

Planning and Rights of Way Panel

Tuesday, 1st December,
2020

at 6.00 pm

PLEASE NOTE TIME OF MEETING

This will be a 'virtual meeting', a link to which will be available on Southampton City Council's website at least 24hrs before the meeting

Virtual Meetings - Virtual meeting

This meeting is open to the public

Members

Councillor Mitchell (Chair)
Councillor Coombs (Vice-Chair)
Councillor L Harris
Councillor Prior
Councillor Savage
Councillor Vaughan
Councillor Windle

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PUBLIC INFORMATION

ROLE OF THE PLANNING AND RIGHTS OF WAY PANEL

The Panel deals with various planning and rights of way functions. It determines planning applications and is consulted on proposals for the draft development plan.

PUBLIC REPRESENTATIONS

Procedure / Public Representations

At the discretion of the Chair, members of the public may address the meeting on any report included on the agenda in which they have a relevant interest. Any member of the public wishing to address the meeting should advise the Democratic Support Officer (DSO) whose contact details are on the front sheet of the agenda.

Southampton: Corporate Plan 2020-2025 sets out the four key outcomes:

- Communities, culture & homes - Celebrating the diversity of cultures within Southampton; enhancing our cultural and historical offer and using these to help transform our communities.
- Green City - Providing a sustainable, clean, healthy and safe environment for everyone. Nurturing green spaces and embracing our waterfront.
- Place shaping - Delivering a city for future generations. Using data, insight and vision to meet the current and future needs of the city.
- Wellbeing - Start well, live well, age well, die well; working with other partners and other services to make sure that customers get the right help at the right time

Dates of Meetings: Municipal Year 2020/2021

2020	
2 June	15 September
23 June	6 October
14 July	3 November
4 August	24 November
25 August	15 December

SMOKING POLICY – The Council operates a no-smoking policy in all civic buildings

MOBILE TELEPHONES:- Please switch your mobile telephones to silent whilst in the meeting

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ACCESS – Access is available for disabled people. Please contact the Democratic Support Officer who will help to make any necessary arrangements.

2021	
12 January	16 March
2 February	20 April
23 February	

CONDUCT OF MEETING

TERMS OF REFERENCE

The terms of reference of the Planning and Rights of Way Panel are contained in Part 3 (Schedule 2) of the Council's Constitution

BUSINESS TO BE DISCUSSED

Only those items listed on the attached agenda may be considered at this meeting.

RULES OF PROCEDURE

The meeting is governed by the Council Procedure Rules as set out in Part 4 of the Constitution.

QUORUM

The minimum number of appointed Members required to be in attendance to hold the meeting is 3.

DISCLOSURE OF INTERESTS

Members are required to disclose, in accordance with the Members' Code of Conduct, **both** the existence **and** nature of any "Disclosable Pecuniary Interest" or "Other Interest" they may have in relation to matters for consideration on this Agenda.

DISCLOSABLE PECUNIARY INTERESTS

A Member must regard himself or herself as having a Disclosable Pecuniary Interest in any matter that they or their spouse, partner, a person they are living with as husband or wife, or a person with whom they are living as if they were a civil partner in relation to:

- (i) Any employment, office, trade, profession or vocation carried on for profit or gain.
- (ii) Sponsorship:
Any payment or provision of any other financial benefit (other than from Southampton City Council) made or provided within the relevant period in respect of any expense incurred by you in carrying out duties as a member, or towards your election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
- (iii) Any contract which is made between you / your spouse etc (or a body in which the you / your spouse etc has a beneficial interest) and Southampton City Council under which goods or services are to be provided or works are to be executed, and which has not been fully discharged.
- (iv) Any beneficial interest in land which is within the area of Southampton.
- (v) Any license (held alone or jointly with others) to occupy land in the area of Southampton for a month or longer.
- (vi) Any tenancy where (to your knowledge) the landlord is Southampton City Council and the tenant is a body in which you / your spouse etc has a beneficial interests.
- (vii) Any beneficial interest in securities of a body where that body (to your knowledge) has a place of business or land in the area of Southampton, and either:
 - a) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body, or
 - b) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which you / your spouse etc has a beneficial interest that exceeds one hundredth of the total issued share capital of that class.

OTHER INTERESTS

A Member must regard himself or herself as having an, 'Other Interest' in any membership of, or occupation of a position of general control or management in:

Any body to which they have been appointed or nominated by Southampton City Council

Any public authority or body exercising functions of a public nature

Any body directed to charitable purposes

Any body whose principal purpose includes the influence of public opinion or policy

PRINCIPLES OF DECISION MAKING

All decisions of the Council will be made in accordance with the following principles:-

- proportionality (i.e. the action must be proportionate to the desired outcome);
- due consultation and the taking of professional advice from officers;
- respect for human rights;
- a presumption in favour of openness, accountability and transparency;
- setting out what options have been considered;
- setting out reasons for the decision; and
- clarity of aims and desired outcomes.

In exercising discretion, the decision maker must:

- understand the law that regulates the decision making power and gives effect to it. The decision-maker must direct itself properly in law;
- take into account all relevant matters (those matters which the law requires the authority as a matter of legal obligation to take into account);
- leave out of account irrelevant considerations;
- act for a proper purpose, exercising its powers for the public good;
- not reach a decision which no authority acting reasonably could reach, (also known as the "rationality" or "taking leave of your senses" principle);
- comply with the rule that local government finance is to be conducted on an annual basis. Save to the extent authorised by Parliament, 'live now, pay later' and forward funding are unlawful; and
- act with procedural propriety in accordance with the rules of fairness.

AGENDA

1 APOLOGIES AND CHANGES IN PANEL MEMBERSHIP (IF ANY)

To note any changes in membership of the Panel made in accordance with Council Procedure Rule 4.3.

2 DISCLOSURE OF PERSONAL AND PECUNIARY INTERESTS

In accordance with the Localism Act 2011, and the Council's Code of Conduct, Members to disclose any personal or pecuniary interests in any matter included on the agenda for this meeting.

3 STATEMENT FROM THE CHAIR

CONSIDERATION OF PLANNING APPLICATIONS

4 PLANNING REPORT FOR THE AIRPORT CONSULTATION

(Pages 1 - 66)

Report of the Interim Head of Planning and Economic Development setting out considerations in regard to the consultation response for the Southampton International Airport planning application

Monday, 23 November 2020

Service Director – Legal and Business Operations

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Planning and Rights of Way Panel 01 December 2020
Planning Application Report of the Head of Planning & Economic Development

Application address: Southampton International Airport, Eastleigh,			
Further consultation from Eastleigh Borough Council on amendments to planning application Ref F/19/86707 at Southampton Airport for the following works to facilitate airport expansion: 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 additional long stay spaces. This latest round of consultation relates to the proposed introduction of noise controls and restriction on the amount of vehicular traffic entering the airport based on a reduced growth forecast capped at 3 million passengers per annum by 2033.			
Application number	20/00943/CONSUL	Application type	Consultation
Case officer	Andrew Gregory	Public speaking time	15 minutes
EBC consultation Expiry for SCC	03 December 2020	Ward	N/A Eastleigh Borough
Reason for Panel Referral:	At the Full Council meeting on 20 November 2019 it was decided that the final decision on this consultation response would be made by the Planning and Rights of Way Panel.	Ward Councillors (Swaythling and Bitterne Park Wards)	Cllr Fuller Cllr Harwood Cllr White Cllr Mintoff Cllr Bunday Cllr Fielker

Applicant: Southampton International Airport Ltd	Agent: Savills
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Recommendation Summary	This report sets out the finely balanced economic benefits and environmental disbenefits of the proposed airport expansion and policy and other material considerations for the decision maker. The Planning Rights of Way Panel is required to reach a decision to either MAINTAIN THEIR OBJECTION or SUPPORT the planning application following the amendments as set out in this report.
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Appendix attached	
1	Previous report to Panel dated 28 January 2020
2	Minutes associated with Previous Panel decision on 28 January 2020
3	Consultation Response letter to Eastleigh Borough Council dated 03 February 2020
4	Peer Review of Noise Impact Assessment by 24 Acoustics dated 10 November 2020

Recommendation in Full

Instruct the Head of Planning & Economic Development to:

1. Prepare a consultation response based on the decision of the Planning and Rights of Way Panel and submit the response on behalf of Southampton City Council to Eastleigh Borough Council by 3rd December 2020, ahead of them determining their planning application ref F/19/86707.
The response shall include this report including Appendices and the redacted comments of residents received by Southampton City Council
2. To request involvement in the drafting of planning obligations and conditions which mitigate against the impacts on Southampton and its citizens, in the event that Eastleigh Borough Council resolve to approve the application at their Local Area Committee meeting 17 December 2020.

Background

Details on the background of this planning application and Southampton City Council's role as consultee rather than decision maker is set out within pages 2 and 3 of the previous report to the Planning and Rights of Way Panel meeting on 28 January 2020, attached to this report as **Appendix 1**.

Southampton City Council responded to the original consultation from Eastleigh Borough Council on 3 February 2020 (following the decision of the Planning and Rights of Way Panel on 28 January 2020) and raised objection to the planning application on the grounds that: Firstly, the proposal fails to satisfy the requirements of environmental and social impacts to residents of Southampton, particularly in respect of noise; and Secondly, the economic benefits do not outweigh the adverse environmental and social impacts and the applications submission suffered from a lack of information. A copy of the consultation response letter is attached as **Appendix 2**.

1 The site and its context

- 1.1 Details of the site and its context are set out within paragraphs 1.1-1.3 of the previous report to the Planning and Rights of Way Panel meeting on 28 January 2020, attached to this report as **Appendix 1**.

2 Proposal

- 2.1 The physical works proposed to extend the runway remain unchanged from the original consultation, however the car parking design has been amended with a reduction in new car parking space from 600 to 470 spaces with the total airport parking capacity reduced from 928 down to 797 car parking spaces (inclusive of disabled spaces).
- 2.2 However the key change relates to a reduction in operational development with forecasted airport growth reduced from 5 million passengers per annum by 2037 to 3 million passengers per annum by 2033 and it would be capped at this level.

It would thereafter remain at that capped level and further planning approval would be required to vary the cap. The proposed reduction in passenger numbers would see a reduction in the number of flights when compared to the 2016 baseline because the extended runway would serve larger jet aircraft which can accommodate greater passenger numbers.

2.3 The collapse of Flybe, which accounted for 90% of flights from Southampton Airport, is a significant material change in circumstances for the airport since the previous consultation response to this planning application was made by Southampton City Council. The Airport have indicated that without the runway extension there would be some backfilling of Flybe routes by other carriers but the routes and number of flights would be reduced with a forecasted reduction in passenger numbers from the 2017 baseline of 2 million passengers per annum to 1 million passengers per annum. The runway extension is needed to facilitate larger jet aircraft (such as Airbus A320 and Boeing 737) to attract low-cost carriers and to access the short haul holiday destination market. Without the runway extension which restricts the size/type of aircraft and limits the fuel load and passenger numbers on jet aircraft, the airport have indicated that the future viability of the airport is at significant risk even with 1 million passengers. The COVID-19 pandemic has adversely impacted the aviation industry globally and has compounded problems for Southampton Airport, however the adverse impacts arising from the pandemic have not been included in the sensitivity tests and the consideration of this application is based on a baseline pre-COVID and growth forecasts which take into account the collapse of Flybe but not the short-term impacts of the pandemic.

2.4 Table 1 below provides a comparison between the previous growth forecast of up to 5 million passengers per annum by 2037 (150% growth on 2017 baseline) and the reduced growth capped at 3 million passengers per annum up to 2033 (50% growth compared to the 2017 baseline). The reduced growth forecast would result in a significant reduction in forecasted flights arriving and departing - Air Transport Movements (ATMs) with in fact a 6.5% reduction in the number of flights by 2033 this is because the larger jet aircraft can accommodate more passengers.

	Air Transport Movements (ATMs)				
	2017	2020	2027	2033	2037
Original growth forecast up to 5 million passengers per annum (150% growth)	39,300		53,100 (35% increase over 2017)		57,800 (47% increase over 2017)
Current revised growth forecast of 3 million passengers per annum (50% growth)	39,300	21,366	31,963 (19% decrease from 2017)	36,737 (6.5% decrease from 2017)	

- 2.5 The Airport propose to cap the growth up to 3 million passengers per annum by 2033 by introducing a noise contour cap (envelope) with noise levels restricted based on noise modelling for 3million passengers per annum (“ppa”). The airport also propose to increase the offer of financial compensation for acoustic insulation to households subject to noise impact of 63db LAeq, 16h or more, from £3,000 as originally offered, to £5,000.
- 2.6 The airport also propose to introduce restrictions to the number of vehicles entering the airport to address capacity issues on the highway network; The number of vehicle movements being proposed for the cap, based on the modal split occurring at the time of the planning application, is approximately aligned with the point at which the number of passengers will reach 3million passengers per annum.
- 2.7 As a consequence of this reduced growth forecast, the assessment of the impacts in terms of socio economic, air quality, transportation, ecology, noise and climate change have been revised.

3 Relevant Planning Policy

- 3.1 Since the Council’s previous consultation response to Eastleigh Borough Council was made, there has been a material change in national policy. The Airports National Policy Statement 2018 (ANPS) has been quashed by the Court of Appeal and can no longer be afforded any weight. The Courts took the decision that the ANPS was unlawful because it failed to take into account the Government’s commitment to the Paris Agreement on climate change as policy. It should however be noted that the Government has legislated for the UK to reach net-zero greenhouse gas emissions by 2050, to include aviation emissions. This exceeds the target set by the Paris Agreement which committed the UK to 80% reduction in carbon emissions relative to the levels in 1990, to be achieved by 2050
- 3.2 All other policy documents and other material considerations as set out within section 03 of the previous report to the Planning and Rights of Way Panel meeting on 28 January 2020, remain relevant.
- 3.3 The key assessment criteria in relation to the Aviation Policy Framework (2013) and the mutually supportive economic, social and environmental objectives of the National Planning Policy Framework (2019) is to ensure the airport expansion maintains a balance between the benefits of aviation and its costs, particularly its contribution to climate change and noise.
- 3.4 In addition, regard needs to be had to the Government Policy Paper ‘*Beyond the horizon The future of UK aviation: Making best use of existing runways*’ (2018) which provides useful Government policy guidance on making the best use of existing runways at airports beyond Heathrow. Paragraphs 1.9-1.11 of this policy document indicates that climate change matters in relation to airport growth proposal should be considered at the national level. This policy paper is supported by background evidence from the Department for Transport providing capacity forecasts for airports nationally ‘*DfT UK Aviation Forecasts*’ (2017)

which indicate that inputs for Southampton were based on 3 million passengers per annum to 2030 and 7 million passengers per annum by 2040.

4 Consultation Responses and Notification Representations

4.1 Southampton Council has again undertaken its own public consultation to allow the public to provide comments to inform the Council's further consultation response. The extent of the public consultation included sending notification letters on 20 July 2020 and 29 October 2020 to 464 addresses, including residents to the south of the runway that would be most affected by the forecasted change in noise environment and additional persons who provided representations to Southampton City Council as part of the original consultation. Notification was also given to those that attended the Full Council meeting on 20 November 2019 and registered with contact details. Southampton also posted 4 site notices in Swaything Ward on 23 July and 23 October.

4.2 In response to SCC's own consultation carried out on 20 July 2020 and 29 October 2020 a total of **122 objections** have been received which are summarised as follows:

- Revised documents still offer no evidence that the harms to local residents (notably from noise) are outweighed by the economic benefits (which continue to be overstated, especially to the local area), and the impact on the environment (including climate change, for which the mitigation measures presented make no significant difference) is too high.
- The proposed noise cap is extremely unlikely to have any material impact on the affected communities for the simple reason that it will only apply "unless and until the airspace at the airport is updated.
- The number of households to be offered money for insulation is a tiny fraction of those impacted and there is no mitigation for the impacts on public open spaces. The flight path over densely populated areas makes Southampton the worst airport in the country to expand in terms of the noise impacts per passenger flying out of the airport.
- An extended runway is not needed for the airport's economic survival. Claims have been made in the press that the airport's survival is at risk without it. However the decision regarding this application should be made only on the documents submitted and these offer no evidence for such a claim. Other airlines have rapidly taken over the most important routes, even in the face of Covid-19. Indeed, the Sensitivity Test (2.6) suggests that the disruption following the collapse of FlyBe and the Covid-19 crisis are temporary issues.
- The application overestimates the number of local jobs because it ignores the fact that indirect jobs arise from non-wage spend by the airport and businesses using it - and the proportion of that spend which is local to the Solent area is much lower.
- Given the promised 'hard cap' on road traffic, intended to restrict passenger numbers to 3 million, the extension will only allow a fairly small increase by 2037 over the no-expansion baseline of 2.26 million (which was 3.37 million as recently as 2017) (ES Addendum Appendix 6.1),

further weakening the economic case, especially given the enormous health consequences that would follow.

- No account at all is taken of financial harms resulting from the proposed development, including losses at other airports in the region should more passengers switch to Southampton. There is now significant extra capacity at other airports within the region, and with parts of Southampton's "inner catchment area" being closer to these airports it is not at all clear that the demand is there for the promised increase in travel from Southampton.
- The economic costs in terms of house price reduction and increased health service spending for communities under the flight paths have not been considered.
- "Regional connectivity" does not require the runway extension. The economic assessment explicitly does not consider the impact of expansion at Heathrow, let alone Gatwick, Bournemouth or Bristol. The needs of Channel Islands residents visiting Southampton Hospitals are already met by the smaller aircraft currently using Southampton Airport. SIA is sustainable as a small regional airport, but with its flight path over a densely populated area is in the wrong place to expand, especially with the much more sensitively located Bournemouth airport not far away.
- The development will lead to a massive increase in carbon emissions, at a time when we need urgent action to reduce these to avoid catastrophic climate change. The airport's "carbon neutrality" affects only 0.36% (ES Addendum p1.51) of its emissions. "Carbon neutral" aviation is impossible on the timescales over which carbon reduction is needed. Electric planes are unlikely ever to be large enough to require the extended runway. Use at scale of biofuels and alternatives such as hydrogen are decades away owing to the long development and testing timescales required. "Offsetting" aviation emissions is highly dubious as few of the claimed developments are genuinely "additional". Reducing the need for people to drive to more distant airports offsets a scant few percent of the emissions arising from the extra flights. In addition, since 42% of passengers would not fly if they had to travel to a more distant airport, it can be claimed that the emissions resulting from their flights are directly attributable to the runway extension. The fact is that permitting the proposed development, would mean EBC, which paints itself as a "leader" in tackling climate change, would be permitting an increase emissions on its doorstep of 500000t per year to 2036.
- No indication of what actions will be taken to reduce them should the vehicle "caps" be exceeded, nor any explanation of why the additional car parking spaces are required since the number of passengers assumed in the "capped" value with development is similar to that in the absence of the proposed development.

