

**READING BOROUGH COUNCIL  
REPORT BY DIRECTOR OF ENVIRONMENT AND NEIGHBOURHOOD SERVICES**

<b>TO:</b>	<b>STRATEGIC ENVIRONMENT PLANNING AND TRANSPORT COMMITTEE</b>		
<b>DATE:</b>	<b>19 MARCH 2018</b>	<b>AGENDA ITEM:</b>	<b>11</b>
<b>TITLE:</b>	<b>HEATHROW EXPANSION AND AIRSPACE PRINCIPLES CONSULTATION - COUNCIL RESPONSE</b>		
<b>LEAD COUNCILLOR:</b>	<b>TONY PAGE</b>	<b>PORTFOLIO:</b>	<b>STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT</b>
<b>SERVICE:</b>	<b>TRANSPORTATION AND STREETCARE</b>	<b>WARDS:</b>	<b>BOROUGHWIDE</b>
<b>LEAD OFFICERS:</b>	<b>CHRIS MADDOCKS/ STEPHEN WISE</b>	<b>TEL:</b>	<b>0118 937 4950 / 0118 937 3735</b>
<b>JOB TITLE:</b>	<b>ACTING STRATEGIC TRANSPORTATION PROGRAMME MANAGER / SENIOR TRANSPORT PLANNER</b>	<b>E-MAIL:</b>	<a href="mailto:chris.maddocks@reading.gov.uk">chris.maddocks@reading.gov.uk</a> <a href="mailto:stephen.wise@reading.gov.uk">stephen.wise@reading.gov.uk</a>

**1. EXECUTIVE SUMMARY**

- 1.1 This report summaries the current consultation being undertaken by Heathrow regarding the emerging proposals and options for expanding the airport, and provides a draft Council response to the consultation.
- 1.2 Appendix A - Draft Response to 'The Proposed Expansion of Heathrow Airport' Consultation.

**2. RECOMMENDED ACTION**

- 2.1 That the Committee notes the contents of the report and approves the draft response from the Council at Appendix A.

**3. POLICY CONTEXT**

- 3.1 To secure the most effective use of resources in the delivery of high quality, best value public service.

## **4. BACKGROUND**

- 4.1 In October 2016 the Government announced that a northwest runway at Heathrow Airport as its preferred scheme for the expansion of airport capacity in the South East. The Government then published the draft Airports National Policy Statement (NPS) in February 2017, setting out the draft policy for expansion at Heathrow.
- 4.2 A consultation on the draft Airports NPS was undertaken by Government in February 2017, with further consultation between October and December 2017 to allow updated evidence to be considered. The draft NPS is currently being scrutinised by the Transport Select Committee and it is anticipated there will be a vote in the House of Commons in 2018 on whether the draft NPS is formally adopted as Government policy.
- 4.3 Expansion of Heathrow is classified as a nationally significant infrastructure project for the purposes of the Planning Act 2008, therefore Heathrow is currently preparing an application to the Secretary of State for Transport for a Development Consent Order (DCO). In addition, changes to airspace will be considered by the Civil Aviation Authority (CAA) through an Airspace Change Process which will decide whether the change can be made based on a range of requirements. Subject to this approval process, it is anticipated that a new northwest runway at Heathrow could be open in late 2025/2026.
- 4.4 The Council's position on Heathrow expansion is set out in the Council Motion adopted in January 2014. This recognises the economic and employment benefits to Reading of Heathrow, accepts the importance of retaining the world's busiest hub airport in its current location, and accepts the need identified by Government for some expansion of airport capacity in the South East. However, the Motion includes caveats for expansion including the need for significant enhancement to sustainable surface access to the airport and the requirement for environmental concerns of local residents to be fully addressed.

