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29<sup>th</sup> January, 2015

**Airports Commission Consultation**  
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Southwark Council  
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*Dear Sir,*

**RE: Airports Commission Consultation response**

We welcome the opportunity to respond to the Airports Commission Consultation Document into three options for increasing UK's aviation capacity in the long-term and the Commission's assessment of them. The council has particular interest in the consultation given the socio-economic and environmental impact that any increase in aviation capacity either at Gatwick or Heathrow Airport will have on the borough.

Whilst our clear preference is for early expansion of Gatwick Airport and we support their plans, our response provides feedback on a number of the issues raised within the extensive suite of consultation documents that have been presented.

**1. Conclusions as to the three short-listed options**

The council recognises that there is a need to rigorously appraise the options for the provision of an additional runway by 2030 at either London Heathrow or Gatwick Airport to cater for growing demand for air travel.

The council must consider both the direct environmental impact that increased aircraft movements will have upon Southwark as a borough but also the appropriateness of mitigation measures for those communities directly impacted by additional flights.

Furthermore we are of the view that at present the evidence base could be improved in relation to the provision of rigorously underpinned evidence to give authority to the assumptions that have been made for each of the options. This relates to (and not limited to) surface access, transport, environmental and wider economic benefits/dis-benefits of the different options.

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## **2. Transport/surface access**

The council notes with interest the comprehensive analysis that has been undertaken in relation to transport/surface access for each of the options. It has a number of observations in relation to this.

### **2.1 Transport/surface access assumptions**

The council's major concern in relation to the transport/surface access relates to The Airports Commission's assessment of surface access impacts at Heathrow and Gatwick. At Heathrow, the analysis examines the surface access impacts of 103.6 million passengers per annum (mppa) and 65mppa at Gatwick in 2030. The analysis has failed to assess the impact of the 149mppa/96mppa that the Commission estimates to be the maximum potential throughput of a 3 runway Heathrow and a 2 runway Gatwick in 2050.

The failure to assess the potential worst case scenarios in relation to surface access significantly underestimates the potential impact of each of the options. Therefore, this would appear to be contrary to the Commission's focus in developing the appraisals for each option of not focusing on a sole view for the future of both the aviation industry and the wider UK and global economy (hence the 5 scenarios used for appraising the shortlisted options).

The council is somewhat concerned about the Commission's future modal assumptions for each of the options. It is of the view, that the Commission has been reliant on numerous sensitive assumptions for each of the airport options which as a result minimise the impact of additional demand.

The council welcomes that the Commission has acknowledged that there are several London rail schemes (including the Bakerloo Line Extension) which may have some degree of impact on final rail mode choice to Gatwick. The council believes that it is essential that surface access by public transport is significantly enhanced to Gatwick Airport. The provision of a Bakerloo Line Extension to/from south London will provide Southwark residents with an easy access interchange with Thameslink services to Gatwick Airport. It is likely that this rail scheme will have a significant impact on Southwark and south London residents who would wish to access the airport without the need to circulate via London Bridge.

### **3.2 Railway network analysis**

The Commission is heavily reliant on both existing planned and uncommitted schemes to meet anticipated demand from airport traffic. For Heathrow it is heavily reliant on Crossrail and the Piccadilly Line Upgrades. These schemes are designed only to meet existing demand pressures. There is no concrete evidence to highlight the magnitude of additional rail infrastructure investment required to meet differing future aviation demand scenarios at both Heathrow and Gatwick.

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For Gatwick, The Commission is heavily dependent upon the Thameslink upgrade which although will provide additional capacity, is unlikely to be able to provide substantial additional capacity particularly in the peak period. This is of specific interest to Southwark Council as these services alongside Southern services provide the rail capacity to/from London Bridge and Gatwick Airport. The council has concerns regarding the Commission's analysis relating to overcrowding on services serving London Bridge in the am peak from 2030 onwards. At present in the am peak fast services from Gatwick to London Bridge experience severe overcrowding with often extended dwell times which have an impact upon wider network performance. New Thameslink rolling stock will provide some additional capacity. Greater consideration needs to be given in the analysis as to how additional fast services to/from London Bridge could be provided to accommodate the additional demand from airport traffic at both peak and off-peak periods.

The Commission is reliant on uncommitted upgrades of the Brighton Main Line as outlined in the 2014 Draft Sussex Route Study. Since many of the proposals are currently unfunded and are out for consultation it is unclear as to both potential timescales and funding sources. It should be recognised that such schemes will require extensive track possessions and resultant disruption to weekday and weekend services to be implemented. These upgrades will be imperative to enhance line capacity if Gatwick is expanded.

Longer term technological improvements to the railway network particularly in relation to capacity on the Brighton Main Line were mentioned in the Appraisal Framework Module 4: Surface Access: Gatwick Airport Second runway report. The concepts explored in relation to providing additional capacity and operational resilience such as provision of double deck rolling stock and enhanced signalling systems all may provide longer term solutions. However, greater analysis is required as to the realistic viability of implementation from both a cost and implementation perspective is required. For example, signalling improvements to the Brighton Main Line were suggested by the adoption of European Rail Traffic Management System Level 2 (ERTMS) which would provide additional line capacity through reduced headways. The report has failed to recognise that currently and in the future, there are many services which radiate on to and off the main line and as such would require the capability to operate via ERTMS and by conventional signalling systems. Retrofitting of existing stock and provision of dual capability new stock will represent a significant cost which the railway industry would struggle to afford.

### 3.4 Other modal access

The Commission has focussed heavily on discussing for each option the strategic highway and rail network issues. There has been minimal discussion about how the modal share of other modes could be addressed or encouraged to grow (apart from presentation of existing and future modal shares). For example, local bus and coach usage to each airport should have been assessed more fully. Similarly, measures to encourage airport workers (where appropriate) to walk or cycle should have also been covered.