4.4 Consultation Responses

Only those specialist consultee comments that relate to the changes are set out below and where no revised comment is offered the comments within Appendix 1 should be used.

4.5 **SCC Highways: No objection**

Passengers Numbers

It is suggested that the current buildings and runway can only accommodate 3 million passengers per annum(mppa) and therefore the runway extension itself will not be able to provide more than that. It is not clear however how this maximum capacity is derived – is this based on the maximum number of people that can physically fit in the airport and projected through number of flights throughout the day then multiplied by number of days in a year? Without knowing this, there is a question to whether current building can technically accommodate more than 3mppa if flights are more frequent and times of flights change/expand. Because of this and the fact the assessments are based on 3mppa, a condition to secure maximum passenger numbers would address this issue and the level of uncertainty.

The Transport Assessment (TA) has included multi modal travel survey data collected over previous years which suggest that there is a consistent trend in the increase of sustainable modes to and from the Airport. This is anticipated to continue although there will be a time where this will reach a saturation point along and for trends to continue along with the increase in passengers and flights, improvements and investment to sustainable transport needs to be delivered.

Car Park

The airport's long-term car parking will increase by 470 spaces as part of the expansion. Although it could be argued that more parking can normally attract more trips, with an airport use, car trips would still arrive with or without on site parking due to its nature – for example passenger drop off or pick up, taxis or buses. Trips associated to the overall expansion is considered through the passenger numbers – which is a lot more than then parking provided.

Due to the nature of the use and the length of stay associated with the expanded long-stay car park, the trips would be lower than a more traditional car park. The additional trips associated with the car park expansion is considered acceptable when you spread the trips across not only the day but throughout week(s). It is also important to provide sufficient parking to meet demand to avoid circulatory trips around the local network if demand is not met and also to help support the economic needs of the airport.

The layout is considered acceptable as well as the access but it is noted that this is outside of Southampton City Council's boundary and therefore this would need to satisfy the local highway authority – in this case Hampshire County Council.

SRTM/Highway trips and Impact Assessment

The TA states that the airport currently (pre-Covid-19) accommodated approximately 2mppa. The TA then breaks this down in terms of highway trips as depending on the specific car travel of the passenger, the number of trips can differ between a single trip (airport taxi's, long stay car parking) or double trips (drop off's, non-airport taxi's etc.) within the assessed hour. It is suggested therefore that the airport currently generated trips that are equivalent to 2.6mppa which is in line with the forecasts set out within the Solent Sub-Regional Transport Model (SRTM).

This is considered logical but a concern was raised that if the number of actual passengers do increase to 3mppa, could the same exercise not be applied which would give an even higher level of highway trips. The response was that the same exercise could not be carried out the same way due to the multi-modal assumptions and the increasing reduction in car travel modes generating 'double trips'. Although this is somewhat agreeable to a degree, it is still considered that the same could still apply and that highway trips would exceed the 3mppa albeit not directly on a pro-rata basis.

Regardless of how the highway trips align with the forecast as set out in the SRTM, an assessment of local junctions in Southampton was requested and carried out to show real world impact as a result of the increase in trips. The additional information helps to answer comments made previously about the modelling of the junctions in Southampton and the impact of the city's highway network.

The modelling of the Wessex Lane/Wide Lane/A335 Stoneham Way junction indicates that the junction currently operate beyond its capacity regardless of the airport expansion and therefore the impact from the development is considered minimal. However, it is considered that because the junction is already exceeding capacity, any additional impact would exacerbate the current problems and is considered to be significant and severe. Furthermore, the modelling output shows that the Wessex Lane junction will increase queue lengths significantly and therefore could have a significant impact form the A27 Mansbridge Road/Wide Lane roundabout.

Lastly, the trip assessments conducted so far is based on current and assumed peak airport movements. It is suggested that the peak hour trips relating to airport (10:00am-11:00am & 13:00pm-14:00pm) is outside the standard transport network peaks (08:00am-09:00am & 17:00pm-18:00pm). However, there are no clear assurances that this would not change if there are a change in flight patterns as a result of different operator's/airport's needs.

Mitigation

Due to the significant impact on the local junctions mainly Wessex Lane/Wide Lane/Stoneham Way junction as well Mansbridge Road/Wide Lane roundabout, measures will be required to mitigate the impacts on traffic flow, highway safety as well improving the environment for pedestrians and cyclists to encourage sustainable travel.

Details to be agreed as part of the S106 agreement process. The Transport team will be happy to work with the developer to agree on the design and measures.

Summary

Overall, more information could be provided to allow for a more extensive assessment of the junctions. However, with the information provided, the proposed development will have a significant impact on Southampton's public highway and local junctions (Wessex Lane/Stoneham Way/Wide Lane junction; and Wide Lane/Mansbridge Roundabout).

The proposal can only be supported subject to suitable mitigation measures being delivered to secure:

- Maximum passenger cap at 3mppa method to be agreed with SCC, HCC and Highways England
- Operational management plan (or similar) to ensure that airport peak trips would not coincide with network peak hours
- Airport Surface Access Strategy (securing on-going review and further measures if or when needed) including a Staff Travel Plan & Passenger Travel Plan
- Improvements to Wessex Lane/Wide Lane junction and Mansbridge Road roundabout including pedestrian and cycle facilities

4.6 **SCC Economic Development Manager: No objection**

The Economic Impact of Southampton Airport (Steer Davies Gleave - Oct 2017) describes the economic value of the airports as £161m supporting nearly 950 jobs directly at the airport (on site) and 1,300 in the supply-chain. The annual economic value of airport operations was £64m with 25% generated by the operator and 75% generated by businesses located on site.

'Airport Users' is one section to consider in terms of the connectivity arguments, wider economic benefit and particularly for the cruise industry. We discussed C-19 impacts however both industries are planning new business models for a post COVID return commercial viability. Section 3.9 makes this point and in terms of Southampton's economy the cruise industry has provided to date significant economic benefit, albeit with environmental impacts.

The number of passengers is projected to increase from 1mppa to 2.3mppa by 2027 and 3.3mppa by 2037 according to revised forecasts, however passengers will be capped at 3.0mppa. (This raises the question of how the airport proposes to cap passenger numbers and if this is a realistic proposal or a desirable one economically and commercially.)

In section 3.4 (Methodology) an estimate is used for the number of jobs supported by the operation of the airport for the alternative scenarios being considered here based on direct job ratio per one million passengers. Southampton Airport currently has a ratio of 630 jobs per million passengers, however for the forecast a lower ratio is used. After a sensitivity test the estimated forecast ratio for Southampton, based on conservative reduction of its current job ratio by 25% in 2027, is for 470 jobs per million passengers. This has the convenient effect of creating a lower base for the jobs forecast. I am not sure the 25% reduction is really properly justified in sections 3.5 and 3.6. A reduction range of 1% > 25% is described and Savills have taken the upper end of this range to establish the 470 jobs per million passengers baseline and Southampton's current jobs ratio is already lower than other regional airports. The reduction is in effect based on predictions about future airport operations and the benefits of efficient airport expansions.

Table 3.2 gives details on net additional jobs. The new baseline position is now 475 jobs in 2027 down from nearly 950 jobs in 2017. My suspicion is that the current jobs total will be lower, perhaps closer to 400. If so then this offers the airport a lower base from which to describe a recovery position to 2027. In terms of our understanding the importance of the prospects for a recovery it might be

helpful to assess if the current employment levels accurately reflect the 2027 estimated jobs ratio. At least then we can also accurately represent the picture in terms of airport closure if the runway is not approved, in terms of safeguarding jobs and the short-term commercial strategy.

Net additional jobs with a runway extension to 2027 are forecast at 609 (2.35 m passengers) and to 2037 we are back up to 2017 levels 927 (3m passengers). The analysis also goes on to consider additionality in terms of leakage, displacement and a multiplier effect. With additionality jobs increase from 609 (direct) net additional in 2027 to 1,022 and to 2037 from 927 (direct) to 1,557.

Jobs forecasts aside, members should also consider the short-term viability of the site, survival prospects and the actual number of real-time jobs (& families) to be safeguarded through to 2027. The owners AGS Airports have described a future capital investment commitment of £15m if a permission is granted and so the safeguarding case has already been made. An effective Employment & Skills Plan should be secured to ensure that local people benefit from the investment.

In summary then the information provided is limited to jobs growth both with or without a runway extension. The real question is can the airport remain viable with between 1 and 2 million passengers without a runway extension. It is unlikely on the basis that the Fly-Be (regional carrier) operation will not be replicated again and that the market position of the airport needs to shift, accommodating other airlines / aircraft.

In terms of COVID impact and on current performance the airport is openly reporting on massively reduced passenger numbers. Between March and August 2020 the total number of passenger has dropped by 715,464 with just 145,116 passengers overall, a 83% decrease from the year before with 860,580 passengers during the same period. In April during the previous national lockdown passenger numbers dropped by 99% to 1,172 when compared to 147,209 in April 2019. My assumption is that the current levels of employment will reflect these significant decreases in passengers numbers and possibly also reflect that the current operation is highly likely to be running at a significant loss.

4.7 **Environmental Health (Noise): Objection**

Southampton City Council's environmental health service investigates complaints about noise from residents and businesses within the city. The service also acts as a consultee to the development control service to advise on the potential noise impacts of developments as part of the planning process.

The environmental health service seeks to ensure that residents and businesses within the city are not subjected to unreasonable noise which could constitute a statutory nuisance. The Council has powers to control such noise through the Environmental Protection Act 1990 but these powers do not extend to noise caused by aircraft (see Section 79(6) of the Act). This means that in the event of planning permission being granted for the runway extension, Southampton City Council nor Eastleigh Borough Council would be able to use the usual enforcement powers to control unreasonable noise affecting residents or businesses within the city.

The noise impact of the proposed extension to the runway at Southampton International Airport on residents and businesses within the city boundary has been carefully considered by the environmental health service.

To inform the response to the consultation, the environmental health service has commissioned an acoustic consultant to undertake a peer review of the noise impact assessment submitted by the applicant in support of their application for the runway extension.

In October 2020, to support the planning application and to respond to points raised earlier in the consultation process, Savills on behalf of Southampton International Airport Limited has submitted additional documentation regarding the potential noise impact of the changes to aircraft operations which would be facilitated by the runway extension. These documents have been subject to peer review by the acoustic consultant instructed by the environmental health service.

Although it is recognised that Southampton International Airport Limited have made further changes to the noise impact relating to the proposed runway extension on the basis of the assumed limit in passenger number of 3 million passengers per annum, including a proposed daytime summer noise contour, no further mitigation has been offered or considered.

The acoustic consultant has advised the environmental health service previously of concerns about the methodology used to prepare the environmental statement and these concerns remain and may underestimate the likely noise impact of changes to the aircraft operations on the residents within the city of Southampton (for example, the modal split on the use of the runway).

The acoustic consultant has concluded that the level of noise impact has reduced compared to previous assessments but concerns relating to the severity of the noise impact on Southampton residents remains and the proposed mitigation measures may not be adequate to address this increased impact.

It is the opinion of the environmental health service that because the proposed runway extension will lead to a significant noise impact for some residents and businesses within the city which cannot be fully mitigated through sound insulation, it is recommended that the Council object to the application on these grounds.

4.8 **SCC Sustainable Development Officer: Objection**

The effects of climate change on Southampton will be felt more acutely than other places, this will have an economic impact in addition to the impacts on the environment and on people. Given its coastal location, the effects of sea level rise will necessitate more investment in flood defences. In addition, extreme weather events including summer heatwaves will be more severe due to the urban heat island effect.

Climate emergency

Whilst the economic importance of the airport is recognised, the proposed expansion will lead to a massive increase in carbon dioxide emissions and this is simply incompatible with addressing the climate emergency which has been declared by Southampton City Council (and National Government, and Eastleigh Borough Council). Southampton's Green City Charter states, "Our vision is to

create a cleaner, greener, healthier and more sustainable city". Supporting this expansion would seriously undermine Southampton's climate mitigation efforts. The UK has legally committed to net zero emissions by 2050 (amendment to the Climate Change Act in June 2019). This development goes directly against this legal obligation; aviation is in the 'hard to de-carbonise' category and expansion should be limited to support the 2050 goal. The Committee on Climate Change (CCC) has said that we cannot achieve carbon neutrality without restraining aviation, which by 2050 will be the single largest emitting sector in the UK. The CCC's calculations suggest that the necessary level of passenger demand in 2050 is an increase no more than 25% over 2018 levels. However Southampton airport is seeking growth of 50% up to 2033.

To put it into context, in 2017 according to the Department for Business Energy & Industrial Strategy, carbon emissions for homes and industry in the entire city of Southampton (excluding the port) equated to 528,000 tonnes. The Airport's own estimate is that carbon emissions will rise on average by 370,000 tonnes per year. No amount of presumed economic benefit can justify this level of increase in carbon emissions.

There is no way of offsetting this level of emissions, and the airport is proposing mitigation for only the carbon emissions during the construction phase and for its own operations, this excludes the most significant carbon emissions which are from the aircraft themselves.

If any trees are to be removed to facilitate the proposal, this will exacerbate emissions from the loss of stored carbon in the trees themselves and future ability to sequester carbon.

The reduction to travel to London is a tentative argument, as emissions saved from cars on these (assumed) journeys will be easily outweighed by the increase in airplane emissions. London airports are unlikely to be reducing their flights in response to Southampton expansion. Looking ahead in the 2017 document, the Department for Transport consider that these trends will continue and without constraints to airport growth, demand is forecast to rise.

Summary

In the submission, NPPF paragraph 38 is quoted, "secure development that will improve the economic, social and environmental constraints of the area," and paragraph 117 "safeguarding and improving the environment and ensuring safe and healthy living conditions." Para 148 also states that "the planning system should support the transition to a low carbon future in a changing climate... It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions." It has not been adequately demonstrated that the proposed development will meet these requirements.

The proposed expansion of the airport and consequential fossil-fuel consumption is considered to be fundamentally unsustainable at a time of climate crisis and unjustifiable against Southampton City Council's Green City goals.

- 4.9 **SCC Ecologist:** Having reviewed the ecology chapter of the environmental statement I am of the view that the ecological assessment is generally robust.

I do, however, have two principal concerns regarding potential impacts on ecological features with Southampton. Firstly, a number of Sites of Importance for Nature Conservation (SINC) located within Southampton, which lie within the

Zone of Influence, have not been considered in the ecological assessment, these sites are as follows:

- Marhill Copse SINC
- Frogs Copse
- Frogs Copse Meadow
- Land south of Monks Path
- Riverside Park

These sites lie under the flightpath and will be subject to higher levels of noise and emissions the impacts of which have not been assessed. In addition, Frogs Copse and Frogs Copse Meadow SINC's have already experienced impacts as a consequence of tree removal to safeguard protected airspace and Marhill Copse SINC is also likely to be affected. Removal of substantial trees will have adverse impacts on ecological value of these sites however, the ecology reports makes no mention of whether larger planes will necessitate additional tree removal and the likely ecological consequences. Should the development result in the need for the removal of additional trees from these SINC's I would expect replacement trees to be provided in the local area.

I also have concerns about the robustness of the air quality assessment which is based on assumptions of reductions in emissions. The conclusion in paragraph 9.6.72 that deposition of nitrogen onto mudflats won't lead to significant adverse effects due to tidal inundation does not appear to be appropriate.

The nitrogen in question will be added to a system that is already experiencing adverse impacts as a consequence of excess nitrogen levels. Any further additions will likely exacerbate the problem and should therefore be considered as an in-combination impact in the Habitats Regulations Assessment. I would also expect this element to be included in a nitrogen budget for the development and for appropriate mitigation measures to be secured. In addition, as it is not possible to predict guaranteed reductions in emissions, a monitoring programme should be put in place and if emissions fail to decline as predicted appropriate mitigation measures should be put in place.

Should planning permission be granted I would expect to see mitigation measures which not only address impacts within Eastleigh but also those within Southampton, which are identified above, to be put in place.

4.10 **SCC Air Quality:** We note that, while some amendments have been made to account for previous comments regarding the methodology and assumptions made for this assessment, that a number are deemed to not have received such a clarification. These points are reiterated and commented on below for clarity. Please note that the paragraph numbers correspond with the original environmental statement chapter submitted.

- Para 7.5.6. The potential dust emission magnitude from track-out, based on the numbers of vehicles likely to be accessing the site per day (less than 50 HGVs but potentially more than 10 on any given day), is estimated to be medium. However, this section states more than 100m of unpaved/unconsolidated road could be in use. According to IAQM Guidance, this would make the magnitude large. – Point not clarified; still states medium impact despite IAQM guidance suggesting otherwise.

- Appendix 7.2. The relationship between monitored and modelled road contribution to NO_x clearly demonstrated that the model was performing differently in certain locations. As such the model verification done using 2 zones, one with a factor of 3.052 and one with a factor of 2.21. The ES appendix should clearly outline the reasons for the differences in model performance in the two areas. – Clarification needed on whether RMSE is within appropriate accuracy boundaries ie. 10% of relevant objective
- Para 7.3.48/49 states that motorways and A-Roads have been sector removed but not the contribution from the airport. Section 7.4.17 states the airport and road contributions have been removed which is a contradiction. – Point not clarified, contradiction persists.
- Para 7.3.44. No information is provided on hourly or daily profiles of future aircraft movements. However, it should have been a relatively simple matter to make assumptions based on professional experience to distribute the annual average LTOs within the airports permitted operating restrictions. By not doing this, it is considered that the following limitations are introduced into the assessment:
 - o The combined impacts from energy plant, airside activities and landside road traffic are not reported at any sensitive receptor.
 - o The annual mean concentrations reported are not based on emissions being modelled under the combination of meteorological conditions likely to be experienced at the time the activities are most likely to occur.
 - Suggestion to distribute annual average LTOs not heeded; the above limitations still exist.
- Figure A7.1.1 illustrates meteorological conditions for Southampton airport in 2018. There is no evidence provided that 2018 was a typical year. No evidence has been provided. We recommend a comparison with other years.
- Appendix 7.3. fNO₂(AIR) values are reported as being based on national data published by the UK government for the fraction of oxide of nitrogen emitted in the form of nitrogen dioxide and not based on data for the subset of the data that represents the specific fleet modelled. More detailed justification of why the data used is representative should be provided.

Despite the remaining limitations of the assessment, we maintain our opinion that the assessment is unlikely to introduce sufficient bias/ uncertainty which could affect the conclusions. However, we would anticipate that the Developer be asked to provide adequate clarification and assurances regarding these remaining comments before any formal planning decision is made. If these comments are not addressed, we would also anticipate developers to justify why this is the case.

4.11 **SCC Tree Officer: Holding Objection**

There has been no new information supplied to lessen my concerns over the potential increase to the obstacle limitation surfaces, therefore my original comments apply.

