

# **Special Meeting of Planning and Rights of Way Panel**

## **ADDITIONAL INFORMATION**

Tuesday, 28th January, 2020  
at 6.00 pm

### **ADDITIONAL INFORMATION RELATED TO THE LISTED REPORTS**

#### **Contacts**

Ed Grimshaw  
Democratic Support Officer  
Tel: 023 8083 2390  
Email: [ed.grimshaw@southampton.gov.uk](mailto:ed.grimshaw@southampton.gov.uk)

# **ADDITIONAL INFORMATION**

Redacted Public Comments

Thursday 23 January 2020

DIRECTOR, LEGAL AND GOVERNANCE

# Agenda Item 4

Email

Dear Sir/Madam

Thank you for writing to me regarding the above application.

I would strongly object to this proposal because of the additional noise and pollution it would cause in this area.

I also do not believe from attending the consultation meeting at Bitterne Park School that consideration has been given to the extra traffic and the traffic pollution it would bring to the area, the roads are already extremely congested in this area. I think it is naive or misleading to advise most people would travel by public transport to the airport. There doesn't appear to be anything in place to improve the train services and seating or additional car parking to meet this need either.

At the consultation meeting they could also not advise how many extra noisy flights we would have to endure over our houses and gardens in the Bitterne Park area, they advised thus would be up to the operator, which is not very reassuring to me, when they fly directly over my home and garden.

thank you very much for considering my views in your consultation

Janet Read

Email

We, Southampton Greenpeace, strongly object to airport expansion. Around 15% of the UK's climate impact comes from aviation. Expanding airports will undermine efforts to meet our legally-binding commitments on climate change - we need to be slashing our emissions. Given the dangers of climate change, we need to be reducing the numbers of planes in the sky, not making space for more by expanding airports. At high altitudes, carbon dioxide has a greater warming effect than at ground level so the impact of aviation is much greater than that from CO2 on its own. Airport expansion would cause more noise pollution and more traffic, and the economic benefits stated by the airport are not clear. We object.

Rosanna Newey,

Email

Dear Sir/Madam,

Not sure if I have missed the deadline to comment but in case not here are my comments.

I wish to object to the proposed expansion of Southampton airport for the reasons below:

1. Increased Traffic - there is already a significant problem with congestion in the area, and this will only be made worse by the expansion. You also have 1,000 new homes being built nearby at North Stoneham Park as well as numerous other developments alongside the M27/M3.
2. Increased Noise - the larger planes that can be accommodated by the extended runway (as well as more frequent flights) will raise the noise levels significantly over those recommended by the World Health Organisation, for thousands of residents including many schoolchildren.
3. Increased air pollution - this will be elevated at a local level with the additional road traffic as well as from the planes themselves whilst taking off/landing/taxiing on the runway. In a time when much more focus is being placed on such issues I find it astonishing that this is even being proposed.
4. Increased Co2 emissions - something that we should all be seeking to reduce and this does the opposite, expanding local airports sends out completely the wrong message, approving this decision will put those involved on the wrong side of history.
5. Dubious economic benefits - these seems to have been significantly exaggerated both for the airport itself and the local economy. Even if there was some basis to them much like the fossil fuel or tobacco industry I'm not sure that I'd be relying upon them into the future.

Points 1-4 obviously involve physical and mental health concerns for those living/working/commuting in the vicinity of the proposed development, I'm not sure that these have been taken into consideration to any significant degree.

Many Thanks,

Mr Daniel Pain

Email

Dear Sir/Madam,

I am a resident at 30 Newton Road, SO18 1NL and I wish to make the following comments about the Southampton Airport Expansion Application to Eastleigh Borough Council:

I have reviewed the material considerations for a planning decision and am objecting to the application on the following grounds:

#### Traffic

As you are aware, traffic is already a big problem in the Eastleigh area. From junction 5 of the M27, there are only two main routes into Eastleigh, Stoneham Lane and A335/Wide Lane. Both of them are under already under huge strain and it is not uncommon for there to be queuing traffic even when it is not rush hour. If the airport is to expand, then the increase in traffic from both additional passengers and airport staff is likely to put additional pressure on Wide Lane with traffic diverting to Stoneham Lane. This will have an adverse impact on the traffic heading to and from Chandler's Ford and also create problems for the new housing development on that road.

#### Noise

My house is in the flight path of Southampton Airport and so I am already impacted by the noise levels. The World Health Organisation recommends noise no louder than 45dB yet the planes create noise that is 55dB. One of the alleged benefits of the expansion is that it allows for larger quieter planes to use the airport but the masterplan does not commit to requiring airlines to use these planes. The only commitment is that larger, noisier aircrafts remain banned with the result that airlines may opt to continue using current aircrafts and operate more flights to meet the increase in demand. The increase in the number of flights will adversely affect the noise level in my neighbourhood.

#### Nature Conservation

Marlhill Copse is situated south of the Airport's runway and concerns have already been raised about the felling of trees to safeguard the Aerodrome. A number of the community have expressed concerns about this yet the masterplan makes no mention of what it intends to do to preserve this green space. It mentions it been a process of consultation between local planning authorities and airport operators but this is insufficient to alleviate the concerns the community has around how the environment is going to be safeguarded.

Yours faithfully

Man Long Chung

Email

Please provide some support in objecting to the planing application for the expansion of southampton airport.

The economic benefit of the expansion can't even come close to justifying the additional carbon emissions and noise pollution. Are we not fighting for climate change? Is our planet not already on fire?

Expanding the airport is a joke in an age where we need to save our planet and our future, who cares if we can't conveniently fly to Barcelona?

- Airport expansion needs to be considered on a regional/national level rather than at local level – expansion of Heathrow would draw custom away from regional airports, and the impact of expansion at other regional airports will impact on passenger flows through Southampton Airport
- The expansion would lead to increased traffic generation with associated congestion and air pollution as well as air pollution from the flights themselves. The airport makes some very optimistic assumptions about its ability to increase use of public transport as a means of getting to the airport. In reality, rail cannot take much increase so it is likely the majority of traffic arriving at the airport will be on our already congested roads. The policy of Eastleigh BC to prioritise the Chickenhall Road link and effectively dismiss the 'Eastleigh Railway Chord' [to link the airport to Portsmouth and the East with greater ease] makes a mockery of the airport MD's advertising of its rail links.
- There will be increased noise for those under the flight path. At present over 5600 local people experience noise levels of 55dB and above – this is twice the loudness of 45dB recommended by the World Health Organisation. The number of people affected will increase with airport expansion.
- Decision on this application should be delayed until after the Airspace Change consultation process is completed, as this may change significantly the impact on residents under or near the flight path.
- Eastleigh Borough Council has declared a climate and environmental emergency. Airport expansion will lead to increased carbon dioxide emissions and is simply incompatible with addressing this climate emergency. The Airport's own estimate is that carbon emissions will rise on average by 350,000 tonnes per year. For comparison, homes, industry and road traffic in the entire Borough of Eastleigh is responsible for 610,000t 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 (already small) carbon emissions during the construction phase and for its own operations (current plans are for only 6,000 tonne reduction).
- Neil Garwood (airport MD) has stated that only 2% of CO2 emissions were due to aviation. This is an absolute minimum figure that applies to global emissions. The UK government itself acknowledges that the current UK aviation emissions are 7% and set to go to 25% by

2050 – when aviation CO2 emissions are likely to be the single greatest offender in the UK. You should know this, because it has been reported extensively on the BBC – as have the recommendations by Lord Deben (the Chair of the Government Committee on Climate Change) that everyone’s appetite for air travel should be curbed and that airport expansion needs to be curtailed.

- The expansion would lead to increased traffic generation with associated congestion and air pollution as well as air pollution from the flights themselves. The airport makes some very optimistic assumptions about its ability to increase use of public transport as a means of getting to the airport. In reality, rail cannot take much increase so it is likely the majority of traffic arriving at the airport will be on our already congested roads. The policy of Eastleigh BC to prioritise the Chickenhall Road link and effectively dismiss the ‘Eastleigh Railway Chord’ [to link the airport to Portsmouth and the East with greater ease] makes a mockery of the airport MD’s advertising of its rail links.
- The economic benefits are overstated. The Airport promises 500 new jobs on the site, yet its last masterplan in 2006 promised an extra 541 jobs by 2015 – in fact there were 54 fewer. Its own figures show that nearly 80% of passengers are local people, so the effect on tourism from incoming visitors is limited. The percentage of flights taken for business has fallen. Moreover, in a time of climate emergency we should not be basing our economy on expansion of a sector that needs to be reduced.
- Aviation expansion is a national issue, as we have a climate emergency. Airport expansion therefore needs to be considered on a regional/national level rather than at local level for example, expansion of Heathrow would draw custom away from regional airports, and the impact of expansion at other regional airports will impact on passenger flows through Southampton Airport. These decisions should not be made locally on a case by case basis by the local authority that each airport happens to be located in, but should be decided nationally.
- Section 13.11.2 (Chapter 13) predicts a saving of 65,000 tCO2e, due to Southampton International Airport becoming Carbon Neutral by 2030. However this is over the *lifetime of the project* [13.9.2]) . Operational emissions are expected to be 42,005,000 tCO2e over the same reference lifespan [13.6.6]. This is a costs/benefits ratio of 646. The National Policy Planning Policy Framework (2019) make a “presumption in favour of *sustainable* development” (paragraph 11). A costs/benefits ratio of 646 is not remotely sustainable. Therefore Eastleigh BC should refuse the proposed development until it has positive proof that it is sustainable.

Sarah Partington

Southampton resident



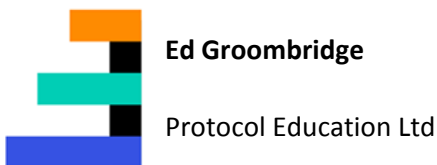
Email

To whom it may concern

I object to the expansion of Southampton airport on environmental and other grounds....

- Airport expansion needs to be considered on a regional/national level rather than at local level – expansion of Heathrow would draw custom away from regional airports, and the impact of expansion at other regional airports will impact on passenger flows through Southampton Airport
- The expansion would lead to increased traffic generation with associated congestion and air pollution as well as air pollution from the flights themselves. The airport makes some very optimistic assumptions about its ability to increase use of public transport as a means of getting to the airport. In reality, rail cannot take much increase so it is likely the majority of traffic arriving at the airport will be on our already congested roads. The policy of Eastleigh BC to prioritise the Chickenhall Road link and effectively dismiss the ‘Eastleigh Railway Chord’ [to link the airport to Portsmouth and the East with greater ease] makes a mockery of the airport MD’s advertising of its rail links.
- There will be increased noise for those under the flight path. At present over 5600 local people experience noise levels of 55dB and above – this is twice the loudness of 45dB recommended by the World Health Organisation. The number of people affected will increase with airport expansion.
- Decision on this application should be delayed until after the Airspace Change consultation process is completed, as this may change significantly the impact on residents under or near the flight path.
- Eastleigh Borough Council has declared a climate and environmental emergency. Airport expansion will lead to increased carbon dioxide emissions and is simply incompatible with addressing this climate emergency. The Airport’s own estimate is that carbon emissions will rise on average by 350,000 tonnes per year. For comparison, homes, industry and road traffic in the entire Borough of Eastleigh is responsible for 610,000t 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 (already small) carbon emissions during the construction phase and for its own operations (current plans are for only 6,000 tonne reduction).
- Neil Garwood (airport MD) has stated that only 2% of CO2 emissions were due to aviation. This is an absolute minimum figure that applies to global emissions. The UK government itself acknowledges that the current UK aviation emissions are 7% and set to go to 25% by 2050 – when aviation CO2 emissions are likely to be the single greatest offender in the UK. You should know this, because it has been reported extensively on the BBC – as have the recommendations by Lord Deben (the Chair of the Government Committee on Climate Change) that everyone’s appetite for air travel should be curbed and that airport expansion needs to be curtailed.
- The expansion would lead to increased traffic generation with associated congestion and air pollution as well as air pollution from the flights themselves. The airport makes some very optimistic assumptions about its ability to increase use of public transport as a means of getting to the airport. In reality, rail cannot take much increase so it is likely the majority of traffic arriving at the airport will be on our already congested roads. The policy of Eastleigh BC to prioritise the Chickenhall Road link and effectively dismiss the ‘Eastleigh Railway Chord’ [to link the airport to Portsmouth and the East with greater ease] makes a mockery of the airport MD’s advertising of its rail links.
- The economic benefits are overstated. The Airport promises 500 new jobs on the site, yet its last masterplan in 2006 promised an extra 541 jobs by 2015 – in fact there were 54 fewer. Its own figures show that nearly 80% of passengers are local people, so the effect on tourism from incoming visitors is limited. The percentage of flights taken for business has fallen. **Moreover, in a time of climate emergency we should not be basing our economy on expansion of a sector that needs to be reduced.**

- Aviation expansion is a national issue, as we have a climate emergency. Airport expansion therefore needs to be considered on a regional/national level rather than at local level for example, expansion of Heathrow would draw custom away from regional airports, and the impact of expansion at other regional airports will impact on passenger flows through Southampton Airport. These decisions should not be made locally on a case by case basis by the local authority that each airport happens to be located in, but should be decided nationally.
- Section 13.11.2 (Chapter 13) predicts a saving of 65,000 tCO<sub>2</sub>e, due to Southampton International Airport becoming Carbon Neutral by 2030. However this is over the *lifetime of the project* [13.9.2] . Operational emissions are expected to be 42,005,000 tCO<sub>2</sub>e over the same reference lifespan [13.6.6]. This is a costs/benefits ratio of 646. The National Policy Planning Policy Framework (2019) make a “presumption in favour of *sustainable* development” (paragraph 11). A costs/benefits ratio of 646 is not remotely sustainable. Therefore Eastleigh BC should refuse the proposed development until it has positive proof that it is sustainable.



Email

Dear Sir or Madam,

I am emailing to ask that Southampton City Council rethink its position in the light of Parliament's declaration of a climate emergency and the 2019 amendment to the Climate Change Act target for zero net carbon by 2050, by publicly stating that the Council objects to the expansion of Southampton International Airport.

The air quality in Southampton is a major cause for concern and the expansion of the airport will only add to this problem as an expanded Southampton airport will increase air pollution in our already polluted city and increase noise for those directly under the flight path and city residents generally.

There is a national and global climate emergency and aviation is responsible for an increasing proportion of greenhouse gas and other emissions. The council has indicated its support to tackle local and national climate issues, as demonstrated by the Green City Charter, which is to be commended. Supporting the extension will undermine the Charter and make a mockery of Southampton Council's efforts to achieve a low carbon future for our city.

The Committee on Climate Change (CCC) identifies several aviation measures to achieve net zero emissions by 2050, including restraint on growth of airports. Aviation growth both nationally and locally is inconsistent with UK emissions targets and is therefore inconsistent with the councils approach.

I know that the planning decision will be made by Eastleigh, but Southampton City Council will be a consultee and I would like you to oppose expansion due to the above reasons,

Thank you for your consideration.

Yours Sincerely,

Carole Binns

Email

Dear Sir or Madam,

I am emailing to ask that Southampton City Council rethink its position in the light of Parliament's declaration of a climate emergency and the 2019 amendment to the Climate Change Act target for zero net carbon by 2050, by publicly stating that the Council objects to the expansion of Southampton International Airport.

The air quality in Southampton is a major cause for concern and the expansion of the airport will only add to this problem as an expanded Southampton airport will increase air pollution in our already polluted city and increase noise for those directly under the flight path and city residents generally.

There is a national and global climate emergency and aviation is responsible for an increasing proportion of greenhouse gas and other emissions. The council has indicated its support to tackle local and national climate issues, as demonstrated by the Green City Charter, which is to be commended. Supporting the extension will undermine the Charter and make a mockery of Southampton Council's efforts to achieve a low carbon future for our city.

The Committee on Climate Change (CCC) identifies several aviation measures to achieve net zero emissions by 2050, including restraint on growth of airports. Aviation growth both nationally and locally is inconsistent with UK emissions targets and is therefore inconsistent with the councils approach.

I know that the planning decision will be made by Eastleigh, but Southampton City Council will be a consultee and I would like you to oppose expansion due to the above reasons,

Thank you for your consideration.

Yours Sincerely,

Carole Binns

Hi

Thank you very much for your letter regarding the proposed airport expansion.

I have submitted my objection to the Eastleigh planning portal and please see below for a copy of my comments.

Thanks again

Jon Dickson

49 Bond Road

Southampton

SO18 1LR

Noise

I live under the flight path on top of the hill in Bitterne Park and from looking at Flight Radar 24, I estimate that the planes pass over at only about 125 feet above our house. The noise is VERY loud but passes quickly. However the thought of the frequency AND the decibels increasing is very worrying.

As evidenced by the noise monitoring forms at Bitterne Park School, the noise levels are already above the WHO guidelines for aircraft (45dB in the day) and already above levels which may affect children's learning.

The idea that we should have to accept significantly noisier and dirtier aircraft based on the airport's \*hope\* that things will improve seems incredibly inconsiderate. Will they agree to halt the flights of larger aircraft if the improvements (over which they have no control) don't materialise? I think not. Surely the response should be that larger aircraft can be considered \*when\* the technological improvements have arrived.

Air quality

Southampton's air quality is amongst the worst in the UK and from personal experience the air in Bitterne Park has noticeably worsened over the years. The diesel fumes during morning rush hour are already very unpleasant.

Despite the airport's intention to go carbon neutral, that doesn't include the planes themselves, so not much use really. More flights WILL increase local air pollution in a city that is already heavily polluted.

## Climate change

With the climate emergency unfolding rapidly, it really does seem astonishingly out of touch to be applying to expand.

The Committee on Climate Change have recently said that "the growth in demand for flights must be curbed to tackle greenhouse gas emissions as part of the UK's climate targets". The government response was "We are also committed to setting a clear ambition for the aviation sector and will carefully consider the advice of the Committee on Climate Change when we publish our position on aviation and climate change for consultation shortly."

The application does not seem to take this into account. However much they may like to increase passenger numbers, they seem to completely ignore that people through moral obligation and government policy will be choosing to fly less.

It's interesting to see so many people supporting the application on the basis of CO2 saved in journeys to London airports. As an example, a return flight from London to Rome produces 234kg of CO2 per person and the return car journey from Southampton to Heathrow approximately 25kg, so a total of 259kg, so if people think that if they could fly from Southampton, they could feel virtuous for saving the 25kg car journey, they are really missing the point. People \*have\* to get used to the idea that flying will become an occasional thing and flying on a weekly basis for business completely unacceptable. Now that the internet offers so many options for connecting face-to-face, it really isn't necessary, and I expect a nudge factor like a frequent-flyer tax will make it a thing of the past.

## Conclusion

It would seem to sensible to me to reject the application at least for the time being until firstly, the national strategy on aviation is clear and secondly until the noise and pollution caused by the larger aircraft is \*at the very least\* no worse than current levels over the local area.

This would also be in line with your own commitment to the borough achieving carbon neutrality by 2030 and would show people locally, and nationally, that your declaration of a climate emergency is actually meaningful and not just greenwash.

Email

Dear City Council,

I am writing to you to express my disagreement with the expansion of the airport of Southampton. I think that the expansion of the airport will have a negative impact on our city.

I currently live at 15 Oxford Road, SO14 6QW where I can hear the planes passing above my house. I used to live in Sirdar Road where the noise of the aeroplanes was even louder and would disturb the quiet enjoyment of my garden. Noise from airports has been linked to detrimental effects on health and on cognitive performance and including in children.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5437751/>  
<https://www.sciencedirect.com/science/article/pii/S027249441300011X>

I am deeply concerned about the health and wellbeing of the people living even closer to the airport.

I am concerned that the expansion of the airport will increase the air pollution to the city not only due to the increasing number of planes that will result from the expansion but from the increase in car traffic linked to the presence of the airport. Southampton is already in breach of its commitment to reducing air pollution and the expansion of the airport will make it even harder to achieve the goals sets for air pollution. This is harmful to us, the local population.

<https://iopublishing.org/news/aviation-emissions-impacts-on-air-quality-larger-than-on-climate-study-finds/>

I am concerned that the expansion of the airport will only have positive externalities on a limited part of the population while creating negative externalities on major parts of the local population and on the environment. If all the externalities on the environment and on people's health are taken into account, this airport expansion has surely a negative impact on the city. I believe that the economic benefits for the population of Southampton will be minimal.

Furthermore, airport expansion is not in line with the reduction of carbon emissions necessary to address climate change (which the city council has duly acknowledged by declaring a climate emergency).

I would suggest developing furthermore the leisure activities available around the city, to foster the local economy rather than encouraging people to fly abroad.

Thank you for the consideration you have for my concerns, I would urge you to oppose the expansion of the airport.

Yours sincerely,

Florentin Bulot.

Email

Dear City Council,  
I hope my message finds you well.