## **5. THE PROPOSAL**

- 5.1 The consultation currently being undertaken by Heathrow is in two parts:
- Airport Expansion - physical changes on the ground needed to build a new northwest runway and to operate an expanded airport.
  - Airspace Principles - high-level principles that could be applied when designing the new airspace required for an expanded airport. It should be noted that future flight path options are not being consulted upon at this time but will be subject to a future consultation.

- 5.2 Reading is located 25 miles west of Heathrow, therefore the effects of the airport expansion will be different to those communities adjacent to the airport. The consultation documents focus mostly on effects on communities adjacent or close to the airport, however the first part of the consultation includes significant sections relating to surface access, noise, air quality & emissions, and carbon & climate change. These aspects are of greater interest and concern to the Council and residents of Reading.
- 5.3 Enhancing sustainable surface access to Heathrow is a particular concern to the Council. The consultation includes a statement of intent supporting airport expansion that *'We have made a commitment that the expansion of Heathrow will not lead to an overall increase in Heathrow related traffic volumes compared to today'*. In addition, the draft Airports NPS states that *'any application for development consent and accompanying surface access strategy must include details of how Heathrow will increase the proportion of journeys made to the airport by public transport, cycling and walking to at least 50% by 2030 and at least 55% by 2040 for passengers. Heathrow must also demonstrate how it will achieve a 25% reduction of all colleague (employee) car trips by 2030, and a reduction of 50% by 2040 from a 2013 baseline level.'*
- 5.4 The proposed expansion of Heathrow would increase the number of people visiting the airport and the consultation sets out the ways in which the percentage of people accessing the airport by sustainable means, particularly public transport, will be increased in order to achieve the surface access commitments. The existing mode share for passenger access to the airport is 39% by public transport, 28% by car and 33% taxis / private hires. For employees, the public transport share is 40% and car share is 53%.
- 5.5 It should be noted that Heathrow is relying on the Elizabeth Line (Crossrail) and Piccadilly Line Upgrade schemes to provide the major transport enhancements needed to meet their surface access commitments. It is being argued by Heathrow that the proposed western and southern rail access schemes are not required to achieve the NPS targets set for airport expansion.
- 5.6 The second part of the consultation relates to airspace design principles; specifically flight paths, urban and rural areas, noise & emissions, technology & innovation and night flights. The purpose of this part of the consultation is to seek feedback on key principles that would be used to guide the design and structure of the airport's future airspace.
- 5.7 The deadline for responding to this consultation is 28 March 2018. It is anticipated that a second consultation containing more detailed proposals will be undertaken by Heathrow next year. The Committee is asked to agree the draft response to the consultation from the Council as set out at **Appendix A**.

## **6. CONTRIBUTION TO STRATEGIC AIMS**

6.1 The delivery of the projects outlined in this report would help to deliver the following Corporate Plan Service Priorities:

- Providing infrastructure to support the economy.

## **7 COMMUNITY ENGAGEMENT AND INFORMATION**

7.1 Significant consultation will be undertaken regarding this proposed scheme as set out within the report.

## **8. LEGAL IMPLICATIONS**

8.1 None relating to this report.

## **9. EQUALITY IMPACT ASSESSMENT**

9.1 In addition to the Human Rights Act 1998 the Council is required to comply with the Equalities Act 2010. Section 149 of the Equalities Act 2010 requires the Council to have due regard to the need to:-

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

9.2 It will be the responsibility of Heathrow to carry out an equality impact assessment at the relevant time.

## **10. FINANCIAL IMPLICATIONS**

10.1 None relating to this report.

## **11. BACKGROUND PAPERS**

11.1 Airports Commission Interim Report - Council Motion, Council, January 2014.

11.2 Consultation documentation - <https://www.heathrowconsultation.com/>

## APPENDIX A - DRAFT READING BOROUGH COUNCIL RESPONSE TO 'THE PROPOSED EXPANSION OF HEATHROW AIRPORT' CONSULTATION

### PART 1 - AIRPORT EXPANSION CONSULTATION

*The first part of the consultation considers issues relating to surface access, noise, air quality & emissions and carbon & climate change. The Council's draft response is set out below:*

#### 1. Surface Access

Reading Borough Council (RBC) supports the surface access commitments set for airport expansion as part of the Airports National Policy Statement (NPS) and notes the current mode share for visitors and employees accessing the airport. The Council strongly supports the development of public transport initiatives for both passengers and staff, given current levels of traffic congestion in existence around the airport, and as a result in journey originating towns like Reading. For the NPS targets to be achieved Heathrow will need to demonstrate real support for schemes that will facilitate a step change in public transport provision to the airport.