The only arboricultural information that has been supplied with the application is in relation to the trees that may be impacted by the construction of the additional parking. These trees have no impact to the City and therefore this will be dealt with locally by the tree officer at Eastleigh Borough Council.

I have concerns as to whether the extension to the runway will change the aerodrome reference code which may alter the obstacle limitation surfaces around Southampton. Information is requested as to whether such change would occur and if so, what impact this will have to Southampton.

Any change to the current obstacle limitation surfaces may increase the geographical area on the ground which in turn will increase the amount of tree work expected for the take off and approach of aircraft. Historically, there has been work undertaken to trees within Southampton in relation to the flight surfaces, such as can be seen around Stoneham Cemetery and Frogs Copse. More recently there is a focus Marlhill Copse in relation to aviation. Any further increase in tree related work will have a negative impact to the local amenity and result in lower carbon sequestration. If there is an increase in the parameters of the obstacle limitation surfaces, details should also be provided on how this may impact future tree planting within the extended zone.

Details are requested of any potential tree work required for the flight paths if permission is granted and larger aircraft can use the airport. This information would be hand in hand with any change to the obstacle limitation surfaces plan.

It is clear that the most pollution caused by the aircraft is during the take off and climb where the engines would be running between 85% to 100%, therefore this will produce the highest proportion of harmful emissions, and given that over 60% of the air traffic movements occur to the south, this will have a negative impact on the city, especially if tree work is required in relation to the proposed extension and larger aircraft. Therefore I would strongly oppose any application that results in additional tree related works.

I therefore wish to lodge a holding objection on the proposed runway extension until the additional information has been provided and assessed.

5 Planning Consideration Key Issues

5.1 The key considerations which need to be balanced in determining the Council's position on the consultation response to Eastleigh Borough Council is to ensure the airport expansion maintains a balance between the benefits of aviation and its costs, particularly its contribution to climate change and noise based on the proposed capped growth scenario. Providing mitigation and control measures are secured as outlined in the various consultees responses, officers do not consider there are grounds to object to the proposal in relation to highways, ecology, air quality and tree matters. The principal issues for further consideration are, therefore, whether or not the environmental disbenefits as outlined in this report are outweighed for the purpose of a planning decision, by the economic and social benefits to Southampton accrued from the airport itself.

5.2 Climate Change

Within this sensitivity test for the reduced growth forecast, emissions from operation of the Proposed Development have been determined to be moderate adverse and significant – which is no change in terms of significance compared to the original submission.

- 5.3 Objection has been received from the Council's Sustainable Development Officer and legitimate concerns have been raised from members of the public and action groups regarding the impacts of the aviation industry on climate change. The operational emissions from the airport are forecasted to be 370,000 tCO₂e per year which is significant, considering the carbon emissions for homes and industry in the entire city of Southampton (excluding the port) in 2017 equated to 528,000 tonnes.
- 5.4 In the UK, aviation emissions account for about 6% of greenhouse gases from the transport sector. However emissions from the aviation sector are set to rise and aviation is likely to be the largest emitting sector in the UK by 2050. The Committee on Climate Change (the CCC) who advise the government on climate change have indicated that even with industry improvements in fuel efficiency, some use of sustainable biofuels, growth in the aviation sector should be limited to 25% above current levels.
It is noted that the reduced growth forecast capped at 3m pppa by 2033 forecasts a reduction in ATMs to below 25% of current levels: with a 19% decrease in ATMs by 2027 and a 6.5% decrease by 2033 (table 1 refers).
- 5.5 The Airport National Policy Framework indicates that action against climate change from aviation set at a global level is the preferred and most effective means by which to reduce emissions. Taking action only at a national or regional level has the potential to create the risk of carbon leakage with passengers travelling via other countries and increasing emissions elsewhere (para 2.8 refers).
Furthermore Paragraphs 1.9-1.11 of the the Government Policy Paper 'Beyond the horizon The future of UK aviation: Making best use of existing runways' (2018) advises that the impacts of increased carbon emissions from increased air traffic should be considered at a national level rather than through local planning decisions.
- 5.6 It should also be noted that a recent Secretary of State decision on a Development Consent Order for the re-opening of Manston Airport overruled a Planning Inspectorate Decision that had said opening Manston would have "a material impact on the ability of government to meet its carbon reduction targets". The Secretary of State Decision dated 9 July 2020, which postdates the Court of Appeal ruling on the 'Airports National Policy Statement' (ANPS), concluded that Manston Airport's forecasted CO₂ contribution of 730,100 tCO₂e per year (over double of the forecasted CO₂ contribution of Southampton Airport) should be afforded moderate weight against the Development in the planning balance.
- 5.7 The Government have said that they are committed to working closely with the sector to meet our climate change commitments, indicating that global aviation emissions offsetting scheme, sustainable aviation fuels, greenhouse gas removal technology and eventually, electric net-zero planes, will all help play their part in the aviation sector decarbonising. The Government also support an industry led commitment to net zero carbon emissions by 2050 and the range of innovative action this will unlock to achieve this outcome.
The majority of CO₂ emissions arising from Southampton airport operation are from scope 3 (indirect emissions), such as from aircraft which is the responsibility of carriers rather than the airport. However it is understood that airports can introduce landing charges to encourage quieter and less polluting

planes and such control/mitigation measures would be recommended to Eastleigh Borough Council in the event this planning application is approved.

5.8 Noise Impacts

The Council's environmental health service have again raised an objection because the proposed runway extension will lead to a significant noise impact for some residents and businesses within the city which cannot be fully mitigated through sound insulation. This objection follows a peer review of the noise issue by consultants on behalf of Southampton City Council which is attached as **Appendix 2**.

5.9 It is considered the scheme should be assessed against the noise contour thresholds laid out by Government within the Aviation Policy Framework which indicates:

>51 Db	Lowest Observed Adverse Effect Level (LOAEL). "This is the level above which adverse effects on health and quality of life can be detected."
>57 Db	The onset of communities becoming significantly annoyed by aircraft noise.
>63 Db	Significant Observed Adverse Effect Level (SOAEL). "This is the level above which significant adverse effects on health and quality of life occur." Government also expects airport operators to offer acoustic insulation to noise-sensitive buildings, such as schools and hospitals, exposed to levels of noise of 63 dB LAeq,16h or more.
>69 Db	The Government expect airport operators to offer households exposed to levels of noise of 69 dB LAeq,16h or more, assistance with the costs of moving.

Table 2 - Comparison of households within aircraft noise contour bands

Contour Level LAeq 16hr dB(A)	BASELINE Number of households in 2016	ORIGINALLY PROPOSED Number of households in 2021 (Based on original 5m ppa growth)	ORIGINALLY PROPOSED Number of households in 2037 (Based on original 5m ppa growth)	REVISED PREDICTION Number of households in 2033 (Based on current proposals)
>51	8,500 of which		25,300 of which	18,050 of which
>54	3,800	8,100	10,800	7,700
>57	1,250	3,750	5,100	2,900
>60	350	1,150	1,800	1,000
>63	0	350	650	200
>66	0	0	50	
>69	0	0	0	

5.10 The updated technical noise report by WSP supporting the planning application indicates In 2033, compared to 2016, an additional 9,350 households are potentially exposed to aviation noise levels between the LOAEL and SOAEL values (51 dB and 63 dB respectively). 200 households will potentially be exposed to noise level above the SOAEL. This is 6,750 households fewer than the 2037 (5 mppa) scenario which predicted an additional 16,100 households between the LOAEL and SOAEL, and 150 households fewer than the predicted 350 households above the SOAEL in the 2037 (5mppa) ESA scenario.

The majority of the most affected households are to the south of the Airport within the Southampton Wards of Swaythling and Bitterne Park.

- 5.11 The updated noise modelling inputs shows that for the 2033 average summer day there was a total of 118.4 movements, a 14% decrease from 2016 (137.2). Although movements are lower in 2033, the shift to relatively high numbers of Airbus A320 aircraft in 2033 causes the contours to expand compared to 2016. It should be noted that the noise assessment has been based on worse case scenarios and cannot take into account future changes to quieter aircraft such as Airbus A380, Boeing 737max and Airbus A321 neo, which are 40-50% quieter than existing jet aircraft. It is understood that Easyjet now have A321 neo as part of their fleet at Gatwick.
- 5.12 The number of households within the Significant Observed Adverse Effect Level (SOAEL) has also reduced but nevertheless there would be 200 new households within this contour which would need to be offered an acoustic insulation package to mitigate against the noise impact, as required by the Aviation Policy Framework. It should be noted that based on the current contours Bitterne Park School does not fall within the SOAEL contour band.
- 5.13 The Airport have increased their financial offer towards acoustic insulation from £3,000 to £5,000 per household. It is noted from the Peer Review by Acoustics 24 that Bristol Airport offers a grant of £7,500 to residents in/above the 63dB contour and £3,750 for residents in the 57 and 60dB contours. Gatwick Airport offers £3000 towards double glazing for households within the 60dB contour. Heathrow offer the full costs of insulation for residents in the 60dB contour.
- 5.14 The Aviation Policy Framework provides guidance on when noise mitigation should be offered in relation to noise from airports i.e. households subject to a noise level of greater than 63db LAeq should be offered support with acoustic insulation and households subject to a noise level of greater than 69db LAeq should be offered financial assistance to move home (there are no households subject to this noise level in relation to the proposed Southampton Airport expansion). However the national policy is not clear in terms of what extent of households subject to a noise level greater than 57db LAeq would reach a stress point beyond which mitigation could not sufficiently address the significant adverse harm when weighed in the planning balance. Southampton Airport appears to have a higher density of residents living in close proximity to the airport than many of UK airports hence the forecasted figure of 2,900 households (increase of 1650 households over the 2016 baseline) subject to a noise level of greater than 57db LAeq. Unfortunately the planning application does not put these figures into context with the impacts of other airports however it is acknowledged it is difficult to make comparisons when each airport is different in terms of ATMs and geography. However to put these figures into some perspective Luton Airport has 4,550 households subject to a noise level of greater than 57db LAeq (summer day average), Gatwick Airport on the other hand has 1,100 households subject to a noise level of greater than 57db LAeq (summer day average).
- 5.15 Although the revised growth forecast capped at 3mppa has seen a reduction in the number of households affected by airport noise, a significant number of properties would still be affected. If it is decided that the socio-economic benefits outweigh this harm, then measures should be secured to ensure the noise

envelope is a robust tool which can be enforced. It is acknowledged that noise envelopes are identified in the Airport Policy Framework as a recognised tool to control noise impact. However it is noted that the Civil Aviation Authorities guidance on noise envelopes (CAP 1129) indicates that ATM restrictions can also be used to provide improved noise controls and better enforceability of the noise limits. Control measures would also be required in the event that Southampton City Council is consulted and involved in ongoing noise control measures should the noise envelope change as a result of changes to airspace design which is outside of the control of the planning process.

- 5.16 It is also recommended that existing controls on night flights should remain in place with no scheduled night-time flights, defined as 23:00 – 06:00 Monday to Saturday, and until 07:30 on Sunday with the exception of 10 night flights per month or a maximum of 100 per annum to account for any unforeseen delays in the programme should be controlled by conditions. Furthermore it is recommended that landing charges should be introduced and structured towards encouraging quieter planes and such mitigation will be recommended to Eastleigh Borough Council in the event that the planning application is approved by them.
- 5.17 Socio-Economic
It would appear the future viability of the airport is at significant risk without the runway extension, given the collapse of Flybe and the reduced interest from alternative carriers in backfilling the routes. It appears the airport needs to access the low-cost airline market to remain viable.
- 5.18 The identified need for expansion to Southampton Airport has been questioned having regard to the proximity to other areas such as Bournemouth, Heathrow and Gatwick. However the Airport Policy Framework (2013) indicates that:

“Airports are in some ways cities in themselves, creating local jobs and fuelling opportunities for economic rebalancing in their wider region or area. New or more frequent international connections attract business activity, boosting the economy of the region and providing new opportunities and better access to new markets for existing businesses.” (para 1.20 refers).
- 5.19 This would suggest that Airports are entitled to compete for growth to support their viability and the economy of the region for which they serve.
- 5.20 The DfT report ‘UK Aviation Forecasts’ (2017) which looked at the opportunity for additional capacity at UK airports identified a growth level at Southampton of 3 million passengers per annum to 2030 and 7 million passengers per annum by 2040. The proposal to cap growth at 3m ppa by 2033 would be within the capacity allowance identified by DfT for Southampton Airport.

Table 3 - Direct and Indirect Jobs

Jobs to 2027			
	2015	2027 without extension	2027 with extension
Direct Jobs	950	475	1083
Indirect Jobs		797	1819

Jobs to 2037			
	2015	2037 without extension	2037 with extension
Direct Jobs	950	483	1410
Indirect Jobs		810	2367

- 5.21 Table 3 provides the forecasted number of direct and indirect jobs for scenarios with or without the runway (these figures are taken from tables 3.2 and 3.3 within the 'Environmental Statement Appendix 2.0 Sensitivity Test of Alternative Baseline and Future Operations' by Savills which supports the planning application). As you can see in 2027 there is forecasted to be a total of 1,272 direct and indirect jobs without the runway but this increases to a total of 2,902 jobs with the runway which is a difference of 1,630 jobs.
- 5.22 The Economic Evidence supporting the planning application indicates the contribution of direct, indirect and induced economic impacts to the total economic footprint of Southampton Airport was estimated to be £161m in 2015. The Airport indicated that this figure was set to rise to £325m per annum by 2027 based on the original masterplan forecast however there doesn't appear to be revised figures based on the capped 3m pppa growth scenario.
- 5.23 Regard also needs to be had to the wider catalytic economic benefits from the airport which are more difficult to quantify. The airport supports the economy of Southampton and the region by facilitating trade, productivity, investment and tourism. Moreover a highly connected regional airport will support the recovery for Southampton and the regional economy. Air connectivity to the UK and Europe will be vital in supporting port recovery (the Port of Southampton handles exports worth £40 billion annually), the city of culture bid, as well as supporting the international Universities, Southampton Football Club and business across the region, as well as helping place the city on the international stage as a city of culture and for investment. The airport is well served by existing public transport infrastructure with its own railway station and direct bus routes from Southampton City Centre.
- 5.24 Southampton Airport is situated within a densely populated catchment area, with 3.5 million people living within one hour's drive time, and 1.4 million living within just 30 minutes. The airport supports tourism in the region but also supports gives the population within the catchment opportunity to experience different cultures or enjoy a holiday.

6 Planning Balance

- 6.1 The starting point in the consideration of this consultation response is the previous Planning and Rights of Way Panel resolution on 28 January 2020, which resolved to object to this planning application on the following grounds: Firstly, the proposal fails to satisfy the requirements of environmental and social impacts to residents of Southampton, particularly in respect of noise; and Secondly, the economic benefits do not outweigh the adverse environmental and social impacts. It was also considered that the application's submission suffered from a lack of information. This was reported to Eastleigh ahead of this re-consultation.
- 6.2 However the revised application which is the subject of this current round of consultation is a materially different scheme arising from the proposed operational growth cap which seeks to limit growth to up to 3mppa by 2033 as opposed to 5mppa by 2037. As such the proposed level of growth is 50% rather than 150% when compared to the 2016 baseline. This is a significant change to the scheme with the number of air transport movements (ATMs) set to decrease by 19% by 2027 compared to the 2016 baseline, as opposed to the 35% increase in ATMs by this period, as originally proposed. As a consequence there has been an associated reduction in environmental impacts that needs to be considered in the Panel's deliberations, although the scale of carbon emissions and noise impact still remain significant.
- 6.3 Having regard to the national policies, consultee responses and other material considerations it is considered that the decision maker can only give moderate weight to the impacts of climate change as part of the planning balance. Any impacts associated with highways, ecology, air quality and tree matters can be mitigated and would not tip the balance as determining factors.
- 6.4 The determining factors in relation to this application are considered to be the economic and social benefits of the airport expansion versus the noise impacts on residents of Southampton. These factors are finely balanced having regard to the direct, indirect and catalytic economic benefits of the runway expansion to enable a viable airport to be maintained and to recover from the Flybe collapse and to access the short-haul holiday market which is served by larger Jet aircraft.
- 6.5 The job creation as a result of the airport expansion is forecasted to be a total of 2,902 direct and indirect jobs. Furthermore the airport supports the economy of Southampton and the region by facilitating trade, productivity, investment and tourism. Moreover a highly connected regional airport will support the recovery for Southampton and the regional economy. Air connectivity to the UK and Europe will be vital in supporting port recovery, the city of culture bid, as well as supporting the international Universities, Southampton Football Club and business across the region, as well as helping place the city on the international stage as a city of culture and for investment

- 6.6 However whilst the forecasted reduction in growth will see a marked reduction in ATMs, the noise impacts remain significant because the extended runway would serve larger, noisier jet aircraft with of 2,900 households (increase of 1650 households over the 2016 baseline) subject to a noise level of greater than 57db LAeq. The onset of communities becoming significantly annoyed by aircraft noise is likely, with 200 existing households in Southampton subject to a significant adverse noise level that they wouldn't need to endure if the runway isn't extended. That said, any noise impacts need to be assessed in the context of the established noise environment appreciated by communities living near the airport. Furthermore, the projected noise levels generated are at a level which government policy suggests can be mitigated by noise controls.
- 6.7 Given the finely balanced nature of these competing issues, coupled with the strong objection given by the Planning & Rights of Way Panel to the earlier consultation, the significant amendments to the growth forecasting by the Airport and the sustained objection from the Council's Environmental Health team officers advise that it is for the Planning Panel to reach a decision to either maintain their objection or support the revised application based on the case presented within this report.
- 6.8 If Eastleigh Borough Council (EBC) are minded to approve the application, following receipt of the Council's response, they are encouraged to secure the following controls through planning conditions or S106 obligations, in addition to the control measures and mitigation offered within the planning application submission:
- Noise monitoring system;
 - Public Noise Complaints Handling Service;
 - Sound Insulation Grants Scheme;
 - Night noise provisions;
 - Aircraft restrictions to restrict size and movement of aircrafts to include a maximum number of ATMs with 10% buffer. This should include a penalty if the number of ATMs is exceeded by reducing the quota by the same amount the following year;
 - Total per annum passenger restriction and associated controls to vehicle movements entering the site with restrictions to access when cap is reached;
 - Controls on shouldering to prevent excessive concentrations of ATMs taking off/landing when the airport first opens during morning hours at 6am Mon-Sat and 7.30am on Sundays;
 - Noise contour areas not to exceed modelled levels in any year
 - New households within contours to be compensated in accordance with agreed scheme (to be assessed annually);
 - Annual Report in impact of airport – noise/employment/pollution/traffic Etc;
 - Vehicle access cap;
 - Nitrogen cap;
 - Penalties if exceed targets – community compensation fund (to benefit affected communities ie. Scc);
 - Phase out noisier aircraft types;
 - Phase out more polluting aircraft type; and
 - Employment and Skills Plan.