I am emailing to ask that Southampton City Council rethink its position in the light of Parliament's declaration of a climate emergency and the 2019 amendment to the Climate Change Act target for zero net carbon by 2050, by publicly stating that the Council objects to the expansion of Southampton International Airport. Aviation is becoming responsible for an increasing proportion of greenhouse gas and other emissions. The Committee on Climate Change (CCC) identifies several aviation measures to achieve net zero emissions by 2050, including restraint on growth of airports.

Aviation growth both nationally and locally is inconsistent with UK emissions targets. In addition, an expanded Southampton airport will increase air pollution in our already polluted city, increase noise for those under the flight path with more flights and bigger aircraft.

There will be few, if any, benefits for Southampton residents (we get a worse quality of life to enable more people to fly – and nationally 70% of flights are taken by just 15% of people). The promise of low-paid jobs is not enough to cover the cost to us, as Southampton citizens, of all the above.

More flights by a Green City Charter signatory will undermine the Charter and make a mockery of the Southampton Council's efforts to achieve a low carbon future for our city. I accept the need for a small regional airport at Southampton whilst acknowledging that the Climate Crisis means we must all fly less. Flights from Southampton are decreasing anyway, and if Heathrow is expanded regional airports will lose traffic, potentially making expansion of Southampton unnecessary. Carbon offsetting is not a viable solution. I assume that the airport is only making its own activities carbon neutral as there is no way they can make the activities of the airlines using the airport carbon neutral. Several studies have already shown how living near an airport is bad for the health such as the 2 studies in the British Medical Journal that found evidence that people confronted with high level of aeroplane noise pollution have higher risk of heart disease and stroke. The expansion of the airport could increase the number of people susceptible to this risk (<https://www.independent.co.uk/life-style/health-and-families/health-news/why-living-near-an-airport-could-be-bad-for-your-health-8867387.html>).

I know that the planning decision will be made by Eastleigh, but Southampton City Council will be a consultee and we would like you to stand up and say you oppose expansion (as Twyford has) for the above reasons. I want you to retract the support you have already given to the idea of airport expansion, as key stakeholders in the consultation for the airport's master plan last year. I urge you to rethink your position.

Thank you for your consideration  
Kindly,  
Salma



Email

Dear Planning Development

I wish to object to the proposed airport expansion on behalf of Bitterne Park Residents.

I object on the following grounds.

1. Potential increase in noise and nuisance levels to residents in Bitterne Park.
2. Potential increase in pollution to the surrounding area.
3. Unacceptable and unsustainable increases in traffic movements around the airport and on approach roads and main routes to the site.

Regards

Councillor Rob Harwood

Conservative Councillor For Bitterne Park

c/o Democratic Services

The Members Room

Southampton City Council

Civic Centre

Southampton

SO14 7LY

Email

I wish to register my objection to the planned expansion of Southampton airport .

Southampton does not need more pollution,

both air and noise. The roads are struggling to cope at the moment, expansion will make this worse

Yours

Roger Nunn

20 Broadwater Road

SO182EB

Email

Hello,

I understand you are collecting more feedback from residents ( 19/02021/CONSUL ) before making a response to the airport expansion proposal.

Can I add my voice to this. (and, to be clear, note just my voice, but also my vote in the next local election, and the votes of quite a few local friends who I've spoken to and who think the same as me):

**The economic benefits of airport expansion are false.**

This is plain from first principles. If UK tourists are flying out of the country, UK domestic tourism is losing out. Air flights do not create jobs at anything like the same number as hotels, B&Bs, cafes, restaurants, etc. Whatever limited job creation there may be (and the airport has consistently failed to create the jobs it said it would in the past, please note), it will not compare to instead protecting and increasing domestic UK tourism.

All that beside the obvious white elephant that most of the costs of flying are spent on fuel, and the UK is a net importer of fossil fuels; much of that expenditure immediately leaves the UK economy and goes to unstable and undemocratic regimes elsewhere. We don't even get any tax on aviation fuel.

The only way to make airport expansion look good for the economy is to take an artificially narrow view. All the hidden costs from noise pollution etc will be picked up by the state. The airport as a business may profit from this; no-one else will.

**Airport expansion is utterly at odds with everything we know about climate change.**

As I write this people in Australia are literally running into the sea to flee the flames as their country burns. Scotland just recorded its hottest december temperature ever, and the UK had its hottest summer ever. We are on the brink. Only the most foolish or, frankly, evil of people would now deny that. The Climate change Committee in its report earlier this year, "Net Zero The UK's contribution to stopping global warming" explicitly said that aviation demand does need to be constrained (i.e. market forces cannot go unchecked). It is the job of local and national government to provide that constraint. Objecting to this expansion is your democratic duty. Eastleigh has declared a climate emergency; Southampton has with much fanfare produced a green charter. But voters are weary of empty words that are not followed up on; we want to see actions, not words.

As a private citizen, I have been playing my part for years now. Every day, in rain, shine, wind, snow or ice, I cycle from Southampton to Romsey and back for work. I could drive; I have a license and

could afford a car. The cycle is unpleasant, sweaty, tiring and dangerous on our busy roads - but I do it because I believe that every little makes a difference, and if I want to see change, it has to start with me.

Please, don't let me down. You know there is a morally right response here. Tell EBC that Southampton city council objects to this airport expansion. I'm watching and following this closely. I'll be noting the outcome and communicating it very clearly to my friends and neighbours to inform their future voting intentions.

Kind regards,

Dr Anthony Michael Strickland

43 Pettinger Gardens

St Denys

Southampton

SO17 2WL

Email Dear Southampton City Council (and Planning Officials)

I am a resident of Bitterne Park.

I am writing to register my opposition to the planned expansion of Southampton Airport for the following reasons:

1. Traffic. Our city already struggles--and many would say fails--to master the very high levels of stress placed on its transport infrastructure, particularly its roads. The airport claims its rail links will be able to absorb increases in travel to and from the airport. A simple consideration of the facts reveals this to be wishful thinking: most leisure users of the airport are from the region, the Airport Parkway station is very poorly linked to the east and west, and at rush hour extremely crowded with passengers travelling north and south. Until there is a major step-change in rail provision to the airport expanding it will mean only one thing: more cars.
2. Pollution. Southampton already suffers from high levels of air pollution, particularly (as your own website points out) from road traffic. The airport's expansion plan (see my first point) does not convince me that road traffic will decrease.
3. Noise. Although it is true that remarkable advances continue to me made in dampening aircraft noise, as a resident of Bitterne Park I can report from my own experience that aircraft noise has not decreased markedly in the 11 years I have lived here. The airport's expansion plan does not address the logical consequences of higher passenger numbers (the plan's stated aim): more flights, and more noise.
4. Economic benefit. The case for economic benefits is weak. The airport has form promising increases in employment and not delivering them. Surely as a profit-making enterprise their real goal in case of increased passengers is greater productivity from the workers they already have. In addition, given the likely effects of Brexit on intra-European business travel and the possibility of a third runway at LHR, I do not believe that the prospects for significant increases passenger numbers are as firm as the airport argues.
5. Climate change. Both local authorities (Eastleigh BC and Southampton) are committed to mitigating climate change. Eastleigh BC has even declared a "climate emergency." It is frankly ludicrous to imagine approving this application--especially given its many other flaws--under such circumstances.

Yours sincerely

Tom Irvine

--

Dr Thomas Irvine  
25 Hillside Avenue

Southampton

SO18 1LD

Email

Re: Consultation reference 19/02021/CONSUL Airport expansion planning application

With reference to Cabinet Member for Green City Southampton City Council and Cllr Steve Leggett: "We want to be carbon-neutral by 2030, which is very ambitious, and we want to reduce pollution down to 25 milligrams by 2025" (<https://www.dailyecho.co.uk/news/17721033.a-greener-future-for-southampton/>) I implore Southampton City Council to object to the application to expand Southampton City Airport.

Despite being outside of the bounds of Southampton, this expansion will impact our ambitions to become a "Green City" because it will increase the known pollution hotspots caused from traffic to/from the airport. By supporting the expansion, the Council would be directly contradicting these ambitions by supporting the increase in carbon emissions from aviation - the scale of which cannot be mitigated by any of the promised adjustments on the ground.

Further, it is Southampton residents who will suffer further noise stress and who will pay the price in terms of impacts on health of reduced air quality. In terms of economic benefits, as we head further into a changing climate, and flying will necessarily be reduced, this expansion will prove to be a waste of money.

As Cllr Leggett correctly observes "Time is running out so we need to be persistent" - this includes everything the council can have an impact on. Please push back against this application and stand up for the residents of Southampton and the future of the global climate.

Isabel Sargent

60 Harrison Road, SO17 3TJ

Email

Dear Sir

We are writing to ask you to oppose the expansion of Southampton International airport.

We believe that we are faced with an urgent climate emergency, and as parents and grandparents, we fear for the ability of our children and grandchildren to live out their lives safely if we do not take urgent steps to reduce carbon emissions.

This fact is becoming increasingly recognised, and Eastleigh Borough Council and Southampton City Council have both declared a climate and environmental emergency. Both councils need to make decisions in accordance with these declarations. Airport expansion will lead to increased carbon dioxide emissions and is simply incompatible with addressing this climate emergency. The Airport's own estimate is that carbon emissions will rise on average by 350,000 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 small carbon emissions during the construction phase and for its own operations.

Lord Deben and the Government Committee on Climate Change have recommended that everyone's appetite for air travel should be curbed and that airport expansion needs to be curtailed. The Committee also said that we cannot achieve carbon neutrality without restraining aviation, which will be the largest single emitting sector by 2050.

Aviation expansion is a national issue, as we have a climate emergency. Airport expansion therefore needs to be considered on a national level, and not on a case by case basis by the local authority that each airport happens to be located in.

For the above reasons, we urge you to oppose this application.

Kind regards

Alison and John Spottiswoode

Southampton residents

Email

Dear Sir/Madam,

RE Planning application F/19/86707 and/or 19/02021

I am writing to ask the City Council to oppose the proposed harmful expansion at Southampton Airport.

I am also asking Eastleigh Council to oppose it for the reason below.

I accept the need for a small regional airport, but the Climate Crisis means that everybody must fly less.

Yours sincerely,

Heather Brayshaw

58 Upper Brighton Road,

Worthing,

West Sussex,

BN14 9HT



Email

I object to the plan for Airport Expansion

It just doesn't make any scientific sense to increase the number of flights and the size of the airplanes when we are in a state of Climate Emergency. We are legally bound to be finding ways of cutting emissions rather than increasing them.

And add to this the extra damage of cutting and lopping magnificent mature trees which are at the peak of their carbon capture function. .. the proposed replanting will take many years to grow to the size that will enable them to match the present trees in their carbon absorption.

And we haven't got years to deal with this problem , we've got to show real significant cuts in carbon in the next few years ( not in the next 20 years ) or it will be too late to avoid the worst effects of global heating which will leave the next generations trying to live on a planet that is becoming more and more uninhabitable.

And then there is the noise and increased air pollution.....

Yours Maggie O'Connor

60 Gordon Avenue

Portswood

So 14 6wd

Email

Dear Sir/Madam

I am emailing to object to the proposed airport expansion. I am concerned about the environmental impact of the expansion. I am also concerned about the impact on the road network which is already very congested at rush hour. I do not think that the airport has addressed the environmental issues in their application.

Thanks

Helen Coleman

31Bond Road

Bitterne Park

SO181LR

Email

Dear Sir/Madam

I would like to express my views over the planning application to expand the runway at Southampton Airport.

Although I agree with the economic need to expand the airport it is difficult to balance residential needs given the geographic position.

I would be concerned if noise pollution increases. Excessive noise occurs particularly in the summer months with windows open plus can restrict use of garden space. There are already flights arriving before 7am and after 11pm which cause sleep disruption. With the planned expansion the health and well-being of local residents needs to be considered.

Regards

Bruce Pringle

7 Hillside Avenue

Southampton

SO18 1LD

\*\*\*\*\*  
\*\*\*\*\*

Email

Dear Planning Department,

I live on Oaktree rd, and am alarmed that Southampton may be given permission to extend their run way in the very near future.

I live on the flight path and have a young family, if i knew this would be happening i would of never moved here some 17 years ago. As the promise was Southampton would never be expanded in this way. This will cause more airpollution, and more noise pollution in the future for us. I thought the Government and Southampton were trying to clean up the air around Southampton not make it worse for us all.

If this goes ahead when we finally have a some hot sunny weather. We will have to keep our windows closed not be able to enjoy our gardens on a weekend relaxing after a hard working week, because of these bigger louder planes will be able to fly over our houses and more frequently.

If this goes ahead what are we gaining from this. Will the airport give us a free flight each a year ? Reduce our council tax by 50% ? No so why should this go ahead.

If the Government find it necessary to expand certain airports locally then look at B'Mouth which is not surrounded by families homes living on the flight path, and is already big enough. I also look at the amount of traffic this will cause around the airport trying to get to the airport. Causing more pollution and congestion.

At present the amount of flights is managable over us. EVEN though the odd plane still flies over around 7am sometimes wakes us, on a weekend in the warmer months with the odd later around 10-10.30pm. Which can wake my young daughters up. Which shouldn't be aloud. Any increase i would need to be looking to move house, as this would disrupt our lives in a negative way for the above reasons.

If we are to take climate change seriously this expansion should not go ahead. All we want in Bitterne Park and surrounding areas is to live a decent quality of live with our families, and with out devaluing our homes in price ?

**But progress and Greed in threatening this please stop this.**

Kind Regards,

**MR Glenn Miller**

Email

Below are just a few of my objections as raised with Eastleigh Borough Council via their website:

1. This expansion would be a massive contradiction to the climate and environmental emergency Eastleigh Borough Council (and Southampton City Council) has declared. The proposed airport expansion will lead to increased carbon dioxide emissions and is simply incompatible with addressing this climate emergency. The Airport's own estimate is that carbon emissions will rise on average by 350,000 tonnes per year. For comparison, homes, industry and road traffic in the entire Borough of Eastleigh is responsible for 610,000t 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 (already small) carbon emissions during the construction phase and for its own operations.
2. Airport MD, Neil Garwood, has stated that only 2% of CO2 emissions were due to aviation. This is an absolute minimum figure that applies to global emissions. The UK government itself acknowledges that the current UK aviation emissions are 7% and set to go to 25% by 2050 – when aviation CO2 emissions are likely to be the single greatest offender in the UK.
3. The expansion would lead to increased traffic generation with associated congestion and air pollution as well as air pollution from the flights themselves. The airport makes some very optimistic assumptions about its ability to increase use of public transport as a means of getting to the airport. In reality, rail cannot take much increase so it is likely the majority of traffic arriving at the airport will be on our already congested roads. I assume that Neil Garwood has not used the train or bus systems he likes to talk about, I have, its not good. Junction 5 of the M27 (and M3) is congested for most of the day, an increase in traffic would make Eastleigh inaccessible to a lot of the borough, lots of shops and local businesses will suffer as it will be easier to go to other towns to shop or work.
4. The economic benefits are overstated. The Airport promises 500 new jobs on the site, yet its last masterplan in 2006 promised an extra 541 jobs by 2015 – in fact there were 54 fewer. In a time of climate emergency we should not be basing our economy on expansion of a sector that needs to be reduced. If all airports, including Heathrow, are given the go-ahead to expand there will be no benefit to Eastleigh/Southampton and we will be left with a white elephant, an expensive one at that.
5. The noise level in the centre of Eastleigh and other local areas is already excessive, even here in West End I can hear the flights take off in the morning so I can sympathise with friends who live in Mansbridge, Bitterne Park, etc.
6. There are sensitive areas near to the runway that include Marlhill Copse; the River Itchen; Riverside Park; Mansbridge Reservoir home to fish, plant life and birds and a conservation area in the northwest corner; Itchen Valley Country Park with its Green Flag (for now). Even the Council's website states that "due to the proximity of the park to the airport, visitors are not permitted to fly drones in the park." Which means that the park is already within a zone of conflict with the airport. Will the council be happy to put its own SSSI and SAC Nature Reserve at risk?

Kind regards

Tracy Weeks

6 Harbourne Gardens, Chartwell Green, West End, Southampton, Hampshire SO18 3LY

Email

Dear Sir/Madam

please find attached comments regarding the above planning response consultation on behalf of Southampton & District Green Party

Kind regards

Angela Cotton

**Re: 19/02021/CONSUL Airport expansion planning application**

Southampton and District Green Party believes the City Council should object to the above application.

We are concerned that Southampton City Council's response to the above planning application is being dominated by the belief that the promise of economic benefits outweighs the costs to both the climate and to those living under the flight path. Or that innovations such as electric planes will remove the negative impacts of airport expansion. On the contrary, electric planes will only ever be able to replace the smaller aircraft currently using the airport. If the airport intended to 'green itself' by attracting such planes it would not need the proposed longer runway.

We believe that the economic argument has been over-played. The number of extra jobs promised by the airport is relatively small, especially considering the large area of land that the airport occupies. Even assuming that all the direct, indirect and induced jobs are within the Solent LEP area – which is questionable since according to Appendix 6.1 (4.6) only 32% of the airport's non-wage spend is local – the extra 1500 jobs represent only 0.24% of the current 608,100 total employment for Solent LEP (Chapter 6, 6.4.12) and will be a much smaller proportion of projected total employment in 2037. Whether these extra jobs actually materialise is questionable, given that the Airport's 2006 Masterplan promised an additional 537 jobs by 2015 but in fact there was a net loss of 54.

The cumulative £18.1bn (=average £90m/year) economic benefit of the airport predicted by Appendix 6.1 is based on introduction of the 'Full Masterplan timetable' by 2022 (Appendix 6.1, 5.8). This timescale is clearly not possible as the runway will only be built in 2020/21 and the assumed 4m passengers by 2027 and 5m by 2037 are more than the road network can handle, as evidenced by the transport assessment (chapter 8). How much of this £1.8bn would be achieved anyway under the 'controlled growth' scenario with 3.3m passengers is not stated, so no comparison can be made as to how much of this is extra money.

The figures presented for 2037 (Appendix 6.1 para 5.5, 5.7) claim that implementation of the 'full Masterplan' results in £400m compared with £275m for the 'controlled growth' scenario without runway extension. This 45% increase may seem impressive, but it is based on the assumption that economic activity will grow proportionately with number of passengers and that there is no increase in the level of efficiency at the airport. (para 5.4) which seems unlikely. Moreover, no account has been taken of factors such as Brexit or the expansion of Heathrow Airport, nor indeed of the growing awareness of the impact of aviation on climate change. No consideration has been given in the economic impact assessment to any negatives arising from expansion, such as reduction in house prices for those under the flight path. This is despite significant numbers of homes being affected: over 10800 households are predicted to be exposed above 54dB  $L_{AEQ,16\text{ hour}}$  (chapter 11, table 11.3).

Climate change is probably the biggest risk facing the world today. Chapter 13 (13.6.6) estimates that there will be an average annual increase of 350,000t carbon emissions during the 'operational phase' (taken as 120 years!). However, the additional aircraft emissions in the early years (which from the point of view of averting a climate catastrophe are the most important) will be significantly above this, namely 517,000t in 2021 and 448,000t in 2036 (table 13.7). Including the baseline aircraft emissions, the total carbon emissions as a result of development will be 998,000t in 2021 and 992,000 in 2036 – approximately twice what they would be without the development. Efforts to reduce Southampton's carbon emissions as part of the Green City Charter will be undermined by all these extra emissions resulting from the expansion of a single Charter signatory. The airport's plan to become 'carbon neutral' by 2030 is a trivial saving in comparison to this and should not be seen as significant mitigation. As a city that has created a Green City Charter and was among the first to declare a climate emergency, Southampton should have no hesitation in opposing this development.

The noise assessment (chapter 11, table 11.13) finds that currently 9000 people are exposed above 54dB  $L_{AEQ,16\text{ hour}}$  and that by 2037 this number will rise to 25,200. In addition the number of people exposed above 63dB (currently zero) will be 1550 by 2037 and 50 households will even be exposed above 66dB. It is unlikely many of these people will see the promised economic benefits. The assessment also ignores the World Health Organisation recommendations to keep aircraft noise 45dB

due to health impacts, especially on children. Since numbers of people exposed at this level are not stated it is impossible to assess the full impact on our residents. Southampton should oppose the application on these grounds, just as Twyford Parish Council has.

Increase in traffic congestion is another major downside. The economic benefits (chapter 6) have been based upon the 'full Masterplan' scenario, but the transport assessment is based on 3m passengers per year. Therefore it has effectively only considered the negative impacts of the 'controlled growth' scenario with no runway extension!

The Scoping document (chapter 5, para 5.4.34) says the EIA has assessed the proposed development based on 'Baseline + Operation of the Proposed Development with 3 million passengers per annum landside and 5 million passengers per annum airside.' It is not made clear how 2 million passengers per year can pass through Southampton airport without either embarking or disembarking at Southampton – nor how such passengers might contribute to economic benefit of the local area as chapter 6 assumes they will.

