

REPORT TITLE: CONSULTATION RESPONSE TO SOUTHAMPTON AIRPORT
EXPANSION PLANING APPLICATION

22 JANUARY 2020

REPORT OF CABINET MEMBER for BUILT ENVIRONMENT AND WELLBEING:
COUNCILLOR JACKIE PORTER

Contact Officer: Elizabeth Marsden Tel No: 01962 848267

Email: emarsden@winchester.gov.uk

WARD(S): EASTLEIGH BOROUGH COUNCIL

PURPOSE

The report sets out Winchester City Council's response (as adjoining Local Planning Authority) to the consultation received from Eastleigh Borough Council for the planning application ref. F/19/86707 to expand Southampton Airport which includes a runway extension and additional car parking provision.

RECOMMENDATIONS:

That Cabinet:

1. Notes the contents of this report
2. Agrees submission of the response of the Cabinet Member for Built Environment and Well Being, attached at Appendix A, on behalf of Winchester City Council as statutory consultee to the consultation on the planning application at Southampton Airport, Reference F/19/86707, which is to be determined by Eastleigh Borough Council.

IMPLICATIONS:

1 COUNCIL STRATEGY OUTCOME

- 1.1 The proposed expansion of Southampton Airport raises a number of issues directly relevant to the new Council Plan:
- 1.2 Tackling the climate emergency and creating a greener district, vibrant local economy and living well.
- 1.3 For the reasons set out below its is considered that proposed scheme to expand the airport is not consistent with the Plan's priorities because of the potential adverse environmental impacts of the development

2 FINANCIAL IMPLICATIONS

- 2.1 None

3 LEGAL AND PROCUREMENT IMPLICATIONS

- 3.1 As an adjoining authority to the application site Winchester City Council represents a Statutory Consultee in relation to what is the major development proposal occurring in the adjoining authority area of Eastleigh Borough Council. Statutory consultees are those organisations and bodies, defined by statute, which local planning authorities are legally required to consult before reaching a decision on relevant planning applications.
- 3.2 Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2010 ("the Development Management Procedure Order") requires that local planning authorities must consult statutory consultees before granting of planning permission. Under article 20 of the Development Management Procedure Order, statutory consultees are expected to provide the consultor with a substantive response within 21 days.
- 3.3 Consultation and therefore a response by the City Council is on material planning considerations and must be taken into account by the Eastleigh Borough Council in the making of a decision.

4 WORKFORCE IMPLICATIONS

- 4.1 None

5 PROPERTY AND ASSET IMPLICATIONS

- 5.1 None

6 CONSULTATION AND COMMUNICATION

- 6.1 It is the responsibility of the Local Planning Authority dealing with a planning application to consult all relevant statutory and non-statutory bodies including

adjoining Local Authorities directly affected by a proposed development which, in this case, includes the City Council as a neighbouring authority to Eastleigh.

6.2 Given the size, scale and implications of the proposal it is considered necessary to provide a clear and comprehensive response to the consultation and, in order to do this, to carry out the necessary internal consultations to ensure the Council's comments are based upon specialist expertise which enable us to assess the impact of the development on the district.

6.3 The Council has a duty to respond to such a consultation request within 21 days of notification. In this case the Council has agreed an extension of time with Eastleigh Borough Council until 24th January 2020 to enable the proposed response to be agreed by Cabinet. The Council's draft response letter can be found at Appendix A of this report.

6.4 Prior to the submission of the planning application the Council have previously responded to the master plan submitted by the Airport and the Portfolio Holder's response can be found at Appendix B of this report.

7 ENVIRONMENTAL CONSIDERATIONS

7.1 To be addressed below.

8 EQUALITY IMPACT ASSESSEMENT

8.1 None

9 DATA PROTECTION IMPACT ASSESSMENT

9.1 None required

10 RISK MANAGEMENT

10.1 None at this time

Risk	Mitigation	Opportunities
<i>Property</i>	N/A	N/A
<i>Community Support</i>	N/A	N/A
<i>Timescales Response not sent in time to be considered by Eastleigh Borough Council.</i>	Agreement reached with Eastleigh Borough Council to extend time to comment on the application to 22/1/20.	Cabinet to agree the response allowing transparency in the consultation response process. N/A
<i>Project capacity</i>	N/A	N/A
<i>Financial / VfM</i>	N/A	N/A

<i>Legal</i>	Completing the Council's legal requirement as a statutory consultee to respond meaningfully to the planning application.	Positive annual report to the Secretary of State as a statutory consultee on the fulfilment of the Council's duties.
<i>Innovation</i>	N/A	N/A
<i>Reputation Failure to respond to this consultation could attract public criticism as the development has potential to have a significant effect on the district particularly in light of the declaration of a climate emergency.</i>	Response sent to Eastleigh Borough Council.	N/A
<i>Other</i>	N/A	N/A

11 SUPPORTING INFORMATION:

11.1 The proposed development relates to the expansion of Southampton Airport which has been submitted as a planning application to Eastleigh Borough Council (EBC) ref. F/19/86707.

11.2 The proposed description of development is:

“Construction of a 164 metre runway extension at the northern end of the existing runway, associated blast screen to the north of the proposed runway extension, removal of existing bund and the reconfiguration and extension of existing long stay car parking to the east and west of Mitchell Way to provide an additional 600 spaces. (This application is subject to an Environmental Impact Assessment).”

11.3 The current proposal to expand the airport marks the first stage of the implementation of its masterplan for growth to 2027. It is understood that the existing length of the current runway limits the weight and range of aircraft that can operate from the airport. The current aircraft of choice for many of the airlines operating from the UK and within Europe are the Airbus A320 and Boeing 737 passenger jets. Such planes do operate from Southampton at present, but they cannot take off in a Southerly direction when fully weight laden (with all seats full of passengers, their baggage and a full fuel tank). This precludes flights to some of the key holiday markets of Southern Europe.

11.4 Section 12 of the Planning, Design and Access Statement discusses the proposed growth resulting from the expansion being able to accommodate the aircraft described above. Forecasts suggest that the number of air traffic movements (ATMS) may increase from 39,000 in 2017 to 57,800 by 2037. This will allow a forecasted increase in the number of passengers, from 2 million in 2017, to 5 million in 2037.