- 6.9 Officers are working with a number of consultants experienced in airport development and will look to draft some detailed wording for these conditions/S106 obligations that will be forwarded to Eastleigh Borough Council as part of the Council's consultation response.
- 6.10 Officers would expect EBC to liaise closely with SCC, in the event that permission is granted and conditions are imposed, to ensure that the restrictions imposed protect the City's residents and mitigate the direct impacts whilst looking at options that promote severe penalties for any breach. Delegation is sought for the Head of Planning and Economic Development to prepare the response on this basis, as informed further by the Panel debate, and to comment in the event that further consultation arises from EBC.

Local Government (Access to Information) Act 1985

Documents used in the preparation of this report Background Papers

1 (a) (b) (c) (d), 2 (b) (d)

AG for 01/12/2020 PROW Panel

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Agenda Item 4

Appendix 1

Planning and Rights of Way Panel 28 January 2020 Planning Application Report of the Head of Planning & Economic Development

Application address: Southampton International Airport			
Consultation from Eastleigh Borough Council regarding a planning application at Southampton Airport for the following development 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)			
Application number	19/02021/CONSUL	Application type	Consultation
Case officer	Andrew Gregory	Public speaking time	15 minutes
Last date for determination:	03 February 2020	Ward	N/A Eastleigh Borough
Reason for Panel Referral:	At the Full Council meeting on 20 November 2019 it was advised that the final decision on this consultation response would be made by the Planning and Rights of Way Panel.	Ward Councillors (Swaythling and Bitterne Park Wards)	Cllr Fuller Cllr Harwood Cllr White Cllr Mintoff Cllr Bunday Cllr Fielker

Applicant: Southampton International Airport Ltd	Agent: Savills
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Recommendation Summary	Holding Objection
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Appendix attached	
1	Peer Review of Noise Impact Assessment by 24 Acoustics

Recommendation in Full

Instruct the Head of Planning & Economic Development to:

1. Prepare and submit a holding objection on behalf of Southampton City Council to Eastleigh Borough Council ahead of them determining their planning application ref F/19/86707. The response shall include this report including Appendices and the redacted comments of residents received by Southampton City Council and seeks an opportunity to comment further should the application be significantly amended ahead of its determination.
2. To respond to any subsequent consultation from Eastleigh Borough Council in consultation with the Chair of the Planning and Rights of Way Panel.

Holding Objection

Reason for holding objection

The National Planning Policy Framework indicates that social, economic and environmental objectives are interdependent and need to be pursued in mutually supportive ways in order to achieve sustainable development. Southampton City Council supports the sustainable growth of Southampton Airport to ensure it remains a competitive and viable regional airport within the South East and welcomes the associated benefits to the regional economy and tourism. However planning applications for development which facilitate this growth must be assessed against these three interdependent social, economic and environmental objectives of the National Planning Policy Framework.

The proposed runway extension would facilitate a level of forecasted growth in Air Transport Movements (ATMs) that would be at odds with the Independent advice to government from the Committee on Climate Change on building a low-carbon economy and preparing for climate change. Furthermore the forecasted amount and frequency of aircraft departing to the south and arriving from the south over Southampton, would have a predicted significant adverse noise effect on 350 households by 2021 and 700 households in 2037, with the majority of these households located within Southampton.

The proposed mitigation measures/controls relating to forecasted carbon emissions and noise impact are not alone sufficient in order to address these concerns. Southampton City Council recommends that robust control measures should be put in place to limit Air Transport Movements to achieve better alignment with the recommendations of the Committee on Climate Change and improved clarification on noise mitigation arrangements is sought to reduce the noise impact on residents of Bitterne Park. It should be noted that other airports, such as London Southend Airport, are subject to controls on ATMs through a S106 legal agreement, which do not require the Local Authority to close the airport, prevent tickets being sold or aircraft taking off.

Finally, it is evident from the Council's own consultation in respect of local residents and relevant consultees, as set out in this report, that the planning application requires further clarification, as set out within paragraph 6.2 of this report, before a fully informed planning decision can be made.

Background

Southampton Airport Ltd have submitted a planning application to Eastleigh Borough Council (EBC) for development to facilitate the first phase of its masterplan growth up to 2027. The majority of the airport site and the land associated with this planning application (as defined by the red line boundary) falls within the administrative boundary of Eastleigh Borough Council. The southern part of the airport falls within the administrative boundary of Southampton, however this part of the airport is outside of the planning application site and is shown as blue land (land owned by the airport but not forming part of the development site). Southampton City Council have been consulted as a neighbouring authority which is adjacent to the application site and have until the 03 February to provide formal comments to EBC.

EBC will determine the application in line with their own Development Plan taking into account any other material considerations. Southampton City Council response will be one such material consideration and should be afforded due weight as part of EBC decision making process.

As Southampton City Council is a consultee, rather than the determining authority, the council is not under any statutory obligation to undertake any public consultation. Generally the Council's consultation responses to developments in neighbouring authorities are carried out under delegated authority and are not informed by public comments. However, in this instance, the scale and extent of the residual effects of the airport expansion (having particular regard to noise, climate change and air pollution) is such that it will have significant impacts on Southampton and its citizens. The Panel should note that the Environmental Statement supporting the Planning Application indicates that 5,400 households are currently affected by adverse noise impacts from the airport, 13,350 households would be affected by adverse noise impact from the first phase of master plan growth from 2021 and a total of 18,400 households would be affected up to 2037, with the majority of households predicted to experience an increase in aviation noise located to the south of the airport in Bitterne Park.

The Council has undertaken its own public consultation to allow the public to provide comments to inform the Council's consultation response. The extent of the public consultation included sending notification letters to 287 addresses, including residents to the south of the runway that would be most affected by the forecasted change in the noise environment and some members of the public who attended the Full Council meeting on 20 November 2019 (those who registered and left contact details).

At the Full Council meeting, the Council's Solicitor advised that the appropriate process to consider and decide on the Council's consultation response should be at a public meeting of the Planning and Rights of Way Panel.

1 The site and its context

- 1.1 Southampton Airport is located to the north of the north of the M27 with the majority of the airport site and site access within Eastleigh Borough. The southern end of the airport site falls within the administrative boundary of Southampton (this area located outside of the planning application site but is within the control of Southampton Airport). The airport has good transport connections with Southampton Parkway Railway Station located adjacent to the western side of the airport and vehicular access is located close proximity to junction 05 of the M27.
- 1.2 Public open space is located due south of the M27 (Itchen Valley Country Park, Mansbridge Recreation Ground, Marlhill Copse and Riverside Park. Residential properties are located further south within Bitterne Park Ward and to the south west within Swaythling Ward.
- 1.3 Planes taking off/arriving to/from the south track over a significant area of housing within Bitterne Park Ward between the airport and the River Itchen. Bitterne Park School is also located within this area of housing. The application submission indicates there are approximately 5, 400 households currently effected by aircraft noise (above a contour noise level of 54db), the majority of these households are located in Bishopstoke to the north–east (within EBC boundary) and Townhill Park/Bitterne Park/Swaythling to the south.

2 **Proposal**

- 2.1 The planning application seeks permission for an extension to the northern end of the runway, associated blast screen and additional 600 long stay car parking to facilitate the first stage of the proposed airport masterplan growth up to 2027.
- 2.2 Southampton Airport Masterplan sets out the airport operator's vision for growth up to 2037 as set out within Table 1 below. Please note that the planning application has revised down the forecasted growth in passenger numbers up to 2027 to 3 million (50% increase over 2017). The employment forecasts set out within the planning application have also increased the employment figures to 1350 staff up to 2027 (42% increase over 2015).

Table 1 – Summary

	2017	2027	2037
Air Transport Movements (ATMs)	39,300	53,100 (35% increase over 2017)	57,800 (47% increase over 2017)
Passenger Forecasts	2 million	4 million (100% increase over 2017)	5 million (150% increase over 2017)

	2015	2027	2037
Economic Contribution	£161 million	£325 million (101% increase over 2015)	£400 million (148% increase over 2015)
Staff employed at the airport	950	1,200 (26% increase over 2015)	1,500 (58% increase over 2015)

- 2.3 The airport masterplan indicates that due to the short length of the existing runway, Southampton Airport currently has a limited route network range with services primarily provided by regional airlines such as Flybe operating medium sized (70-120 seats) regional aircraft such as Bombardier Q400 and Embraer 175/195 jets. The main assumption made for the medium term forecast is that a runway starter extension would allow larger narrow-body aircraft, such as the Airbus A319/A320 and Boeing 737-800 with 150-190 seats, to operate without major restrictions to a more distant and much wider route network from Southampton Airport, covering a range of European destinations.
- 2.4 With the provision of a runway starter extension and opportunity for larger aircraft, Southampton Airport seek to capture a much larger proportion of the demand from its catchment area for the short-haul European market.
- 2.5 The proposed runway extension would extend the runway by 164 metres, at the northern end. This would allow larger aircraft such as the Airbus A320 and Boeing 737 passenger from taking off in a southerly direction, across Southampton, to reach wider holiday market and business destinations within southern Europe.

- 2.6 The application submission indicates the runway extension would only facilitate the first phase of the masterplan growth up to 2027. The airport indicate that extension to the terminal building and further car parking beyond the 600 spaces proposed would be required to facilitate growth beyond 2027 up to 2037 and that these works, along with increased capacity of supporting infrastructure would be considered as part of a future separate planning application. That said, the current submission indicates that the proposed extended runway would accommodate the forecasted 57,800 ATM's by 2037 without requiring any further Terminal extension and, therefore, this current application assesses the ecology, air quality and noise impacts up to the 2037 growth scenario.

3 Relevant Planning Policy

SCC Planning Policy Team

- 3.1 The Planning Policy Team considers that the proposal to extend the airport will not present any significant harm to the strategic gap between Southampton and Eastleigh and acknowledges the fact that the development is likely to have a positive impact upon the economic growth of both Southampton and Eastleigh. In light of this, the Planning Policy Team supports the proposal as a whole.
- 3.2 However, given the proximity of the site to the River Itchen, which is of both national and international conservation importance, as well as consideration towards the existing congestion experienced on both the M27 and A335, which surround the site and provide a key transport network to and from the airport, the Planning Policy Team request that conservation and highways impacts are thoroughly assessed by Eastleigh Borough Council during the decision-making process, in partnership with Highways England and Hampshire County Council and Southampton City Council Transport/Highways departments where necessary. Furthermore, in the interest of promoting and enhancing sub regional economic growth the runway extension, if it includes a northern extension, should safeguard the physical ability to provide the Chickenhall Lane Link Road so as to enable what is a significant new employment allocation north east of the site to be opened up.
- 3.3 Finally, as the site is situated between two distinct residential areas (north and south of the site) careful consideration should be made to the increased noise, vibration and late night disturbance that may result from the airport hosting larger aircrafts; any increase to flight frequencies over time; and the additional vehicular traffic on the surrounding road networks and how these may affect the amenity of local residents.
- 3.4 In light of the above, the proposal for 'development of a 170 metre starter strip, new taxiway, tunnel safeguarding works, terminal expansion and additional car parking on Mitchell Way' is supported by the Planning Policy Team, subject to the considerations aforementioned. All other considerations relating to the proposal are for Eastleigh Borough Council to address.

National Planning Policy Framework (2019)

- 3.5 The National Planning Policy Framework (NPPF) indicates that the purpose of the planning system is to contribute to the achievement of sustainable development which, at a very high level, can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs to pursue interdependent.

In order to achieve this the planning system is required to pursue interdependent overarching economic, social and environment objectives in mutually supportive ways. In the context of this proposal, the economic benefits of the airport expansion, which includes contribution to employment and tourism, needs to be balanced with its impacts on the health and well-being of local communities and environmental impacts on biodiversity and climate change.

- 3.6 Paragraph 24 of the NPPF indicates that Local planning authorities are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. This is particularly important because the benefits and dis-benefits arising from this airport expansion have significant impacts beyond the administrative boundary of Eastleigh Borough Council, particularly on Southampton and its citizens. Therefore Eastleigh Borough Council must consider the wider impacts and have regard to other material considerations and not just development policies which relate to Eastleigh Borough alone.

Aviation Policy Framework (2013)

- 3.7 The aviation policy framework (AVP) sets out the government's policy to allow the aviation sector to continue to make a significant contribution to economic growth across the country, whilst respecting the environment and protecting quality of life. Para 5.6 of the AVP indicates that this policy framework may be a material consideration in planning decisions depending on the circumstances of the case.
- 3.8 Paragraph 05 of the AVP indicates:
"The Government's primary objective is to achieve long-term economic growth. The aviation sector is a major contributor to the economy and we support its growth within a framework which maintains a balance between the benefits of aviation and its costs, particularly its contribution to climate change and noise. It is equally important that the aviation industry has confidence that the framework is sufficiently stable to underpin long-term planning and investment in aircraft and infrastructure."
- 3.9 In respect of the environmental impacts on aviation the AVP acknowledges that the environmental impacts from aviation are both global (climate change) and local (primarily noise, as well as air pollution and surface access traffic congestion). In respect of climate change the AVP seeks to ensure the aviation sector makes a significant and cost effective contribution towards reducing global emissions (para 12 refers).
- 3.10 The AVP indicates that the overall objective on noise is to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise. The AVP makes clear that the acceptability of growth in aviation depends to large extent on the industry continuing to tackle its noise impact and confirms that the Government expects the industry at all levels to continue to address noise.
- 3.11 The AVP provides guidance on the noise levels which should be used when assessing the impact of aviation noise on communities. The Government treats the 57db LAeq 16 hour contour as the average level of day time aircraft noise making the approximate onset of significant community annoyance.

Acoustic insulation mitigation should be offered to noise-sensitive buildings such as schools and hospitals, and can include households, which are subject to noise levels of 63db LAeq 16h. The AVP goes on to indicate that the Government expects operators to offer households exposed to noise levels of 69db LAeq, 16h or more, assistance with the costs of moving.

3.12 Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England (2018)

The Airports NPS 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. Other NPSs may also be relevant to decisions on airport capacity in this geographical area.

3.13 The Airports NPS indicates that on 25 October 2016, the Government announced that its preferred scheme to meet the need for new airport capacity in the South East of England was a Northwest Runway at Heathrow Airport. This is an important factor when deciding on the weight to give to the need for expansion of this regional airport as part of the overall planning balance.

3.14 The Airport NPS provides guidance on the assessment of planning applications in relation to key issues such as carbon emissions, noise, air quality, surface access and biodiversity.

In respect of Noise impacts, paragraph 5.68 of the Airport NPS indicates: *“Development consent should not be granted unless the Secretary of State is satisfied that the proposals will meet the following aims for the effective management and control of noise, within the context of Government policy on sustainable development:*

- *Avoid significant adverse impacts on health and quality of life from noise;*
- *Mitigate and minimise adverse impacts on health and quality of life from noise; and*
- *Where possible, contribute to improvements to health and quality of life.”*

3.15 In respect of Carbon emissions, paragraph 5.82 of the Airport NPS indicates that:

“Any increase in carbon emissions alone is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the project is so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets.”

Noise Policy Statement for England (March 2010)

3.16 The Noise Policy Statement (NPS) is the overarching noise policy for England and introduced the 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.

- 3.17 These levels are not defined numerically in the NPS 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.

Other material considerations

- 3.18 Committee on Climate Change Letter: International aviation and shipping and net zero (September 2019)

The Committee on Climate Change (the CCC) is an independent, statutory body established under the Climate Change Act 2008. Their purpose is to advise the UK Government and Devolved Administrations on emissions targets and report to Parliament on progress made in reducing greenhouse gas emissions and preparing for climate change.

- 3.19 On 24 September 2019 the CCC wrote to the Secretary of State for Transport responding to the Governments request on how to bring international aviation and shipping emissions formally within the UK' net zero target by 2050. The letter indicates that zero carbon aviation is highly unlikely to be feasible by 2050. However emissions could be reduced by around 20% from today to 2050 through improvements in fuel efficiency, some use of sustainable biofuels and by limiting demand growth at 25% above current levels.

- 3.20 The CCC indicate that measures should be put in place to limit growth in aviation demand to at most 25% above current levels by 2050. These could include carbon fixing, a frequent flyer levy, fiscal measures to ensure aviation is not undertaxed, reforms to Air Passenger Duty or management of airport capacity.

- 3.21 The letter goes on to indicate that the Government should assess its airport capacity strategy in the context of net zero carbon. Indicating that current planned additional airport capacity in London, including the third runway at Heathrow, is likely to leave at most very limited room for growth at non-London airports.

Green City Charter for Southampton

- 3.22 The Council's Green City Charter sets out the challenging goals to make Southampton a cleaner, green, healthier and more sustainable city. This includes goals to reach carbon neutrality by 2030 and to see a reduction in emissions with nitrogen dioxide levels of 25 µg/m³ as the norm by 2025.

4 Consultation Responses and Notification Representations

- 4.1 Following receipt of the application, and their own consultation, Eastleigh Borough Council erected 4 site notices within the administrative boundary of Southampton, providing notification of the public consultation on the planning application. The planning application submission indicates the airport also carried out pre-application public consultation, including a meeting at Bitterne Park School on 29.10.19, it is however unclear whether the airport have carried out any targeted consultation to households that will be affected by a change in noise environment within the city boundary.

4.2 This Council has undertaken its own public consultation to allow the public to provide comments to inform the Council's consultation response. The extent of the public consultation included sending notification letters on 05 December 2019 to 287 addresses, including residents to the south of the runway that would be most affected by the forecasted change in noise environment. Notification was also given to those that attended the Full Council meeting on 20 November 2019 and registered with contact details. In response to SCC's notification a total of **82 objections** have been received which are summarised as follows:

- More noise pollution (5600 local people are already living with levels of noise that are double those recommended by the WHO for airport emissions);
- Increased air pollution (from both flights and associated traffic increases);
- Worse road congestion;
- Increased greenhouse gas emissions (inconsistent with achieving zero net carbon by 2050 - flight numbers need to be cut, not increased, to prevent climate breakdown);
- Few, if any, benefits for Southampton residents (we get a worse quality of life to enable more flights);

In addition:

- The promise of low-paid jobs is not enough to cover the cost to us, as council tax payers, of all the above;
- Flights from Southampton are decreasing anyway, and if Heathrow is expanded regional airports will lose traffic, making expansion of Southampton unnecessary;
- More flights will undermine Southampton City Council's own Green City Charter and make a mockery of the Council's efforts to achieve a low carbon future for our city.

4.3 A redacted copy of all 82 representations received will be forwarded to Eastleigh Borough Council as part of the Council's consultation response.