The transport assessment claims to find no significant negative impacts of 3m passengers compared with 2m, despite the fact that many of our junctions are already at capacity. However, the modelling is flawed. The SRTM model was run with 2.66m passengers for the 'Do something' scenario and with 2m passengers for the baseline scenario. Chapter 8 (8.2.28) then claims that because the proportion of people currently arriving by public transport is actually higher than the model used assumes, modelling undertaken 2.66m is equivalent to really modelling 3m. This is fair enough, but the same adjustment should have been used also for the baseline scenario since by the same argument modelling 2m passengers is equivalent to really modelling 2.5m (approx). Therefore the modelling has only shown no significant impacts when comparing 3m passengers to 25% more traffic than is currently on our roads. The modelling also assumes infrastructure and public transport improvements that may not occur.

Southampton already has poor air quality and this development will worsen it. Firstly, air pollution from the increased traffic, and secondly pollution emitted from aircraft themselves (chapter 7, Table 7.15 says this will increase from 83.57 tonnes in 2018 to 320.96 tonnes by 2027.

Southampton and District green Party believes that the costs of this development far outweigh any claimed benefits, and Southampton Council should object to the planning application.



Re: **19/02021/CONSUL** Airport expansion planning application

We believe that Southampton City Council should object to this development on the following grounds:

**1. Impact on climate change**

We have serious concerns about ES chapter 13 (climate change – greenhouse gases) which appears to contain both factual errors and some possibly questionable assumptions that are not made explicit.

**Road emissions error**

Table 13.3 lists total emissions related to the airport as being 1238ktCO<sub>2</sub>/annum rising to 1522kt by 2036, with over 60% of this being due to road traffic and less than 40% due to aircraft. This is an extraordinary figure, given that people arriving at the airport are predominantly from the local area. The 2021 value (766kt) is larger than the total emissions due to road transport within Eastleigh Borough including motorways of 289.5kt (table 13.4) and implies over 70% of traffic on the Borough’s roads is airport-related. This is incredible and suggests a major error in the figures.

**Table 13.3: Future emissions – baseline scenario**

Emissions Source	2021 (KtCO <sub>2</sub> e/annum)	2036 (KtCO <sub>2</sub> e/annum)	2021 to 2140 (Reference Lifespan, KtCO <sub>2</sub> e)
LTO (B1)	29	31	3,155
CCD (D)	443	468	47,951
Road Traffic (D)	766	1,023	122,895
<b>TOTAL</b>	<b>1,238</b>	<b>1,522</b>	<b>173,971</b>

**Aircraft emissions**

The same figures appear in table 13.7 which gives the emissions for aircraft and road traffic under the “with proposed development” scenario. We also note that this table indicates that total aircraft emissions will be lower in 2036 than in 2021 despite the increase in flights and passengers.

The same pattern is shown in table 13.8 for the “per passenger” emissions. The ES states (13.2.13 and footnote 13) the assumed increases in aircraft efficiency as:  
 2016-2030 -0.62%/annum, 2030-2040 - 1.31%/annum and 2040-2050 - 1.45%/annum.

**Table 13.8: Aircraft Emissions per passenger**

Emissions Source	Pas2080 Ref	Timespan	Without Proposed Development (tCO <sub>2</sub> e/Passenger)	With Proposed development (tCO <sub>2</sub> e /Passenger)
LTO and CCD	D	2021 only	0.243	0.271
		2036 only	0.190	0.192
		Reference lifespan (2021-2140)	0.176	0.179

We have applied these values (year by year – see attached spreadsheet for our calculations) to the 2021 figures and find that our calculated 2036 emissions per passenger are higher than those given in the table – by more than 50% in the case of the “without development” scenario and by more than 100% in the case of “with development.” We assume that (unstated) changes in aircraft occupancy may be part of the reason for the lower per passenger emissions.

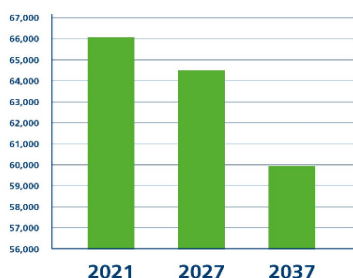
However, increased destination distances in the case of the “with development” scenario would work in the opposite direction. The ES states (3.2.46) that “changes to destinations with and without the

Proposed Development were available (ref: Steer Davies Gleave (2017) The Economic Impact of Southampton Airport <https://www.southamptonairport.com/media/4699/the-economic-impact-of-southampton-airport-v1.pdf>) This report gives little information on new destinations and it is not clear how this data has been used to calculate distances travelled. Para 13.2.57 states that “distances flown to countries within 2018” have been assumed “representative of the distances to be flown to these countries with the Proposed Development in place”. Therefore it is not clear how new destinations have been included. If they have not been included, the per passenger emissions will be higher in 2036 for the “with development” scenario and therefore the total emissions for the CCD figures in table 13.7 would be higher.

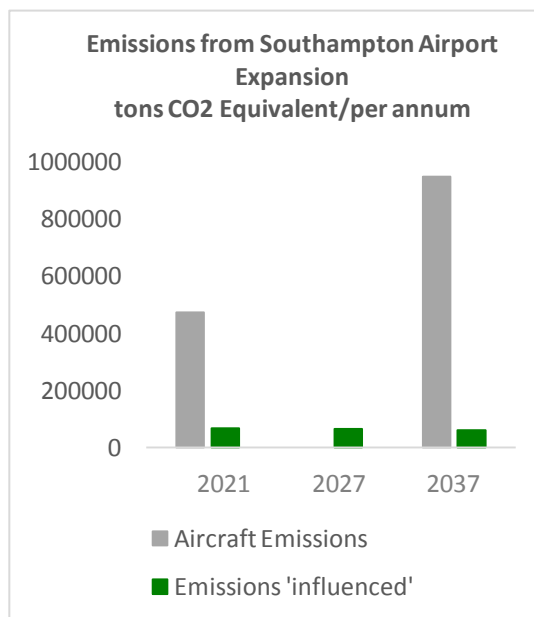
In the context of a climate emergency (as declared by both Southampton and Eastleigh as well as the government), we wish to challenge the use of a 120 year “Project Reference Lifespan” as absurd. We have 12 years to avert a climate catastrophe and if we don’t reduce emissions – including from aviation – in time, major climate changes will have occurred well before 2140.

The airport’s own figures state that extra emissions associated with the development will be 350kt. This compares with 534kt emissions from homes and businesses in Southampton (source: BEIS), meaning this development is like building a city 2/3 the size of Southampton on our doorstep. The airport is a Green City Charter signatory and claims it will become carbon neutral by 2030. However information on its website <https://www.southamptonairport.com/media/6029/southampton-airport-public-information-session-materials.pdf> shows that it plans to reduce its emissions by just 10% to 60kt by 2037, ie hardly “carbon neutral by 2030” (see their graph, below left). This is a drop in the ocean compared to the extra aircraft emissions and in no way mitigates the impact of expansion. Note also the choice to begin the y-axis above zero, making the reduction look bigger than it is.

Co<sub>2</sub> Emissions Influenced By Southampton Airport (Tonnes)



An alternative version of this graph, also including the aircraft emissions, is presented to the right. (Aircraft emissions data taken from ES chapter 13, table 13.7: 2021 “without development”, 2036 “with development”.)



As an aside: Hertfordshire County Council unanimously voted to oppose further expansion of Luton airport at a meeting on 26/11/19. Councillor John Hale said: “Expanding the airport ...when we are trying to reduce carbon emissions is madness.”

<https://www.stalbansreview.co.uk/.../18074877.hertfordshire-.../>

Southampton City Council should take the same view in respect of expanding Southampton airport.

## **2. Impact on traffic and traffic-related air pollution**

We are concerned that that the transport assessment (ES chapter 8) assesses only 3mppa, not 5mppa as per all the other assessments including that of economic impact. This is despite the Scoping Report (appendix 4.1) stating (3.3.3-3.1.4) “...the overall aspirations of SIAL are to increase airport activity by 2037 to the following: 5 million passengers, 57,800 ATMs. As such, and given that the additional runway capacity could at least theoretically facilitate the quantum of development envisaged for 2037, the EIA will assess the effects associated with the airport activity projected to occur in 2037 (brought forward to 2027) as a theoretical consequence of the proposed development.”

The Dec 2018 Scoping report (reproduced as Appendix A in ES Appendix 8.1 p51) also promised (2.2.4) that the transport assessment would assess the effects of 5million passengers:

2.2.4. Whilst the primary assessment of the TA will be Airport activity in 2027 (as directly facilitated by the Proposed Development, it is recognised that the overall aspirations of SIAL are to increase Airport activity by 2037 to the following (which may be achievable utilising under the Proposed Development):

- 5 million passengers per annum
- 57,800 air transport movements

As such, the TA will also assess the effects associated with Airport activity in 2037 as a theoretical consequence of the Proposed Development. This assessment will necessarily utilise a series of assumptions regarding matters including, traffic movements, parking etc.. The objective of the 2037 assessment would be to demonstrate the requirement or otherwise for strategic infrastructure and/or mitigation to enable this level of Airport activity.

The stated reason for not doing this in the 2019 transport assessment (ES chapter 8, 8.2.35) is that “Although the runway facilitates the growth of the airport to 5mppa, the supporting infrastructure limits this growth to approximately 3mppa, which is the basis of the planning application”. However since this criterion could equally have been applied to all other assessments including the economic assessment – but it was not – it seems more likely that the choice of 3mppa for the transport assessment was for the simple reason that an assessment of 5mppa would show the road network unable to cope.

We believe there is a methodological flaw in the traffic modelling. The SRTM model has been run with 2.66mppa for “Do something” and with 2.0mppa for “Do Minimum” (where the runway extension does not take place). Because the proportion of people arriving by public transport is higher than the SRTM model assumes, the ES concludes that modelling undertaken for the “Do something” scenario at 2.66mppa can be taken to reflect results for 3mppa (actually 3.31mppa) because this better matches the actual number of arrivals by road.

6.3.4. The results of the travel survey show that approximately 25% of users of the Airport travel by public transport, which is a significantly greater proportion of trips than the 8% included in the SRTM 2036 forecast assumptions. The data confirms that the modal split obtained from the travel surveys is significantly different to the SRTM modal split and as a consequence will have a large influence on the passenger trip numbers by mode. Maintaining the ‘Highway trips’ at 2.45 million per annum and utilising the Southampton International Airport recorded modal split from 2018 to extrapolate ‘Public Transport trips’, this equates to 0.86mppa travelling by public transport. This means that the SRTM Local Plan modelling has assessed the impact of a total of 3.31 million passengers per year through the Airport, based on the same level of ‘Highway trips’ on the network.

But by the same argument, running the model with 2.0mppa must be equivalent to assessing 2.49mppa. Therefore to provide a true comparison with the “Do Minimum” scenario of 2mppa the model should have been re-run with a smaller number of passengers (ie  $2.66 \times 3.31 / 2.0 = 1.6$  mppa) and these results compared with 2.66mppa. This has not been done. Therefore “Do Something” has been compared with a larger number of trips than would really be taken under “Do Minimum”, underplaying any differences. We are also surprised that ES (dated December 2019) references the UK Aviation Forecasts 2013 as the source of the initial choice of 2.66mppa. This document was replaced withdrawn and replaced in 2017.

The overall summary of junction modelling ignores some of the individual results, for example (table 7.6) 12% increase in mean am peak delays at the Wide Lane/Bassett Green Rd/Stoneham Way junction (from 172 to 202sec). There is no evidence that the modelling takes account of changes in driver route choices if delays worsen at the over-capacity junctions. Nor is there any evidence that the model takes account of peaks in traffic due to local events such as home football matches or cruise ship arrivals. Given that air quality in Southampton is already bad, the addition of potentially significant extra traffic can only make things worse. Additionally, ES chapter 9 states (9.6.40) that there is a risk of significant effects on the River Itchen SSSI as a result of the pollution from road traffic being added to aircraft pollution. Southampton city council should object to the development on these grounds.

Response from Transition Southampton, prepared by Mark Hancock and Angela Cotton (Co-Chairs)

from ES 13 table 13.8	LTO+CCD emissions/person (t CO2e)	
	Without	With
2021	0.243	0.271
2036	0.19	0.192
Ratios	0.782	0.708
Carbon intensity improvement	<b>22%</b>	<b>29%</b>
Ratio of carbon intensity improvement to efficiency improvement calculated using official forecasts	<b>157.56%</b>	<b>210.59%</b>

Official Forecasts	2021-2030	2031-2037
Efficiency increase pa	0.62%	1.31%
No of years	9	6
Efficiency improvement	5.7%	8.1%
<b>Total efficiency improvement 2021-2037</b>		<b>13.8%</b>

The assumed GHG/ emmissionspassenger from the Airport are decreasing more than the official efficiency figures. This could be due to occupancy assumptions, but increased distances would do the opposite.

'UK Aviation Forecasts' provides annual aircraft efficiency improvement estimates to; the central estimates of these have also been used in this assessment<sup>13</sup>.

<sup>13</sup> 2016-2030 -0.62%/annum, 2030-2040 - 1.31%/annum and 2040-2050 - 1.45%/annum.

Email

Dear Planning Team,

**19/02021/CONSUL Southampton International Airport, Mitchell Way, Eastleigh**

Attached is my objection to Southampton International Airport's planning application F/19/86707 to Eastleigh Borough Council, including a short note asking Southampton City Council to object to the application under consultation 19/02021/CONSUL. I understand that today is the deadline for the public to submit comments to the city council.

I work for Southampton City Council's planning department. I am commenting on the application as a member of the public and Southampton resident. However I am unsure whether it is OK for me to comment on an application, given that I work for the planning team, even if the application is not relevant to my job. If there is a problem with this, please let me know and ignore my email. Otherwise, please pass this on to the planning officer.

Best wishes

Ingrid Peckham

83 Earls Road, Southampton, SO14 6SG

Email

Good afternoon,

Please include the following in your deliberations:

Section 13.9 of the Environmental Statement lists the airport's carbon neutrality by 2030 as a 'mitigation' of its operational production of CO<sub>2</sub> and therefore of the proposed development.

The airport signed Southampton City Council's Green City Charter well before the current application was submitted. It was going to have to be (or more likely, attempt to be) carbon neutral by 2030 anyway.

**Therefore, 'Carbon Neutrality by 2030' should not be regarded or used as a mitigating factor in the development's effects.**

Please note that in the green-bar graph on page 8 of the following:

<https://www.southamptonairport.com/media/6029/southampton-airport-public-information-session-materials.pdf>,

the airport itself estimates that its 'influenced' CO2 emissions in 2030 (the year it should supposedly be Carbon Neutral) will be between 64,5000 and 60,000 tonnes of CO2.

I would be grateful if you could ensure that the officers and councillors responsible for the Green City Charter are aware of this.

Many thanks,

Gareth Narbed

**Table 7.15 [Chapter 7] shows an almost quadrupling of airport source emissions from 85.57 tonnes/year (2018 baseline) to 320.96 tonnes/year (2027 with development).**

The Information for the Habitats Regulation Assessment (HRA) submitted with this application states [7.43] "The NO<sub>x</sub> concentrations and nitrogen deposition exceed critical level and critical load in the future with or without the Proposed Development. The 1% screening threshold for contributions from the Proposed Development alone is also exceeded. Therefore, likely significant adverse effects on the River Itchen SAC from air quality cannot be ruled out, either for the Proposed Development **in-isolation or in-combination** with other plans and projects. *An Appropriate Assessment will be required* to assess impacts on the River Itchen SAC and its sensitive qualifying feature Southern Damselfly and supporting habitat 'Rich fen'."

The '*Appropriate assessment*' states [7.77] "The Proposed Development will not prevent the restoration of these supporting processes (adaptation and resilience, air quality, conservation measures, water quantity/quality (Natural England, 2019), **although it may cause a delay with relation to air quality through pollution contributions in-combination with other plans and projects**, and after the restoration has been complete, the ability of the affected area to support the habitats of Southern Damselfly will not be subject to negative influences from air quality."

Section 7.7.1 states the "**known** effect of nitrogen dioxide poisoning is through effects on the lungs and associated mucus membranes, which are absent in insects." I have been unable to find this in the source documents available online. Furthermore I can not find studies asserting that direct NO<sub>x</sub>/NO<sub>2</sub> does **not** affect the Damselfly via its system of trachea – indeed it would be surprising that the system which directly delivers beneficial oxygen to insects cells would also not thus transport a respiratory poison. The interaction effects between airborne NO<sub>x</sub> levels and Nitrogen deposition levels do not appear to have been investigated in the EIS, which further brings the conclusions of the 'Appropriate Assessment' into question.

Section 9.9.4 lists the cumulative (**in-combination**) schemes considered and includes housing developments such as those off Burnett's Lane and Fir Tree Lane.

1. However the following, that Eastleigh BC is in favour of (including its adopted and emerging local plans), have **not** been included:
  - The Allbrook/Bishopstoke/Fair-Oak housing development and associated road construction and operation.
  - The proposed industrial/commercial development of land to the north east of the airport.
  - The Chickenhall Road link.



2. Furthermore future tunnelling under the runway (and subsequent maintenance such as ongoing water extraction) through contaminated land is likely to release at least some of these to the SAC. Whilst not necessarily related to NOx or Nitrogen deposition levels, the potential cumulative affects on the Southern Damselyfly of these contaminants needs to be assessed.

Please note that the HRA relies on Appendix 9.2 Ecological Context. Sections, 1.20, 1.21 and 1.22 refer to evaluating the scheme against Biodiversity Opportunity Areas. This is not up to date:

“Previously, the Hampshire Biodiversity Information Centre had developed and mapped Biodiversity Opportunity Areas (BOAs) as part of a regional project to identify those areas of strategic importance that offered the greatest opportunity for landscape-scale habitat management and restoration. These BOAs were produced in consultation with a great many stakeholders and utilised HBIC’s Habitat Suitability GIS model<sup>2</sup> in combination with data on existing habitats, site designations, geology and historic mapping. **However, it was agreed that BOAs were considered too broad-brush for defining ecological networks for use in planning at the local scale**, plus they excluded large parts of Hampshire. A much more precise delineation of an ecological network was required, whilst retaining BOAs as the “strategic ecological network” for landscape scale projects.” [HBIC ‘Mapping the Ecological Network’ 2018]. To summarise:

3. The ecological impact of the proposed development (particularly interaction and cumulative effects) has not been evaluated on the Local Ecological Network .

**The HRA assessment is therefore inadequate on at least three counts. Overall it fails to provide proof that the development in combination with other plans will not affect the integrity of this European nature conservation site (SAC). Without such evidence, the "presumption in favour of sustainable development does not apply". [National Planning Policy Framework - (NPPF) 2019]**

P. G. Narbed  
19.12.2019

Email and attachment

Please see attached. This is ridiculous and must be stopped.

Tony Goodwin

2 Dimond Hill

Eastleigh ref: F/19/86707

Southampton ref: 19/02021/CONSUL

# I am opposed to the expansion of our local airport on the following grounds:

## Noise

I live at 2 Dimond hill, and work in Barton Park Industrial estate. I am therefore under the flightpath, and boy local authorities. In both locations I am RIGHT under the flightpath and the noise and jet wash has increased hear on year. I have lived here more than 20 years. The extra length of the runway will OF COURSE open the way for

1. More planes
2. Bigger planes
3. More frequent planes
4. Longer operating hours

What is written specifically into the proposals to prevent each of these?

What penalties will be levied if the guarantees that these won happen are ignored, after the event?

How will local residents be compensated in a meaningful way for breaches?

I'm told that the planes should take the 'river route'. They don't. The line-up miles away for landing and every single one comes EXACTLY over my house. Can't they vary that a bit on a fine day? The take-offs, similarly far too frequently do NOT turn left or right soon enough. The noise is far to great, ruining my garden experience in the summer, and making me keep the windows closed. Extra glazing won't help that, but I wold like free triple glazing throughout mitigate these new plans if they go ahead. I am, as I said RIGHT UNDER the flight path at the top of the hill and they come over at 100-200 feet. Come and see me if you don't believe it.

Where is the path and height of every flight logged? Is it public? Who is the watchdog that checks they are complying? What are the penalties if they don't?

At work (like at home) we have to just stop talking during meetings on the phone and conference calls as the plan comes over. My place of work should also have comprehensive sound insulation offered.

I understand this is but the start of a grand airport expansion plan to take the numbers many fold more than today, and this will take place over several years more. Where is the compensation for the depression in house value caused by the noise footprint? We knew we lived by an airport when we purchased, yes, but not that it would expand in this way.

## Safety

Years ago I got a letter telling me I am in the footprint and that I can't extend my house in a way as to add residents here. This was on Safety grounds.