- 11.5 The section also discussed future plans that are not the subject of this application but which include enhancements to the terminal building and the provision of a tunnel under the runway to avoid prejudicing access to the adjoining allocated employment land.
- 11.6 Winchester City Council was consulted on the proposed development by Eastleigh Borough Council on 20th November 2019 as an adjoining Local Planning Authority that will be directly affected by the proposed development.
- 11.7 The application represents Schedule 2 development in relation to the Environmental Assessment Regulations that is likely to have a significant effect on the environment and therefore is accompanied with an Environmental Statement setting out in detail the environmental impact of the development. The chapters of the Environmental Statement, together with their supporting technical documents, address the following issues:
- Socio-economics
 - Air Quality
 - Transport and Access
 - Ecology
 - Water, Flood Risk and Drainage
 - Noise and Vibration
 - Ground Conditions
 - Climate Change – Greenhouse Gases
 - Climate Change – Resilience
 - Population and Human Health
- 11.8 In addition the following documents were submitted in support of the application.
- Planning, Design and Access Statement
 - Heritage Statement and Landscape Appraisal
 - Flood Risk Assessment and Drainage Strategy
 - Transport Assessment
 - Runway Extension Ground Investigation Report
 - Information for Habitat Regulations Assessment

- The Economic Impact of Southampton Airport
- Wildlife Enhancement Plan
- Airspace Change supporting letter

11.9 **Planning Policy Context**

11.10 The planning application falls within Eastleigh Borough Council's area and therefore will be determined by that authority in accordance with their relevant Local Plan Policies. There are national policies and national planning policies that are relevant to the consideration of the proposal and these are set out below.

11.11 In addition, whilst the City Council's Local Plan does not have adopted policies relating to specifically the airport, which is outside of its boundary, there are relevant policies in relation to noise and pollution that are set out below for clarification.

11.12 **National policy**

11.13 Airports National Policy Statement (NPS) June 2018: New runway capacity and infrastructure at airports in the South East of England - Provides the primary basis for decision making on development consent applications for a Northwest Runway at Heathrow Airport, and will be an important and relevant consideration in respect of applications for new runway capacity and other airport infrastructure in London and the South East of England.

11.14 *Para. 1.39 - the Government has confirmed that it is supportive of airports beyond Heathrow making best use of their existing runways. However, we recognise that the development of airports can have positive and negative impacts, including on noise levels. We consider that any proposals should be judged on their individual merits by the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts.*

11.15 Aviation Policy Framework 2013. - The aviation policy framework sets out the government's policy to allow the aviation sector to continue to make a significant contribution to economic growth across the country. It provides the baseline for the Airports Commission to take into account on important issues such as aircraft noise and climate change. It sets out government's objectives on the issues which will challenge and support the development of aviation across the UK.

11.16 **Noise Policy Statement for England (NPSE) 2010**

11.17 The NPSE was produced as the overarching noise policy for England. It introduces three concepts for the assessment of noise in the UK

- NOEL – No Observed Effect Level – this is the level below which no effect can be detected.
- LOAEL – This is the level above which adverse effects on health and quality of life can be detected.
- SOAEL – Significant Observed Adverse Effect Level – this is the level above which significant adverse effects on health and quality of life occur.

11.18 These levels are not defined numerically, nor are there defined methodologies for their assessment, but they are included within the Planning Practice Guidance for Noise (PPG) as an example of a way in which noise may be categorised and assessed. The theory is that significant noise effects (SOAEL) should be avoided) and attempts made to reduce noise levels below or as near as possible to the Lowest effect level. (LOAEL)

11.19 National Planning Policy Framework (2019)

- Para 8 – Overarching objectives of planning system achieving sustainable development from an economic, social and environmental perspective
- Para. 11 – Presumption in favour of sustainable development
- Para 102 – Promoting sustainable transport
- Para 148 – Supporting a low carbon future; radical reductions in greenhouse gas emissions
- Para. 180 - *Planning policies and decisions should also ensure that new development is appropriate for its location..... In doing so they should: a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life*

11.20 Local Planning Policies - Planning policies contained in the Winchester Local Plan suite of documents that would be relevant if the application were considered within the Winchester District:

11.21 Local Plan Part 1 – Policies CP8 (economic growth), CP10 (transport), CP11 (sustainable low and zero carbon built development)

11.22 Local Plan Part 2 – Policies DM19 (development and pollution), DM20 (development and noise)

11.23 It is recognised that there are a number of material planning considerations that are relevant to the assessment of the planning application. Many of these issues such as landscape, ecology, transport, contamination etc. are localised issues that will be considered by EBC. However there are some material planning issues that have a wider, cross boundary impact and will affect the Winchester District and its residents. It is considered that the following key planning issues are relevant to Winchester to assess in relation to the proposed development:

- Economic impact
- Environmental impacts including: Climate change, Noise and Disturbance, Air Quality

11.24 In relation to the above impacts the application has been informed by the relevant City Council Leads for Public Protection and Engagement. The formal responses from the internal consultees are appended to this report and their views have been taken into account in relation to the assessment below.

11.25 Economic Impact

11.26 The Airport's strong business travel base and high percentage of outbound domestic travel does, it can be inferred, support local businesses in terms of business connections to major commercial centres in the UK, for trade and services, knowledge exchange and connections to clients and suppliers. Speed of connection and price competitiveness of flying over rail and car also helps business productivity.

11.27 It is recognised that the Airport is also a strong asset and attractor for inward investment and future developments in Winchester could benefit from its close proximity to the airport although. However the submitted Economic Impact of Southampton Airport report from Steer Davies Gleave, states the value of investment the Airport attracts has not been quantified as part of the applicant's submission.

11.28 The economic assessment supporting the expansion of Southampton Airport has not demonstrated a significant favourable impact in Winchester District in terms of economic value to local businesses through the supply chain, jobs for local residents or tourism from inbound visitors. Based on the submitted information it is concluded therefore that any economic benefit to be gained within the District from the expansion would be minimal.