More general discussion for each option in relation to smarter travel choices initiatives currently in operation at each airport and future proposals needs to be presented. At present it is difficult to ascertain with any degree of certainty how future year modal splits would be achieved for other modes.

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#### **4. Economy and jobs**

The council notes with interest the Commission's analysis of the different options and their impact on the economy and job provision and has several comments.

##### **4.1 Additional job creation assumptions**

The Airports Commission evaluated the additional jobs that could be generated by either of the Heathrow expansion options, estimating between 54,800 and 108,000 by 2050. In contrast, for Gatwick the estimate was between 7,900 and 32,500. The figures presented are gross employment figures. They only include those employed directly at the airport and those working outside the airport boundary as part of the supply chain (indirect jobs) or provide support services for airport workers (induced jobs).

The council welcomes the notion that a substantial number of jobs will be directly and indirectly linked to airport expansion. With high quality surface access it would expect Southwark residents to benefit from these new jobs, particularly if Gatwick were to be expanded.

##### **4.2 Future employment locations**

Specifically in relation to where future employment may be located, the Commission focus on the immediate 'local area' which includes 14 or 15 local authorities closest to Heathrow.

Despite the lack of clarity as to the level of potential employment opportunities for local communities not in the immediate vicinity, the council recognises the potential benefits to Southwark residents of increased employment opportunities as a result of airport expansion. This is particularly of relevance for Southwark in relation to the Gatwick option. Many of its residents would be within easy access of fast, frequent rail links to Gatwick by interchanging at London Bridge or at New Cross Gate via any future potential Bakerloo Line Extension.

##### **4.3 Catalytic employment**

The council believes that the actual employment benefits could be underestimated as at present the Commission's approach refers to airport associated employment. It ignores catalytic employment. The Commission's Spatial-computable General Equilibrium (SCGE) model highlights that London and South East experiences positive Gross Domestic Product (GDP) impacts. The labour market strengths of London, primarily IT, professional and financial services and a relatively high degree of large multinational companies lends itself well to benefit from the catalytic impacts of airport development cited by the Commission. This is pertinent when evaluating the scope for enhanced surface access connectivity at primary transport nodes such as at London Bridge. The strength of London and such connectivity have been identified by all promoters as key drivers of delivering the stated economic benefits of airport expansion. These further impacts at present have been overlooked by the Commission.

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## **5. Housing provision**

The council notes with interest the Commission's analysis in respect to the additional demand for housing created with each airport expansion option.

### **5.1 Housing demand assumptions**

The Commission's evaluation of additional housing demand is concentrated on a prescribed 'local area' which excludes the majority of London Boroughs. It assumes in a worst case scenario that up to an additional 70,800 dwellings would be needed for Heathrow and up to 18,400 for Gatwick (this is contrast to earlier reports that suggested as many as 40,000 new dwellings might be required). However, it does acknowledge that this is dependent on numerous factors such as the magnitude of additional employment taken up by existing residents. It has excluded the additional demand associated with catalytic employment impacts.

### **5.2 Housing densities**

The Commission concludes that housing requirements can be met through the increasing of densities and the utilisation of a greater supply of brownfield locations. In contrast, both promoters indicate that all additional employment could be absorbed locally and that no additional housing would be required. In the case of Gatwick this would be on a more limited scale.

### **5.3 Housing, land use and transport**

The Commission and promoters appear to underplay the housing requirements once catalytic employment generation is considered. It is difficult to see how additional housing could be easily accommodated within solely those local authority areas noted by the Commission. There is unsubstantiated bias regarding the opportunities to increase housing stock, particularly within London boroughs. Additional housing may need to be accommodated in London Boroughs and local authorities outside the Commission's assessment area. The highest demand is likely to be in locations that have good surface access to the airports and across strategic employment corridors.

## **6. Noise**

Noise is a significant issue that impacts upon certain communities within the borough. These are primarily in the areas of Camberwell and Dulwich and relate to existing flight paths to/from London Heathrow and City Airport. The council has a number of comments in relation to the noise impact assessment of the different options presented.

### **6.1 Night flight noise impact analysis**

Sleep disturbance has negative effects on the health of residents living under flight paths. In order for the situation for local residents to improve, it is imperative that there is a reduction in the levels of permitted movements over areas of high population such as central London. The Council is concerned by Heathrow's proposals that it would increase the number of night flights affecting central London including Southwark.

## 6.2 Flight path analysis for the different options

Based on the evidence that has been presented within the consultation document, it is still very unclear as to exactly what the make up of additional flights would be and the resultant impact on flight paths for each option. Although in the NATS Support to the Airports Commission: Appraisal Module 14: Operational Efficiency: Airspace Efficiency Report there is some indication of potential flight paths for each option, it is still unclear as to the magnitude of flights undertaking each route. This would need to be provided under the 5 aviation forecast scenarios that the Commission has proposed. This would help to understand the full environmental impact on not just neighbouring areas to the airport but communities close to or under predicted flight paths.

## 6.3 Strategic fit with London Plan noise policies

The London Plan acknowledges the importance that both Heathrow and Gatwick play in maintaining London's economic competitive advantage over other major European cities. The London Plan opposes under Policy 6.6 any future airport expansion particularly concerning Heathrow where this would see additional aircraft movements.

The London Plan under Policy 7.15 expects airport operators to reduce and manage noise to ensure that the health and quality of life of London's residents is enhanced. The evidence presented by the Commission increases the probability that any future development at Heathrow would see an increased noise impact on London. This is despite introduction of more advanced aircraft technology. There is no guarantee as to how the impact on local communities would be appropriately mitigated.

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