How on earth can that be valid, now that the proposal is to have more and more people and flights going over my house? I would like this rule rescinded – if the expansion goes ahead – how can it make sense that I am financially blighted, while the airport and the local authorities cash in?

If it's safe for the airport, it's safe for me.

Heavier planes coming over at 100-200 feet must surely be a bigger risk, as there will be a smaller margin for error. Surely heavier planes should be required to take a steeper approach angle – after all the runway will be longer.

If there was a single mistake, my house at the top of Diamond Hill and all my neighbours would be wiped out. For supporting the alleged 'need' for extra air travel? The case is absolutely NOT made for this – it's just a grab for business. We are told by the climate change conferences that air travel must REDUCE! Why are all the regional airports increasing size then? Where is this reduction going to come from?

We would be better sorting the roads and rail out, especially in this area. More traffic to the Airport is not needed – that's what the big airports are for, and are already designed to cope with. This expansion is fiddling at the edges of the infrastructure that is really needed if Southampton Airport is to become a real player. If not now, when?

## Removal of trees

There are beautiful trees that have caused NO THREAT to the airport for years. It makes no sense to say that they must all now be cut down now. If there was a risk before then it should have been managed before. Trees should be managed by maintenance, not felling. With the current polluting from the M27 and the airport, trees in close locations are vital to control pollution and noise. The airport should be planning many, many more, very close to the airport, and not cutting any down at all.

## Increase of vehicular movements around the airport affecting local roads.

The road system around the airport is a laughing stock. I have commuted around junction 5 for 20 years and all the attempts to improve as traffic increases have made things worse. Unless there is a root and branch rethink now, the problem is only going to worsen. We need flyovers, filter lanes, new bridges, underpasses, road straightening. It all needs to be paid for from the Airport – that's what will cause the problem. Has there been any traffic profiling? What does it say? It's not been published.

1. Left filter only top of Stoneham lane so that traffic leaving Southampton can join M27 west without being stuck behind traffic queuing for the airport. This should have been done years ago when each of the changes were made, who knows why it was omitted.
2. A27 flow is blocked at the Fleming. Recent rebuild has left flooding under the arch, and no help for people trying to join M27. Needs a rethink and a roundabout
3. Road by Montefiore Is a pinch point and this is a rat run to avoid item 1
4. The rail bridge by the airport is a death trap. Artics take the middle of the road, cyclists have nowhere to go, street lamps are in the pavement. It needs a complete redesign, and widening.
5. The road going up to Eastleigh needs the flow sorted out. When it sticks, the whole thing jams up. Priority to flow away from the airport is vital.
6. University playing fields are all very well, but what we need, again, is a sensible flow to get the traffic away from the M27 and into Eastleigh without having to go right past the airport and station and industrial estate and road past the old transit along with everything else. There has been no planning and it's a disaster.
7. Woodmill? Well don't even ask – it needs straightening, and a 2 way bridge
8. Time lost to getting around the M27 J5 Makes this part of the world a BAD place to work, and a bad place to live.

## Increase in pollution caused by aircraft and vehicle movements in an area where our air quality is already poor.

With all that above, the smog in the natural bowl that is Eastleigh will increase. I look out of my landing window in the summer at a brown haze which lasts for weeks on end in anticyclonic conditions. Its not just that there will be an increase, but that it will be multiplied by the lie of the land.

1. Who is going to pay the NHS for all the extra Asthma cases?
2. What about premature deaths from breathing difficulties
3. Lost days at work
4. Electric charging points would help – will the airport put in a realistic number? Not 10 or 20 but hundreds
5. What about charging points in the station car parks?

Email

I have just re-read and copied below the comments from Airport Expansion Opposition.

I find they reflect my point of view entirely but with much better back-up from research than I can supply. Please read this carefully with reference to your own claims.

My own comments:

As a mother of 3

- A resident of St Denys (under the flight path) and directly to be impacted by any increase in flights
- Someone very much concerned about our environment
- And who has learnt enough about the climate emergency to know that fossil fuels (e.g. Air and road transport) need to reduce drastically not increase
- And who suffers from asthma, so interested in clean air
- A member/leader of the Southampton Woodcraft Folk (supporting the children who are our future in social responsibility
- a devoted supporter of Marlhill Copse, threatened with major chopping of ancient woodland in order to allow lower take-off trajectories
- a real lover of the wilderness of exotic nature and biodiversity of Marlhill Copse that has developed there as a historic planting area
- a member of Mansbridge Community orchard (also under the flight path) which will be affected by increased traffic overhead.
- a resident of Priory rd that experiences the increasing levels of car traffic as static queues outside my house every day and as increased difficulty moving around the whole area, this will get worse with more traffic to and from the airport.

I very sincerely believe, and am sure you must agree, that this expansion plan comes at the worst possible time. Now is when we need to reduce and downscale our expectations. We are the generation that has a last chance to make these decisions.

I would urgently urge you to reconsider allowing the airport to expand its unnecessary and harmful traffic for my reasons above and for AXI's reasons below.

Louise Owen

278 Priory Rd, st Denys, Southampton SO172LS.

Re: [19/02021](#)/CONSUL Airport expansion planning application

Since almost all of the harm resulting from expansion is to be borne by residents of Southampton, mostly those living near the airport or under the flight path, we believe the City Council must scrutinise the economic case very closely to determine whether the benefits to the city are in proportion to the costs. We believe they are not. The Council also needs to scrutinise the environmental assessments of the dis-benefits to ensure they have been fully represented in the EIA. We believe they have not. In particular we wish to point out that the economic benefits are assessed on the assumption of 5m passengers per year but the transport assessment is based on only 3m.

ECONOMICS The claimed economic benefits are based on the 2017 report by Steer Davies Gleave (Appendix 6.1). The headline figure of cumulative £18.1bn by 2037 is based on Appendix 6.1, which states (5.8)

“The expansion of air services following the Masterplan is assumed to commence in 2019, at which point the baseline and vision scenarios diverge. A full Masterplan timetable is assumed to be in operation from 2022.”

This is patently not possible since the runway extension cannot be built before 2021. The key graph (Appendix 6.1 figure 5.3) shows a large step change in economic benefit between 2019 and 2022. The underlying passenger numbers on which this is based are not stated but since the top of the “step” takes the economic benefit far above the value for the “Future Baseline” 2037 value based on 3.3mppa this must reflect more passengers than that. The graph on p32 of the Surface Access Strategy <https://www.southamptonairport.com/media/4689/surface-access-strategy.pdf> has the same shape as figure 5.3 and indicates that the number of passengers in 2022 is assumed to be 3.7m This is simply not credible, firstly because the road network cannot take this number, and secondly because the ES claims that exceeding 3mppa is not possible without terminal building developments, which are unlikely by 2022.

Local economic benefit is unclear: It is not made clear exactly how much of the claimed financial benefit is local to the Solent area rather than UK wide. Employment due to the airport is divided into direct, indirect and induced jobs. 73% of the direct jobs are held by people who live within the Solent LEP area. The assessment of indirect jobs assumes these are created by non-wage spend (total £64m in 2015) by the airport and businesses based on site. It is stated (Appendix 6.1 para 4.6) that only 32% of airport non-wage spend is in the Solent area (see also figure 4.3 for details). Figures for the other businesses, which provide the majority of non-wage spend (ie £54m), are not given. But since para 4.8 states that this was dominated by Flybe, most of whose spend was aircraft-related, it is unlikely that much was local. Appendix 6.1 para 4.6 states that approximately 50% of the airport’s non wage expenditure was on “manufacturing and construction”. (See also figure 4.2, which shows that only half of that spend is local.) Aside from construction work (estimated to last 34 weeks) that would result from the planning application being approved, it is hard to imagine that such a level of expenditure on construction will be maintained.

Induced effects not primarily local: Induced jobs are obtained by using a multiplier (25%) of the direct and indirect jobs. Appendix 6.1 states (4.11):

“Since a majority of employees at the airport campus are resident within the study area (73%), a significant proportion of induced impacts will be experienced within the immediate vicinity of Southampton Airport.”

This is a false assumption because induced jobs are assumed to be 25% of the direct plus indirect jobs – and as previously stated the indirect jobs come from non-wage expenditure, of which local spend is only 32% or less. So the maximum number of local induced jobs must be 25% x [73% x direct jobs plus 32% x indirect jobs]. We estimate on this basis that the total number of current jobs local to Solent LEP (direct, indirect and induced) is only 1387 of the total 2900 jobs.

Future scenario assumptions are flawed :We also challenge the assumptions on which the future scenarios are based. For the “Future Baseline” scenario, Appendix 6.1 states (5.4) “Economic activity is assumed to grow proportionately with terminal passenger throughput. For direct impacts, this assumes that there is no increase or decrease in the level of efficiency at the airport through time.”

This seems unlikely as all employers constantly work to increase efficiency, and there will always be economies of scale. The method for estimating extra economic benefit in the “Future Vision” scenario is not stated, but the resulting numbers (para 5.7) suggest that the same assumption has been made.

ES chapter 6 (p24, table 6.5) gives the number of additional jobs predicted under the future scenarios:

Scenario	Direct jobs	Indirect jobs	Induced jobs	Total
Future baseline	100	200	100	400
Future vision	500	650	350	1500

Based on the same analysis that we used above for current jobs, we estimate the number of these additional jobs that are local to Solent LEP would be:

Scenario	Direct local	Indirect local	Induced local	Total local jobs
Future baseline	73	64	34	171
Future vision	365	208	143	716

This is not a large number of jobs given the land area occupied by the airport. (For comparison, on a much smaller footprint the old Ford site directly employed 4000 local people and the Mountpark site that has replaced it is predicted to employ 1500.) We would also like to point out that previous promises of extra jobs have failed to materialise. The Airport’s 2006 Masterplan promised an additional 537 jobs on top of the existing 1004 by 2015. In fact there were only 950, a net loss of 54.

Most passengers are outbound: The majority of passengers live in the Solent area, and according to the airport's 2019 Masterplan 78% of flights begin as outbound flights by UK residents rather than by people from outside the region travelling in. ES Appendix 6.1 claims (1.9) that this is important because

“The economic benefits of air travel (particularly for those travelling in the course of business) are largely experienced where the trip itself originated”.

While this is indeed probably true for business travel, we do not believe it is true of non-business travel, where (apart from purchases made at the airport prior to departure) expenditure would generally be in the destination country. Therefore for non-business travel only 22% of passengers are likely to contribute to our local economy through, for example, tourism. The 2006 Masterplan reported that business accounted for 39% of trips, but the latest Masterplan quotes only 29%. Even for business travellers, as airline costs rise (which they must, if any form of carbon-offsetting or carbon credits is introduced), use of other methods such as virtual meetings may become more common.

Demand may not rise as predicted: ES (chapter 8) states that the expansion plans are a response to rising demand. The 2006 Masterplan stated that 2005 passenger numbers were 1.84m a year, and it forecast 3m in 2015 and 6 million in 2030.

[https://southamptonairport.com/media/1051/Southampton\\_masterplan\\_final.pdf](https://southamptonairport.com/media/1051/Southampton_masterplan_final.pdf)

The DFT forecast for current Southampton passengers was 2.66m but the actual figure is 2m. There is no evidence in the data presented that passenger numbers are rising – in fact they have fallen recently. Also ES chapter 6 (paras 6.2.40 and 6.6.20) admits that passenger growth may be optimistic as no account has been taken of Brexit effects nor of the potential development of a third Heathrow runway.

It is more likely that the intention is to stimulate demand by increasing capacity. Even this may be optimistic given recent airline bankruptcies. Flybe has even stated its intention to withdraw from routes that are better served by rail. The Committee on Climate Change has said that we cannot achieve carbon neutrality without restraining aviation, which by 2050 will be the single largest emitting sector in the UK. Leisure trips are far more likely to be sensitive to increases in price or perceptions that flying is environmentally harmful (eg “flight-shaming”).

Economic harm not considered: Finally, the economic assessment contains no reference at all to any dis-benefits such as reductions in price of homes under the flight path. This is important because under the proposed development over 10800 households (25200 people) will be exposed above 54dB LAEQ, 16 hour (ES chapter 11, table 11.3).

## TRAFFIC

Alone among the EIAs the Transport assessment is based upon 3m passengers per year. All others – including, crucially, the economic impact assessment – are based upon 5m in order to “assess effects associated with 2037 actual (brought forward to 2027) as a theoretical consequence of the proposed development” (ES Chapter 3, 3.1.4). The Transport scoping report (reproduced in Appendix 8.1 p 65 Appendix A para 3.7.2) promised:

“The scenarios assessed will include the following: Scenario 1: 2019 Baseline Year (assuming 2m passengers), Scenario 2: 2020 Construction ... Scenario 3: 2027 Future Year (assuming 5 million passengers to reflect predicted 2037 activity)” (our emphasis).

However the current Transport assessment does not deliver this. ES chapter 5 says (5.4.34)

“The EIA assesses the Proposed Development based upon the following scenarios: ...

Baseline + Operation of the Proposed Development with 3 million passengers per annum landside and 5 million passengers per annum airside (based upon predicted 2037 Airport



activity set out in the SIA Master Plan)...” (our emphasis)

Since it is not credible that 2 million passengers per year can pass through Southampton airport (“airside”) without either embarking or disembarking (“landside”) at Southampton, it is hard to escape the conclusion that these numbers have been chosen because the assessment would otherwise have shown significant impacts on the road network. But basing the transport assessment on 3mppa means that the ES has only studied the impact of the number of passengers estimated by the economic impact assessment (chapter 6) to occur by 2037 without the proposed development taking place!

Modelling assumptions may not occur: The modelling assumptions “Do something (DS3)” are initially based on the DfT Aviation forecast (2013) of 2.66mppa. The modelling scenarios include not only planned highway improvements, but also additional highway mitigation improvements (5.2.13) and improvements to bus services (5.2.14). It is not clear how/whether these improvements will take place, especially since the bus services are run by independent companies and the ES notes (7.6.17) that “investment will be required by rail and bus operators”. Should such investment not be forthcoming, further modal shift away from cars may not take place, and without the infrastructure improvements the figures given in the detailed tables are likely to show bigger changes with the proposed development. Given that four of the studied junctions are already over capacity the claim that airport expansion has little impact must be questioned.

Individual junction issues downplayed: The overall summary of junction modelling ignores some of the individual results, for example (table 7.5) mean queue lengths at the A335 arm of the M27 J5 signalized junction double from 5 to 9 (am peak) and (table 7.6) mean delays (am peak) at the Wide Lane/Bassett Green Rd/Stoneham way signalised junction increase from 172 to 202sec (12% increase). If delays worsen at these over-capacity junctions it is possible drivers will start to use other routes, increasing delays on other approach roads. There is no evidence that the modelling takes account of this.

Assessment does not correctly model “Do Minimum” road usage: Because the proportion of people currently arriving by public transport is higher in reality than the SRTM model used assumes, ES chapter 8 concludes (8.2.28) that modelling undertaken for the “Do something” scenario at 2.66mppa can be taken to reflect results for 3mppa because this better matches the actual number of arrivals by road. This is then compared with the model run for 2mppa to reflect the “Do Minimum” situation where the runway extension does not take place. However for the same reason, modelling 2mppa actually reflects actual results for a higher number of passengers – therefore this is not a true comparison with the actual number of road vehicles expected under “Do Minimum” scenario and underplays the impact of 3mppa.

In summary, ES chapter 8 has neither assessed the impact of the number of passengers anticipated by the airport’s Masterplan “vision” nor demonstrated that there will not be major impacts on the local road network.

## NOISE

ES chapter 11 assesses the impact of aircraft noise in relation to threshold of 57dB, “above which is the onset of “communities becoming significantly annoyed by aircraft noise” (as identified in the Aviation Policy Framework 1982) and 54dB (government survey, 2004).

Large numbers of Southampton residents adversely affected: Already noise affects 3100 people above 57dB LAEQ, 16 hour and 9000 54dB. These numbers are expected to rise significantly to 8,800 and 18,700 respectively by 2021 and 11,900 and 25,200 by 2037 (ES chapter 11, table 11.13). Although most of the rise in number is due to population growth the conclusion of chapter 15 (15.6.8) that this is an increase of only 1.4% in the proportion of residents affected should not be used to obscure the fact that very large numbers of people will be exposed to noise. In addition the number of people exposed above 63dB (currently zero) will be 350 by 2021 and 1550 by 2037 – when there will even be 50 households exposed above 66dB. The airport proposes to offer noise insulation to these latter groups, but this will only help if they wish to stay in their homes with windows closed!

WHO recommendations ignored: The World Health Organisation has found adverse health impacts, especially on children, at aircraft noise levels above 45dB and recommends noise is kept below these levels. 57dB is more than twice as loud as the 45dB recommendation and 66dB is more than four times as loud. ES chapter 15 discusses human health impacts, but simply ignores the WHO evidence on the grounds that “These are recommendations rather than requirements and therefore not used in this assessment.” (15.2.17). While this distinction is clearly relevant to statutory requirements placed upon the airport, it is not grounds for ignoring findings in terms of health impacts, and undermines the conclusion of chapter 11 that noise impacts are not significant. No figures are given for the number of people affected at above 45dB but clearly it will be much larger than the 25200 to be exposed at 54dB. The impact on those experiencing noise under the flight path is dismissed (chapter 16 para 16.1.14) in comparison with the socio-economic benefits

“... the socio-economic impacts are beneficial in nature and may serve to reduce the negative effects experienced as a result of other impacts. For example, the sensitivity of occupiers in nearby properties experiencing noise impacts may reduce (ie they become more tolerant of environmental noise) in the context of the socio-economic benefits that the proposed development will bring.”

This seems to demand an unrealistic degree of altruism from many thousands of people, few of whom will personally experience these socio-economic benefits. Especially since ES chapter 15 finds (15.6.7) “...the economic effects of the Proposed Development are deemed to be of neutral significance” in the context of human health and (15.6.4) “the magnitude of personal circumstances impacts from the Proposed Development is considered to be negligible.”

## CLIMATE

Southampton City Council was among the first to declare a climate emergency and its response to this proposed development is the first opportunity for the Council to show that it intends to put its words into action.

The ES estimates (chapter 13, 13.6.6) that there will be an average annual increase of 350,000t carbon emissions during the operational phase. For comparison, according to BEIS homes and industry in the entire City of Southampton (excluding the port) emitted 534,000t CO2 in 2017 (<https://data.gov.uk/dataset/723c243d-2f1a-4d27-8b61-cdb93e5b10ff/emissions-of-carbon-dioxide-for-local-authority-areas>). Efforts to reduce Southampton’s carbon emissions as part of the Green City Charter will be undermined by all these extra emissions resulting from the expansion of the airport, a Charter signatory.

Mitigation is not possible: There is no effective mitigation for the GHG emissions associated with the operational phase of the development. Mitigation is confined to the (already negligible) construction phase and to the airport’s own operations. The ES (13.9.2) states its

intention to:

“Ensure that the airport’s direct operations become carbon neutral by 2030. Over the project reference lifespan, this is expected to lead to a saving of approximately 65,000 tCO<sub>2</sub>e.”

This is just 0.15% of the additional operational emissions, which ES 13.6.6 estimates as totalling 42,005,000 tCO<sub>2</sub>e over the reference lifetime (average 350,000tCO<sub>2</sub>e).

The ES discusses the impacts of CORSIA, concluding (13.9.4):

“CORSIA is not yet operational, it’s [sic] mechanisms to reduce emissions are uncertain, and its operation isn’t within the control of Southampton International airport.”

Electric planes will only ever be able to replace the smaller aircraft, not the larger jets the runway extension aims to attract, and carbon offsetting projects simply cannot be scaled up to offset all our current flights, let alone more. No airport expansion should take place until such time as genuine mitigation for all these emissions is shown to be feasible. The claim (reference as above) that the presence of a larger local airport will reduce carbon emissions from people driving to other airports is specious, comparing as it does two unsustainable methods of transport and ignoring the possibility of people using public transport or electric vehicles – or even (in the case of many European destinations) travelling to the destination entirely by rail.

ES chapter 13.13.2 states that the extra 350000t CO<sub>2</sub> emissions is “moderate negative” but ES Summary (chapter 5) assesses the impact of greenhouse gas emissions to be “substantial” and negative. In Chapter 5 table 5.5 “substantial” is defined as being “generally associated with sites and features of national importance”. Given this, and in the context of climate emergency, airport planning decisions should be part of an overall strategy and not decided on a case-by-case by the local authority in which the airport happens to be sited. As already stated, the Committee on Climate Change has said that we cannot achieve carbon neutrality without restraining aviation.

Error in emissions data: We would also like to point out that the emissions table (table 13.3) states that road traffic contributes 766 ktCO<sub>2</sub>/year to airport-related emissions, more than half the 1238kt total and more than twice the total emissions due to road transport within Eastleigh Borough itself (289.5kt, table 13.4). No comment is made about this extraordinarily large figure and it is probably an error. That it has gone unnoticed rather undermines credibility of the assessment.