11.29 Environmental impacts – Climate Change

11.30 The Airport is already a significant contributor of CO₂ emissions and the development proposals will increase the average annual emissions of 1,462 ktCO₂e, on average, by a further 352 ktCO₂e per annum which is roughly equivalent to a quarter. The additional estimated lifespan carbon emissions from the proposed development are 42,005 ktCO₂e so the proposed mitigation lifespan saving of 65 ktCO₂e does not get close to achieving carbon neutrality for the new development. The total emissions of the Borough of Eastleigh, as reported in their 2019 Climate & Environmental Emergency Action Plan, are 1037.7ktCO₂e. Therefore the proposal will be a significant contributor to increase carbon dioxide emissions in the region.

11.31 The supporting report states the greenhouse gas emissions resulting from the airport expansion have been determined to be "moderate negative" and

“significant”. Eastleigh Borough have set ambitious targets for becoming a carbon neutral Borough, and the airport expansion will add additional challenges to this aim.

- 11.32 Given the transient nature of greenhouse gases, and the emissions from flying, Winchester will be negatively impacted by the expansion of the airport and the increase in emissions thereof. In addition, with the projected increase in road transport emissions (regardless of airport expansion from 176 tCO₂e to 766 tCO₂e), the pressure on the Winchester road network will be intensified and the emissions will directly impact Winchester City Council's ambition of being carbon neutral as a District by 2030.
- 11.33 The application is supported by a series of mitigation measures to reduce the carbon emissions from the airport site as a whole to be secured through a S106 or on-going monitoring measures. Having examined these measures, they are limited to on-site mitigation such as the airport committing to electric vehicles by 2025, encouraging more sustainable travel to the airport, providing more electric plug-in parking spaces and becoming carbon neutral by 2030. Whilst these measures are welcome it is considered that they would play a very minor role in off-setting the significant increase in carbon emissions likely to be generated by the air expansion plans and do not overcome the Council's objection to the development.

11.34 Environmental Impacts – Noise and Disturbance

- 11.35 The noise assessment (Environmental Statement Chapter 11) has been examined with respect to Operational aircraft flight noise. The assessments in relation to construction noise or ground based operations have not been reviewed by the City Council , as these operations will have little or no impact on Winchester residents. EBC will consider the impact on their residents.
- 11.36 The National Planning Policy Framework (paragraph 180) states that planning policy and decisions should *‘mitigate and reduce to a minimum potential impacts resulting from noise from new development and avoid noise giving rise to significant adverse impacts on health and quality of life’* (and it refers to the Noise Policy Statement for England (NPSE) 2010, that introduces impact levels).
- 11.37 The City Council has several concerns regarding the chosen approach to noise assessment. 11.25 The assessment has failed to provide a complete review of literature about annoyance and aircraft noise to determine an appropriate level or method of assessing noise. This includes for example, World Health Organisation guidelines on aircraft noise exposure. A Government guidance document ‘Air Navigation Guidance 2017’ by Department of Transport, which is used by Heathrow airport states that the LOAEL level should be 51dB $L_{Aeq(16\text{ hr})}$ for daytime noise. The applicant proposes a LOAEL of 54dB. Whilst a difference of 3dB doesn't sound like a lot, decibels are a logarithmic scale, so a 3 dB difference represents a doubling of sound pressure.

- 11.38 The noise assessment has taken individual aircraft movements and has 'averaged' them over a 16 hr period. This fails to acknowledge the way in which residents of Winchester will experience noise from aircraft. The noise will not be so frequent that the ear can 'average it out' or consider it as part of the background noise level. Residents will rather recognise the effects of a number of discrete, noticeable events (maximum noise levels from aircraft) against the background noise levels experienced in villages near Winchester, including Colden Common, Twyford, Shawford and Otterbourne.
- 11.39 The noise report does not consider the L_{Amax} (the maximum sound pressure level (noise levels) that a human would perceive) at all. It was identified in the scoping report that the L_{Amax} of aircraft and the frequency of movements should be considered as it is argued that this would better represent how Winchester residents experience noise from aircraft movements.
- 11.40 Critically there has been no review and there are no proposed changes to the 'Noise preferred routes'. These are the routes that the aircraft have to take after take off /before landing below about 2000ft (above 2000ft, navigation control is taken over by National Air Traffic Services (NATS)). There may have been an opportunity to, for example, overfly the less populated river course within the District to avoid or reduce effects on the villages to the South of Winchester. With a 48% increase in air traffic movements, this is considered to be a major omission. In addition there is no detail on the amenity impacts from stacking of aircraft which occurs over Winchester's airspace.
- 11.41 Based upon the above assessment, and given that this application proposes a significant change to air traffic movements, it is concluded that the proposal fails to adequately assess the potential noise impacts on the amenities of Winchester residents and fails to provide adequate mitigation to overcome the potential harm caused to noise amenity.

11.42 Environmental Impacts – Air Quality

- 11.43 Operation Phase (aviation and traffic) - Three 'core' scenarios have been considered.
- Baseline (2018)
 - Future (2027) without the proposed development
 - Future (2027) with proposed development presenting up to an additional 12000 traffic movements (maximum of 57,300 air traffic movements) per annum, hosting 3 million passengers generating an increase of 1450 vehicles per day.
- 11.44 Winchester city centre has a designated Air Quality Management Area (AQMA) which currently exceeds the annual nitrogen dioxide standards of $40\mu\text{g}/\text{m}^3$, so any increases in NO_x in this area will present cause for concern. However Environmental Statement Chapter 7 does not consider impacts to Winchester's AQMA.

- 11.45 However, this is not surprising, because the NOx and particulate emissions arising from aviation emissions passing over the Winchester District will generated in excess of 2000ft and at such heights the arising increased to ambient NOx and particulate impacts at ground level receptors will be immeasurable and therefore insignificant. Aviation emissions will not therefore present demonstrable public health impacts within the Winchester District, but they will nevertheless add to regional carbon emissions, which will be a material consideration for impacts to climate change which is assessed in the relevant section of this report.
- 11.46 Similarly, in the report, Winchester has not been considered for ground based sources i.e. increased traffic arising from the additional 1450 vehicle movements modelled per day. This number of additional vehicle movements when considered in a regional context is very small and will again present an immeasurable and therefore insignificant impact on NOx and particulate levels within the Winchester AQMA and wider District. However, this additional traffic loading will converge on, and therefore be localised to, the airport and will form a material consideration within Eastleigh Borough Council's assessment of the development.
- 11.47 Based upon this assessment the Council does not consider that an objection based upon the impact of the development on air quality levels in the Winchester District can be substantiated.