Whilst the strategy as outlined in the surface access document includes support for developing public transport links to the airport, it is short on detail as to what level of financial support will be forthcoming, if at all. This is particularly the case where new rail links have been proposed to connect Heathrow to the west and south. These areas are shown in the car use statistics in the consultation documents to be responsible for a disproportionate amount of the current car journeys to the airport. These car journeys are one of the principal causes of existing congestion on the M25, M3, M4 and A4 and the development and implementation of the new rail projects should be a priority for support from Heathrow Airport now, particularly in the case of the rail access from the west. As part of the expansion plans a further new rail link will be needed to connect Heathrow to the rail lines to the south.

#### Western Rail Link to Heathrow

In the case of the proposed Western Rail Link to Heathrow (WRLTH), development seems to have stalled over arguments regarding funding. It is clear that Heathrow currently would benefit considerably from implementation of this access and the scheme should be delivered in advance of the works to expand Heathrow as this will help to embed sustainable travel habits for both visitors and employees.

The period of construction for the expanded airport would inevitably cause significant congestion and traffic issues around a large area, therefore construction of WRLTH should take place and be completed in the period prior to the major construction programmes for airport expansion as this would help to mitigate the disruption and enable a significant modal shift to take place.

The statement in the consultation that Heathrow would '*Provide a fair and reasonable contribution to the costs for a new Western Rail Link to Heathrow allowing direct rail services to Heathrow from Reading and the west*' falls significantly short of the commitment needing to be shown by Heathrow to ensure this project is delivered in a timely manner. The Council notes with concern that there is no proposed date for completion of this link in the documentation.

### Southern Rail Access to Heathrow

Regarding rail access from the south, the consultation document states that Heathrow will '*Work with stakeholders to support the development of a new direct rail link to Heathrow from the south.*' Again this statement falls a long way short of the commitment required from Heathrow for this scheme, considering that for an expanded Heathrow a direct rail link to the mass of rail lines south of the Thames would be a significant benefit.

Further, in the consultation document it is stated that '*A feasibility study undertaken by Network Rail showed that there is a strong business case for the proposals and that there are credible infrastructure solutions that should be explored further. Heathrow's analysis to date indicates that our proposed surface access strategy is not reliant on a Southern Rail Link to deliver the mode share targets in the revised draft ANPS and commitment to no increase in Heathrow-related traffic.*' This analysis appears to ignore Heathrow's own analysis elsewhere which clearly shows that where good public transport connections exist they are already used; whilst where they do not exist the car is the dominant form of passenger and worker access to the existing airport.

Currently the public transport share of passengers from Camden is 69%, Westminster 56%, but Reading only 29% and Guildford just 9%. These figures clearly show the need for the rail links to be provided to the west and south of the airport. Therefore the contention that the southern rail access is not really needed for Heathrow Airport expansion is a major concern.

A similar argument for early implementation of a southern link exists, as this would start to tackle the number of car journeys to the airport from that direction ahead of the disruption and capacity constraints likely to be caused by the physical works to expand Heathrow.

Failure to provide either or both rail links to the west and south will be likely to cause additional rather than less traffic as a result of airport expansion. This will lead to more traffic congestion for those living and travelling in a wide area and not needing any direct dealings with the airport. This would be an unreasonable imposition on residents and business in the area nearby, and further away towns in the Thames Valley and Surrey.