## ECOLOGY

Should the development go ahead, the Chickenhall Lane link road to the proposed industrial park would need to be tunnelled under the extended runway. The knock-on effects of this should be considered, specifically the fact that due to the high water table, water will have to be pumped from the tunnel during both construction and use. The River Itchen is the obvious place for disposal of this water. This is seriously problematic given that, being an old railway works site, this water is highly likely to contain contaminants such as asbestos, arsenic and heavy metals. Should this water enter the river it would feed into a site of Special Scientific Interest (SSSI) and the breeding grounds of the Southern Damsel Fly – a protected species than could not be relocated.

ES chapter 9 says (9.6.40)

“The traffic modelling predicts that more than 50 AADT 24 hour traffic change as a result of the Proposed Development alone will occur on roads within 200m of the R. Itchen SAC... Therefore the potential for likely significant effects as a result of the pollution from traffic being added to aircraft pollution... cannot be ruled out.”

Similar comments are made about NO<sub>x</sub> concentrations (9.6.41) and nitrogen deposition

(9.6.42). we have already discussed the likelihood that the transport assessment on which these calculations are based underestimates the impact of the proposed development.

### AIR QUALITY

ES chapter 7 says (7.5.23) “The contribution to the total impact resulting from changes to traffic flows is less than that from airport emissions and at all locations. This reflects the fact that the traffic generation due to the proposed development is relatively low ... and, with the exception of receptors on Wide Lane to the south of the Airport, the impacts from traffic generation are imperceptible in magnitude.” (our emphasis).

We have already criticised the assessment of traffic for modelling for under-reporting the effects of the proposed development. Therefore the impact on Wide Lane is likely to be worse than claimed.

Airport expansion would undermine Southampton’s efforts to improve air quality: Southampton City Council’s Transport Policy team wrote in October 2018 as part of its comments on the airport Masterplan

<https://axosouthampton.files.wordpress.com/2019/12/southampton-airport-masterplan-consultation-scc-transport-policy-response-final-oct-2018.pdf> (page 5 para 2) :

“SCC is making significant effort to reduce emissions associated with road transport and this should not be viewed as an opportunity to generate further capacity for other sectors” (our emphasis).

Yet in contradiction of this, ES chapter 7 claims (7.5.16) that “... the increase in emissions from the Airport is more than offset by the reduction in emissions from other sources”

Aircraft NOx emissions: Finally, we would also like to point out that ES chapter 7 Table 7.15 shows an almost fourfold increase in total annual emissions from aircraft as a result of the proposed development (from 83.57 tonnes in 2018 to 320.96 tonnes by 2027).

**Re: 19/02021/CONSUL Airport expansion planning application**

Since almost all of the harm resulting from expansion is to be borne by residents of Southampton, mostly those living near the airport or under the flight path, we believe the City Council must scrutinise the economic case very closely to determine whether the benefits to the city are in proportion to the costs. We believe they are not. The Council also needs to scrutinise the environmental assessments of the dis-benefits to ensure they have been fully represented in the EIA. We believe they have not. In particular we wish to point out that the economic benefits are assessed on the assumption of 5m passengers per year but the transport assessment is based on only 3m.

**ECONOMICS**

The claimed economic benefits are based on the 2017 report by Steer Davies Gleave (Appendix 6.1). The headline figure of cumulative £18.1bn by 2037 is based on Appendix 6.1, which states (5.8)

*“The expansion of air services following the Masterplan is assumed to commence in 2019, at which point the baseline and vision scenarios diverge. A full Masterplan timetable is assumed to be in operation from 2022.”*

This is patently not possible since the runway extension cannot be built before 2021. The key graph (Appendix 6.1 figure 5.3) shows a large step change in economic benefit between 2019 and 2022. The underlying passenger numbers on which this is based are not stated but since the top of the “step” takes the economic benefit far above the value for the “Future Baseline” 2037 value based on 3.3mppa this must reflect more passengers than that. The graph on p32 of the Surface Access Strategy <https://www.southamptonairport.com/media/4689/surface-access-strategy.pdf> has the same shape as figure 5.3 and indicates that the number of passengers in 2022 is assumed to be 3.7m This is simply not credible, firstly because the road network cannot take this number, and secondly because the ES claims that exceeding 3mppa is not possible without terminal building developments, which are unlikely by 2022.

***Local economic benefit is unclear***

It is not made clear exactly how much of the claimed financial benefit is local to the Solent area rather than UK wide. Employment due to the airport is divided into direct, indirect and induced jobs. 73% of the direct jobs are held by people who live within the Solent LEP area. The assessment of indirect jobs assumes these are created by non-wage spend (total £64m in 2015) by the airport and businesses based on site. It is stated (Appendix 6.1 para 4.6) that only 32% of airport non-wage spend is in the Solent area (see also figure 4.3 for details). Figures for the other businesses, which provide the majority of non-wage spend (ie £54m), are not given. But since para 4.8 states that this was dominated by Flybe, most of whose spend was aircraft-related, it is unlikely that much was local. Appendix 6.1 para 4.6 states that approximately 50% of the airport’s non wage expenditure was on “manufacturing and construction”. (See also figure 4.2, which shows that only half of that spend is local.) Aside from construction work (estimated to last 34 weeks) that would result from the planning application being approved, it is hard to imagine that such a level of expenditure on construction will be maintained.

***Induced effects not primarily local***

Induced jobs are obtained by using a multiplier (25%) of the direct and indirect jobs. Appendix 6.1 states (4.11):

*“Since a majority of employees at the airport campus are resident within the study area (73%), a significant proportion of induced impacts will be experienced within the immediate vicinity of Southampton Airport.”*

This is a false assumption because induced jobs are assumed to be 25% of the direct plus indirect jobs – and as previously stated the indirect jobs come from non-wage expenditure, of which local spend is only 32% or less. So the maximum number of local induced jobs must be 25% x [73% x direct jobs plus 32% x

indirect jobs]. We estimate on this basis that the total number of current jobs local to Solent LEP (direct, indirect and induced) is only 1387 of the total 2900 jobs.

**Future scenario assumptions are flawed**

We also challenge the assumptions on which the future scenarios are based. For the “Future Baseline” scenario, Appendix 6.1 states (5.4)

*“Economic activity is assumed to grow proportionately with terminal passenger throughput. For direct impacts, this assumes that there is no increase or decrease in the level of efficiency at the airport through time.”*

This seems unlikely as all employers constantly work to increase efficiency, and there will always be economies of scale. The method for estimating extra economic benefit in the “Future Vision” scenario is not stated, but the resulting numbers (para 5.7) suggest that the same assumption has been made.

ES chapter 6 (p24, table 6.5) gives the number of additional jobs predicted under the future scenarios:

Scenario	Direct jobs	Indirect jobs	Induced jobs	Total
Future baseline	100	200	100	400
Future vision	500	650	350	1500

Based on the same analysis that we used above for current jobs, we estimate the number of these additional jobs that are local to Solent LEP would be:

Scenario	Direct local	Indirect local	Induced local	Total local jobs
Future baseline	73	64	34	171
Future vision	365	208	143	716

This is not a large number of jobs given the land area occupied by the airport. (For comparison, on a much smaller footprint the old Ford site directly employed 4000 local people and the Mountpark site that has replaced it is predicted to employ 1500.) We would also like to point out that previous promises of extra jobs have failed to materialise. The Airport’s 2006 Masterplan promised an additional 537 jobs on top of the existing 1004 by 2015. In fact there were only 950, a net loss of 54.

**Most passengers are outbound**

The majority of passengers live in the Solent area, and according to the airport’s 2019 Masterplan 78% of flights begin as outbound flights by UK residents rather than by people from outside the region travelling in. ES Appendix 6.1 claims (1.9) that this is important because

*“The economic benefits of air travel (particularly for those travelling in the course of business) are largely experienced where the trip itself originated”.*

While this is indeed probably true for business travel, we do not believe it is true of non-business travel, where (apart from purchases made at the airport prior to departure) expenditure would generally be in the destination country. Therefore for non-business travel only 22% of passengers are likely to contribute to our local economy through, for example, tourism. The 2006 Masterplan reported that business accounted for 39% of trips, but the latest Masterplan quotes only 29%. Even for business travellers, as airline costs rise (which they must, if any form of carbon-offsetting or carbon credits is introduced), use of other methods such as virtual meetings may become more common.

**Demand may not rise as predicted**

ES (chapter 8) states that the expansion plans are a response to rising demand. The 2006 Masterplan stated that 2005 passenger numbers were 1.84m a year, and it forecast 3m in 2015 and 6 million in 2030. [https://southamptonairport.com/media/1051/Southampton\\_masterplan\\_final.pdf](https://southamptonairport.com/media/1051/Southampton_masterplan_final.pdf)

The DFT forecast for current Southampton passengers was 2.66m but the actual figure is 2m. There is no evidence in the data presented that passenger numbers are rising – in fact they have fallen recently. Also ES chapter 6 (paras 6.2.40 and 6.6.20) admits that passenger growth may be optimistic as no account has been taken of Brexit effects nor of the potential development of a third Heathrow runway.

It is more likely that the intention is to stimulate demand by increasing capacity. Even this may be optimistic given recent airline bankruptcies. Flybe has even stated its intention to withdraw from routes that are better served by rail. The Committee on Climate Change has said that we cannot achieve carbon neutrality without restraining aviation, which by 2050 will be the single largest emitting sector in the UK. Leisure trips are far more likely to be sensitive to increases in price or perceptions that flying is environmentally harmful (eg “flight-shaming”).

### ***Economic harm not considered***

Finally, the economic assessment contains no reference at all to any dis-benefits such as reductions in price of homes under the flight path. This is important because under the proposed development over 10800 households (25200 people) will be exposed above 54dB  $L_{Aeq,16\text{ hour}}$  (ES chapter 11, table 11.3).

### **TRAFFIC**

Alone among the EIAs the Transport assessment is based upon 3m passengers per year. All others – including, crucially, the economic impact assessment – are based upon 5m in order to “*assess effects associated with 2037 actual (brought forward to 2027) as a theoretical consequence of the proposed development*” (ES Chapter 3, 3.1.4). The Transport scoping report (reproduced in Appendix 8.1 p 65 Appendix A para 3.7.2) promised:

*“The scenarios assessed will include the following: Scenario 1: 2019 Baseline Year (assuming 2m passengers), Scenario 2: 2020 Construction ... Scenario 3: 2027 Future Year (assuming 5 million passengers to reflect predicted 2037 activity)”* (our emphasis).

However the current Transport assessment does not deliver this. ES chapter 5 says (5.4.34)

*“The EIA assesses the Proposed Development based upon the following scenarios:  
... Baseline + Operation of the Proposed Development with 3 million passengers per annum landside and 5 million passengers per annum airside (based upon predicted 2037 Airport activity set out in the SIA Master Plan)...”* (our emphasis)

Since it is not credible that 2 million passengers per year can pass through Southampton airport (“airside”) without either embarking or disembarking (“landside”) at Southampton, it is hard to escape the conclusion that these numbers have been chosen because the assessment would otherwise have shown significant impacts on the road network. But basing the transport assessment on 3mppa means that the ES has only studied the impact of the number of passengers estimated by the economic impact assessment (chapter 6) to occur by 2037 without the proposed development taking place!

### ***Modelling assumptions may not occur***

The modelling assumptions “Do something (DS3)” are initially based on the DfT Aviation forecast (2013) of 2.66mppa. The modelling scenarios include not only planned highway improvements, but also additional highway mitigation improvements (5.2.13) and improvements to bus services (5.2.14). It is not clear how/whether these improvements will take place, especially since the bus services are run by independent companies and the ES notes (7.6.17) that “*investment will be required by rail and bus operators*”. Should such investment not be forthcoming, further modal shift away from cars may not take place, and without the infrastructure improvements the figures given in the detailed tables are likely to show bigger changes with the proposed development. Given that four of the studied junctions are already over capacity the claim that airport expansion has little impact must be questioned.

### ***Individual junction issues downplayed***

The overall summary of junction modelling ignores some of the individual results, for example (table 7.5) mean queue lengths at the A335 arm of the M27 J5 signalized junction double from 5 to 9 (am peak) and (table 7.6) mean delays (am peak) at the Wide Lane/Bassett Green Rd/Stoneham way signalised junction increase from 172 to 202sec (12% increase). If delays worsen at these over-capacity junctions it is possible drivers will start to use other routes, increasing delays on other approach roads. There is no evidence that the modelling takes account of this.

### ***Assessment does not correctly model “Do Minimum” road usage***

Because the proportion of people currently arriving by public transport is higher in reality than the SRTM

model used assumes, ES chapter 8 concludes (8.2.28) that modelling undertaken for the “Do something” scenario at 2.66mppa can be taken to reflect results for 3mppa because this better matches the actual number of arrivals by road. This is then compared with the model run for 2mppa to reflect the “Do Minimum” situation where the runway extension does not take place. However for the same reason, modelling 2mppa actually reflects actual results for a higher number of passengers – therefore this is not a true comparison with the actual number of road vehicles expected under “Do Minimum” scenario and underplays the impact of 3mppa.

In summary, ES chapter 8 has neither assessed the impact of the number of passengers anticipated by the airport’s Masterplan “vision” nor demonstrated that there will not be major impacts on the local road network.

## **NOISE**

ES chapter 11 assesses the impact of aircraft noise in relation to threshold of 57dB, “above which is the onset of *“communities becoming significantly annoyed by aircraft noise”* (as identified in the Aviation Policy Framework 1982) and 54dB (government survey, 2004).

### ***Large numbers of Southampton residents adversely affected***

Already noise affects 3100 people above 57dB  $L_{Aeq,16\text{ hour}}$  and 9000 54dB. These numbers are expected to rise significantly to 8,800 and 18,700 respectively by 2021 and 11,900 and 25,200 by 2037 (ES chapter 11, table 11.13). Although most of the rise in number is due to population growth the conclusion of chapter 15 (15.6.8) that this is an increase of only 1.4% in the proportion of residents affected should not be used to obscure the fact that very large numbers of people will be exposed to noise. In addition the number of people exposed above 63dB (currently zero) will be 350 by 2021 and 1550 by 2037 – when there will even be 50 households exposed above 66dB. The airport proposes to offer noise insulation to these latter groups, but this will only help if they wish to stay in their homes with windows closed!

### ***WHO recommendations ignored***

The World Health Organisation has found adverse health impacts, especially on children, at aircraft noise levels above 45dB and recommends noise is kept below these levels. 57dB is more than twice as loud as the 45dB recommendation and 66dB is more than four times as loud. ES chapter 15 discusses human health impacts, but simply ignores the WHO evidence on the grounds that *“These are recommendations rather than requirements and therefore not used in this assessment.”* (15.2.17). While this distinction is clearly relevant to statutory requirements placed upon the airport, it is not grounds for ignoring findings in terms of health impacts, and undermines the conclusion of chapter 11 that noise impacts are not significant. No figures are given for the number of people affected at above 45dB but clearly it will be much larger than the 25200 to be exposed at 54dB.

The impact on those experiencing noise under the flight path is dismissed (chapter 16 para 16.1.14) in comparison with the socio-economic benefits

*“... the socio-economic impacts are beneficial in nature and may serve to reduce the negative effects experienced as a result of other impacts. For example, the sensitivity of occupiers in nearby properties experiencing noise impacts may reduce (ie they become more tolerant of environmental noise) in the context of the socio-economic benefits that the proposed development will bring.”*

This seems to demand an unrealistic degree of altruism from many thousands of people, few of whom will personally experience these socio-economic benefits. Especially since ES chapter 15 finds (15.6.7) *“...the economic effects of the Proposed Development are deemed to be of neutral significance”* in the context of human health and (15.6.4) *“the magnitude of personal circumstances impacts from the Proposed Development is considered to be negligible.”*

## **CLIMATE**

Southampton City Council was among the first to declare a climate emergency and its response to this proposed development is the first opportunity for the Council to show that it intends to put its words into action.



The ES estimates (chapter 13, 13.6.6) that there will be an average annual increase of 350,000t carbon emissions during the operational phase. For comparison, according to BEIS homes and industry in the entire City of Southampton (excluding the port) emitted 534,000t CO<sub>2</sub> in 2017 (<https://data.gov.uk/dataset/723c243d-2f1a-4d27-8b61-cdb93e5b10ff/emissions-of-carbon-dioxide-for-local-authority-areas>). Efforts to reduce Southampton's carbon emissions as part of the Green City Charter will be undermined by all these extra emissions resulting from the expansion of the airport, a Charter signatory.

### **Mitigation is not possible**

There is no effective mitigation for the GHG emissions associated with the operational phase of the development. Mitigation is confined to the (already negligible) construction phase and to the airport's own operations. The ES (13.9.2) states its intention to:

*“Ensure that the airport's direct operations become carbon neutral by 2030. Over the project reference lifespan, this is expected to lead to a saving of approximately 65,000 tCO<sub>2</sub>e.”*

This is just 0.15% of the additional operational emissions, which ES 13.6.6 estimates as totalling 42,005,000 tCO<sub>2</sub>e over the reference lifetime (average 350,000tCO<sub>2</sub>e).

The ES discusses the impacts of CORSIA, concluding (13.9.4):

*“CORSIA is not yet operational, it's [sic] mechanisms to reduce emissions are uncertain, and its operation isn't within the control of Southampton International airport.”*

Electric planes will only ever be able to replace the smaller aircraft, not the larger jets the runway extension aims to attract, and carbon offsetting projects simply cannot be scaled up to offset all our current flights, let alone more. No airport expansion should take place until such time as genuine mitigation for all these emissions is shown to be feasible. The claim (reference as above) that the presence of a larger local airport will reduce carbon emissions from people driving to other airports is specious, comparing as it does two unsustainable methods of transport and ignoring the possibility of people using public transport or electric vehicles – or even (in the case of many European destinations) travelling to the destination entirely by rail.

ES chapter 13.13.2 states that the extra 350000t CO<sub>2</sub> emissions is “moderate negative” but ES Summary (chapter 5) assesses the impact of greenhouse gas emissions to be “substantial” and negative. In Chapter 5 table 5.5 “substantial” is defined as being “generally associated with sites and features of national importance”. Given this, and in the context of climate emergency, airport planning decisions should be part of an overall strategy and not decided on a case-by-case by the local authority in which the airport happens to be sited. As already stated, the Committee on Climate Change has said that we cannot achieve carbon neutrality without restraining aviation.

### **Error in emissions data**

We would also like to point out that the emissions table (table 13.3) states that road traffic contributes 766ktCO<sub>2</sub>/year to airport-related emissions, more than half the 1238kt total and more than twice the total emissions due to road transport within Eastleigh Borough itself (289.5kt, table 13.4). No comment is made about this extraordinarily large figure and it is probably an error. That it has gone unnoticed rather undermines credibility of the assessment.

### **ECOLOGY**

Should the development go ahead, the Chickenhall Lane link road to the proposed industrial park would need to be tunnelled under the extended runway. The knock-on effects of this should be considered, specifically the fact that due to the high water table, water will have to be pumped from the tunnel during both construction and use. The River Itchen is the obvious place for disposal of this water. This is seriously problematic given that, being an old railway works site, this water is highly likely to contain contaminants such as asbestos, arsenic and heavy metals. Should this water enter the river it would feed into a site of Special Scientific Interest (SSSI) and the breeding grounds of the Southern Damsel Fly - a protected species than could not be relocated.

*“The traffic modelling predicts that more than 50 AADT 24 hour traffic change as a result of the Proposed Development alone will occur on roads within 200m of the R. Itchen SAC... Therefore the potential for likely significant effects as a result of the pollution from traffic being added to aircraft pollution... cannot be ruled out.”*

Similar comments are made about NO<sub>x</sub> concentrations (9.6.41) and nitrogen deposition (9.6.42). we have already discussed the likelihood that the transport assessment on which these calculations are based underestimates the impact of the proposed development.

### **AIR QUALITY**

ES chapter 7 says (7.5.23)

*“The contribution to the total impact resulting from changes to traffic flows is less than that from airport emissions and at all locations. This reflects the fact that the traffic generation due to the proposed development is relatively low ... and, with the exception of receptors on Wide Lane to the south of the Airport, the impacts from traffic generation are imperceptible in magnitude.” (our emphasis).*

We have already criticised the assessment of traffic for modelling for under-reporting the effects of the proposed development. Therefore the impact on Wide Lane is likely to be worse than claimed.

### ***Airport expansion would undermine Southampton’s efforts to improve air quality***

Southampton City Council’s Transport Policy team wrote in October 2018 as part of its comments on the airport Masterplan <https://axosouthampton.files.wordpress.com/2019/12/southampton-airport-masterplan-consultation-scc-transport-policy-response-final-oct-2018.pdf> (page 5 para 2) :

*“SCC is making significant effort to reduce emissions associated with road transport and this should not be viewed as an opportunity to generate further capacity for other sectors” (our emphasis).*

Yet in contradiction of this, ES chapter 7 claims (7.5.16) that “... the increase in emissions from the Airport is more than offset by the reduction in emissions from other sources”

### ***Aircraft NO<sub>x</sub> emissions***

Finally, we would also like to point out that ES chapter 7 Table 7.15 shows an almost fourfold increase in total annual emissions from aircraft as a result of the proposed development (from 83.57 tonnes in 2018 to 320.96 tonnes by 2027).