11.48 Conclusions

- 11.49 The impact of the proposed airport expansion plans have been assessed in relation to the effect on the Winchester District and in light of National and Local Planning Policies. The major issues of economic prosperity, carbon emissions, noise amenity and air quality have been carefully considered.
- 11.50 Given the level of information provided in terms of noise assessment, and the nature and scale of mitigation proposed, the development, which would lead to the expansion of the existing airport increasing the number of flights to and from the site significantly, would likely result in an adverse effect on the amenity of Winchester's residents based on noise impact. The proposals therefore fail to meet the requirements of paragraph 180 of the National Planning Policy Framework and policy DM20 of the Winchester Local Plan Part 2.
- 11.51 Furthermore the expansion plans would significantly increase the carbon emissions generated which have not been adequately mitigated by the development to the detriment of the climate. The proposals therefore fail to meet the requirements of paragraph 148 of the National Planning Policy Framework and policy CP11 of the Winchester Local Plan Part 1.
- 11.52 The positive effect on the economic prosperity of Winchester is very limited and is far outweighed by the adverse impacts the expansion plans would have on the District's environment in terms of noise amenity and carbon emissions.

11.53 Based upon the above conclusions it is recommended that the City Council objects to the proposed expansion plans as set out in Appendix A.

11.54 Recommendation

11.55 That Winchester City Council submits an objection to the airport development proposal described in the planning application due to the adverse impacts that the development proposal would have on the amenity of its residents based on likely increase in noise levels and the adverse impact it would have on the climate due to significant increases in carbon emissions with insufficient mitigation to counter this.

11.56 A draft letter of objection to Eastleigh Borough Council is appended to this report

12 OTHER OPTIONS CONSIDERED AND REJECTED

12.1 None at this time

BACKGROUND DOCUMENTS:-

Previous Committee Reports:-

None

Other Background Documents:-

Winchester's response to the Southampton Airport Expansion Master Plan

APPENDICES:

A - Winchester's response letter to the planning application ref. F/19/86707 for the Southampton Airport Expansion proposals.

B - Winchester's response to the Southampton Airport Expansion Master Plan

C - Public Protection Team response to consultation on noise (16.12.19)

D - Engagement – Economy and Sustainability consultation response (12.12.19)

E - Public Protect Team response to consultation on air quality

Appendix A – WCC response to the planning application ref. F/19/867

Eastleigh Borough Council
By email: craig.morrison@eastleigh.gov.uk

Your Ref: F/19/86707
Our ref: 19/02614/ENQ
Contact: Cllr Jackie Porter
Email: jporter@winchester.gov.uk

January 2020

Dear Sirs,

CONSULTATION RESPONSE TO SOUTHAMPTON EXPANSION PLAN

Applicant: Mr S Thurston.

Proposal: Construction of a 164 metre runway extension at the northern end of the existing runway, associated blast screen to the north of the proposed runway extension, removal of existing bund and the reconfiguration and extension of existing long stay car parking to the east and west of Mitchell Way to provide an additional 600 spaces. (This application is subject to an Environmental Impact Assessment)

Location: Southampton International Airport, Mitchell Way, Eastleigh, SO18 2HG

Thank you for your consultation to Winchester City Council regarding the above development, which was received on 20th November 2019.

The proposal was considered by Council Cabinet on 22nd January 2020 and it was decided that Winchester City Council **raises an objection** to the application on the grounds of:

- i) The development proposals would lead to the expansion of the existing airport increasing the number of flights to and from the site significantly from 39,800 in 2017 to 57,800 by 2037. Based on the information provided to support the application, and method of assessment adopted regarding noise impacts, the City Council is concerned that there would be a material adverse impact on the amenity of Winchester District's residents caused by likely increased levels of noise resulting from additional flights which would not be adequately mitigated. This is contrary to paragraph 180 of the National Planning Policy Framework and policy DM20 of the Winchester District Local Plan Part 2.
- ii) The expansion plans would significantly increase the carbon emissions generated by the airport which have not been adequately mitigated by the development to the detriment of the climate. This is contrary to paragraph 148 of the National Planning Policy Framework and policy CP11 of the Winchester District Local Plan Part 1.
- iii) The minimal positive effect on the economic prosperity of Winchester District is far outweighed by the adverse impacts the expansion plans would have on the District's environment in terms of noise amenity and carbon emissions.

A full copy of the report which substantiates this objection is attached to the response and should be considered in conjunction with this letter.

Please contact me if there is anything you would like to discuss.

Yours faithfully,

Councillor Jackie Porter
Cabinet Member for Built Environment and Wellbeing

Appendix B – WCC response to masterplan dated 30th October 2018

FAO:
Mr N Garwood
Managing Director
Southampton Airport

Your ref:
Our Ref: JW/SF/AT
Contact: Cllr Jan Warwick
Portfolio Holder

Email: jwarwick@winchester.gov.uk

30th October 2018

By e-mail: consultation@southamptonairport.com

Dear Mr Garwood

RE: Winchester City Council's response to Southampton Airport Draft Master Plan Consultation 2018.

I have read the draft Master Plan in detail and have consulted with a range of Officers at the City Council / Winchester residents and would like to make the following comments on behalf of Winchester City Council.

It is noted that the Masterplan details the proposed extension of the airport from 2018-2037. The main changes include an extension to the terminal building, increase in car park provision, a new passenger walkway and an extension to the runway of 170m.

The proposals are to allow additional larger aircraft/ aircraft with a greater weight (passengers/fuel) to take off from Southampton and travel to a wider variety of European destinations.

This will allow a forecasted increase in the number of passengers, from 2 million in 2017, to 5 million in 2037 and an additional number of aircraft movements from 39,300 in 2017 to 57,800 by 2037.