## Local Bus Services

Expansion of local bus routes is proposed as part of the consultation, however it appears to concentrate on those within the Greater London area and mostly ignores those running outside that area to Slough and other locations in the Thames Valley.

As noted above, there is a need to develop better public transport links to Thames Valley locations whether by direct rail links or where these are not possible, by direct frequent bus links. In addition the proposed rail links will not serve local stops in residential areas that are served by buses. The consultation suggests that many bus services don't provide good timetables that are appropriate to the needs of shift workers at Heathrow. This would be easy to solve with Heathrow support for these bus services, as there is no need for overnight engineering possessions of tracks as for a rail service. There are currently no 24 hour buses from/to Thames Valley towns such as Slough, Maidenhead and Reading, presumably because of reluctance by Heathrow to offer support.

This contrasts with the situation in Reading where there are five 24/7 bus routes in operation. Bus usage statistics (DfT) also show that the potential for development of bus services west of Heathrow is not currently being met, as in Reading Borough a total of 21.4m bus journeys are made compared to just 4.7m in Slough Borough (the nearest town west of Heathrow). In terms of trips by bus per head of population (which is broadly similar) the figure for Reading is 131 trips per year per head of population compared with just 32 in Slough. It is clear from these figures that current bus routes to the west of Heathrow are not sufficient to attract significant numbers of car users to travel by bus.

The consultation documents do not contain any specific proposals to upgrade bus links to Mass Rapid Transit (MRT) or Bus Rapid Transit (BRT) standards (not necessarily guided) despite the planned wholesale relocation of roads such as the A4. The relocation/rebuilding of these roads which are already used by numerous buses should include the provision of dedicated bus lanes (where feasible) to provide exclusive right of way for bus services. This will allow bus services to operate more quickly and more reliably than is currently the case. This will allow more services to be run for the same cost and attract more passengers to them.

As a minimum at least one 'transit corridor' for upgrading to BRT standards should be provided in each direction of approach to the airport campus. Given the very large sums likely to be spent in relocating the affected roads this is a golden opportunity to provide this missing BRT infrastructure and to create a world class connecting public transport network to match the aspirations for a world class airport. To the west Slough Borough Council is implementing BRT lanes on the A4 and it would be logical to deliver a complete BRT route from Slough to the Heathrow campus and operate it 24 hours a day.

On the Heathrow campus there should be no reason for buses to be stuck in traffic queues as dedicated bus lanes can be provided to ensure efficient access to and

between terminals. There is no mention of future provision of any such 'on campus' facilities in the consultation documentation.

In addition, to enable construction workers to easily get to/from work sites the more bus lanes that are implemented prior to the main construction the easier it will be to deal with the construction. It will also mitigate the effects of road closures and the inevitable congestion.

### Smart Ticketing

Provision of new and innovative ticketing arrangements is ongoing within both Transport for London (TfL) and the wider bus industry in the Thames Valley, and to a lesser extent with train services. There is a clear need for passengers and employees to be able to easily obtain economic and flexible tickets for their whole journey from their home to the airport. This is not the case currently and would be a major step towards people being able to easily choose to use public transport. Currently information on how to get to Heathrow is patchy.

Inclusive public transport tickets from airlines are also the exception. It should be feasible to offer free or discounted surface access public transport tickets as part of an airline ticket package. The airline offering such surface access solutions should be rewarded by the airport.

## 2. Noise

Reading is not directly affected by the noise of operations (take off and landings) at the airport and the effects of flight paths will be covered in the future Airspace Principles consultation.

However, RBC would support the measures proposed to reduce or mitigate the effects of noise nuisance from both the existing airport and the expanded airport. The ability to offer respite through runway alternation would appear to be improved with the three runways and should be made a significant objective. The 6.5 hour ban on night flights should continue and the 11pm to 5.30am period seems suitable. However it is unclear how if the current ban is from 11.30pm to 6am, there can be flights 'scheduled to land from 04.30 to 06.00'. If the ban period is to be from 11pm to 5.30am there should not be planes arriving at 4.30am.