We hope you will consider the above points and recommend that Southampton Council objects to the planning application.

Email

Dear Sir/ Madam

I writing this to object to the proposed airport expansion at Southampton Airport. I am a resident of Southampton and have several concerns. I have concerns of increased noise from increased flights, increased congestion on travel to and from the airport and most importantly the pollution factor as a result of increased number of flights.

We are in the middle of a climate emergency and I do not think that increased Southampton's air pollution in this way is sustainable or sensible.

Please desist

Yours Sincerely,

Katie Jay

Southampton Resident and healthcare professional at Southampton Hospital

Email

Dear Sir/Madam

Re: 19/02021/CONSUL Airport expansion

**I object to plans to expansion of Southampton (Eastleigh) Airport**

- As someone who lives in Bitterne Park, my family, neighbours and I already experience high levels of noise pollution, which interfere with daily life, causing stress and sleep disruption at both ends of the day. The proposed expansion would bring increased noise for those of us under the flight path. At present over 5600 local people experience noise levels of 55dB and above – this is twice the loudness of 45dB recommended by the World Health Organisation. The number of people affected will increase with airport expansion.
- The expansion would lead to increased traffic generation with associated congestion and air pollution as well as air pollution from the flights themselves. The motorways in and out of Southampton currently struggle to carry traffic at peak times of day and during special events. The airport makes some very optimistic assumptions about its ability to increase use of public transport as a means of getting to the airport. In reality, rail cannot take much increase so it is likely the majority of traffic arriving at the airport will be on our already congested roads. The policy of Eastleigh BC to prioritise the Chickenhall Road link and effectively dismiss the 'Eastleigh Railway Chord' [to link the airport to Portsmouth and the East with greater ease] makes a mockery of the airport MD's advertising of its rail links.
- I write this objection against a background of tragic world news and national concern over flooding, arising out of the dire impact of climate change. Eastleigh Borough Council has declared a climate and environmental emergency. Airport expansion will lead to increased carbon dioxide emissions and is simply incompatible with addressing this climate emergency. The Airport's own estimate is that carbon emissions will rise on average by 350,000 tonnes per year. For comparison, homes, industry and road traffic in the entire Borough of Eastleigh is responsible for 610,000t 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 (already small) carbon emissions during the construction phase and for its own operations (current plans are for only 6,000 tonne reduction).
- This expansion could cause serious damage to the local environment with no gains to the local community. Aviation expansion is a national issue, as we have a climate emergency. Airport expansion therefore needs to be considered on a regional/national level rather than at local level for example, expansion of Heathrow would draw custom away from regional airports, and the impact of expansion at other regional airports will impact on passenger flows through Southampton Airport. These decisions should not be made locally on a case by case basis by the local authority that each airport happens to be located in, but should be decided nationally. There has already been a reduction to the planned number of flights out of Southampton for 2020, making it hard to see why greater capacity is required.
- Decision on this application should be delayed until after the Airspace Change consultation process is completed, as this may change significantly the impact on residents under or near the flight path.
- Neil Garwood (airport MD) has stated that only 2% of CO2 emissions were due to aviation. This is an absolute minimum figure that applies to global emissions. The UK government itself acknowledges that the current UK aviation emissions are 7% and set to go to 25% by 2050 – when aviation CO2 emissions are likely to be the single greatest offender in the UK. You should know this, because it has been reported extensively on the BBC – as have the recommendations by Lord Deben (the Chair of the Government Committee on Climate Change) that everyone's appetite for air travel should be curbed and that airport expansion needs to be curtailed.

- The economic benefits are overstated. The Airport promises 500 new jobs on the site, yet its last masterplan in 2006 promised an extra 541 jobs by 2015 – in fact there were 54 fewer. Its own figures show that nearly 80% of passengers are local people, so the effect on tourism from incoming visitors is limited. The percentage of flights taken for business has fallen. Moreover, in a time of climate emergency we should not be basing our economy on expansion of a sector that needs to be reduced.
- Section 13.11.2 (Chapter 13) predicts a saving of 65,000 tCO<sub>2</sub>e, due to Southampton International Airport becoming Carbon Neutral by 2030. However this is over the *lifetime of the project* [13.9.2] . Operational emissions are expected to be 42,005,000 tCO<sub>2</sub>e over the same reference lifespan [13.6.6]. This is a costs/benefits ratio of 646. The National Policy Planning Policy Framework (2019) make a “presumption in favour of *sustainable* development” (paragraph 11). A costs/benefits ratio of 646 is not remotely sustainable. Therefore Eastleigh BC should refuse the proposed development until it has positive proof that it is sustainable.

Please act on behalf of the citizens of Southampton in opposing these plans,

Thank you,

Mrs Ceinwen Curtis

Email

I object to the airport expansion. It's a climate emergency, our future is uncertain, we can't be burning more fossil fuels this has to stop.

Thank you.

Email

Dear Southampton City Council

I am writing to you to express my dismay about and objections to the airport's planning application to expand their runway by 164 metres.

My son attends Bitterne Park School, which is under the flight path, and his PE lessons are already repeatedly interrupted by loud planes overhead. The noise levels, and interruptions, would only increase with larger planes able to take off and land at the airport, with the longer runway. He is very likely to be taking PE at GCSE and therefore the lessons and interactions with staff and other pupils will be vital for his success in the subject.

In addition, the scientific evidence that the planet is warming too quickly, and that we all need to work together to reduce carbon emissions as soon as we can, to provide a safe place for our children and grandchildren to live in the future, is now overwhelming. Plane emissions contribute massively to global warming as well as local pollution. Now is not the time to expand the airport, but rather to provide alternative methods of transport and start changing people's attitudes to aeroplane travel generally.

The city council's declaration of a climate emergency and green charter are a great start, particularly the new cycle routes and commitment to carbon neutrality by 2030. We cannot endanger our children's futures further by expanding the airport, bringing more traffic and pollution. Please stick to this declaration you have made and oppose the expansion plans.

My Mother in law also lives under the flight path in Townhill Park, and the planes are already very loud. She suffers with bad asthma and has possible COPD. Air quality will be reduced if larger planes are flying over every day, which my Mother in law and other residents of our city do not need to be exposed to. The expansion of the airport in no way helps the thousands of Southampton residents who live under or near the flight path and are daily exposed to louder than acceptable noise levels and pollution. I don't see that airport passengers would spend their money or time in Southampton before or after their flights, as they are more likely to stay in Eastleigh for one night and then leave.

Therefore, I'm asking you to oppose the 164 metre extension as the City Council and recommend that Eastleigh Borough Council does not approve the planning application submitted by the Airport.

Your sincerely,

Wendy Waghorn (Mrs).

Email

I strongly object to the plan to extend the runway for the following reasons:

#### 1. Emissions – CO2

Extending the runway will enable a large increase in the number of flights. Although progress is being made in aircraft technology, most experts agree that this will nowhere near mitigate the increase in CO2 caused by the extra flights. Agreeing to the development counters government legislation to be carbon neutral by 2050. The development would also nullify all the measures being considered by local councils to address climate change.

#### 2. Emissions – local air quality

Aviation related activity has a serious adverse impact on local air quality and thus health of residents in Bitterne Park and surrounding areas. This is particularly pronounced on mornings with atmospheric pressure and little wind – the distinctive smell of aircraft emissions can be smelt before the first take-offs of the day. And no, it is not car traffic related – if you have any doubts I respectfully invite you to come and sample it yourselves.

#### 3. Noise

The development will allow heavier aircraft to operate more regularly from the airport. It will thus make longer range routes more economically viable to airlines and thus attract high intensity carriers such as EasyJet to establish a base of operations. Although progress is being made in reducing aircraft noise, no significant progress is expected in the near future, and none which would offset the additional disturbance caused by a large increase in flights. Also, the types of aircraft currently operating from the airport, but operating at maximum take-off weight will emit more noise than current operations. The impact on the health and learning of people exposed to this noise has been well documented.

#### 4. Economics

Airport masterplans, by their very nature are notoriously over-optimistic. They are not produced independently and objectively but rather with an agenda in mind designed ultimately to enhance the value of the airport to existing investors. Claims about the economic benefit to the region in terms of jobs etc. very rarely materialise. It must be made absolutely clear that the biggest beneficiaries of any development would be the current investors. Any planning decision which is based on such claims would be guilty of pandering to the private equity investment community.

Yours sincerely

Sandrine Péron



Email

> Hello,  
> In reference to the proposed airport expansion at Southampton Airport.  
>  
> I would like to object to the proposed expansion to the airport.  
> On a personal level I live under the flight path in Bitterne and am concerned about the noise levels as they are already over the limit, and they are very frequent.  
> On a wider basis - Eastleigh council has recently declared a climate emergency in light of the rising levels of CO2 and global warming, so this would be in direct opposition to that. The impact of the airport would be on local traffic and increased emissions from more flights. I think the environmental concerns outweigh the commercial benefits. I have read comments from the local campaign groups and from local university academics who oppose this and agree with their views.  
>  
> Best wishes,  
> Alice Raby  
>

Email

I wish to object to the proposed plans to extend the runway at Southampton airport ref 19/02021/CONSUL, We live on the flight path with planes coming in low creating huge noise and often a smell of fuel, also causing pollution. We have never complained about this as we knew it was on the flight path when we moved here 15 years ago. In that time air traffic has increased but we still put up with it. However we feel this expansion is a step too far both in terms of noise and pollution. Planes will surely be bigger, more noisy and more frequent causing more noise and more pollution in an already polluted city. There is no need to expand the airport other than sheer greed. It serves the region perfectly well as it is. Please take into account our views and those of many other residents when making your decision.

Thank you

Graham and Theresa Hiley

27, Cobbett Road

Bitterne park

Southampton SO18 1HJ

Email

Hi,

I am emailing to strongly object against Southampton Airports proposals to expand the runway. We are local residents of Bitterne Park and already have to endure the extreme intrusion of loud aircraft flying over our local community. I recently had the Airports Managing Director Neil Garwood visit our home and even he admitted that he would not wish for this for his family. However he lives in Winchester and so such proposals are unlikely.

Like most people living in Bitterne Park all we wish for is a decent quality of life which unfortunately is now under threat in the name of progress and greed. Please consider at least independent , unbiased information other than the Airports misinformation.

Kind regards,

Colin Carter and residents of Ash Tree Rd , Bitterne Park.

Email

Dear Sir/Madam,

Ref: 19/02021/CONSUL

The government has declared a climate emergency, Eastleigh Borough Council has declared a climate emergency, Southampton City council has a green charter. Airport expansion goes against this.

The Airport says that emissions will rise on average by 350.000 tonnes per year, we need to be cutting emissions, not adding to them, we are facing devastating impacts on our weather systems and planet.

As a local resident under the flight path, I am already woken by some aircraft, early morning or late evening, and have conversations regularly paused because of extremely noisy planes overhead. My daughter is at Bitterne Park school and one of the teachers said she regularly has to pause in class to let a plane pass before continuing. Presumably this is why the school has a library called a 'destination lounge'?

The noise also has health impacts as reported by the British Medical Journal:

<https://www.bmj.com/content/347/bmj.f5752> Where they state: The link seems real: planners take note Environmental noise is an understudied environmental pollutant that has important implications for public health and policy. Although studies of exposure to aircraft noise have examined the risk of hypertension,<sup>1</sup> few have examined the risk of cardiovascular disease.<sup>2</sup> One early study suggested that exposure to aircraft noise around Schiphol airport, Amsterdam, was related to medical treatment for heart disease and hypertension and the use of cardiovascular drugs after adjusting for age, sex, smoking, height and weight, and socioeconomic differences.<sup>3</sup> Two linked BMJ studies have investigated the association between cardiovascular disease and airport noise.<sup>4</sup> 5 The study by Hansell and colleagues (doi:10.1136/bmj.f5432) found an increased risk of stroke, coronary heart disease, and cardiovascular disease for both hospital admissions and mortality in relation to daytime and night-time exposure to aircraft noise in people living around Heathrow airport, London. The results were adjusted for area level ethnicity, social deprivation, lung cancer as a proxy for smoking, road traffic noise exposure, and air pollution. A dose-response association was seen between admissions to hospital for cardiovascular disease and the level of aircraft noise.

The traffic increase will have a serious impact on surrounding areas too, despite the airport saying that they're encouraging public transport use, they are still increasing parking by 600 spaces in the first phase. This will lead to more traffic on the roads, and more pollution from the cars as well as the flights. The link road that will need to tunnel under the runway will need to have water pumped out of it due to the high water table, and this would most likely be pumped into the river Itchen, where it is an old railway works site, there will be damaging contaminants which would then feed in

to a site of special scientific interest where the Southern Damsel Fly breeds, this is a protected species which could not be relocated.

The Airport has previously overestimated benefits to the local economy of the airport, they have overestimated the number of jobs made and also the amount of money brought into the economy, so it would be unsurprising if this was the case again. The gain to local people of jobs and money locally would be insignificant compared with the noise, pollution and health risks produced by living near the airport. Marhill Copse also needs protecting, there shouldn't be any tree felling to facilitate the airport expansion.

Hertfordshire County Council unanimously voted to oppose further expansion of Luton airport, I would urge Eastleigh and Southampton Councils to do the same. I strongly object to the airport expansion and I urge Southampton City Council to object too.

Regards

Rachel Hickman

Email

Southampton Planning Ref: 19/02021/CONSUL

Application Ref: F/19/86707

We live under the flight path for the airport and have no objection to the extension of the runway.

We would like our views noted on the appropriate paperwork thank you.

Mr/Mrs Holloway

2 Pinefield Road

Southampton

SO18 2GD

Email

Begin forwarded message:

> I am writing with reference to the Planning Application  
> 19/02021/CONSUL and I wish to register my objections I live underneath  
> the flight path and will be personally affected by any increase in  
> flight numbers However, my main objection is on environmental grounds.  
> Southampton City Council has declared a Climate Emergency and accepted  
> the consequent responsibilities. If it then supports an increase in  
> this hugely damaging form of transport, it must call into question  
> just how genuine that commitment is Please stand by the principles of  
> the declaration and refuse to facilitate any increase in air traffic  
> at Southampton airport Regards Denise Long  
> 2 Holyrood Ave  
> Southampton  
> SO17 1SH  
>

Email

As a local Councillor for the Blitterne Park Ward in Southampton, I am objecting on behalf of the residents who have contacted me on the following grounds:

1. Increase in noise pollution. Many residents both directly and indirectly under the flight path put up with significant intrusion into their lives from the noise of aircraft taking off and landing. Most have accepted this as a consequence of living near an airport but the proposals now put forward by the airport in this planning application will see a significant increase in the number of flights over the coming years. This will mean greater negative impact on local residents. There is also a concern that by increasing the load of existing planes (additional fuel and baggage) will mean an increase in the level of noise as more thrust would be required for the planes to take off. In summary, this will significantly impact on the lives of local residents who are already blighted by aircraft noise.

2. Air quality. The increase in flights over the coming years will lead to a reduction in air quality for local residents, both from the planes themselves and from vehicles taking passengers too and from the airport. At a time when Southampton's air quality is the subject of much debate, increasing this problem would be counter intuitive.

3. Climate change. Many residents have raised concerns that with climate change taking such a prominent position in today's world we should carefully consider increasing the amount of air travel is the correct choice.

Cllr David Fuller  
Blitterne Park Ward

David Fuller



Email

Ref 19/02021/CONSUL

*I ask the City Council to oppose this harmful development. We have a climate emergency.*

My reasons are below, thank you,

Dr A N Mackenzie

- Airport expansion needs to be considered on a regional/national level rather than at local level – expansion of Heathrow would draw custom away from regional airports, and the impact of expansion at other regional airports will impact on passenger flows through Southampton Airport
- The expansion would lead to increased traffic generation with associated congestion and air pollution as well as air pollution from the flights themselves. The airport makes some very optimistic assumptions about its ability to increase use of public transport as a means of getting to the airport. In reality, rail cannot take much increase so it is likely the majority of traffic arriving at the airport will be on our already congested roads. The policy of Eastleigh BC to prioritise the Chickenhall Road link and effectively dismiss the ‘Eastleigh Railway Chord’ [to link the airport to Portsmouth and the East with greater ease] makes a mockery of the airport MD’s advertising of its rail links.
- There will be increased noise for those under the flight path. At present over 5600 local people experience noise levels of 55dB and above – this is twice the loudness of 45dB recommended by the World Health Organisation. The number of people affected will increase with airport expansion.
- Decision on this application should be delayed until after the Airspace Change consultation process is completed, as this may change significantly the impact on residents under or near the flight path.
- Eastleigh Borough Council has declared a climate and environmental emergency. Airport expansion will lead to increased carbon dioxide emissions and is simply incompatible with addressing this climate emergency. The Airport’s own estimate is that carbon emissions will rise on average by 350,000 tonnes per year. For comparison, homes, industry and road traffic in the entire Borough of Eastleigh is responsible for 610,000t 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 (already small) carbon emissions during the construction phase and for its own operations (current plans are for only 6,000 tonne reduction).
- Neil Garwood (airport MD) has stated that only 2% of CO2 emissions were due to aviation. This is an absolute **minimum** figure that applies to **global** emissions. The UK government itself acknowledges that the current **UK** aviation emissions are 7% and set to go to 25% by 2050 – when aviation CO2 emissions are likely to be the single **greatest** offender in the UK. You should know this, because it has been reported extensively on the BBC – as have the recommendations by Lord Deben (the Chair of the Government Committee on Climate Change) that everyone’s appetite for air travel should be curbed and that airport expansion needs to be curtailed.
- The expansion would lead to increased traffic generation with associated congestion and air pollution as well as air pollution from the flights themselves. The airport makes some very optimistic assumptions about its ability to increase use of public

transport as a means of getting to the airport. In reality, rail cannot take much increase so it is likely the majority of traffic arriving at the airport will be on our already congested roads. The policy of Eastleigh BC to prioritise the Chickenhall Road link and effectively dismiss the 'Eastleigh Railway Chord' [to link the airport to Portsmouth and the East with greater ease] makes a mockery of the airport MD's advertising of its rail links.

- The economic benefits are overstated. The Airport promises 500 new jobs on the site, yet its last masterplan in 2006 promised an extra 541 jobs by 2015 – in fact there were 54 fewer. Its own figures show that nearly 80% of passengers are local people, so the effect on tourism from incoming visitors is limited. The percentage of flights taken for business has fallen. Moreover, in a time of climate emergency we should not be basing our economy on expansion of a sector that needs to be reduced.
- Aviation expansion is a national issue, as we have a climate emergency. Airport expansion therefore needs to be considered on a regional/national level rather than at local level for example, expansion of Heathrow would draw custom away from regional airports, and the impact of expansion at other regional airports will impact on passenger flows through Southampton Airport. These decisions should not be made locally on a case by case basis by the local authority that each airport happens to be located in, but should be decided nationally.
- Section 13.11.2 (Chapter 13) predicts a saving of 65,000 tCO<sub>2</sub>e, due to Southampton International Airport becoming Carbon Neutral by 2030. However this is over the *lifetime of the project* [13.9.2] . Operational emissions are expected to be 42,005,000 tCO<sub>2</sub>e over the same reference lifespan [13.6.6]. This is a costs/benefits ratio of 646. The National Policy Planning Policy Framework (2019) make a “presumption in favour of *sustainable* development” (paragraph 11). A costs/benefits ratio of 646 is not remotely sustainable. Therefore Eastleigh BC should refuse the proposed development until it has positive proof that it is sustainable.

Email

**Ref 19/02021/CONSUL**

***I ask the City Council to oppose this harmful development. We have a climate emergency. Should we do nothing?***

One example of the airport's comments is:

Chapter 4 of the Environmental Statement (Consultation and Alternatives) threatens the locality with SIAL moving elsewhere [e.g. 4.3.6], but does not address the *benefits* of doing nothing, which “is not an alternative option that has been considered further”. [4.3.8]. Rather odd, as Appendix 6.1 refers to ‘business as usual’ leading to 3.3 million jobs and an extra 300 jobs by 2037 – not a whiff of the airport ‘going under’.

Also unaddressed is the road tunnel under the extended runway that would be required to access to the proposed development north-east of the airport [Eastleigh BC supports this e.g. section 6.4.38 of the Eastleigh Local Plan 2016-2036 <https://www.eastleigh.gov.uk/media/2053/appendix-1-eastleigh-borough-local-plan-2016-2036.pdf>] and to any Chickenhall Road link (across the Fareham-Eastleigh railway line). Tunneling under the runway is clearly more problematic than not tunneling. The last proposed route north of the runway was roughly the same distance from the northern end of the current runway that the M27 is from the southern end of the runway. Therefore if the current southern end road is deemed safe so should a northern one. Tunneling should not be required under the ‘do nothing scenario’.