In principle, Winchester City Council broadly welcomes the plan and proposals.

From an economic development perspective, the close proximity of the Winchester District to Southampton Airport means there is potential for the District to benefit from economic growth, employment and leisure opportunities.

Winchester City centre is located less than 10 miles from the airport and benefits from excellent rail and road connectivity. Southern parishes of the District are even closer. Local businesses operating within these areas will benefit from air transport providing connectivity to a wider range of European markets and a significantly larger customer base. Winchester District residents are also ideally placed to benefit

from the proposed creation of 500 additional jobs and the convenience of making holiday flights to a wider variety of destinations from such a close airport.

The plans also support the growth of international and domestic tourism in the District. The airport currently reduces journey times between Winchester and the major conurbations of Manchester, Leeds, Newcastle, Glasgow and Edinburgh making it an ideal weekend break for time-poor affluent urban dwellers. The expansion plans with the possibility of flights from Barcelona, Milan, Rome, Stockholm, Frankfurt, Madrid, Berlin, Copenhagen, Venice and Prague could open up new tourism markets. We already know from our current international visitor profile that Germany, Spain, France and the Netherlands are the highest six and have a propensity to visit Winchester.

However, it is also recognised that accompanying any development of this scale, there can be significant detrimental effects on the local residents of Winchester and wider environment, should the impacts not be properly controlled or mitigated.

It is clear that there will be an increase in traffic movements to and from the airport associated with the planned increase in passenger numbers (2-5 million per annum even allowing for a modal switch from private to public transport) and that this level of growth is likely to impact on the local area and wider motorway network. With the increase in number of planes, and traffic, there will likely to be an increase in Nitrogen Dioxide emissions and fine particulates (PM_{10s} & PM_{2.5s}). It is accepted that both the traffic and air quality implications of this proposed development are likely to have a more direct impact on Eastleigh residents and those using the M27 corridor than people living within Winchester District. No doubt, Hampshire County Council, (transport and highway authority), and Eastleigh Borough Council, will wish to be fully satisfied that the proposals are acceptable in terms of the development's off-site impacts. However, in general terms, if the scale of growth intended is to proceed, it would be with the expectation that the necessary infrastructure improvements will be put in place to accommodate the airport's expansion and that measures are also implemented to encourage passengers to access the site by means other than private motor vehicles.

Whilst there is some mention in the document about 'Climate Change,' the City Council would welcome more detail about any projects that the airport is undertaking to minimise their carbon footprint, including any projects that they have implemented towards the 'Airport Carbon Accreditation scheme'. The Council would also be interested in learning further detail about any projects that are promoting sustainable transport for passengers going to and from the airport eg. taxis, customer incentives.

In respect of noise, the proposals show no change to some aspects of the 'Flying Controls Agreement' that was set up in 1993 to safeguard the community. For example, there will be no scheduled night flights, (with very limited exceptions). However the proposals are very general in nature and do not sufficiently detail how the proposed changes will impact on Winchester residents from a noise perspective. They do not state what additional control measures will be put into place to mitigate the noise impacts of a large increase in aircraft movements.

It may be that Southampton Airport intend to provide more detailed information about this at the planning application stage and we would welcome this and would want to provide comments. It is our expectation that this should include analysis of the types of planes proposed and their noise emissions, including where possible, modelling of noise levels across the Winchester wards that may be affected e.g. conurbations of Shawford, Colden Common, Otterbourne, Brambridge, Winchester etc. In addition, this is an opportunity to review and revise the preferred noise routings that are currently used to examine whether there are better routes that avoid residential conurbations and / or whether aircraft can achieve a greater altitude more quickly to minimise the noise impact.

In conclusion, whilst the proposed development is welcomed from an economic perspective, Winchester City Council would like to see additional details about the resulting noise impacts from the development and proposed noise mitigation in order to be satisfied that Winchester residents are not adversely affected.

Yours sincerely

Cllr Jan Warwick

Portfolio Holder for the Environment
Cabinet Member
Winchester City Council

Appendix C. Consultation Response on Noise (16 December 2019)

Project: Southampton International Airport Planning application
F/19/86707

For: Elizabeth Marsden, Principal Planning Officer – preparing
consultation response on behalf of Winchester City Council

From: Abigail Toms, Environmental Protection Manager,
Public Protection Team

Construction of a 164 metre runway extension at the northern end of the existing runway, associated blast screen to the north of the proposed runway extension and the reconfiguration and extension of existing long stay car parking to the east and west of Mitchell Way to provide an additional 600 spaces.

Thank you for your consultation. I have been consulted to review the noise impacts for Winchester and its residents from the above application that Eastleigh Borough Council is considering. I have reviewed the application itself, the Planning, Design and Access Statement and all of the relevant Environmental Statements/ Appendices accompanying the application.

The existing Flying Controls Agreement (FCA), which was made under a Section 106 agreement to previous planning permission 07535/011, precludes 'night flights' i.e. flights between the hours of 2300-0600 (Monday to Saturday) and 0730 on Sundays. There are no proposals to change these night restrictions, which are welcomed. If planning consent is given, the applicant is prepared to enter into a new Flying Controls Agreement through Section 106, to continue to preclude 'night flights.'

It is worth noting that the hour between 0600-0700 is considered to be night time in most noise guidance; however there is no reference to this and none of the noise assessments accompanying the application make a differentiation to noise standards for 'night time'. It is impossible to assess therefore what impact the proposed changes will have on Winchester residents early in the morning, during these night hours.

I understand that the length of the current runway limits the weight and range of aircraft that can operate from the airport. The current aircraft of choice for many of the airlines operating from the UK and within Europe are the Airbus A320 and Boeing 737 passenger jets. Such planes do operate from Southampton at present, but they can not take off in a Southerly direction when fully weight laden (with all

seats full of passengers, their baggage and a full fuel tank). This precludes flights to some of the key holiday markets of Southern Europe.

Section 12 of the Planning, Design and Access Statement discusses the proposed growth from being able to accommodate the aircraft described above. Forecasts suggest that the number of air traffic movements (ATMS) may increase from 39,000 in 2017 to 57,800 by 2037. That represents a growth of 48% of planes taking off or landing. I would ask, however, what restrictions can be put into place to curb the growth if this number of aircraft movements were to be exceeded?