Consultation Responses

4.4 SCC Highways: Holding Objection

Connected Southampton 2040 Transport Strategy (LTP4) sets out the long-term transport vision and strategy to support sustainable economic growth in Southampton. It identifies Southampton Airport as one of the main Economic Drivers for the City Region as an international gateway. For sustainable economic growth the Airport needs to have improved access by public transport and active travel.

More information is required in order to determine the impact that the proposals would have on the local highway network. The application states that the proposals would facilitate an increase of passengers using the airport from 2 million passengers per annum (mppa) to 3mppa and the Solent Sub-Regional Transport Model (SRTM) has been utilised to determine the level of trip generation that would result from such an increase.

However, this estimated trip generation has not been corroborated with existing data and as such this is required before the impact of the increased passenger numbers can be fully assessed.

Furthermore the impact of the 600 space car park has not been considered within the Transport Assessment. This significant increase in parking spaces at the airport will have an impact on travel behaviour which hasn't been addressed within the assessment. In particular the justification for using the SRTM 'DS3' scenario uses the modal split reported from a 2018 travel survey. This was a key element in determining that the modelled 2.66mppa in the SRTM is comparable to the new projected increase to 3mppa. Should travel behaviour to and from the airport change as a result of the car park then these assumptions may not be correct. Other assumptions have been made in determining that the SRTM DS3 scenario includes traffic associated with 3mppa that require additional justification or clarification should this be used as a basis for assessment, including:

- It is not clear how the modal split data has been used to revise the mppa covered by the SRTM traffic flows. It is noted that the surveyed modal split shows a higher public transport share than the SRTM assumptions, however the assessment then goes on to retain the total mppa using highway trips whilst using the surveyed modal split proportion to add additional mppa using public transport. The reasoning behind this is not set out.
- The assessment notes that the SRTM does not determine which trips are two-way (for example someone dropping off a passenger by car so arrives and departs within an hour) and which are one way (a passenger parking at the airport) which could underestimate the number of passengers per trip and to address this a 50/50 split in the taxi mode share between two-way trips and one way trips has been assumed. This is on the basis that all 'off site' taxis (i.e. not airport based) would be one way trips however it is not clear what this is based upon, for example is it assumed that all taxis drop off one fare and then wait at the airport to pick up another fare?
- Finally the assessment then considers vehicle occupancy rates between when the SRTM was constructed and now which show a 16% increase in occupancy. It would be useful to show vehicle occupancy rates for other years if available in order to understand if this is part of a trend for an increase in vehicle occupancy at the airport or whether one or both figures are anomalous and therefore whether using the 16% figure is appropriate. In addition more information on the surveys (and the 2018 survey on which the modal split data is based) is required, for example were the vehicle occupancy surveys undertaken at the same times of year (as occupancy rates could be higher during school holidays) and how was the data collected.

The majority of the junctions assessed are in Hampshire or affect the M27, and we would expect Hampshire County Council and Highways England to comment on these. Whilst the A27/Wide Lane and the Wide Lane/A335/Wessex Lane/Stoneham Way junctions in Southampton have been modelled as requested there is no current year baseline in order for the models to be validated. As such turning count data and queue length surveys are required and a current year baseline model should be provided to demonstrate that the model is predicting the impact of future traffic growth and the proposals accurately. In addition the model for the A27/Wide Lane junction should be reviewed. Whilst it is acknowledged that the junction could be impacted upon by the operation of the Wide Lane/A335/Wessex Lane/Stoneham Way junction, the LinSig model as it

stands does not seem to accurately model the roundabout junction, particularly underestimating queuing on the Mansbridge Road in the AM peak.

More information is needed on sustainable travel – walking, cycling, bus and rail – given the proximity of the Airport to Southampton Airport Parkway station which has frequent connections to Southampton Central Station. Likewise, there is little on staff journeys to work who may be coming from Southampton to work at the Airport – this can be covered within a staff travel plan but commitments of action/delivery plans should be considered to further reduce the need for private car travel.

Whilst mitigation options cannot be determined given the impact of the proposals is not confirmed, it is expected that further information on sustainable and active travel access for both passengers and staff and a Travel Plan be provided as part of this application as requested at the pre-application scoping stage.

It is noted that the Transport Assessment includes a commitment to prepare a Travel Plan however a document should be submitted setting out the targets for sustainable travel mode share and how the current mode share can be improved upon.

It is noted that the runway extension will allow sufficient aircraft movements to accommodate 5mppa. However due to the size of the current buildings, only 3mppa can be accommodated and therefore impact from only 3mppa have been assessed. There is little information on why this is and whether flight schedules or management can affect how many passengers can be accommodated by the current buildings. Sufficient measures should be included to ensure that passenger numbers do not exceed 3mppa and to allow for the assessment of 5mppa when it appropriate - whether that would be a suitably worded condition and/or assurance this would be assessed if a future application is submitted for the building expansions.

At this stage without further information, Highways cannot support the application.

4.5 SCC Economic Development Manager: No objection

Economic Development response to 'The Economic Impact of Southampton Airport' – October 2019 by Steer Davies Gleave (SDG).

SDG use a standard desk-based methodology based on direct, indirect and induced impacts. The study also partly considers catalytic impacts. It is widely agreed that such impacts are more difficult to assess and so SDG has sought to rely on qualitative evidence. In addition business representations into the consultation process may describe some catalytic benefits.

Based on direct, indirect and induced impacts analysis in Figure 5.3 of the value (£ millions) of the 'expansion of air services' (section 5.8) in the years 2019, 2020 and 2021 is marked as the value of these services increases from the 'Future baseline' trajectory to nearly £300 million. This circa £100 million value uplift is significant and it is questionable if this sum can solely correspond to a projected 'expansion of air services' alone. The capital investment associated with construction works for value may support this marked projected uplift if accounted for in these calculations as direct impact.

The main point is that a £100m uplift in the value of services over such a short period of time is contingent on the delivery of the wider masterplan which, we assume, is also contingent on an additional application to expand the terminal and new transport investment.

The analysis does not describe if any new pipeline or current transport investments on the M27, by Highways England, will contribute or support the 'Future vision' based on wider master plan delivery. An indication of an intermediate scenario might help to balance the baseline and visionary positions.

On catalytic benefits SDG could potentially have provided more clarity by describing the relationship between business investment, wages and productivity growth particularly in terms of Foreign Direct Investment (FDI). FDI could reenergise the office market in Southampton, helping to diversify and further rebalance the economy toward higher value private sector services.

Overall Southampton is a small regional airport requiring investment to ensure new air services are offered to support the future growth of the Solent and the city regions to compete with other major employment centres in the South East or the rest of the UK.

4.6 **Environmental Health (Noise): Objection**

Southampton City Council's environmental health service investigates complaints about noise from residents and businesses within the city. The service also acts as a consultee to the development control service to advise on the potential noise impacts of developments as part of the planning process.

The environmental health service seeks to ensure that residents and businesses within the city are not subjected to unreasonable noise which could constitute a statutory nuisance. The Council has powers to control such noise through the Environmental Protection Act 1990 but these powers do not extend to noise caused by aircraft (see Section 79(6) of the Act). This means that in the event of planning permission being granted for the runway extension, Southampton City Council would not be able to use the usual enforcement powers to control unreasonable noise affecting residents or businesses within the city.

The noise impact of the proposed extension to the runway at Southampton International Airport on residents and businesses within the city boundary has been carefully considered by the environmental health service.

In addition, the environmental health service has commissioned an acoustic consultant to undertake a peer review of the noise impact assessment submitted by the applicant in support of their application for the runway extension.

Chapter 11 of the Environmental Statement submitted by the applicant considers noise and vibration. The statement considers the impact of various types of noise and vibration associated with the development, but the only significant impact on residents or businesses within Southampton is due to noise from the operation of aircraft.

The runway extension will facilitate operation of larger jet aircraft from the airport, many of which will take off in a southerly direction towards Southampton, over Bitterne Park and Townhill Park. This has the potential for residents and businesses within these parts of the city to experience additional noise from the operation of these larger jet aircraft.

The Environmental Statement recognises this, and states that ‘the sensitivity of receptors, both households and the school [Bitterne Park School], is considered to be high, and the magnitude of impact, is considered to be high. Therefore, there is likely to be a direct, long-term, adverse effect of major significance prior to the implementation of mitigation measures. (See paragraph 11.6.14). The majority of the impacted premises are situated within the city of Southampton, within Bitterne Park and Townhill Park.

The applicant will seek to mitigate this noise impact by providing financial assistance for sound insulation to the occupiers of impacted premises. However, this will not fully mitigate the impact of the additional noise, for example on domestic gardens or school play areas. The peer review recognises this, advising that ‘the limitations of sound insulation should not be overstated. They will benefit internal areas at receptors providing residents keep windows closed (which may lead to ventilation and overheating issues). They will clearly be of no benefit to external amenity areas’. (24 Acoustics Paragraph 7.6)

It should also be noted that the peer review by the acoustic consultant has considered the data used to prepare the Environmental Statement and considers this to underestimate the noise impact over Southampton (24 Acoustics – paragraph 7.2).

It is the opinion of the environmental health service that because the proposed runway extension will lead to a ‘direct, long-term, adverse effect of major significance’ to some residents and businesses within the city which cannot be fully mitigated through sound insulation, it is recommended that the Council object to the application on these grounds.

4.7 **SCC Sustainable Development Officer: Objection**

Climate emergency

Whilst the economic importance of the airport is recognised, the proposed expansion will lead to a massive increase in carbon dioxide emissions and this is simply incompatible with addressing the climate emergency which has been declared by Southampton City Council (and National Government, and Eastleigh Borough Council). Southampton’s Green City Charter states, “Our vision is to create a cleaner, greener, healthier and more sustainable city”. Supporting this expansion would seriously undermine Southampton’s climate mitigation efforts.

The UK has legally committed to net zero emissions by 2050. This development goes directly against this legal obligation; aviation is in the ‘hard to de-carbonise’ category and expansion should be limited to support the 2050 goal. The Committee on Climate Change (CCC) has said that we cannot achieve carbon neutrality without restraining aviation, which by 2050 will be the single largest emitting sector in the UK. The CCC’s calculations suggest that the necessary level of passenger demand in 2050 is an increase no more than 25% over 2018 levels. However Southampton airport is seeking growth of 150% up to 2037.

To put it into context, in 2017, according to the Department for Business Energy & Industrial Strategy, carbon emissions for homes and industry in the entire city of Southampton (excluding the port) equated to 528,000 tonnes. The Airport's own estimate is that carbon emissions will rise on average by 350,000 tonnes per year.

There is no way of offsetting this level of emissions, and the airport is proposing mitigation for only the carbon emissions during the construction phase and for its own operations, this excludes the most significant carbon emissions which are from the aircraft themselves.

The reduction to travel to London is a tentative argument, as emissions saved from cars on these (assumed) journeys will be easily outweighed by the increase in airplane emissions. London airports are unlikely to be reducing their flights in response to Southampton expansion. Looking ahead in the 2017 document, the Department for Transport consider that these trends will continue and without constraints to airport growth, demand is forecast to rise.

The effects of climate change on Southampton will be felt more acutely than other places, this will have an economic impact in addition to the impacts on the environment and on people. Given its coastal location, the effects of sea level rise will necessitate more investment in flood defences. In addition extreme weather events including summer heatwaves will be more severe due to the urban heat island effect.

Traffic/ surface access

Traffic impacts will be assessed in depth by the Transport team, but it seems that there will be an inevitable traffic increase, and despite encouraging public transport use, parking is still to be increased by 600 spaces in the first phase. This will lead to more traffic on the roads, and more emissions from the cars as well as the flights. The negative effects on traffic appear to be underplayed relative to the claimed economic benefits.

Environmental Statement

NEF Consulting on behalf of EBC reviewed the Environmental Statement and found that Climate Change was not considered holistically or throughout the EIA or considered within the iterative design process. They state that there is a strong case for including efforts to achieve decarbonisation of aviation in the Council's strategic approach on climate change.

Summary

In the submission, NPPF paragraph 38 is quoted, "secure development that will improve the economic, social and environmental constraints of the area," and paragraph 117 "safeguarding and improving the environment and ensuring safe and healthy living conditions." It has not been adequately demonstrated that the proposed development will meet these requirements.

The proposed expansion of the airport and consequential fossil-fuel consumption is considered to be fundamentally unsustainable at a time of climate crisis and unjustifiable against Southampton City Council's Green City goals.

4.8 **SCC Tree Officer: Holding Objection**

The only arboricultural information that has been supplied with the application is in relation to the trees that may be impacted by the construction of the additional parking. These trees have no impact to the City and therefore this will be dealt with locally by the tree officer at Eastleigh Borough Council.

I have concerns as to whether the extension to the runway will change the aerodrome reference code which may alter the obstacle limitation surfaces around Southampton. Information is requested as to whether such change would occur and if so, what impact this will have on Southampton.

Any change to the current obstacle limitation surfaces may increase the geographical area on the ground which in turn will increase the amount of tree work expected for the take off and approach of aircraft. Historically, there has been work undertaken to trees within Southampton in relation to the flight surfaces, such as can be seen around Stoneham Cemetery and Frogs Copse. More recently there is a focus on Marhill Copse in relation to aviation. Any further increase in tree related work will have a negative impact to the local amenity and result in lower carbon sequestration. If there is an increase in the parameters of the obstacle limitation surfaces, details should also be provided on how this may impact future tree planting within the extended zone.

Details are requested of any potential tree work required for the flight paths if permission is granted and larger aircraft can use the airport. This information would be hand in hand with any change to the obstacle limitation surfaces plan.

It is clear that the most pollution caused by the aircraft is during the take off and climb where the engines would be running between 85% to 100%, therefore this will produce the highest proportion of harmful emissions, and given that over 60% of the air traffic movements occur to the south, this will have a negative impact on the city, especially if tree work is required in relation to the proposed extension and larger aircraft. Therefore I would strongly oppose any application that results in additional tree related works.

I therefore wish to lodge a holding objection on the proposed runway extension until the additional information has been provided and assessed.

4.9 **SCC Ecologist: Holding Objection**

Having reviewed the ecology chapter of the environmental statement I am of the view that the ecological assessment is generally robust.

I do, however, have two principal concerns regarding potential impacts on ecological features with Southampton. Firstly, a number of Sites of Importance for Nature Conservation (SINC) located within Southampton, which lie within the Zone of Influence, have not been considered in the ecological assessment, these sites are as follows:

- Marhill Copse SINC
- Frogs Copse
- Frogs Copse Meadow
- Land south of Monks Path
- Riverside Park

These sites lie under the flightpath and will be subject to higher levels of noise and emissions the impacts of which have not been assessed.

In addition, Frogs Copse and Frogs Copse Meadow SINC's have already experienced impacts as a consequence of tree removal to safeguard protected airspace and Marhill Copse SINC is also likely to be affected. Removal of substantial trees will have adverse impacts on ecological value of these sites however, the ecology reports makes no mention of whether larger planes will necessitate additional tree removal and the likely ecological consequences.

I also have concerns about the robustness of the air quality assessment which is based on assumptions of reductions in emissions. As it is not possible to predict guaranteed reductions in emissions, further information should be provided detailing what measures will be put in place to prevent adverse air quality impacts if nitrogen emissions do not decline as predicted. In addition, the conclusion in paragraph 9.6.72 that deposition of nitrogen onto mudflats won't lead to significant adverse effects due to tidal inundation does not appear to be appropriate. The nitrogen in question will be added to a system that is already experiencing adverse impacts as a consequence of excess nitrogen levels. Any further additions will likely exacerbate the problem and should therefore be considered as an in-combination impact.

- 4.10 **SCC Air Quality:** The Council's Environmental Health Team have appointed a consultant to review the impacts of the development on the City's Air Quality. At the time of writing this report no comments had been received and an update will be provided ahead of the Panel meeting.

5 **Planning Consideration Key Issues**

- 5.1 The key considerations in determining the Council's position on the consultation response to Eastleigh Borough Council are set out below and seek to strike a balance between sustainable growth at the airport alongside robust protection of the environment and residential amenity.

5.2 **Economic Growth**

Southampton City Council would support a sustainable level of growth of Southampton Airport to ensure it remains a competitive and viable regional airport, whilst balancing the benefits of associated economic growth with the need to avoid significant adverse impacts on health and quality of life from noise and air pollution. Furthermore the level of growth should be managed to ensure that the carbon emissions resulting from the project are not so significant that it would have a material impact on the ability of the Government and this Council to meet its carbon reduction targets.

- 5.3 The airport currently has a limited route network because the existing short length of the runway constrains the size of aircraft which can currently operate from the airport. The opportunities to allow larger planes to service from the site as a result of the proposed runway extension would have significant benefits to the regional economy and tourism and would provide increased choice and services for residents who live within the airport catchments, which includes citizens of Southampton. The airport seek to capture a much larger proportion of the demand from its catchment area for the short-haul European market and this may have sustainability benefits with customers within the catchment avoiding longer journeys to airports which are outside of the catchment such as Gatwick, Heathrow, Stanstead.

Furthermore the opportunity to attract a greater range of operators to the airport may assist in future proofing the airport having regard to the recent difficulties facing FlyBe which currently account for a significant number of passengers using Southampton Airport.

5.4 The Council’s Economic Development Manager has queried the forecasted uplift in economic growth in the years 2019-2021. The main point is that a £100m uplift in the value of services over such a short period of time and is contingent on the delivery of the wider masterplan which, we assume is also, contingent on an additional application to expand the terminal and new transport investment. Clarification should be sought on this point in order to determine the level of weight the economic benefits of the scheme should be given as part of the overall planning balance.

5.5 Noise Impacts

The Council’s environmental health service have raised an objection because the proposed runway extension will lead to a ‘direct, long-term, adverse effect of major significance’ to some residents and businesses within the city which cannot be fully mitigated through the scheme of mitigation measures offered, including the offer of acoustic insulation to households and other noise sensitive buildings subject to noise levels over 63dB LAeq. This objection follows a peer review of the noise issue by consultants on behalf of Southampton City Council which is attached as **Appendix 1**.

5.6 It is considered the scheme should be assessed against the noise contour thresholds laid out by Government within the Aviation Policy Framework which requires acoustic insulation measures to be offered to households and noise sensitive buildings, which includes Bitterne Park School.

5.7 The submission indicates that the 63db LAeq 16 hour noise level is marked as the SOEL (Significant Observed Adverse Effect Level) – This is the level above which significant adverse effects on health and quality of life occur. Housing and noise sensitive properties such as school or hospitals subject to noise levels at 63db LAeq 16 hour would trigger a scheme of acoustic insulation.