There was nothing mentioned in the main consultation document regarding noise of construction. Clearly the construction project will be ongoing for many years once it starts. This needs to be treated as a serious noise issue as it will affect nearby residents, passengers and colleagues at the airport for years.

There is no connection noted between noise nuisance and the choices of surface access made to get to/from the airport. This is an omission as the over dependence on cars as a means of access ensures high levels of road traffic noise nuisance are experienced on roads even a long way from the airport such as the M4 passing South Reading. If the proposed western and southern rail links as set out



above were delivered there would be a beneficial noise reduction effect over a large area.

### **3. Air Quality and Emissions**

The main consultation document contains a triple lock guarantee on air quality and emissions as set out below:

- *'Meeting our existing commitment to play our part in improving air quality by targeting no increase in the amount of airport related vehicles on the road and by supporting improved surface access.*
- *Ensuring further measures are ready to be introduced, if required, to reduce road journeys and emissions and encourage sustainable forms of transport.*
- *Binding our commitment by guaranteeing that new capacity at an expanded airport will only be released when it is clear that the airport's contribution will not delay the UK's compliance with EU air quality limits.'*

RBC would agree with the requirements of the triple lock and re-iterate that the delivery of the rail links and bus links for surface access noted above will be the best and most effective way of ensuring that the airport expansion plays its part in reducing emissions and improving air quality.

The consultation document outlines the general approaches that will be taken to reduce the impact on air quality, such as incentivising the use of cleaner aircraft and their operation on the ground. It will be important that the future consultation contains more detail on these incentives and other measures that will offset the significant increase in planes and the associated increase in traffic on the ground.

However, it is noted that as the airport expansion is intended to provide for an increase in take offs and landings by provision of the third runway, it is surprising that there is little detail on how the extra emissions from the extra planes will be dealt with. The consultation document contains little acknowledgment that planes burn large quantities of fossil fuels and appears to mostly apportion airport emissions to surface access transport.

### **4. Carbon and Climate Change**

RBC supports the proposals to reduce carbon emissions, and reduce the climate change effect of the airport. The consultation document rightly acknowledges the influence of construction as well as operations in this area. The need for a climate change resilient airport is also acknowledged with a need for greater resilience for adverse weather events. This is not something the current airport with its restricted runway capacity is good at.

Once again making surface access by sustainable transport as attractive and easy as possible will be of great importance in reducing carbon emissions and climate change. Although electric vehicles have their place, an electric car is still an

inefficient use of road space compared to an electric or low emission BRT vehicle or compared to a bicycle or train. A reduced need for car parking spaces for any type of car and a consequent need for less road space would contribute to a reduction in carbon emissions throughout the 'life cycle' of the airport expansion and reduce the influence on climate change.

The proposed incentivised use of lower carbon aircraft is noted and supported.

## **PART 2 - AIRSPACE PRINCIPLES CONSULTATION**

### **Principle 1: Flight Paths**

#### Extract from the Consultation Document:

*'There are three options for the design principle we could apply when deciding where we choose to put our flight paths in relation to where they are today. A trade-off exists between these three options so we want your views on which should be given priority.'*

- A. Minimise the total number of people overflown, with routes designed to impact as few people as possible.*
- B. Minimise the number of people newly overflown, keeping routes close to where they are today, where possible.*
- C. Share routes over a wider area, which might increase the total number of people overflown but would reduce the total number of people most affected by the routes as the noise will be shared more equally.'*

#### RBC Response:

Option A is likely to place significant impact on the people who will be overflown, whilst Option C is likely to blight huge areas not previously affected by noise nuisance from overflights. Therefore, the Council's preference would be Option B to keep the same routes where feasible, as this would affect as few additional people as possible.