I have examined the noise assessment (Environmental Statement Chapter 11) with respect to Operational aircraft flight noise. I have not reviewed the assessments in relation to construction noise or ground based operations, which have little or no impact on Winchester residents, despite no doubt being of concern to Eastleigh Borough Council.

The National Planning Policy Framework (paragraph 180) states that planning policy and decisions should *'mitigate and reduce to a minimum potential impacts resulting from noise from new development and avoid noise giving rise to significant adverse impacts on health and quality of life'* (and it refers to the Noise Policy Statement for England (NPSE) 2010, that introduces impact levels . The impact levels are:

NOEL – No Observed Effect Level – this is the level below which no effect can be detected.

LOAEL – Lowest Observed Adverse Effect Level – This is the level above which adverse effects on health and quality of life can be detected.

SOAEL – Significant Observed Adverse Effect Level – this is the level above which significant adverse effects on health and quality of life occur.

UAEL – Unacceptable Adverse effect

Paragraph 11.2.82 of the Environmental Statement (Chapter 11 – Noise) shows that the applicant has chosen to represent the LOAEL as 54dB $L_{Aeq(16\text{ hr})}$. This is based on a 'Survey of Noise attitudes' (SoNA 2014) that was commissioned by the Department of Transport.

The SOAEL level has been chosen as 63dB $L_{Aeq(16\text{ hr})}$ - which is the level above which airports are required to provide sound insulation for schools and hospitals (as outline in the Aviation Policy Framework 2013. (APF 2013)

The UAEL has been chosen to be 69dB $L_{Aeq(16\text{ hr})}$ which is the level at which the Government expects airport operators to offer households assistance with the cost of moving. (Para 3.36 of APF 2013)

The noise assessment has taken noise contours from Southampton airport's Noise Action plan (NAP) and data from real time short term and long term measurements in a variety of locations and using aircraft noise modelling software has predicted the number of households likely to fit within the LOAEL and SOAEL levels, those that exceed the SOAEL and UAEL levels by 2037 with the forecasted 57,800 air traffic movements.

It has been concluded that no households exceed the UAEL (the level above which the Government expects airport operators to offer households assistance with the cost of moving.) It is predicted that a total of 650 households will subject to levels above the SOAEL (63dB $L_{Aeq(16\text{ hr})}$) – where the Government expects airports to fund the cost of sound insulation or alternative measures to schools or hospitals. (This include Bitterne School)

There are a total of 10,800 properties that are forecasted to be affected by noise levels above 54dB $L_{Aeq(16\text{ hr})}$ (above the LOAEL.)

I have several criticisms of the above approach to noise assessment.

The assessment has failed to provide a complete review of literature about annoyance and aircraft noise to determine an appropriate level or method of assessing noise. This includes for example, World Health Organisation guidelines on aircraft noise exposure. A recent Government guidance document 'Air Navigation Guidance 2017' by Department of Transport, which is used by Heathrow airport states that the LOAEL level should be 51dB $L_{Aeq(16\text{ hr})}$ for daytime noise.

The noise assessment has taken individual aircraft movements and has 'averaged' them over a 16 hr period. This fails to acknowledge the way in which residents of Winchester will experience noise from aircraft. The noise will not be so frequent that the ear can 'average it out' or consider it as part of the background noise level. Residents will rather recognise the effects of a number of discrete, noticeable events (maximum noise levels from aircraft) against the background noise levels experienced in villages near Winchester, including Colden Common, Twyford, Shawford and Otterbourne.

The noise report has failed to consider the L_{Amax} at all. It was identified in the scoping report that the L_{Amax} of aircraft and the frequency of movements should be considered as it is argued that this would better represent how Winchester residents experience noise from aircraft movements.

Information on L_{Amax} noise levels from aircraft is readily available. I did a simple search to find that National Air Traffic Service (NATS) had made an assessment of L_{Amax} noise levels of different categories of planes at different altitudes including for the proposed Airbus A340 and Boeing 737.

Going back to the LOAEL assessment, the applicant has proposed some mitigation measures to deal with households affected above the LOAEL, which it states are based on taking a balanced approach to noise control in accordance with the International Civil Aviation Organisation guidelines (ICAO). (Paragraph 11.5.2 of Chapter 11 Environmental Noise and Vibration)

To my knowledge these include very few noise control measures to those that exist at present. Critically there has been no review and there are no proposed changes to the 'Noise preferred routes'. These are the routes that the aircraft have to take after take off /before landing below about 2000ft (above 2000ft, navigation control is taken over by National Air Traffic Services (NATS)). There may have been an opportunity to, for example, overfly the less populated river course to avoid affecting the villages to the South of Winchester. With a 48 increase in air traffic movements, this appears to be a major omission. There is no detail on the amenity impacts from stacking of aircraft which occurs over Winchester's airspace.

Given that this application proposes a significant change to air traffic movements, I would recommend that Winchester objects to the application on noise grounds due to a lack of sufficient assessment of noise amenity impacts.

If you require any further information, please contact me.

Kind regards

Abigail Toms

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Appendix E – Engagement – Economy and Sustainability response –**12.12.2019****Service Team****Project**

Engagement – Economy and Sustainability

Southampton Airport Expansion Planning Application - consultee response

Note from:

Susan Robbins, Corporate Head of Engagement

Comments / Opinion

This comment and opinion is based on a review of the supporting information to F/19/86707 - Full planning from Southampton Airport for Construction of a 164 metre runway extension at the northern end of the existing runway, and the reconfiguration and extension of existing long stay car parking to provide an additional 600 spaces.

Two documents were reviewed:

- Environmental Statement Chapter 13 - Climate Change - Greenhouse Gases
- Economic Impact Assessment

Economic Impact Comment /Opinion

The economic assessment supporting the expansion of Southampton Airport has not proven a significant impact in Winchester District in terms of economic value to local businesses through the supply chain, jobs for local residents or tourism from inbound visitors. Any benefit to be gained from the expansion would be minimal.