Thank you,

Sam Mackenzie, 42 Oakmount Ave, SO17 1ED

Email

**Ref 19/02021/CONSUL**

***I ask the City Council to oppose this harmful development. We have a climate emergency so I consider it a "no-brainer".***

For example: Southampton City Council's Transport Policy team wrote in October 2018 (as part of its comments on the airport masterplan – page 5 para 2 see below): "SCC is making significant effort to reduce emissions associated with road transport and this should not be viewed as an opportunity to generate further capacity for other sectors." Table 7.15 of the airport's Environmental Statement shows sub-totals of airport source NOx emissions as 2018 (baseline): **83.57** tonnes/year; 2027 (future baseline) **91.36** tonnes; 2027 (with development): **320.96** tonnes. "No-brainer"?

Lauren Mackenzie, 42 Oakmount Ave, SO17 1ED

Email

**Ref 19/02021/CONSUL**

*I ask the City Council to oppose this harmful development. For every possible reason it is a terrible idea. We have a climate emergency.*

Even points the airport makes such as use of public transport, do not stand up to scrutiny. However many taxi firms there are, taxis are not a sustainable way of travelling. However many people use trains to get to the airport, is it still a small proportion, and the trains are pretty full a lot of the time. However much the airport says people will stop travelling to Gatwick or Heathrow, I know that people still choose to use Gatwick or Heathrow because the flights are so much cheaper (they they don't take wear and tear into account when driving - because fuel and parking are all people take into account)... etc etc. Please object. We are in a climate emergency.

**Thanks, Lyn Brayshaw, SO17 1ED, no 42.**

Email and attachment

Re: 19/02021/CONSUL Southampton International Airport expansion planning application

Attached are our comments, asking you to object. We believe Southampton City Council should object to the above planning application.

Thanks,

From Southampton Friends of the Earth.

Re: 19/02021/CONSUL Southampton International Airport expansion planning application

We believe Southampton City Council should object to the above planning application on the following grounds:

Impact on Climate change

Taking one long-haul flight is as bad for the climate as a whole year's worth of driving. Green aviation isn't a thing. Offsetting schemes aren't working – an EU report showed that 98% support carbon cuts that would have happened anyway. And renewably-powered, electric planes are a distant dream (besides which, they will only replace smaller planes, not the jets the runway extension aims to attract).

Both Southampton City Council and Eastleigh Borough Council have declared a climate emergency and it would be hypocritical to support this proposed development because of the impact on the climate. Expansion of the airport goes against almost all the points in Southampton's Green City Charter. If the is to be anything more than hot air, the council must oppose this development – just as Hertfordshire County Council has done with respect to expanding Luton airport on the grounds that 'Expanding the airport ...when we are trying to reduce carbon emissions is madness.'

<https://www.stalbansreview.co.uk/.../18074877.hertfordshire-.../>

The ES estimates (chapter 13, 13.6.6) that there will be an average annual increase of 350kt carbon emissions during the 'operational' phase of the airport development. For comparison, according to BEIS homes and industry in the entire City of Southampton (excluding the port) emitted 534kt CO2 in 2017 (<https://data.gov.uk/dataset/723c243d-2f1a-4d27-8b61-cdb93e5b10ff/emissions-of-carbon-dioxide-for-local-authority-areas>).

However this 'average' figure of 350kt is obtained by averaging over 120 years (a ridiculously long timescale) and assuming that emissions from aviation fall substantially later on. The emissions table (table 13.3) shows that in the early years aviation emissions are significantly higher than this average, namely 21+492=527kt for 2021 and 36+421=457kt for 2036. This is exactly what we don't need in the context of the climate emergency and the need to take serious action within the next 11 years. Carbon emitted prior to 2050 is using up our remaining 'carbon budget' to avoid temperature rise above 3°C and catastrophic climate

change. A development of this kind should not be allowed to go ahead until effective mitigation has been demonstrated and is in place.

The Airport is pinning its hopes on CORSIA to help mitigate all these extra emissions, even though CORSIA is not yet in operation (13.9.4) and it is by no means clear that it will be effective. An analysis by Transport & Environment states 'The interim analysis finds that, due to the weakness of the Corsia target, issues inherent to offsetting, and concerns with how ICAO operates, implementing Corsia in Europe represents a direct threat to Europe's existing climate commitments under the Paris Agreement. Over the period 2021-2030, such a move would increase Europe's aviation emissions by 683.8 million tonnes CO<sub>2</sub>, which is equivalent to the 2017 CO<sub>2</sub> emissions of Poland and France combined. The analysis was carried out by the TAKS consultancy, which was commissioned by T&E.'

([https://www.transportenvironment.org/sites/te/files/publications/2019\\_09\\_Corsia\\_assessment\\_final.pdf](https://www.transportenvironment.org/sites/te/files/publications/2019_09_Corsia_assessment_final.pdf))

The airport's goal of making its own operations 'carbon neutral by 2030' leads to a trivial saving in comparison to all the extra aircraft emissions. The ES (13.9.2) says

'Over the project reference lifespan, this [becoming carbon neutral] is expected to lead to a saving of approximately 65,000 tCO<sub>2</sub>e.' In comparison, ES 13.6.6 states 'The results and their context as presented above show that ... operational emissions are expected to be approximately 42,005,000 tCO<sub>2</sub>e over the reference lifespan, averaging approximately 350,000 tCO<sub>2</sub>e per year.'

It is not even clear how the airport will become 'carbon neutral' given that information presented at its drop-in events showed only a 10% reduction by 2037.

The argument that expanding our local airport will reduce the need for people to drive to other airports is not logical in the context of proposed expansions at Heathrow and at other regional airports. Since they are all wishing to expand, it is clear that the aim is to induce additional journeys in the same way that building more road capacity increases traffic. The Committee on Climate Change has said that we cannot achieve carbon neutrality without restraining aviation.

#### Air pollution

The ES identifies two sources of additional air pollution arising from the proposed expansion: aircraft themselves and road traffic. ES chapter 8 assesses the impact of 3 million extra passengers (of the 5 million the development is designed to attract) and finds that 3 million is the maximum the road network can handle. Coincidentally, 3m is approximately the number of passengers assumed by the Economic Impact Assessment (Appendix 8.1) under the "business as usual" scenario with no extension to the runway!

The additional 2 million passengers are presumably assumed to arrive by public transport, yet there is no clear evidence that this is possible and whatever its intentions the airport can have little influence on the actions of public transport operators. While it remains cheaper to drive than to use the train, people will inevitably continue to drive.

Quite apart from the increase in congestion, the extra traffic will increase air pollution in a city that already has a major air quality problem. ES chapter 7 admits that there will be an increase in NO<sub>x</sub> and other emissions but says (7.5.16) that "... the increase in emissions from the Airport is more than offset by the reduction in emissions from other sources". This is

freeloading on the efforts of Eastleigh Borough and Southampton City Councils' efforts to reduce emissions – it is not acceptable that the Airport should use this as an opportunity to increase its own emissions.

The ES also (chapter 7 table 7.15) shows that annual emissions from aircraft as a result of the proposed development will increase by a factor of 3.8, from 83.57 tonnes in 2018 to 320.96 tonnes by 2027.

Chapter 9 shows that the extra traffic generated by increasing to 3 million passengers will occur on roads within 200m of the R. Itchen SAC, (9.6.40) 'Therefore the potential for likely significant effects as a result of the pollution from traffic being added to aircraft pollution... cannot be ruled out.'

### The Economy

Given the above problems and the issue of increased number of people being exposed to increased noise for the extra aircraft movements and the intended switch to larger (and noisier) jets, it is clear that the only justification the City Council can give for supporting this damaging development is economic.

ES Chapter 4 contains an implicit threat that if the development is not permitted there is a risk of 'SIAL not being able to sustain its existing contribution to employment and the local economy; a situation that would be likely to arise if the current airline operators were to choose to relocate, reduce their operation and/or begin operating larger aircraft that cannot be accommodated on the existing runway.' Yet as already noted, the Economic Impact Assessment confidently predicts that in the absence of the runway extension the number of passengers would rise to 3.3m by 2037. Risks that the airport would shrink or would cease contributing its current benefits to the local economy are conspicuous by their absence in this document.

The economic impact assessment also neglects to mention any negative economic impacts of the development, for example a reduction in the price of houses under the flight path. It is also not made clear exactly how much of the benefit will be in the Solent region as opposed to UK wide. For example, only 32% of the airport's non-wage spend is local. (Appendix 6.1 para 4.6)

Furthermore, to base our economic prosperity on something that must inevitably need to be reduced in order to meet our carbon reduction targets is madness.



Email

Please accept this Email on my opposition to the airport expansion. My complaint is pollution both noise and air. Noise population will increase to above recommended limits with no formal testing of actual outputs, just modelling. Air pollution we have bad air getting worse with cruise ships and planes we don't need increased traffic. This will move us in the wrong direction at a time when we should be preserving this area.

Please register receipt of this email and the objection. Thank you.

Sean Phelan  
59 Castle Road  
Southampton  
SO181QP

Email and attachment

Dear Sir/Madam  
please find attached my comments on the above consultation.

Kind regards

Angela Cotton

On 06 December 2019 at 10:40 Planning wrote:

Development Management

Southampton City Council

Lower Ground Floor

Civic Centre

Southampton SO14 7LY

**Direct Dial:** 023 8083 3006 5 December 2019

**Please ask for:** Planning Enquiries

**Our Ref:** 19/02021/CONSUL

The Occupier

**Application No:** F/19/86707

**Address:** Southampton International Airport Mitchell Way Eastleigh

**Proposal:** 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)

A planning application for the above mentioned development has been submitted to Eastleigh Borough Council for determination under the Town and Country Planning Act 1990 (As amended). They have consulted Southampton City Council for its comments.

As an occupier of neighbouring premises outside of Eastleigh's administrative boundary, you may wish to have an opportunity to inspect the submitted application. The documents can be viewed on Eastleigh Borough Council's website at the following web address <https://www.eastleigh.gov.uk/planning-and-building/southampton-airport-planning-application>

Your valid comments will be taken into account in determining this application and should be made in writing to Eastleigh Borough Council by entering your comments on-line through the Public Access webpage at Eastleigh Borough Council via the above web



address or (if this is not possible) in written form with your full name & postal address, quoting **Eastleigh's Planning reference: F/19/86707** to Development Management, Eastleigh Borough Council, Eastleigh House, Upper Market Street, Eastleigh, SO50 9YN by 31 December 2019.

Whilst Southampton City Council is not determining this planning application we have been notified as a neighbouring Local Authority and will be submitting a consultation response to Eastleigh Borough Council. As a resident of Southampton you also have the opportunity to provide comments to Southampton City Council which will be taken into account as part of our formal consultation response to Eastleigh Borough Council. Comments to Southampton City Council should be made in writing to [Planning@southampton.gov.uk](mailto:Planning@southampton.gov.uk) or (if this is not possible) in written form with your full name & postal address to Development Management, Southampton City Council, Civic Centre, Southampton, SO14 7LY by 31 December 2019. When writing to us please quote **Southampton's Planning reference: 19/02021/CONSUL**.

If you have queries in relation to the consultation response of Southampton City Council, you can call on the number above and ask to speak with the case officer. Due to the need to deal with the consultation response within statutory time limits the Council will not enter into correspondence.

Southampton City Council is collecting this information in order to perform this service, and if further information is needed in order to do so, you may be contacted using the details provided. In performing this service, any information you provide will be made available online via public access and the Council may share your information with other organizations or departments. The Council may also share your personal information for the purposes of the prevention, investigation, detection, or prosecution of criminal offences, but will not share your personal information, or use it for this, or any other purpose, unless provided for by law. More detailed information can be found online (<http://www.southampton.gov.uk/privacy>), or on request.

If you are not the owner of the property to which this letter is addressed, would you please pass on this letter to them as quickly as possible. Notification is carried out in accordance with Government Regulations. If you think other neighbours would wish to comment, please show them this letter.

Yours faithfully,

**Paul Barton**

**Interim Service Lead**

**Infrastructure, Planning & Development**

Angela Cotton 8 Summerfield Gardens Southampton SO16 3DR 30 Dec 2019

**Re: 19-02021 CONSUL Southampton Airport Expansion**

As a Southampton resident I object strongly to this development. The negative impacts on both climate change and on local residents (e.g. from noise, air pollution and traffic congestion) outweigh the economic advantages, which have been overstated in the EIA. The noise assessment makes clear that substantial number of local people will be adversely affected by the development. At present some 9000 people are affected above 54dB. By 2037 25,200 will be affected at this level (ES chapter 11, table 11.13). Chapter 11 (11.2.82) states that 'The SOAEL for aviation noise has been set at 63 dB LAeq, 16 hour as above this level, the significant adverse effect of aviation noise should be avoided and is aligned with the Government's trigger level for noise insulation for schools and hospitals as set out in the APF.'

At present no households are exposed above 63dB. By 2037 the proposed development would result in 1550 people being exposed above this level and 50 households above 66dB. This latter is over 4 times louder than the 45dB recommended by the World Health Organisation for aircraft noise, since above this level adverse effects on health have been noted. This is especially the case for children – a concern, since several schools lie under the flight path. No mention is made in the noise assessment of these WHO recommendations, and even the health assessment (chapter 13) dismisses them because (15.2.17) 'These are recommendations rather than requirements and therefore not used in this assessment.'

The climate change assessment is based on comparisons of 2021 and 2036 'with development' and 'without development' and a 'project reference lifetime' of 120 years – with

unstated assumptions regarding the long term trends in aviation carbon emissions over the post 2-36 of this period, resulting in an average annual increase of 350,000t carbon emissions during the operational phase. The choice of such a long 'lifetime' is inconsistent with the Infrastructure Carbon Review (noted in chapter 13, 13.2.18) highlighting the need to 'assess GHG emissions early in the lifecycle of a proposed infrastructure development when there is the greatest carbon reduction potential'.

Chapter 13 table 13.7 shows that approximately 500,000t (i.e. significantly more than 350,000t) will be emitted in each year until at least 2037. This is about 87% of the 608,700t CO2 emissions currently attributable to Eastleigh (table 13.4). The EBC Climate change and Environment Emergency Strategy 2020-2030 states: 'All Council decisions will take into account the potential impact on Climate Change and the environment to achieve congruence with this strategy.' It is not possible to meet this strategy while permitting airport expansion. Similarly it is inconsistent with Southampton's Green City Charter to support such a development.

The economic impact assessment is based on the 2017 report by Steer Davies Gleave (Appendix 6.1), which appears (figure 5.3) to assume the runway extension will be built in 2019 with 4 million passengers per year well before 2027 and 5 million by 2037 – compared with a 'future baseline' (ie no runway extension) of 3.3 million by 2037. Meanwhile the transport assessment compares today's figures with a future scenario based on 3 million passengers, which is the same as the economic report's baseline!

Chapter 5 says (5.4.34) the EIA is based on '3 million passengers per annum landside and 5 million passengers per annum airside' which does not make any sense as few passengers will pass through the airport without either embarking or disembarking at Southampton. Steer Davies Gleave state (Appendix 6.1, page ii) that 'The most important determinant of this future impact is the level of activity taking place at the airport, measured by the number of terminal passengers'. Therefore it is not appropriate to use an economic prediction based on 5 million 'airside' passengers when it assumed that only 3 million of them will have passed through the 'landside' terminal.

The choice of 3.3mppa as the 'future baseline' assumption in the economic assessment also contradicts the threat in chapter 4 that without the runway extension there is the 'risk of SIAL not being able to sustain its existing contribution to employment and the local economy'. The economic

assessment does not even consider this possibility. The headline figure of £1.8bn cumulative contribution from the 'future vision' to the economy (NB not specifically to the local economy) is taken over 20 years (ie an average of £90m) and is presented without an equivalent figure for the cumulative contribution in the absence of the development. Therefore over the 20 years to 2037 no comparison of the total impact of 5 million passengers relative to 3 million can be made.

The transport assessment makes clear than the road network cannot handle more than 3 million passengers. The rationale for assessing only 3 million is that this is also the limit of what the terminal infrastructure can handle. However it is hard to imagine that once the runway extension is built the Airport will not find ways to reconfigure the terminal buildings to accommodate the additional passengers the runway will permit. It is not at all clear that public transport developments will be in place to bring these passengers to the airport, meaning traffic will increase beyond the carrying capacity of the local roads. I see that local taxi companies are supporting the planning application in the expectation of more passengers. Unless their confidence is mistaken, it undermines any claim that most additional passengers will use public transport.

The EIA fails to demonstrate that the economic benefits (much of which is not even local to Solent LEP, let alone to Southampton) is sufficient to outweigh the increased noise, traffic and climate change impacts. I urge the City Council to oppose it, in the same way that Hertfordshire County Council has voted to oppose further expansion of Luton airport, on the basis that 'Expanding the airport ...when we are trying to reduce carbon emissions is madness.' <https://www.stalbansreview.co.uk/.../18074877.hertfordshire-.../> It is also madness to base an economy on something that must be reduced.

Email

On Mon, 30 Dec 2019 at 16:34, Wyn Jeffery > wrote:

Good afternoon

I write to urge Southampton City Council, as a statutory consultee, to voice its strong opposition to the planning application submitted to Eastleigh Borough Council by Southampton Airport to extend its runway.

As a longtime resident of Bitterne Park I already endure the noise of planes taking off and in particular landing from 06.45 until at least 22.00, often later. Currently some large planes use the airport but as they cannot take off or land fully laden with passengers their numbers are limited. The noise when when one does so, however, is significantly louder than that produced by the smaller aircraft. The extension of the runway will allow these larger planes to be fully laden, thus it will encourage more airlines who use them to move to Southampton, so increasing to an intolerable level the noise suffered by residents of Bitterne Park and beyond. Recently I heard one of these aircraft at a high volume and for a prolonged period of time when I was at an event at the University of Southampton.

Experts in the field have grave doubts about this expansion. Professor Eigenbrod has commented that the negative effects, especially that of noise, are much worse than he feared, and the economic case is much worse than he thought. Noise levels will far exceed those allowed by the governments's own Aviation Policy Framework.

Environmental impact assessments, by law, have to include the *full* extent of negative environmental impacts of any proposed development. The airport's own assessment fails to consider traffic and noise impacts. It is frankly ludicrous for it to claim that there will be less traffic on the roads. Anyone who drives in and around Southampton will know that it is a rare occasion indeed when one is not caught in congestion, even in the middle of the working day.

The City Council is rightly proud of the Green City Charter, but unless it gets to grips with a major cause of pollution, noise and environmental destruction, it will scarcely be worth the paper it is written on. There is no credible case for expansion once the full costs to society are considered, in what has been correctly described as a climate emergency.

Yours sincerely

Wyn Jeffery (Ms)

32A Thorold Road, Bitterne Park, SO18 1JB

Email

Dear Paul,

Thank you for your invitation to contribute to Southampton's consultation response. Herewith some interim questions that I would like the City Council to get answers to. Please note there is no need for SCC to wait until the 31st December before proceeding with these enquiries and I would be pleased to receive answers well before then.

### **Question 1: (Air Quality)**

Table 7.15 [Chapter 7 page 7.41] of the Environmental Statement gives the airport NOx Emissions baseline as **83.57** tonnes/year.

Table 15.4 [Chapter 15 page 15.34] of the Environmental Statement quotes an airport NOx Emissions baseline of **182.47** tonnes/year.

*Which of these vastly differing amounts has been used as an input to the modelling process used to predict pollution levels attributable to the proposed development?*

### **Question 2: (Noise)**

Section 15.2.16 [Chapter 15] of the Environmental Statement notes the recommendations of the World Health Organisation to reduce aircraft noise below 45 dB. Whilst 15.2.17 states "These are recommendations rather than requirements and therefore not used in this assessment."

However section 15.2.3 notes Eastleigh Borough Council's adopted local plan.



“When considering the acceptability of proposals for noise mitigation reference will be made, in particular, to guidance contained in BS8233, BS4142 and **World Health Organisation** publications”. [section 3.13 EBC Local Plan Review 2001-2011].

*Why are noise contours (and the number of people living within them) for the WHO recommended 45dB level not presented and used in the assessment?*

### **Question 3: (Socio-Economics)**

Paragraph 1.11.8 [Non-Technical Summary page 1.15] states that under the ‘controlled growth scenario’ there would be 3 million passengers by 2027. Section 6.6.20 [Chapter 6 page 6.23] states that there would be 3 million passengers by 2037 under the controlled growth scenario.