Table 2: Comparison of households within aircraft noise contour bands (as set out within the submitted Environmental Statement Chapter 11: Noise and Vibration)

Contour Level LAeq 16hr dB(A)	Number of households in 2016	Number of households in 2021	Number of households in 2037
>54	3,800	8,100	10,800
>57	1,250	3,750	5,100
>60	350	1,150	1,800
>63	0	350	650
>66	0	0	50
>69	0	0	0

5.8 As table 2 indicates 350 households would be subject to the SOEL level in 2021 with a further increase to 700 households by 2037.

5.9 It is noted that the Peer review by Acoustics 24, supporting the comments from the Council's Environmental Health Team, has also identified the following shortcomings in the noise assessment and proposed noise mitigation measures:

- The ES states that this split was 76/24 in 2016 (meaning that the majority of departures occurred over Southampton and approaches over Eastleigh). For reasons unknown, however, a split of 64/36 has been used for the future scenarios. This will have the effect of underestimating the noise impact over Southampton and should be clarified by the Airport/ WSP;
- It would be helpful if contours showing the number of events exceeding (for example) 65 and 70 dB LAMax,s (N65 and N70) could be provided. In practice the noise level associated with a regional jet arrival may be slightly lower than that from a turbo-prop aircraft which may be of some benefit to residents living under the approach path in Southampton (such as those in Bitterne Park). Departure noise levels, however, are significantly greater.
- WSP's determination of the noise levels that relate to LOAEL and SOAEL for aircraft movements are higher than the levels reported in the AECOM/ Defra publication. In addition, the Airport's NAP defines a lower level for LOAEL. As a result it is our opinion that the ES has significantly underestimated the full extent of the likely noise impact.
- The limitations of sound insulation cannot be over-stated. They will benefit internal areas at receptors providing residents keep windows closed (which may lead to ventilation and overheating issues). They will clearly be of no benefit to external amenity areas.
- It is considered that the Airport's Noise Preferred Routes, whilst potentially suitable for the existing operations, may not go far enough for the new proposals. It is considered that the Airport should be asked to consider new noise abatement procedures/ routes to reduce the number of households affected by the proposals.

5.10 It is unclear from the application submission as to how the proposed scheme of acoustic mitigation would be delivered to affected households in practice to ensure that acceptable internal ambient noise limits are met in accordance with British Standards (BS8233). The delivery of improved building acoustic performance through improved building fabric and glazing specification may be costly to ensure full compliance with BS8233. It is noted from the Peer Review by Acoustics 24 that Bristol Airport offers a grant of £7,500 to residents in/above the 63dB contour and £3,750 for residents in the 57 and 60dB contours. Gatwick Airport offers £3000 towards double glazing for households within the 60dB contour. Heathrow offer the full costs of insulation for residents in the 60dB contour.

5.11 It is requested that the applicants should address the above queries and if necessary re-run the noise modelling to accurately show the noise impacts of the scheme.

Further details are also required in relation to the scheme of acoustic mitigation, and Southampton Airport is strongly encouraged to offer the full costs of mitigation to households both within the 60 and 63db contours to ensure households maintain acceptable internal ambient noise levels in accordance with BS 8233. This would require mitigation for an additional 1,150 households in 2021.

5.12 Given the modelled noise impact on Southampton residents, it seems appropriate that the airport has a clear and transparent strategy to both monitor the noise impact and to reduce it over time as aircraft types become quieter (i.e. an approach to phasing out the noisier aircraft types over time). This would also assist in minimising the risk of more properties being affected by noise as activity at the airport increases. It may also be appropriate for the airport to consider specific and regulated noise monitors and noise thresholds such that any ATM that is over the threshold can lead to a penalty against the operator.

5.13 Climate Change

Objection has been received from the Council's Sustainable Development Officer and legitimate concerns have been raised from members of the public and action groups regarding the impacts of the aviation industry on climate change.

5.14 In the UK, aviation emissions account for about 6% of greenhouse gases from the transport sector. However emissions from the aviation sector are set to rise and aviation is likely to be the largest emitting sector in the UK by 2050. The Committee on Climate Change (the CCC) who advise the government on climate change have indicated that even with industry improvements in fuel efficiency, some use of sustainable biofuels, growth in the aviation sector should be limited to 25% above current levels. Therefore Eastleigh Borough Council are encouraged to impose a control on Annual Transport Movements (ATMs) to bring the level of growth closer in line with the advice from the Committee on Climate Change with remodelling required to determine acceptable costs. The proposal currently seeks growth of 35% above current levels up to 2027, and 47% up to 2037.

Highways

5.15 More information is required in order to adequately determine the impact that the proposals would have on the local highway network based on the forecasted growth in passenger numbers and 600 car parking spaces proposed.

6 Recommendation

6.1 It is recommended that Southampton City Council submit a holding objection and request that EBC should submit a request for further information under Regulation 25 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017. That further information is required in relation to noise, climate change issues, biodiversity, highways, economic development and tree matters as set out within this report and the peer review by Acoustics 24, as appended. An update on Air Quality will be given at the Panel meeting.

6.2 To summarise the following further information is requested:

1. Traffic and transportation

- corroboration of trip generation forecasts with existing data in order to enable the impact of the increased passenger numbers to be fully assessed;
- modelling of the impact of the 600 additional car parking spaces within the Transport Assessment and justification of the modal split assumptions;
- greater detail on sustainable travel modes and how these will be achieved through employee and passenger travel plans;
- justification for the occupancy rates considered, including information on the surveys undertaken.

2. Noise

- Further information and sensitivity testing needs to be provided in terms of the types of aircraft (including load factors from passengers and fuel) that will be enabled to operate with the runway extension;
- The worst case scenario in terms of air transport movements (ATMs) needs to be assessed, calculating the maximum number of passengers that could pass through the current terminal, the fleet mix and the contours that would be generated;
- Appropriate mitigation measures need to be proposed, including: noise envelopes as recommended in the APF and being prepared in association with Heathrow's third runway DCO; and sound insulation schemes sensitive receptors (both residential and non-residential); taking into account best practice at other airports, any growth in capacity should be linked to reduction in noise contours taking into account the GOvts policy of communities sharing the benefits of airport expansion (noting that noise envelopes are meant to provide a degree of certainty for those impacted by aviation);
- Modelling should include sensitivity testing, taking into account the introduction of new generation aircraft (such as the Airbus NEOs and the Boeing MAX, but also considering other factors that may alter the performance;
- Assumptions between the split that has been modelled for take-offs between runways 02/20 needs to be justified, with sensitivity testing given the data for 2016 and the forecasts for future years, sensitivity testing should be undertaken to determine the potential for further households to be significantly affected by noise, falling within the SOAEL, based on historic trends (or the 2016 split);
- Individuals experience noise in different ways, the use of LAeq to provide average figures is the main metric advocated by Government, however other metrics, such as those relating to the number of overflown events (i.e. the N65 and N70 metrics) should be provided;
- Sensitivity testing is required in relation to the LOAEL and SOAEL levels, the ES uses 51 and 63 LAeq16hr as the LOAEL and SOAEL respectively for the daytime noise levels and 45 and 55 LAeq8hr respectively for the night time LOAEL and SOAEL, however, the DEFRA report "Possible Options for the Identification of SOAEL and LOAEL in Support of the NPSE" advocated lower measures, namely 52 and 60 for LOAEL and

SOAEL in the daytime and 41 and 53 for LOAEL and SOAEL at nighttime;

- Additional abatement procedures or revised noise preferential routes should also be assessed in the ES to determine if the number of households exposed to adverse noise levels can be reduced;
- Details of a sound insulation scheme, using best practice, should be included at this stage within the proposal.

3. Climate change and Air Quality

- Greater clarity is needed as to how future potential changes in Government policy on climate change and the reduction in greenhouse gas emissions could be taken on board as part of the airport's growth especially given the CCC's recommendations to the Govt in Lord Deben's letter of 25 Sept 2019;
- A fuller assessment of how the current proposal accords with paragraphs 38 and 117 of the NPPF is required;
- Since the ES is based on assumptions about reduction in aircraft emissions from new generation aircraft, the growth in ATMs should be limited/connected to the provision of the new generation aircraft so that improvements in air quality that have been relied upon in the ES can be achieved;

4. Trees and Ecology/Biodiversity

- Assessment of safeguarding in terms of trees that may infringe obstacle limitation surfaces within Southampton is required in order to fully assess the impact of the development upon trees in the City and whether further mitigation, with contributions towards off-site tree planting and air quality initiatives will be required;
- Ecological assessments of Sites of Important Nature Conservation within the identified Zone of Influence need to be undertaken to fully understand the impacts of the additional aircraft activity and determine any appropriate mitigation.

5. Economic benefits

- Clarification should be provided on the uplift calculation in the short term (to 2021) in order to determine the weight that should be given to the forecast economic benefit

6.3 Without the above information being provided it is not possible to fully assess the significant impacts of the proposed development and therefore the Environmental Statement in its current form is inadequate.

6.4 Ultimately, if improvements in the noise environment are not secured and growth in ATMs limited to better reflect the advice from the Committee on Climate Change then this application should be recommended for refusal.

6.5 However if Eastleigh Borough Council are minded to approve the application, following receipt of this response, they are encouraged to secure the following controls through planning conditions or S106 obligations, in addition to the control measures and mitigation offered within the planning application submission:

- Noise monitoring system;
- The introduction of noise envelopes;
- Public Noise Complaints Handling Service;
- Sound Insulation Grants Scheme;
- Night noise provisions;
- Aircraft restrictions to restrict size and movement of aircrafts to include a maximum number of ATMs with 10% buffer. This should include a provision whereby if the number of ATMs is exceeded, the quota is reduced by the same amount the following year;
- Aircraft restrictions to tie the growth of the number of movements to the introduction of new generation aircraft (such as the A320NEO or Boeing 737MAX) to ensure the benefits of reductions in noise and emissions identified in the ES are achieved;
- Introduction of a Quota Count system, used as other airports (such as the designated airports [Heathrow, Gatwick and Stansted], London City and Luton) to seek to encourage the use of quieter aircraft;
- Total per annum passenger restriction; and
- Controls on shouldering to prevent excessive concentrations of ATMs taking off/landing when the airport first opens during morning hours at 6am Mon-Sat and 7.30am on Sundays.

6.6 Officers are working with a number of consultants experienced in airport development and will look to draft some detailed wording for these conditions/S106 obligations that will be forwarded to Eastleigh Borough Council as part of the Council's consultation response.

6.7 Whilst looking at options that promote severe penalties for any breach. Delegation is sought for the Head of Planning and Economic Development to prepare the response on this basis, as informed further by the Panel debate, and to comment in the event that further consultation arises from EBC,

Conclusion

Further information is requested in relation to the benefits and dis-benefits and measures to mitigate against the impacts of the airport expansion. Without this additional information the Council cannot be satisfied that this airport scheme maintains an appropriate balance between the benefits of aviation and its costs, particularly in relation to its contribution to climate change and noise.

Local Government (Access to Information) Act 1985 **Documents used in the preparation of this report Background Papers**

1 (a) (b) (c) (d), 2 (b) (d)
AG for 28/01/2020 PROW Panel

PLANNING AND RIGHTS OF WAY PANEL
MINUTES OF THE MEETING HELD ON 28 JANUARY 2020

Present: Councillors Savage (Chair), Mitchell (Vice-Chair), Coombs, G Galton, L Harris, Fielker and Prior

Apologies: Councillors Vaughan and Windle

50. **APOLOGIES AND CHANGES IN PANEL MEMBERSHIP (IF ANY)**

It was noted that following receipt of the temporary resignation of Councillors Vaughan and Windle from the Panel, the Service Director Legal and Governance acting under delegated powers, had appointed Councillors Prior and Fielker to replace them for the purposes of this meeting.

51. **SOUTHAMPTON INTERNATIONAL AIRPORT**

The Panel considered the report of the Head of Planning and Economic Development recommending delegated authority be granted in respect of an application for a proposed development at the above address.

Consultation from Eastleigh Borough Council regarding a planning application at Southampton Airport for the following development 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)

Angela Cotton, Felix Eigenbrod, Katherine Barbour, Lyn Brayshaw, Gareth Narbed and Kendall Field -Pellow (local residents/ objecting), Neil Garwood (applicant), and Councillor Fuller (ward councillor objecting) were present and with the consent of the Chair, addressed the meeting.

The presenting officer corrected an error within the report stating the paragraph 5.14 of the report should read:

“In the UK, domestic and international aviation emissions account for about 6% of total greenhouse gas emissions or 22% of the transport sector’s greenhouse gas emissions...”

In addition it was reported that further correspondence had been received following the publication of the report. It was noted that this included a letter from Councillor Hammond on behalf of the Southampton Labour Group objecting to the airport expansion. It was noted that the comments in the objection had been supported by an additional email from Angela Cotton supporting the Labour Group decision to object to the airports expansion.

The Panel then considered the officers recommendations, as set out in the report. On being put to the vote the recommendation was lost.

RECORDED VOTE: on the officer recommendation
FOR: Councillors L Harris, G Galton and Prior
AGAINST: Councillors Savage, Mitchell, Coombs and Fielker

A further motion to respond to the consultation objecting to the expansion of the airport refuse, as set out below, was then proposed by Councillor Mitchell and seconded by Councillor Coombs.

RECORDED VOTE the motion proposed by Councillor Mitchell
FOR: Councillors Savage, Mitchell, Coombs and Fielker
ABSTAINED: Councillors L Harris, G Galton and Prior

RESOLVED that the Panel delegated authority to the Head of Planning and Economic Development to:

1. Prepare and submit an objection letter on behalf of Southampton City Council to Eastleigh Borough Council ahead of them determining their planning application ref F/19/86707. The response shall include this report including Appendices and the redacted public comments received by Southampton City Council, to include the comments from the Labour Group.

The objection letter will comprise the following three parts:

Firstly, the proposal fails to satisfy the requirements of environmental and social impacts to residents of Southampton, particularly in respect of noise;

Secondly, the economic benefits do not outweigh the adverse environmental and social impacts and the application's submission suffers from a lack of information as set out on pages 20-21 of the Panel report; and

Thirdly, in the event that Eastleigh Borough Council are minded to approve the application following the receipt of the SCC objection, they are encouraged to secure the control measures as set out on pages 21-22 of the Panel report, through planning conditions or S106 obligations.

The response letter will cover the following matters raised by Councillor Coombs:

- Insufficient details in relation to tree works in the event of a change to the obstacle limitation surfaces around the airport / details of any tree works to be agreed in the event that tree works are required and Eastleigh Borough Council are minded to approve;
- Off-site tree planting and mitigation;
- Car occupancy Rates;
- No justification for the change in flight split which may underestimate the noise impact;
- 25% growth restriction in line with the advice from the Committee on Climate Change;
- Regional jet aircraft noise details

NOTES

- 1) That no vote taken on the second part of the proposed officer recommendation which sought delegated authority to respond to any subsequent consultation on application ref F/19/86707, subject to agreement from the Chair of the Planning and Rights of Way Panel. Therefore any further consultation from Eastleigh Borough Council ahead of their determination of this application will be brought before the Planning and Rights of Way Panel for a decision on the consultation response of Southampton City Council.
- 2) That the Labour Councillors sitting on the Panel confirmed that they had no part in the discussions leading to the additional correspondence from the Labour Group Leader seeking an objecting to the proposed airport expansion.

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DEVELOPMENT MANAGEMENT

Southampton City Council
Lower Ground Floor
Civic Centre
Southampton
SO14 7LY



Please ask for: Andrew Gregory
Our Ref: 19/02021/CONSUL

03 February 2020

Mr Craig Morrison
Development Management Team
Eastleigh Borough Council
Eastleigh House
Upper Market Street
Eastleigh SO50 9YN

Dear Mr Morrison,

Application No: F/19/86707

Site Address: Southampton International Airport

Description: 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)

Thank you for your consultation on the above dated 02 December 2020 and for agreeing an extension until today for our formal response. This Council's Planning & Rights of Way Panel considered this application at its meeting on 25 January 2020.

Southampton City Council Position - OBJECTION

The proposed development to facilitate the growth of Southampton Airport would have significant adverse environmental and social impacts on Southampton and its citizens, particularly in respect of noise and, therefore, the City Council formally **objects** to this application and recommend that planning permission be refused.

The runway extension proposed will lead to a 'direct, long-term, adverse effect of major significance' to households, Bitterne Park School and businesses within the city of Southampton which cannot be fully mitigated through the scheme of mitigation measures offered, including the offer of acoustic insulation to households and other noise sensitive buildings subject to noise levels over 63dB LAeq.

Chapter 11: Noise and Vibration of the Environmental Statement (ES), supporting the planning application, indicates that 5,400 homes in Southampton are currently subject to adverse noise impact from the airport. This figure is forecasted to rise significantly based on the airport growth proposals with an additional 3,950 households in Southampton subject to adverse noise impact in the first year of airport expansion (2021) and a further 6,300 households by 2037. Furthermore 350/700 new households will be subject to a noise level defined in the planning application as having a significant observed adverse effect (SOEL) by years 2021 and 2037 respectfully.

Please note that this consultation response has been informed by an independent peer review of the applicant's noise impact assessment and the findings are appended to this letter (Peer Review by 24 Acoustics dated 05th January 2019).

The runway extension will facilitate operation of larger jet aircraft from the airport, many of which will take off in a southerly direction towards Southampton, over Bitterne Park and Townhill Park. This has the potential for residents and businesses within these parts of the city to experience additional noise from the operation of these larger jet aircraft.

The ES recognises this and states that 'the sensitivity of receptors, both households and the school [Bitterne Park School], is considered to be high, and the magnitude of impact, is considered to be high. Therefore, there is likely to be a direct, long-term, adverse effect of major significance prior to the implementation of mitigation measures. (See paragraph 11.6.14). The majority of the impacted premises are situated within the city of Southampton, within Bitterne Park and Townhill Park.

The applicant seeks to mitigate this noise impact by providing financial assistance for sound insulation to the occupiers of impacted premises. However, this will not fully mitigate the impact of the additional noise, for example on domestic gardens or school play areas. The limitations of sound insulation cannot be overstated. Acoustic insulation would only benefit internal areas at receptors providing residents keep windows closed (which may lead to ventilation and overheating issues). It will not be possible to mitigate against the noise impact to external amenity areas.