However the Airport's strong business travel base and high percentage of outbound domestic travel does, it can be inferred, support local businesses in terms of business connections to major commercial centres in the UK, for trade and services, knowledge exchange and connect to clients and suppliers. Speed of connection and price competitiveness over rail and car also helps business productivity.

The Airport is also a strong asset and attractor for inward investment and future developments in Winchester could benefit from its close proximity to the airport. Although the Economic Assessment states this has not been quantified as part of its research.

Carbon Neutrality Comment/Opinion

The Airport is already a significant contribution of Co₂ emissions and the development proposals will increase the average annual emissions of 1,462 ktCO₂e per annum by, on average a further 352 ktCO₂e per annum or nearly another quarter.

The additional estimated lifespan carbon emissions from the proposed development are 42,005 ktCO₂e so the proposed mitigation lifespan saving of 65 ktCO₂e does not get close to achieving carbon neutrality for the new development.

Therefore the proposal will be a significant contributor to increase carbon dioxide emissions in the region. The supporting report states the operations have been determined to be moderate adverse and significant.” Based on the provided data, it is highly unlikely that Eastleigh will reach its climate emergency targets as a consequence of the Airport growth.

Given the transient nature of greenhouse gases, and the emissions from flying; Winchester will be negatively impacted by the expansion of the airport and the increase in emissions thereof. In addition, with the projected increase in road transport emissions (regardless of airport expansion), the pressure on the Winchester road network will be intensified and the emissions will directly impact Winchester City Council’s ambition of being carbon neutral by 2030.

Conclusion

On balance the economic impacts and benefits do not outweigh the carbon emission impacts of the proposed expanded runway and additional car parking.

Detailed review of information provided to form opinion

Carbon Neutrality: Environmental Statement Chapter 13 - Climate Change - Greenhouse Gases

Eastleigh Borough Council has declared a Climate Emergency, with an aim for all projects and services delivered in the Borough to achieve carbon neutrality by 2030. Airport emissions have been included in the Borough plan.

In the Environmental Statement, Chapter 13 of the supporting documents of the airport planning application, it is reported that emissions from the airport (flights and road transport) in 2021 are anticipated to be 1,238 ktCO₂e/annum; rising to 1,522 ktCO₂e/annum by 2036 should no development occur; an increase of 284 ktCO₂e. Table 13.3.

However the lifespan emissions with no development is predicted to be 174,000 ktCO₂e which give an average increase of 1,462 ktCO₂e per annum.

Life span calculations are from year of opening 2021 to 2140 = 119 years.

Tables The additional estimated lifespan carbon emissions from the proposed development are 42,005 ktCO₂e from:

- 18 ktCO₂e Construction (Table 13.5)
- 96 ktCO₂e Fuel consumption (Table 13.6)
- 41,907 ktCO₂e Operations (Table 13.6)

An additional average increase of 352 ktCO₂e per annum.

The report states

“13.6.9 Emissions from construction are **negligible** and although the IEMA guidance state that all emissions are significant, in the context of the Proposed Development, these emissions are considered to be **not significant. Emissions from operation of the Proposed Development have been determined to be moderate adverse and significant.**”

At 13.9.2 Mitigation measures are estimated to save 65 ktCO₂e over the project lifespan.

Rail and road transport are reported as contributing 176 kt CO₂e to Eastleigh Borough’s carbon footprint as at 2017. The anticipated emissions from road traffic travelling to and from the airport are anticipated to be 766 kt CO₂e in 2021, in addition to the District’s existing transport emissions. It should be noted, that this report does only details a negligible increase in road traffic transport in the event of the proposed development compared to without the development. The proposed development includes additional car parking for 600 additional car parking spaces; suggesting increased transport by car to the airport and a related increase in transport carbon emissions, more detailed should be provided here.

Carbon Neutrality Comment / Opinion:

The Airport is already a significant contribution of Co₂ emissions and the development proposals will increase the average annual emissions of 1,462 ktCO₂e per annum by, on average a further 352 ktCO₂e per annum or nearly another quarter.

The additional estimated lifespan carbon emissions from the proposed development are 42,005 ktCO₂e so the proposed mitigation lifespan saving of 65 ktCO₂e does not get close to achieving carbon neutrality for the new development.

Therefore the proposal will be a significant contributor to increase carbon dioxide emissions in the region. The supporting report states the operations £have been determined to be moderate adverse and significant.” Based on the provided data, it

is highly unlikely that Eastleigh will reach its climate emergency targets as a consequence of the Airport growth.

Given the transient nature of greenhouse gases, and the emissions from flying; Winchester will be negatively impacted by the expansion of the airport and the increase in emissions thereof. In addition, with the projected increase in road transport emissions (regardless of airport expansion), the pressure on the Winchester road network will be intensified and the emissions will directly impact Winchester City Council's ambition of being carbon neutral by 2030.

Economic impact assessment: Environmental Statement Appendix 6.1 - Economic Impact Report

Forecast growth and contribution to the economy

Baseline (business as usual growth)

- Passengers from 2M to 3.3M by 2037
- Economic impact from £161M to £275M
- Jobs by 300 to 3,250

Vision (Masterplan Vision growth)

- Passengers to 5M
- Economic impact to £400M
- Jobs by 1750, to 4,700

The Assessment shows however that whilst some Winchester residents work at the airport the majority are from the Southampton – Portsmouth corridor and the assessment recognises that the majority of benefits are localised and in fact do not spread more widely.

1.10 In total, **73% of employees and 56% of outbound passengers live within the boundary of the Solent LEP**. Outside this area, the only remaining significant concentration of workers and employees live very close to Bournemouth airport. As a consequence, the Solent LEP boundary has been used to define the study area.

1.11it is clear that the **influence of the airport extends well beyond the study area, albeit more diffusely**.

There is a concentration of outbound passengers from Winchester city (Figure 1.3) however this is likely to be due to the fact that 80% of passengers work in managerial, professional and technical roles, which matches the city's socio-economic profile.

Further Indirect Impact, defined as the quantity of economic activity supported in down-stream industries that supply and support the activities at the airport are:

£64M made up of £54M by business operating at the airport and £10M by Airport operations.