### **Principle 2: Urban and Rural Areas**

#### Extract from the Consultation Document:

*'We are seeking views about whether we should prioritise flights over urban or rural areas. When designing airspace, we could:*

- A. Prioritise routing aircraft over urban areas, recognising that urban areas have higher general noise levels; or*
- B. Prioritise routing aircraft over rural areas where fewer people live.'*

#### RBC Response:

Airport expansion is stated to be for the benefit of the entire region and the UK as a whole, therefore it is envisaged that a reasonable balance of spreading noise nuisance across both urban and rural areas would be the only equitable and

feasible way to achieve the additional flights resulting from the proposed expansion. However, between the two options RBC would favour Option B, particularly with priority given for avoiding noise pollution over urban areas during anti-social hours.

### **Principle 3: Urban Areas**

#### Extract from the Consultation Document:

*'Not all urban areas have the same general noise level, and parks and open spaces within urban areas may be especially valued for their tranquillity. When designing airspace in urban areas, we could:*

- A. Design flight paths over parks and open spaces rather than residential areas; or*
- B. Design flight paths over residential areas, avoiding aircraft overflight of parks and open spaces.'*

#### RBC Response:

As stated above it is anticipated that a reasonable sharing of noise nuisance across all areas would be achieved, however RBC would favour Option A particularly with priority given for avoiding noise pollution over residential areas during anti-social hours.

### **Principle 4: Noise and Emissions**

#### Extract from the Consultation Document:

*'Avoiding overflight of local communities could result in a longer route, with aircraft burning more fuel and producing more emissions. When designing airspace, we could:*

- A. Design flight paths that prioritise the reduction of aircraft noise for local communities over those that reduce fuel burn and emissions; or*
- B. Design flight paths that prioritise a reduction in fuel burn and emissions over those that reduce noise for local communities.'*

#### RBC Response:

In the context of an inter-country or inter-continental journey the extra fuel used by making some diversions around particularly sensitive locations would be a relatively minor increase. For people on the ground respite from aircraft noise is likely to be a more important consideration, therefore RBC would favour Option A.

### **Principle 5: Technology and Innovation**

#### Extract from the Consultation Document:

*'This airspace redesign is a once in a generation opportunity to modernise the way our airspace is used. The airspace we design now needs to be efficient for the foreseeable future.'*

*We are therefore proposing that one of our design principles is to base our airspace on the latest navigation technology, and we are working in partnership with our airlines to ensure they invest in some of the older aircraft at Heathrow to bring them up to these more modern capabilities.*

*We don't offer an alternative to this principle, but we do ask for you to comment on aircraft technology and airline investment as part of this consultation.'*

RBC Response:

As the airport expansion is based on a degree of inconvenience and adjustment being required by the airport's neighbours and by society as a whole while the project is delivered, it is essential that the aviation industry make its own investments in aircraft suitable for the future arrangements. This is not only true with regard to navigation and airspace performance but also in terms of emissions and noise reduction, better carbon lifecycles and generally making aircraft more acceptable.

**Principle 6: Night Flights**

Extract from the Consultation Document:

*'Reducing the noise impacts of Heathrow, particularly at night, is a key focus for us - now and in the future. Heathrow has made good progress over the last few years in reducing the number of late running flights that operate from the airport and, with expansion we have committed to extend the ban on scheduled night flights from five hours today to six and a half hours (sometime between 11pm and 7am) with the exact timings to be decided by the Development Consent Order process.*

*Within our separate but parallel consultation on the expansion of the airport, we are required to ask for your feedback on particular issues relating to night flights, noise and air quality.'*

RBC Response:

This principle doesn't really relate to night flights if the ban is to be a key part of future operations. The option of making different choices of the airspace principles above for the stated 'small number' of early flights before 7am or late flights after 11pm should be viewed with the overriding principle that there should be a fair distribution of noise nuisance, with priority given to avoiding residential areas during anti-social hours.