Southampton City Council is also concerned that the following shortcomings of the noise assessment and proposed scheme of mitigation may have underestimated the significance and extent of the noise impact on Southampton and its citizens:

- The worst case scenario in terms of air transport movements (ATMs) has not been assessed, calculating the maximum number of passengers that could pass through the current terminal, the fleet mix and the contours that would be generated.
- Modelling has not been sensitivity tested to take into account the introduction of new generation aircraft (such as the Airbus NEOs and the Boeing MAX), but also considering other factors that may alter the performance of these aircraft.
- The ES states that this split was 76/24 in 2016 (meaning that the majority of departures occurred over Southampton and approaches over Eastleigh). For reasons which have not been justified, a split of 64/36 has been used for the future scenarios. This will have the effect of underestimating the noise impact over Southampton and should be clarified by the Airport/ WSP;
- No details have been provided showing the number of events exceeding (for example) 65 and 70 dB LAMax,s (N65 and N70 noise contours).
- WSP's determination of the noise levels that relate to LOAEL and SOAEL for aircraft movements are higher than the levels reported in the AECOM/ Defra publication. In addition, the Airport's NAP defines a lower level for LOAEL. As a result it is our opinion that the ES has significantly under-estimated the full extent of the likely noise impact.
- It is considered that the Airport's Noise Preferred Routes, whilst potentially suitable for the existing operations, may not go far enough for the new proposals. It is unclear whether the Airport have considered new noise abatement procedures/ routes to reduce the number of households affected by the proposals.

- The limitations of sound insulation cannot be over-stated. The insulation would only benefit internal areas at receptors providing residents keep windows closed (which may lead to ventilation and overheating issues). They will clearly be of no benefit to external amenity areas. Furthermore it is unclear how the proposed scheme of acoustic mitigation would be delivered to affected households in practice, to ensure that acceptable internal ambient noise limits are met in accordance with British Standards (BS8233). The delivery of improved building acoustic performance through improved building fabric and glazing specification may be costly to ensure full compliance with BS8233. It is noted from the Peer Review by Acoustics 24 that Bristol Airport offers a grant of £7,500 to residents in/above the 63dB contour and £3,750 for residents in the 57 and 60dB contours. Gatwick Airport offers £3000 towards double glazing for households within the 60dB contour. Heathrow offer the full costs of insulation for residents in the 60dB contour.

The development proposal is therefore considered contrary to paragraphs 8 and 180 of the National Planning Policy Framework (2019), 3.12 of the Aviation Policy Framework (2013), 5.67-5.68 of the Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England (2018), 2.23 of the Noise Policy Statement for England (2010).

In addition to the substantive objection it is considered that the application is also suffering from a lack of information in the following areas:

1. Traffic and transportation: –

The application states that the proposals would facilitate an increase of passengers using the airport from 2 million passengers per annum (mppa) to 3mppa and the Solent Sub-Regional Transport Model (SRTM) has been utilised to determine the level of trip generation that would result from such an increase. However, this estimated trip generation has not been corroborated with existing data and as such this is required before the impact of the increased passenger numbers can be fully assessed.

Furthermore the impact of the 600 space car park has not been considered within the Transport Assessment. This significant increase in parking spaces at the airport will have an impact on travel behaviour which hasn't been addressed within the assessment. In particular the justification for using the SRTM 'DS3' scenario uses the modal split reported from a 2018 travel survey as a key element in determining that the modelled 2.66mppa in the SRTM is comparable to the 3mppa projected increase. Should travel behaviour to and from the airport change as a result of the car park then these assumptions may not be correct.

Other assumptions have been made in determining that the SRTM DS3 scenario includes traffic associated with 3mppa that require additional justification or clarification in order for this be used as a basis for assessment, including:

- It is not clear how the modal split data has been used to revise the mppa covered by the SRTM traffic flows. It is noted that the surveyed modal split shows a higher public transport share than the SRTM assumptions however the assessment then goes on to retain the total mppa using highway trips whilst using the surveyed modal split proportion to add additional mppa using public transport. The reasoning behind this is not set out.
- The assessment notes that the SRTM does not determine which trips are two-way (for example someone dropping off a passenger by car so arrives and departs within an hour) and which are one way (a passenger parking at the airport) which could underestimate the number of passengers per trip and to address this a 50/50 split in

the taxi mode share between two-way trips and one way trips has been assumed. This is on the basis that all 'off site' taxis (i.e. not airport based) would be one way trips however it is not clear what this is based upon, for example is it assumed that all taxis drop off one fare and then wait at the airport to pick up another fare?

- Finally the assessment then considers vehicle occupancy rates between when the SRTM was constructed and now which show a 16% increase in occupancy. It would be useful to show vehicle occupancy rates for other years if available in order to understand if this is part of a trend for an increase in vehicle occupancy at the airport or whether one or both figures are anomalous and therefore whether using the 16% figure is appropriate. In addition more information on the surveys (and the 2018 survey on which the modal split data is based) is required, for example were the vehicle occupancy surveys undertaken at the same times of year (as occupancy rates could be higher during school holidays) and how the data was collected.

The majority of the junctions assessed are in Hampshire or affect the M27, and we would expect Hampshire County Council and Highways England to comment on these. Whilst the A27/Wide Lane and the Wide Lane/A335/Wessex Lane/Stoneham Way junctions in Southampton have been modelled as requested there is no current year baseline in order for the models to be validated. As such turning count data and queue length surveys are required and a current year baseline model should be provided to demonstrate that the model is predicting the impact of future traffic growth and the proposals accurately. In addition the model for the A27/Wide Lane junction should be reviewed. Whilst it is acknowledged that the junction could be impacted upon by the operation of the Wide Lane/A335/Wessex Lane/Stoneham Way junction, the LinSig model as it stands does not seem to accurately model the roundabout junction, particularly underestimating queuing on the Mansbridge Road in the AM peak.

Insufficient information has been provided on sustainable travel modes – walking, cycling, bus and rail – given the proximity of the Airport to Southampton Airport Parkway station which has frequent connections to Southampton Central Station. Likewise, there is little on staff journeys to work who may be coming from Southampton to work at the Airport – this can be covered within a staff travel plan but commitments of action/delivery plans should be considered to further reduce the need for private car travel.

It is noted that the Transport Assessment includes a commitment to prepare a Travel Plan however the application should be supported by a document setting out the targets for sustainable travel mode share and how the current mode share can be improved upon.

It is also noted that the runway extension will allow sufficient aircraft movements to accommodate 5mppa. However due to the size of the current buildings, only 3mppa can be accommodated and therefore impact from only 3mppa have been assessed. There is little information on why this is and whether flight schedules or management can affect how many passengers can be accommodated by the current buildings.

2. Climate change:-

The application fails to clarify how future potential changes in Government policy on climate change and the reduction in greenhouse gas emissions could be taken on board as part of the airport's growth, especially given the recommendations of the Committee on Climate Change (CCC) to the Government in Lord Deben's letter of 25 Sept 2019. The proposal has not been sensitivity tested against the 25% growth cap as recommended by the CCC. A fuller assessment of how the current proposal accords with paragraphs 38 and 117 of the NPPF is required. Furthermore since the ES is based on assumptions about reduction in aircraft emissions from new generation aircraft, the growth in ATMs should be

limited/connected to the provision of the new generation aircraft so that improvements in air quality that have been relied upon in the ES can be achieved.

3. Air Quality:-

Southampton City Council's Scientific Service has considered the document 'Environmental Statement (ES) Chapter 7 Air Quality' submitted for Southampton International Airport, Eastleigh (19/020/21/CONSUL) prepared by WSP in 2019. We note the report concludes that the modelled pollutant concentrations within Southampton City Council's boundaries are not likely to threaten our ability to maintain compliance with statutory air quality standards or our ability to sustain an ongoing general improvement in Southampton's air quality. However, we have several concerns regarding the methodology applied, assumptions used and have noted several inconsistencies. These are listed below:

- Para 7.3.16. It is unclear if construction traffic data is in the format of annual average daily flows or another averaging time.
- Para 7.5.6. The potential dust emission magnitude from track-out, based on the numbers of vehicles likely to be accessing the site per day (less than 50 HGVs but potentially more than 10 on any given day), is estimated to be medium. However, this section states more than 100m of unpaved/unconsolidated road could be in use. According to IAQM Guidance, this would make the magnitude large.
- Para 7.3.24. The reported method claims that the assessment has used a 'theoretical worst-case scenario' by applying current aircraft emissions across all years – assuming no improvement in future year aircraft emission rates. It is unclear on what basis current emissions of oxides of nitrogen have been assumed to be lower than newer aero-engines. Additional evidence should be provided to justify the assertion of a worst-case scenario and that there is not a risk that newer aero-engines might generate greater emissions.
- Appendix 7.2. The relationship between monitored and modelled road contribution to NO_x clearly demonstrated that the model was performing differently in certain locations. As such the model verification done using 2 zones, one with a factor of 3.052 and one with a factor of 2.21. The ES appendix should clearly outline the reasons for the differences in model performance in the two areas.
- Para 7.3.48/49 states that motorways and A-Roads have been removed but not the contribution from the airport. Section 7.4.17 states the airport and road contributions have been removed which is a contradiction.
- Para 7.4.21 states 'For future years, deposition levels have been reduced by 2% per annum from the APIS mapped data for the 3 year average between 2015 – 2017. This is contrary to the IAQM guidance document, 'A guide to the assessment of air quality impacts on designated nature conservation sites' (version 1.0) . which suggests that an alternative approach is to assume no change in future baseline concentrations or deposition rates, where there is no evidence to indicate that they may decrease in value. If the DMRB methodology is used, it is recommended that evidence of the decreasing trends in nitrogen deposition is provided.
- Para 7.3.44. No information is provided on hourly or daily profiles of future aircraft movements. However, it should have been a relatively simple matter to make assumptions based on professional experience to distribute the annual average LTOs within the airports permitted operating restrictions. By not doing this, it is considered that the following limitations are introduced into the assessment:
- The combined impacts from energy plant, airside activities and landside road traffic are not reported at any sensitive receptor.
- The annual mean concentrations reported are not based on emissions being modelled under the combination of meteorological conditions likely to be experienced at the time the activities are most likely to occur.
- Appendix 7.1 Includes emission rate data sourced from the appropriate databases. Clarification should be provided that all values (including those for the E195) are

reported on a per engine basis as stated or on a per plane basis as this is not clear in the document.

- Figure A7.1.1 illustrates meteorological conditions for Southampton airport in 2018. There is no evidence provided that 2018 was a typical year.
- Appendix 7.3. fNO₂(AIR) values are reported as being based on national data published by the UK government for the fraction of oxide of nitrogen emitted in the form of nitrogen dioxide and not based on data for the subset of the data that represents the specific fleet modelled. More detailed justification of why the data used is representative should be provided.
- Table A7.3.1. Reports The fNO₂ factors as a single emission weighted average factor. But there is an opportunity to refer to nitrogen dioxide emissions that are specific to the airport conditions, for example length of taxi-ways, actual usage of plant. The dispersion modelling has modelled the dispersion from the actual sources separately to take account of the distance from each source to each receptor and the associated dilution on an hour by hour basis. However, this detail is then lost by applying a single weighted emission factor. More detail should be provided to demonstrate that the approach used does not result in under representing nitrogen dioxide concentrations at receptors nearest to the airport.

4. Trees and Ecology/Biodiversity:-

It is unclear whether the extension to the runway will change the aerodrome reference code which may alter the obstacle limitation surfaces around Southampton. Any change to the current obstacle limitation surfaces may increase the geographical area on the ground which in turn will increase the amount of tree work expected for the take off and approach of aircraft. Historically, there has been work undertaken to trees within Southampton in relation to the flight surfaces, such as can be seen around Stoneham Cemetery and Frogs Copse. More recently there is a focus Marlhill Copse in relation to aviation. Any further increase in tree related work will have a negative impact to the local amenity and result in lower carbon sequestration.

A number of Sites of Importance for Nature Conservation (SINC) located within Southampton, which lie within the Zone of Influence, have not been considered in the ecological assessment, these sites are as follows:

- Marlhill Copse SINC
- Frogs Copse
- Frogs Copse Meadow
- Land south of Monks Path
- Riverside Park

These sites lie under the flightpath and will be subject to higher levels of noise and emissions the impacts of which have not been assessed. In addition, Frogs Copse and Frogs Copse Meadow SINC have already experienced impacts as a consequence of tree removal to safeguard protected airspace and Marlhill Copse SINC is also likely to be affected. Removal of substantial trees will have adverse impacts on ecological value of these sites however, the ecology reports makes no mention of whether larger planes will necessitate additional tree removal and the likely ecological consequences.

Furthermore it is not possible to predict guaranteed reductions in emissions, and it is unclear what measures will be put in place to prevent adverse air quality impacts if nitrogen emissions do not decline as predicted. In addition, the conclusion in paragraph 9.6.72 of the ecology assessment that deposition of nitrogen onto mudflats won't lead to significant adverse effects due to tidal inundation does not appear to be appropriate. The nitrogen in question will be added to a system that is already experiencing adverse impacts as a consequence of excess nitrogen levels. Any further additions will likely exacerbate the problem and should therefore be considered as an in-combination impact.

5. Economic benefits:-

The forecasted uplift in economic growth in the years 2019-2021 is queried. The main point is that a £100m uplift in the value of services over such a short period of time and is contingent on the delivery of the wider masterplan which, we assume is also, contingent on an additional application to expand the terminal and new transport investment.

However if, following receipt of this objection, Eastleigh Borough Council are minded to approve the application, you are encouraged to secure the following controls through planning conditions or S106 obligations, in addition to the control measures and mitigation already offered within the planning application submission:

- Noise monitoring system.
- The introduction of enforceable noise envelopes and monitoring.
- Public Noise Complaints Handling Service.
- Sound Insulation Grants Scheme.
- Night noise provisions.
- Aircraft restrictions to restrict size and movement of aircrafts to include a maximum number of ATMs with 10% buffer. This should include a penalty if the number of ATMs is exceeded by reducing the quota by the same amount the following year. This control measure can be used to limit both noise impact and also greenhouse gases having regard to the advice of the CCC which recommends a growth cap of 25%.
- Aircraft restrictions to tie the growth of the number of movements to the introduction of new generation aircraft (such as the A320NEO or Boeing 737MAX) to ensure the benefits of reductions in noise and emissions identified in the ES are achieved.
- Introduction of a Quota Count system, used at other airports (such as the designated airports [Heathrow, Gatwick and Stansted], London City and Luton) to seek to encourage the use of quieter aircraft.
- Total per annum passenger restriction.
- Controls on shouldering to prevent excessive concentrations of ATMs taking off/landing when the airport first opens during morning hours at 6am Mon-Sat and 7.30am on Sundays.
- Travel Plan.
- Replacement tree planting and ecology mitigation.

The City Council would wish to work proactively with Eastleigh Borough Council as it develops planning controls whether through planning conditions or Section 106 Agreements such that its residents and business are mitigated against this impact of this proposed development.

Please also find enclosed the redacted public comments received by Southampton City Council in relation to this consultation response (84 representations received), including an objection from the Leader of the Council, Councillor Hammond, on behalf of the Labour administration.

Yours sincerely,



Paul Barton
Interim Head of Planning & Economic Development

Enc.

Peer Review by Acoustics 24 dated 5 January 2020

Letter from the Leader of the Council, Councillor Hammond dated 23 January 2020

Redacted public comments

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Mr Gavin Derrick
Southampton City Council
Civic Centre,
Southampton,
SO14 7LY

By email

Date: 10th November 2020
Reference: R8824-1 Rev 0

Dear Gavin

**RE: Proposed Runway Extension, Southampton International Airport
Peer Review of (Further) Amended Noise Impact Assessment**

Thank you for your recent instruction. I am pleased to provide our further peer review of the updated noise impact assessment relating to the proposed runway extension at Southampton International Airport (Eastleigh Borough Council planning application Reference F/19/86707) below.

1.0 INTRODUCTION AND BACKGROUND

- 1.1 The application is for the 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.
- 1.2 An Environmental Impact Assessment has been undertaken by Savills and WSP. Chapter 11 and associated appendices of the Environmental Statement (ES) relate to noise impact (undertaken by WSP). An addendum has been provided following consultation with Eastleigh Borough Council and other stakeholders.
- 1.3 This is the third report produced by 24 Acoustics Ltd for Southampton City Council on the subject. Our initial report (Reference R8315-1 Rev 0 dated 6 January 2020) commented on the original noise impact assessment (noise chapter of the Environmental Statement) and concluded the following (wording taken directly from our previous report):

- *Aircraft usually take off and land into the wind to maximise lift. The prevailing wind in this part of the country is south-westerly meaning the majority of departures will occur over Southampton and the majority of approaches over Eastleigh. The ES states that this split was 76/24 in 2016 (meaning that the majority of departures occurred over Southampton and approaches over Eastleigh). For reasons unknown, however, a split of 64/36 has been used for the future scenarios. This will have the effect of underestimating the noise impact over Southampton and should be clarified by the Airport/ WSP.*
- *The proposals will accommodate a 36% growth in aircraft movements between 2016 and 2037. They will also accommodate a change in aircraft type which is currently dominated by the DHC800 to the B737/A319/A320 which are estimated to represent 40% of all movements by 2037¹.*
- *Aircraft noise levels have been expressed as 16 hour L_{eq} levels during an average Summer day. It should be noted that humans do not integrate (average) noise levels over 16 hours and the 'real world' noise impact may relate to the maximum noise level associated with each aircraft movement together with the number of daily events. It would be helpful if contours showing the number of events exceeding (for example) 65 and 70 dB $L_{A_{Max,S}}$ (N65 and N70) could be provided. In practice the noise level associated with a regional jet arrival may be slightly lower than that from a turbo-prop aircraft which may be of some benefit to residents living under the approach path in Southampton (such as those in Bitterne Park). Departure noise levels, however, are significantly greater.*
- *24 Acoustics does not agree with WSP's determination of the noise levels that relate to LOAEL and SOAEL for aircraft movements. Levels reported in the AECOM/ Defra publication are lower. In addition, the Airport's NAP defines a lower level for LOAEL. As a result it is our opinion that the ES has significantly under-estimated the full extent of the likely noise impact. Regardless, the noise predictions do not indicate that there will be an unacceptable adverse impact and, in planning terms, this means that the noise impact may be acceptable if mitigated to a minimum. It is our opinion, however, that the mitigation offered (particularly for noise impact between LOAEL and SOAEL) is inadequate.*
- *The Airport has offered to provide sound insulation to receptors which fall at/above (their definition of) SOAEL and to continue with the existing mitigation defined in their Noise Action Plan for receptors with a noise impact between LOAEL and SOAEL. The limitations of sound insulation cannot be over-stated. They will benefit internal areas at receptors providing residents keep windows closed (which may lead to ventilation and overheating issues). They will clearly be of no benefit to external amenity areas. Therefore, the provision of sound insulation to properties should be considered only as a last resort.*
- *It is considered that the Airport's Noise Preferred Routes, whilst potentially suitable for the existing operations, may not go far enough for the new proposals. It is considered that the Airport should be asked to consider new noise abatement procedures/ routes to reduce the number of households affected by the proposals.*

¹ These figures have now changed as a result of the latest application and the proposal to limit movements to 3 mppa.