But only £3m (32%) of this £10M was spent in the study area (defined as the Solent LEP area) Highest spend by type was on construction and manufacturing. It can be reasonably deduced that little of the £9M balance would be spent in the areas adjacent the study area, i.e. Winchester District.

Passenger profile and tourism

29% travel for business

Business travel

“At 29%, the proportion of business travellers from Southampton Airport is high. With the exception of London City Airport (where approximately half of all passengers are travelling for business), this is broadly in line with Heathrow Airport (28%) and higher than Birmingham (17%), Bristol (16%), and London Gatwick (14%) airports “.

Source: Southampton Airport - A Vision for Sustainable Growth 2018

Tourism

With regard to tourism impacts and benefits little data was provided within the economic report, however other sources do provide some context.

Southampton Airport - A Vision for Sustainable Growth 2018

“3.5 ORIGIN OF SOUTHAMPTON AIRPORT PASSENGERS

78% of Southampton Airport passengers are outbound, **whilst 22% are inbound**, with the vast majority coming from across the Hampshire region. The cities of Southampton, Portsmouth, Poole and Bournemouth are especially large catchments areas for passengers.”

Civil Aviation Authority UK airport data 2018

This data relates to all passenger movements (pax) (outbound and inbound/ terminal and transit).

Domestic passengers

Domestic passengers account for 60% of all passengers

Airport	PAX	Percentage of total
MANCHESTER	220,742	19%
GLASGOW	186,325	16%
EDINBURGH	183,236	15%
JERSEY	169,369	14%

BELFAST CITY	128,209	11%
GUERNSEY	119,533	10%
NEWCASTLE	116,613	10%

International passengers

International passengers account for 40% of all passengers

77% of international passengers relate to three destinations France, Amsterdam and Ireland.

Airport	Total PAX	% of total
NETHERLANDS - AMSTERDAM	233,700	29%
IRELAND - CORK & DUBLIN	179,036	23%
FRANCE	203,662	26%
SPAIN	94,647	12%

Economic Impact Comment / Opinion

The economic assessment supporting the expansion of Southampton Airport has not proven a significant impact in Winchester District in terms of economic value to local businesses through the supply chain, jobs for local residents or tourism from inbound visitors. Any benefit to be gained from the expansion would be minimal.

However the Airport's strong business travel base and high percentage of outbound domestic travel does, it can be inferred, support local businesses in terms of business connections to major commercial centres in the UK, for trade and services, knowledge exchange and connect to clients and suppliers. Speed of connection and price competitiveness over rail and car also helps business productivity.

The Airport is also a strong asset and attractor for inward investment and future developments in Winchester could benefit from its close proximity to the airport. Although the Economic Assessment states this has not been quantified as part of its research.

Appendix F – Consultation Response on Air Quality

Project: Southampton International Airport Planning application
F/19/86707

For: Elizabeth Marsden, Principal Planning Officer – preparing
consultation response on behalf of Winchester City Council

From: David Ingram, Service Lead – Public Protection Team

Re: Construction of a 164 metre runway extension at the northern end of the existing runway, associated blast screen to the north of the proposed runway extension and the reconfiguration and extension of existing long stay car parking to the east and west of Mitchell Way to provide an additional 600 spaces.

This is a consultation response on behalf of Winchester City Council (“the Council”), in regards the above proposed development and focuses on air quality impacts to public health arising within the Council’s jurisdiction and assesses the applicant’s report entitled ‘Environmental Statement Chapter 7 –Air Quality’

This consultation response does not consider air quality impacts to other Council jurisdictions, notably Eastleigh Borough Council and Southampton City Council, nor does it consider ecological impacts. This consultation response also does not consider carbon emissions, which although related to air quality are considered in a separate consultation submission on behalf of the Council.

Construction Phase

The report considers dust impacts arising from construction and associated vehicular activities, within a 350m buffer of the site boundary and within 100m of public roads used by construction traffic within 500m of the site access points in accordance with the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Dust and from Demolition and Construction (2014). No part of Winchester City Council’s jurisdiction falls within this area of consideration and is therefore not considered.

However as stated in the report the substantial emission of dust arising from any demolition and construction will be in the larger 1 – 75 µm (micrometres)

aerodynamic diameter which has a rapid fall out rate over distance and as such will only affect sites immediately adjacent to the construction area.

Finer dust particles measured as PM₁₀ and PM_{2.5} (< 10 µm) remain in suspension for longer periods and have the capacity to travel further, however the level of dispersion achieved over distance will be such that any impacts on the Winchester district can be considered negligible and therefore insignificant.

Notwithstanding it would be expected that for a construction project of this size, that the contractor be required to adopt good dust management practice as part of their Construction Management Plan, and that it is in Eastleigh Borough Council's interests to ensure that such a plan be enshrined by condition.

Operation Phase (aviation and traffic)

There 'core' scenarios have been considered.

- Baseline (2018)
- Future (2027) without the proposed development
- Future (2027) with proposed development presenting up to an additional 12000 traffic movements (maximum of 57,300 atm's) per annum, hosting 3 million passengers generating an increase of 1450 vehicle per day.

Winchester City Centre is has a designated Air Quality Management Area (AQMA) which currently exceeds the annual nitrogen dioxide standards of 40µg/m³, so any increases in NO_x to this areas will present cause for concern. However Environmental Statement Chapter 7 does not consider impacts to Winchester's AQMA.

This is not surprising, because the NO_x and particulate emissions arising from aviation emissions passing over the Winchester District will be in excess of 2000ft and at such heights the arising increased to ambient NO_x and particulate impacts at ground level receptors will be immeasurable and therefore insignificant. Aviation emissions will not therefore present demonstrable public health impacts within the Winchester district, but they will nevertheless add to regional carbon emissions, which will be a material consideration for impacts to climate change.

Similarly Winchester has not been considered for ground based sources i.e. increased traffic arising from the additional 1450 vehicle movements modelled per day. This number of additional vehicle movements when considered in a regional context is very small and will again present an immeasurable and therefore insignificant impact on NO_x and particulate levels within the Winchester AQMA and wider district. However, this additional traffic loading will converge on and therefore

be localised to the airport and will form a material consideration within Eastleigh Borough Council's jurisdiction.

Kind regards

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