pairs rather than city pairs) so that the UK's main international hub can be accessible to the UK's regions, nations and Crown Dependencies, and that each should enjoy a measure of slot ring-fencing to achieve this. Additionally, consideration should be given to other measures to protect services from UK regions which may not be able to compete in commercial terms with the value of long haul operations at a national hub, but are nevertheless extremely important for local and regional economic development. The National Connectivity Task Force produced a very useful report in this area and it seems to SASIG that a group of this kind, working alongside Government and the runway promoter to optimise the economic benefits of new runway capacity for all parts of the UK, might be a useful model to ensure these interests are properly reflected in the eventual outputs from the development.

B) Consideration of Environmental Impacts

Local Authorities have clearly defined responsibilities on air pollution and climate change under EU regulation and the Climate Change Bill, and SASIG would like to see clear assessments of the effects of expansion on carbon limits and other forms of environmental pollution such as noise and air quality for the preferred option, with clear commitments given on how these are to be mitigated or compensated.

Night noise is a particularly sensitive issue and we would expect to see some improvement in the current regimes at Heathrow or Gatwick in return for new runway capacity being approved. We also question whether the assessments of noise provided thus far can be relied upon for any mitigation regime as detailed flight paths associated with a new runway have in reality yet to be specified with any accuracy.

Similarly there must be carefully specified management plans for dealing with NO_x and PM₁₀ emissions, with effective provisions for the relevant authorities to be able to step in to address exceedences associated with the airport. In the current climate for local authority funding, and given that the new runway would be a strategic national infrastructure project, SASIG believes that enforcement and fines incurred as a consequence of the regulations outlined above being broken, should be handled centrally rather than by nearby local authorities.

Futhermore with regard to Airspace design, which is of particular concern to many communities living adjacent to, or under the flight-paths of airports, we believe that flight-paths should not be moved from the existing noise preferential routes (NPRs) without full consultation with the communities affected. Whether concentration on specific paths within NPRs or dispersal routes across NPRs is preferable will vary between airport locations and between NPRs. These operational measures should be determined locally, for each airport, in accordance with the communities affected.

C) Urgent Establishment of an Independent Noise Authority

Given the extent of public concern about noise emissions (especially at night) associated with a new runway, SASIG urges the early establishment of an Independent Aviation Noise Authority so that this Authority can be appropriately involved in the planning process, and consequently be well-placed to monitor the undertakings that are entered into during those procedures in this area. This is in line with the Airports Commission's recommendation that, "*An independent aviation noise authority should be established with a statutory right to be consulted on flight paths and other operating procedures.*"

Most importantly however, the Noise Authority must be, and be seen to be, a truly independent body with effective powers if it is to command public confidence and be able to secure industry compliance.

For example, a key concern raised by SASIG members is that if night flights are banned at Heathrow, then night flights at other South East airports might increase. The Group feels, therefore, that there should be a mechanism in place to address this issue.

D) Strong measures to limit the impacts on those living nearby

In line with the noise concerns stated above, SASIG wholeheartedly support a raft of protective measures on the immediate neighbours to the airport.

The Airport Commission's report mentions:

- Following construction of a third runway at the airport there should be a ban on all scheduled night flights in the period 11:30pm to 6:00am. This is only possible with expansion.
- A clear 'noise envelope' should be agreed and Heathrow Airport must be legally bound to stay within these limits. This could include stipulating no overall increase above current levels.
- Heathrow Airport Ltd should compensate those who would lose their homes at full market value plus an additional 25% and reasonable costs. It should make this offer available as soon as possible.
- Heathrow Airport Ltd should be held to its commitment to spend more than £1 billion on community compensation. In addition, a new aviation noise charge or levy should be introduced to insure that airport users pay more to compensate local communities. Taken together these would fund enhanced noise insulation and other schemes. Support for schools should be included as a priority.
- A Community Engagement Board should be established under an independent Chair, with real influence over spending on compensation and community support and over the airport's operations.

SASIG has significant concerns about the indirect impacts on housing land supply and the ability to offer sufficient school places as a result of the enhanced workforce that will be directly required as a result of a new runway and the wider sub-regional growth pressures that will accompany it, and asks that the recommendations in the Davies Commission's report with regard to these matters be fully adhered to.

Moreover, we believe that the definition of any noise envelope should result in an improving noise climate for overflown communities and so as a key feature could include the addition of meaningful movement limits.

E) Improvements to Supporting Infrastructure

SASIG asks that full consideration be given to the surface access infrastructure network that will support the proposed expansion, including improved road and rail links and sustainable transport. The question of where funding will come from for these improvements needs to be determined, clearly set out and, where this involves public funding, appropriate contractual commitments made such that another administration cannot renege on them at some future date.

SASIG note that certain commitments regarding transport infrastructure from the 2013 Interim report have still not come to fruition (e.g. improved rail connectivity between London and Stansted) and believe this demonstrates the need for a fully defined, funded and contractually committed surface access plan. Concerns have also been raised about potential expansion at Heathrow overlapping with HS2 construction and the possible effect of this on congestion of the M25 and surrounding area, which again highlights the need for defined scheduling/planning.

SASIG believes that county councils should be fully involved in infrastructure decisions and that there is much benefit to everybody working together on this issue to facilitate deliverability.

F) Tying the new runway into the Productivity agenda for the UK as a whole.

SASIG believes that Government need to give some thought to ensuring that the promised boost to UK productivity through South East expansion is truly delivered.

The most significant long-term impacts of aviation connectivity are not just direct employment effects, but also its ability to facilitate economic growth through enhanced productivity in the wider economy. Enhanced connectivity can allow an economy to draw on a wider source of labour, skills and capital; to transport goods and services efficiently and reach distant markets; and encourage investment by foreign as well as domestic firms. Business operations and production are enhanced, exports and tourism are increased and there is higher retention of businesses.

Ensuring this productivity benefit is felt throughout the UK means ensuring that enhanced regional connectivity is an essential component of South East expansion, as per point A.

G) The deliverability of the preferred option

SASIG has concerns about the deliverability of whichever option for expansion is finally decided upon, taking into account the long lead-times for such a project and the

changing parliamentary cycles which will occur during this time. SASIG believes that the Government need to set out a clear delivery strategy with timescales in their recommendations and that the Department needs to remain fully resourced to follow-through on these commitments, enabling these projects to be resourced centrally rather than devolving responsibility to Local Authorities.

SASIG suggest that a delivery taskforce should be established alongside the parliamentary and planning process to consider these wider issues with regard to delivery of this important and controversial national runway infrastructure project. SASIG, in their position as representatives for Local Authorities across the country, would happily play some sort of facilitative or stakeholder role in such a taskforce.

Conclusions

In summary, SASIG continues to maintain it's neutral position in terms of any particular option, other than to advocate that a proper balance is struck between securing economic benefits and addressing environmental impacts in arriving at a final decision.

SASIG asks Government that the key provisions as set out in the body of this report are fully addressed and put in place to accompany any new runway approval.