- 1.4 WSP addressed many of these points in their updated ES chapter. Our second report (dated 12th August 2020) reviewed this and concluded:
- *We previously questioned the modal split which has been used for the assessment years (2021 and 2037) as this differs from the split used in the 2016 baseline year. The updated ES has advised that the split for the future years has been based upon the average data over the past 3 years. We believe that this data may relate to the entire year rather than the Summer months and will have had the effect of underestimating the noise impact over Southampton. Southampton City Council should make enquiries to ensure that the modal split used for the future years is representative of the Summer period.*
 - *The revised ES has reduced the LOAEL from 54 dB $L_{Aeq, 16 \text{ hour}}$ to 51 dB $L_{Aeq, 16 \text{ hour}}$. This is now commensurate with the airport's own Noise Action Plan and 24 Acoustics concurs with this value. The SOAEL remains at 63 dB $L_{Aeq, 16 \text{ hour}}$. Whilst there is evidence to suggest that this could be lower there is currently little precedence to support this.*
 - *The updated ES has re-emphasised the airport's commitment to provide sound insulation to receptors which fall at/above the SOAEL and to continue with the existing mitigation defined in their Noise Action Plan for receptors with a noise impact between LOAEL and SOAEL. Again, we emphasise that the limitations of sound insulation cannot be over-stated. They will benefit internal areas at receptors providing residents keep windows closed (which may lead to ventilation and overheating issues) and will be of no benefit to external amenity areas. Therefore, the provision of sound insulation to properties should be considered only as a last resort.*
 - *It is understood that arrival and departure procedures cannot be altered at the current time as they will fall under an air change proposal which will occur sometime 'in the 2020s'. This is most regrettable as it is considered that changes such as alterations to noise preferred routes, approach glide angles etc. could result in significant reductions in noise impact to Southampton receptors. The airport should be strongly encouraged to consider any changes which are feasible now outside of the ACP process. One such change, which would be beneficial to Southampton receptors, would be to prevent aircraft from turning (from runway/ 217 degree heading on take off from runway 20) until over Southampton Water. This is a minor change from the current procedure (which allows a turn earlier at an altitude not less than 2000 feet) and would significantly reduce the amount of aircraft movements directly over large parts of the residential areas of the city.*
 - *The updated ES has introduced a night-time noise assessment relating to flight operations during the shoulder hour between 06:00 and 07:00 hours (Monday to Saturday). It is appreciated that this is difficult to assess objectively, however, the assessment methodology is considered flawed and, depending upon the likely number of flights it appears that there is significant risk of sleep disturbance on departures over Southampton (on runway 20) to some residents. On balance, however, the ES has not quantified the baseline position and it may be that a similar level of impact already occurs. The sound insulation scheme should be extended to residents experiencing noise levels at this period which could cause sleep disturbance and suitable robust eligibility criteria should be drawn up.*
 - *In summary it is clear that the aircraft operations associated with the proposed runway expansion will cause an adverse/ significant adverse noise impact at some Southampton receptors. The Planning Practice Guidance, however, is clear in that this is not unacceptable providing measures are taken to reduce the impact to a*

minimum. It is our opinion that the mitigation described in the ES is insufficient. We recommend the following further measures:

- *Alterations to departure and approach procedures, where feasible within the constraints of the ACP process;*
- *Further detail on the sound insulation proposals to include measures to provide ventilation and prevent overheating so that affected residents need not open their windows for any reason. Further eligibility assessment criteria for sound insulation to include receptors which are at high risk of excessive noise from flights within the shoulder period between 06:00 and 07:00 hours.*

1.4 In response to feedback from Eastleigh Borough Council Southampton International Airport now propose a 3 mppa passenger cap with an associated noise contour limit (based upon geographical area) which applies based upon this cap. WSP (acting on behalf of Southampton International Airport) has also introduced the use of the N65 metric to further assess noise impact. Southampton International Airport consider that they would reach the 3 mppa cap by the 2033 and therefore the assessment is now presented for this year.

2.0 SCOPE OF PEER REVIEW

2.1 The scope of our peer review is unchanged from our work undertaken in January and August of this year. It relates to noise impact that may affect receptors within the city of Southampton.

2.2 Noise from groundborne operations and construction noise impacts are considered highly unlikely to affect Southampton receptors and therefore have not been considered. In addition, the construction and the operation of the proposed car park should not affect receptors in Southampton and have also not been considered.

2.3 This peer review therefore relates to noise from aircraft departures on runway 20 and arrivals on runway 02 only (relating to aircraft arrivals and departures over Southampton).

3.0 REVIEW OF UPDATED NOISE IMPACT ASSESSMENT

3.1 We comment on WSP's updates which specifically relate to the points raised by 24 Acoustics Ltd in either our first or second review (in italics) below.

Effect of Modal Split on Acoustic Modelling

3.2 The modal split relates to the ratio of departures/ landings in a particular direction. It is presented as Runway 20/ Runway 02 (departures over Southampton and approaches over Eastleigh/ departures over Eastleigh and approaches over Southampton). It is an important parameter as the use of an incorrect or inappropriate modal split may under or over-estimate the noise impact on receptors. It is considered particularly important in terms of the noise impact relating to departures on runway 20 (over Southampton).

3.3 **24A:** *We previously questioned the modal split which has been used for the assessment years (2021 and 2037) as this differs from the split used in the 2016 baseline year. The updated ES has advised that the split for the future years has been based upon the average data over the past 3 years. We believe that this data may relate to the entire year rather than the Summer months and will have had the effect of underestimating the noise impact over Southampton. Southampton City Council should make enquiries to ensure that the modal split used for the future years is representative of the Summer period.*

- 3.4 It is noteworthy that Paragraph 11.2.87 of revision 1 of the ES described a 2016 (baseline) runway split of 76/24 for runways 20 and 02 respectively. This was described as actual data for the Summer 2016 period. Table 1 of the WSP Technical note supporting the further updated ES describes the modal split for this period as 72/27. This split cannot be correct as the two values should total 100 and regardless this inconsistency casts doubt on the accuracy of the split used in the 3 mppa assessment.
- 3.5 The 3 mppa assessment is taken as the average of the summer modal splits between 2015 and 2019 resulting in a split of 72/28. It should be further noted that a split of 64/36 was used in the previous assessment. This highlights that the previous assessment was incorrect and will have under estimated the noise impact for departures occurring on Runway 20 (over Southampton). This is not a trivial difference and again given the inconsistencies identified above Southampton City Council/ Eastleigh Borough Council should satisfy themselves that the modal split used in this latest assessment is appropriate.

Use of N65/N70 dB Metrics to Assess Noise Impact

- 3.6 N65 or N70 are the number of aircraft movement events (in an average Summer day) in which the noise level exceeds a noise level of 65 dB $L_{Amax,s}$ or 70 dB $L_{Amax,s}$.
- 3.7 **24A:** *Aircraft noise levels have been expressed as 16 hour L_{eq} levels during an average Summer day. It should be noted that humans do not integrate (average) noise levels over 16 hours and the 'real world' noise impact may relate to the maximum noise level associated with each aircraft movement together with the number of daily events. It would be helpful if contours showing the number of events exceeding (for example) 65 and 70 dB $L_{Amax,s}$ (N65 and N70) could be provided. In practice the noise level associated with a regional jet arrival may be slightly lower than that from a turbo-prop aircraft which may be of some benefit to residents living under the approach path in Southampton (such as those in Bitterne Park). Departure noise levels, however, are significantly greater.*
- 3.8 **WSP:** The further updated ES has included the use of N65. This indicates the following:
- There will be no change in the number of households experiencing 100 or more events per day with noise levels of 65 dB $L_{Amax,s}$ (or more) between the baseline year and assessment year (2016 vs 2033);
 - There would be approximately 6,650 fewer households experiencing between 50 and 100 events per day generating a noise level of 65 dB $L_{Amax,s}$ or more;
 - There will be approximately 10,700 more households experiencing between 20 and 50 events per day generating a noise level of 65 dB $L_{Amax,s}$ or more.
- 3.8 The significance of the above figures is difficult to determine. It is, however, indicative of the fact that in 2033 the noise level associated with each individual movement will be greater than in 2016.

Definition of LOAEL & SOAEL

- 3.10 As previously advised, LOAEL (Lowest Observed Adverse Effects Level) and SOAEL (Significant Observed Adverse Effects Level) are not defined objectively in planning policy/guidance and therefore a degree of interpretation is required in order to adequately define. This was challenged in our review of the original ES. We did not originally agree with WSP's determination of the noise levels that relate to LOAEL and SOAEL for aircraft movements. In particular, the Airport's Noise Action Plan defined a lower level for LOAEL than that used in the original ES. As a result of this in the first revision to the ES used a reduced noise level for LOAEL (of 51 dB $L_{Aeq, 16 \text{ hour}}$) which we agreed was appropriate.

- 3.11 *WSP has continued to define SOAEL for aviation noise at 63 dB L_{Aeq, 16 hour}. As advised previously, there is evidence to suggest that this could be lower but there is currently little precedence to support this. It is noteworthy that it is receptors with noise impact falling at, or above, SOAEL that are to be offered sound insulation.*

Provision of Sound Insulation

- 3.12 **24A:** *The updated ES has re-emphasised the airport's commitment to provide sound insulation to receptors which fall at/above the SOAEL and to continue with the existing mitigation defined in their Noise Action Plan for receptors with a noise impact between LOAEL and SOAEL. Again, we emphasise that the limitations of sound insulation cannot be over-stated. They will benefit internal areas at receptors providing residents keep windows closed (which may lead to ventilation and overheating issues) and will be of no benefit to external amenity areas. Therefore, the provision of sound insulation to properties should be considered only as a last resort.*
- 3.13 In August 2020 we further stressed that whilst the provision of sound insulation to receptors is of value it will only protect the interior of properties, allowing certain activities such as sleeping not to be impeded. Private gardens and other external amenity areas will therefore be subject to noise impact at or above the SOAEL (defined as 63 dB L_{Aeq, 16 hour} as stated above) as a result. As advised previously, Heathrow Airport currently offer 'full costs' for sound insulation to residents in the 60 dB L_{Aeq, 16 hour} noise contour. Any sound insulation measures that are provided should also include alternative means of ventilation and measures to prevent overheating so that properties may be occupied at all times with no requirement to open windows or doors.
- 3.14 It is worth registering that the latest updates do not re-consider sound insulation proposals. Mitigation is offered, inter-alia, however, through the 3 mppa cap and associated physical noise contour limit.

Consideration of Noise Preferred Routes

- 3.15 **24A:** *It is considered that the Airport's Noise Preferred Routes, whilst potentially suitable for the existing operations, may not go far enough for the new proposals. It is considered that the Airport should be asked to consider new noise abatement procedures/ routes to reduce the number of households affected by the proposals. (24 Acoustics- January 2000)*
- 3.16 **24A:** *It is understood that arrival and departure procedures cannot be altered at the current time as they will fall under an air change proposal which will occur sometime 'in the 2020s'. This is most regrettable as it is considered that changes such as alterations to noise preferred routes, approach glide angles etc. could result in significant reductions in noise impact to Southampton receptors. The airport should be strongly encouraged to consider any changes which are feasible now outside of the ACP process. One such change, which would be beneficial to Southampton receptors, would be to prevent aircraft from turning (from runway/ 217 degree heading on take off from runway 20) until over Southampton Water. This is a minor change from the current procedure (which allows a turn earlier at an altitude not less than 2000 feet) and would significantly reduce the amount of aircraft movements directly over large parts of the residential areas of the city. (24 Acoustics August 2000).*
- 3.17 The latest updates do not comment on arrival and departure procedures/ routes and therefore we assume that WSP/ Southampton International Airport's position regarding this remains unchanged.

3.18 Whilst we accept that such changes may be subject to the ACP process (and thus out of the Airport’s control) we are of the opinion that changes to departure routes from runway 20 (over Southampton) could result in a significant reduction in noise impact on Southampton receptors. This was highlighted to me personally as a passenger on Friday 6th November 2020 on a Loganair Embraer ERJ135 flight from Southampton to Newcastle. I observed a steep climb and then right turn shortly after takeoff, the rate of climb then lessened and we flew over the densely populated areas of Swaythling, Portswood, Highfield, just south of Southampton Common (which is a SSSI), Shirley, Milbrook, Lordswood and Nursling. The departure track is shown below (taken from Flight Radar 24).

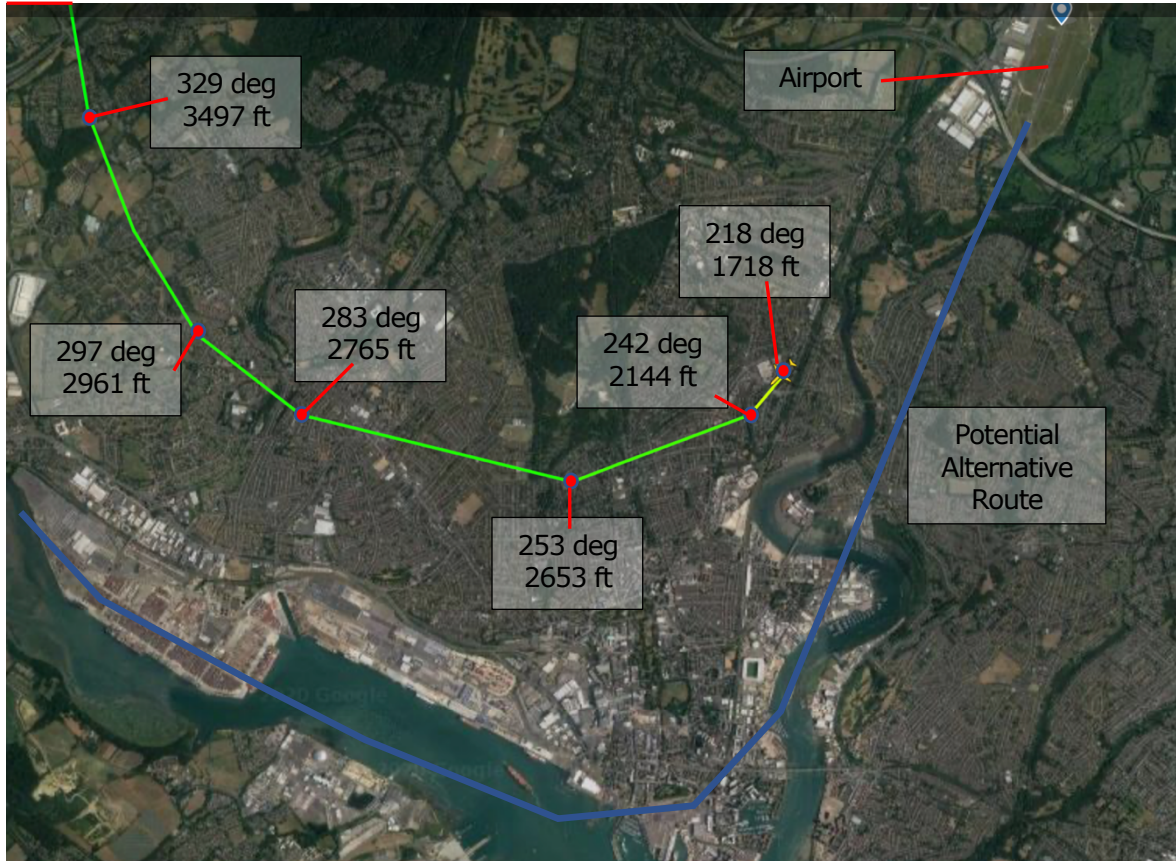


Figure 1: Departure Track of Loganair Flight LM540 on 6 November 2020 (Flight Radar 24) and potential alternative departure route

3.19 After landing at Newcastle I briefly spoke to the pilots. They explained that with only 6 passengers on board they experienced significantly more lift than normal (and hence potentially turned over the city earlier than normal). Regardless when I explained my understanding of Southampton Airport’s noise abatement procedure to them (which requires aircraft to turn to a heading of 217 degrees at 500 feet and then permits them to turn at an altitude of 2,000 feet or at Southampton Water (whichever comes first)) they were surprised and not aware of the option to turn over Southampton Water. Indeed, they showed me their operating procedure which shows that they should turn at 2,000 feet (with no mention of Southampton Water). They further explained that an early turn is actively encouraged by air traffic control. In fairness to Loganair it is possible that the climb rate of the Embraer ERJ135 may be such that they would always reach an altitude of 2000 ft long before reaching Southampton Water and hence the option to turn over Southampton Water is irrelevant.

3.20 Whilst it is appreciated and understood that any significant changes to the departure procedure needs to be subject to the ACP process, it is considered that the current proposals do route (higher powered) jet engine aircraft directly over highly populated areas of the city. It is considered that a departure procedure close to the runway heading followed by a turn at Southampton Water/ the docks (as indicated in Figure 1 above in blue) would significantly reduce noise impact over the city. It is considered establishing if such a route would be operationally possible and, if so, it would be worthwhile quantifying the improvement that this would make (by noise modelling) and if it is considered sufficiently significant it is strongly recommended that Southampton City Council/ Eastleigh Borough Council take steps to ensure that these views are represented during the ACP process.

4.0 SUMMARY

4.1 Southampton International Airport/ WSP have made further changes to the noise impact relating to the proposed extension of the runway on the basis of an assumed limit in passenger numbers of 3 mppa. A daytime summer noise contour restriction based upon this number of movements is also proposed. No further mitigation has been offered or considered. In complying with the area contour restriction, however, it will be necessary to consider mitigation as aircraft numbers grow. The assessment has also been updated to show the change in the number of properties that will be subject to an aircraft noise event at or exceeding 65 dB $L_{Amax,f}$.

4.2 The runway modal split upon which the updated assessment has been based still appears to be muddled and potentially incorrect. WSP should be asked to clarify this and update it if necessary.

4.3 Whilst the level of impact is reduced compared to the previous assessment (as a result of the reduction in the assumed number of passenger movements), concerns relating to the severity of the noise impact on the city of Southampton remain. The spirit of current national planning policy is that an adverse or potentially significantly adverse noise impact may be acceptable providing it is mitigated to a minimum. The updated assessment indicates that in excess of 10,000 new properties (an increase of approximately one third) will be introduced to between 20 and 50 aircraft events per day generating a noise level at, or in excess of, 65 dB $L_{Amax,s}$ in 2033 compared to the baseline year in 2016. It is arguable whether the proposed mitigation is adequate to address this increased impact.

4.4 It is appreciated that changes to departure routes/ noise abatement procedures over the city of Southampton need to be determined on a national basis as part of the ACP process. However, it is the author's opinion that the current procedures needlessly cause an excessive noise impact over densely populated areas of the city and that noise impact could be substantially reduced by a number of relatively simple route changes. The benefit of this could be quantified by noise modelling. If justified, it would then be strongly recommended that representatives from Southampton City Council and Eastleigh Borough Council ensure that their voices are adequately heard during the ACP process to facilitate these changes, if feasible.

I trust you will find the above to your satisfaction. Should you have any further queries please do not hesitate to contact me.

Yours sincerely,
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