*Which date is wrong?*

### **Question 4: (Climate Change)**

EBC Climate change and Environment Emergency Strategy (2020-2030) states:

*All Council decisions will take into account the potential impact on Climate*

*Change and the environment to achieve congruence with this strategy.*

Table 13.7 [Chapter 13 page 13.25] shows that the Proposed development will produce an **additional** 527,000 tonnes of CO2 each year from 2021 – 2036 [LTO + CCD cycles]. This would be an increase of 111% to almost 1000 Kt CO2 each year – roughly what the whole of the Eastleigh Borough produces now.

*How would it be possible for EBC to achieve congruence with its own policy and not turn down or oppose this harmful development? I suggest that SCC asks itself the same question.*

### **Question 5: (Noise)**

Appendix 11.4 Noise contours for 2016 show a 76/24 split Runway 20/02. Appendix 11.3 says the applicant requested a 64/36 modal split for runway 20/02 for the 2021 and 2037 contours. This is curious as the declared purpose of the starter extension is to allow larger/more laden aircraft to take off to the south (runway 20), therefore a greater not lesser use of runway 20 might be expected.

*If the 76/24 split had been presented would the noise contours have shown a larger spread of noise over the more populated area to the south – Southampton?*

I look forward to your answers - as soon as possible.

Kind regards,

Gareth Narbed

On Fri, 6 Dec 2019 at 10:39, Planning <[planning@southampton.gov.uk](mailto:planning@southampton.gov.uk)> wrote:

Development Management

Southampton City Council

Lower Ground Floor

Civic Centre

Southampton SO14 7LY

**Direct Dial:** 023 8083 3006 5 December 2019

**Please ask for:** Planning Enquiries

**Our Ref:** 19/02021/CONSUL

The Occupier

**Application No:** F/19/86707

**Address:** Southampton International Airport Mitchell Way Eastleigh



**Proposal:** 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)

A planning application for the above mentioned development has been submitted to Eastleigh Borough Council for determination under the Town and Country Planning Act 1990 (As amended). They have consulted Southampton City Council for its comments.

As an occupier of neighbouring premises outside of Eastleigh's administrative boundary, you may wish to have an opportunity to inspect the submitted application. The documents can be viewed on Eastleigh Borough Council's website at the following web address <https://www.eastleigh.gov.uk/planning-and-building/southampton-airport-planning-application>

Your valid comments will be taken into account in determining this application and should be made in writing to Eastleigh Borough Council by entering your comments on-line through the Public Access webpage at Eastleigh Borough Council via the above web address or (if this is not possible) in written form with your full name & postal address, quoting **Eastleigh's Planning reference: F/19/86707** to Development Management, Eastleigh Borough Council, Eastleigh House, Upper Market Street, Eastleigh, SO50 9YN by 31 December 2019.

Whilst Southampton City Council is not determining this planning application we have been notified as a neighbouring Local Authority and will be submitting a consultation response to Eastleigh Borough Council. As a resident of Southampton you also have the opportunity to provide comments to Southampton City Council which will be taken into account as part of our formal consultation response to Eastleigh Borough Council. Comments to Southampton City Council should be made in writing to [Planning@southampton.gov.uk](mailto:Planning@southampton.gov.uk) or (if this is not possible) in written form with your full name & postal address to Development Management, Southampton City Council, Civic Centre, Southampton, SO14 7LY by 31 December 2019. When writing to us please quote **Southampton's Planning reference: 19/02021/CONSUL**.

If you have queries in relation to the consultation response of Southampton City Council, you can call on the number above and ask to speak with the case officer. Due to the need to deal with the consultation response within statutory time limits the Council will not enter into correspondence.

Southampton City Council is collecting this information in order to perform this service, and if further information is needed in order to do so, you may be contacted using the details provided. In performing this service, any information you provide will be made available online via public access and the Council may share your information with other organizations or departments. The Council may also share your personal information for the purposes of the prevention, investigation, detection, or prosecution of criminal offences, but will not share your personal information, or use it for this, or any other purpose, unless provided for by law. More detailed information can be found online (<http://www.southampton.gov.uk/privacy>), or on request.

If you are not the owner of the property to which this letter is addressed, would you please pass on this letter to them as quickly as possible. Notification is carried out in accordance with Government Regulations. If you think other neighbours would wish to comment, please show them this letter.

Yours faithfully,

**Paul Barton**

**Interim Service Lead**

**Infrastructure, Planning & Development**

Email

Good afternoon,

We would be pleased if you would include in SCC response the wording of the petition debated by the City Council on November 20th and clearly indicate that this debate arose because 1900 validated Southampton associates oppose airport expansion for the reasons given.

Kind regards,

The AXO team

Email

Dear Sirs,

I am writing to ask you to oppose proposals to increase the runway and capacity of Southampton Airport.

This city needs clean air and this proposal would increase pollution from the planes themselves and from increased traffic.

In addition to emissions, expansion of the airport can also only increase the carbon footprint of the area - at a time when we are meant to be reducing it.

Please oppose this.

Kind regards,

Karen Martin

6 Sandown Road, Southampton, SO15 5QP

Email

Dear Sir / Madam,

I sincerely hope that Southampton City Council will oppose the expansion of Southampton Airport. Every decision we take now will shape whether we mitigate the effects of the climate emergency and this is a critical local step towards that, reflected with the Green City Charter.

The immediate noise effect on residents and their homes (including the effect on house prices), the transportation of significantly more people to the airport and most importantly the escalation of aviation CO2 emissions (when we should be limiting demand for air travel) should present clear opposition to this expansion. The proposed economic benefits of expansion will mainly go to the Spanish-Australian partnership of Ferrovial-Macquarie.

Please see the recently published view of 5 eminent scientists:

<https://axosouthampton.wordpress.com/2019/12/06/the-experts-view-prof-f-eigenbrod-dr-m-hudson-dr-p-shaw-dr-j-g-dyke-prof-c-heady/>

Please do the right thing and oppose this expansion.

Yours faithfully,

Richard Strange

Southampton

SO17 1ST

Email

Please could you add my comments, as follows, to the objections towards SIA's expansion plans:

1. The current levels of noise are already overwhelming; even more flights from what was once a small, provincial airport would only increase the problem.
2. Operating hours are also too long; for what was a supposedly small, provincial airport in a heavily built-up area, 0600 to 2300 really stretches the boundaries of what is acceptable. 0700 to 2200 would be a far more area/population friendly operating slot.
3. SIA's testing of its sirens/fire engine bells at 0600 daily is an aspect of life which is totally unnecessary. If a car cannot sound its horn in a built up area before 0700, why does SIA believe that it can sound sirens, bells and klaxons at 0600.
4. SIA has annexed the right of way - which has been used as such for at least 40 years - through Marlhill copse and fenced it off. It also wishes to lop, remove and/or cut down some magnificent specimens of trees in what was Lord Swaythling's garden, along with wishing to lop trees within other people's gardens. This is sheer high-handed environmental vandalism.
5. If the way of the world is to take action to combat climate change and preserve valuable environmental and fossil fuel resources for future generations, our remit should be to decrease flights, not increase them.

J Caplen  
18 River Walk  
SO18 2DP



Email

CAUTION: This email originated from a non UK Government address. Do not click links or open attachments unless you recognise the sender and know the content is safe.

We live in Fairview Drive,Hythe and have planes flying constantly over our area, specially in spring and summer when noise gets so bad, that we can't enjoy our garden anymore, or get woken up early in the morning. The planes fly so low that we can smell the polluted air. The pollution in and around Southampton is so bad already and more planes and bigger ones would make our quality of life unbearable.

Bournemouth has the capacity for bigger planes already, so we wouldn't need anymore flying over our houses and endangering our health. Thank you.

Sent from my iPhone

Email

Dear Planners

We would ask you to carefully consider the planning application for the development of Southampton airport. It makes no sense whatsoever at a time when we should be thinking about the future of our planet. Such a development will cause – amongst other problems - (1) greater air pollution to a city already reputed to suffer from too much pollution through shipping and vehicles, (2) an intolerable increase in noise – we live in Highfield and know what it is like to be under the flight paths; (3) an unacceptable increase in traffic in a city which has been unable to develop a park and ride scheme.

Please oppose this plan.

Yours sincerely

Monique and Neil Broadbent

Highfield residents

Email

Dear Southampton City Council, and Councillors Cooper, Mitchell and Savage,

I am emailing to ask that Southampton City Council rethink its position in the light of Parliament's declaration of a climate emergency and the 2019 amendment to the Climate Change Act target for zero net carbon by 2050, by publicly stating that the Council objects to the expansion of Southampton International Airport. Aviation is becoming responsible for an increasing proportion of greenhouse gas and other emissions. The Committee on Climate Change (CCC) identifies several aviation measures to achieve net zero emissions by 2050, including restraint on growth of airports.

Aviation growth both nationally and locally is inconsistent with UK emissions targets. In addition, an expanded Southampton airport will increase air pollution in our already polluted city, increase noise for those under the flight path with more flights and bigger aircraft.

There will be few, if any, benefits for Southampton residents (we get a worse quality of life to enable more people to fly – and nationally 70% of flights are taken by just 15% of people). The promise of low-paid jobs is not enough to cover the cost to us, as Southampton citizens, of all the above.

More flights by a Green City Charter signatory will undermine the Charter and make a mockery of the Southampton Council's efforts to achieve a low carbon future for our city. I accept the need for a small regional airport at Southampton whilst acknowledging that the Climate Crisis means we must all fly less. Flights from Southampton are decreasing anyway, and if Heathrow is expanded regional airports will lose traffic, potentially making expansion of Southampton unnecessary. Carbon offsetting is not a viable solution. I assume that the airport is only making its own activities carbon neutral as there is no way they can make the activities of the airlines using the airport carbon neutral.

I know that the planning decision will be made by Eastleigh, but Southampton City Council will be a consultee and we would like you to stand up and say you oppose expansion (as Twyford has) for the above reasons. I want you to retract the support you have already given to the idea of airport expansion, as key stakeholders in the consultation for the airport's master plan last year. I urge you to rethink your position.

I further support the expert analysis carried out by Professor Eigenbrod and colleagues at the Universities of Southampton, Exeter and Kent, and ask that you take note of their concerns.

Thank you for your consideration.

Yours sincerely,

Alexandra Mant  
27 Grosvenor Road  
Southampton  
SO17 1RU

Dear Planners

We would ask you to carefully consider the planning application for the development of Southampton airport. It makes no sense whatsoever at a time when we should be thinking about the future of our planet. Such a development will cause – amongst other problems - (1) greater air pollution to a city already reputed to suffer from too much pollution through shipping and vehicles, (2) an intolerable increase in noise – we live in Highfield and know what it is like to be under the flight paths; (3) an unacceptable increase in traffic in a city which has been unable to develop a park and ride scheme.

Please oppose this plan.

Yours sincerely

Monique and Neil Broadbent

Highfield residents

With regards to application reference 19/00073/CONSUL, Planning Policy's comments are as follows:

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.

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, we 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.

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.

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.

Email

Dear Planning Dept

Re: 19/02021/CONSUL Airport expansion

I would like to urge Southampton City to object to expansion plans. I object on the grounds of increased noise and pollution in the city of Southampton and The Itchen corridor. Along side this are issues of increased traffic and the environmental impact of that as well as the environmental impact of the air traffic, both locally and globally. Many thanks.

Regards

Jonathan Dellow SO17 2LN

Email

On Thu, 19 Dec 2019 at 08:29, Co-ops Southampton/SACDA < wrote:

I wish to object to the proposed extension of the airport at Eastleigh.

We have an obligation to reduce rather than increase our use of fossil fuels. It should be possible to construct a business model which maintains airport travel at present levels. Cheap flights are attractive but ultimately destructive of our children's future.

Environmental pollution and destruction of habitat must be avoided, especially as short-term gains in jobs and affluence will not compensate for future disasters.



Email

Dear COUNCIL!

Christmas is coming

The planes are getting fat,

please spare some thought for our neighbourhood habitat....

*reference 19/02021/CONSUL Regarding Southampton Airport planning application put in to Eastleigh Borough Council.*

It is of great concern that the airport's economic interests can override the health and welfare of residents, and that city's resources, the trees, can be so easily discounted. The 27 or so trees at Marlhill Copse are busy doing for us, sequestering carbon, producing oxygen, filtering the air, reducing noise and doing much more in maintaining the organism of the copse. Those trees have had tree protection orders on them and have been forbidden by the council to be cut twice in previous decades. Why now are we so keen to support the airport expansion? In such a time as this.... everyone is talking about trees and putting hope in trees but you cant just plant new saplings in place of 150year old mature trees and expect that to equalise the immediate impact of felling. The airport expansion is unrealistic and blind to the times we are living in of climate anxiety and fear and the need to attend to earths stewardship responsibly and locally. **Where power and decisions are made, that is where there is opportunity to make a positive stand with the environment and step off the over reach of pure profit pursuits.** it is obvious that the airport expansion will be detrimental to local residents - noise, air, congestion, i'm sure other residents have sent in the facts and figures. People are working hard to help show the council how the airports planning application doesn't add up... **Please take the opportunity to stand with the trees and with stand airport expansion - it is not necessary and not needed.**

- Eastleigh Borough Council has declared a climate and environmental emergency. Airport expansion will lead to increased carbon dioxide emissions and is simply incompatible with addressing this climate emergency. The Airport's own estimate is that carbon emissions will rise on average by 350,000 tonnes per year. For comparison, homes, industry and road traffic in the entire Borough of Eastleigh is responsible for 610,000t 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 (already small) carbon emissions during the construction phase and for its own operations (current plans are for only 6,000 tonne reduction).

Lets hope that our local government can stand by what matters and give due and thorough consideration to this important issue, in the context of Green City Charter, Climate Emergency and general decline in natural habitats... the planes don't need to get so fat..

Kind Regards

Liz Jones

Portswood resident

Email

Dear Sirs,

I write in relation to the council's position regarding the application to extend the airport runway. Southampton City Council should oppose this application as it will detrimentally affect all of the many households in the flight path of the airport and blight them with noise and pollution. The inevitable increase in traffic will only cause further delays on the overcrowded roads around the airport and junction 5 of the M27. This will cause further pollution and have a detrimental impact on the entire north east quarter of Southampton and the whole of Eastleigh.

In the Southampton Airport Draft Master Plan Consultation 2018 document the airport stated that 'the suggested noise contours for 2021 and 2037 are similar in shape to those for 2016, but cover a slightly different area.' This is presumably a euphemism for there will be significantly more noise over a significantly larger area affecting significantly more local residents.

On pages 73,74 & 75 of the same document the airport published the noise contour map from 2016 and predictions for 2021 & 2037. These show that in the Bitterne Park area the current decibel level is between 50-54 db(A), the prediction is that in 2021 the levels will be between 57-63 db(A) and by 2037 between 57-66 db(A). In addition the area affected increases to encompass parts of St Denys & even Northam and Itchen.

The airport master plan clearly states that their predictions already take account of new, quieter aircraft that are able to climb more quickly (page 43). This shows that the claim that such advances will reduce noise levels are simply untrue.

In addition to the increased volume and area affected there is likely to be an increase in airplane movements compounding the impact. The actual number of air transport movements in 2017 was 39,300, but 53,100 are predicted in 2027 and 57,800 by 2037 (page 29 of the above document). These numbers can only be supported by an increased frequency of flights and not solely by the use of larger planes.

The second main objection relates to traffic. The airports master plan consultation document referred to above states that they had 2,865 parking spaces in 2017 and that they plan to increase this number to 5,562 by 2027 & 6,877 by 2037 (page 37). It is obviously appropriate to extrapolate from this that there will be a 194% increase in traffic to and from the airport by 2027 and a 240% increase by 2037. This appears to have been glossed over in their plans and applications but will cause gridlock in the local area.

The airport in the same consultation document have set a target for passengers arriving by public transport. In 2016 the actual percentage of passengers arriving by rail/bus was 23.81% with targets of 27.50% in 2027 and 29.2% in 2037 (page 50 ).

However if you apply the percentages to the proposed passenger numbers they demonstrate a massive increase in road traffic movements to and from the airport. The passenger numbers in 2017 were 2 million (page 27) therefore over 1.5 million arrived by road. The prediction for 2027 is 4 million passengers (page 27) and therefore 2.9million will be arriving by road. The prediction of 5 million passenger by 2037 (page 27) means 3.54 passengers arriving by road. The area cannot cope and the targets do not appear to be supported by realistic proposals to increase public transport usage.

You sincerely

**Robert Simpson**

Email and 2 attachments

I understand that you are seeking comments on the Southampton Airport's planning application to be taken into account as part of the City Council's formal consultation response to Eastleigh Borough Council.

I attach comments made on behalf of Transition Southampton.  
Please confirm receipt.

Kind regards

Angela Cotton  
Co-Chair, Transition Southampton  
8 Summerfield Gardens  
Southampton  
SO16 3DR

from ES 13 table 13.8	LTO+CCD emissions/person (t CO2e)	
	Without	With
2021	0.243	0.271
2036	0.19	0.192
Ratios	0.782	0.708
Carbon intensity improvement	<b>22%</b>	<b>29%</b>
Ratio of carbon intensity improvement to efficiency improvement calculated using official forecasts	<b>157.56%</b>	<b>210.59%</b>

Official Forecasts
Efficiency increase
No of years
Efficiency improvement
<b>Total efficiency improvement 2037</b>

The assumed GHG/ are decreasing more. This could be due to increased distances

'UK Aviation Forecasts' provides annual aircraft efficiency improvement estimates to; the central estimates of these

<sup>13</sup> 2016-2030 -0.62%/annum, 2030-2040 - 1.31%/annum and 2040-2050 - 1.45%/annum.

2 X ATTACHEMNTS

Email and attachment

Dear Paul,

Please find attached our comments that we would be pleased to have considered by the City Council when formulating its response to Eastleigh BC regarding the expansion of Southampton airport.

We would be very happy to discuss further, should you find that helpful, and would be grateful to receive confirmation of this document's safe receipt.

Kind regards,

The AXO team

ATTACHMENT

Email

Dear Sirs.

I have recently written to Eastleigh Council opposing the expansion of the Airport, shown below. I kindly request that for the reasons stated, you add your support in objecting to these plans. I would have thought, considering the investment you have made regenerating Townhill Park, (which I warmly applaud) in an attempt to improve the quality of life for the residents, you would not want to compromise this by subjecting them to a severe increase in noise pollution.

“I object to the proposed expansion plans for Southampton Airport which I hope you will take into consideration when studying these Plans.

Firstly, I am sure you are aware of the huge increase in the public’s concern over Climate Change and their desire to do all in their power to reduce the current impact. I am sure if I were to ask what can I do to combat Climate Change?, the answer would not be “take more Air flights a year”!!! Obviously Cold Play do not think so, and it is their livelihood at stake.

Let’s face it, in other parts of the country some communities have had to sacrifice their livelihoods and had their local economies, devastated to combat climate change. Namely the closure of fossil fuelled Power Stations, even though the production of energy is essential to the people of the U.K.

Consequently, I think they would find it difficult to comprehend the justification of increasing our local impact on climate change, by the promise of a few jobs and a contribution to the local economy. Especially as it is for the sake of a leisure activity, namely taking more holidays with the convenience of being within a short distance of their home. (the reason of increasing the runway is to make more European Tourist destinations accessible).

I think everybody agrees that the Aircraft Industry is a major contributor to Climate Change. Vince Cable recently on Question time, when asked what the Liberal Party would do in the future to combat Climate Change. He replied-

“Reduce the out of control expansion of the Aircraft Industry “

Recently Jo Swinson stated she objected to the proposed expansion to Southampton Airport and I presume she spoke on behalf of the Liberal Democrat Party.

My other major concern is the increase in Traffic. The area is already trying to cope with the increase of cars from all the New Build in the area, then on top of this using your figure of 4 million passengers by 2027 of which 65% will arrive by car. I calculate, based on the generous assumption of 3 passengers to a car (more likely 2). The number of cars visiting or leaving the Airport in 2027 will be **2500 DAILY** or **3500 DAILY** if 2 car share. This comes at a time when both Southampton and Eastleigh are keen to reduce traffic pollution and discouraging people to use their cars.

Thirdly, another major concern is the fact that there will be a significant increase in noise pollution suffered by residents under or close to the proposed flightpaths. The Airport show stats that indicate little increase in complaints received about noise in last 5 years. This is hardly surprising as the Fleet of aircraft operating has remained constant and there has been very little increase in the frequency, in fact last year there was a decrease.

However, the introduction of a predominantly Jet based fleet operating will severely impact on the quality of life enjoyed by Residents close to the Flight paths and the number of noise related complaints will significantly rise. The noise related figures stated by Airport are questionable as are

all figures on this subject. Do they take into consideration that many homes in the Townhill/Bitterne Park area are over 150 ft above sea level, so much closer to the Planes than those at sea level? The only real test is to personally witness the difference in noise emitted by the Prop planes (bearable) and the Jets (unbearable) you must take a long pause when speaking to your neighbour. The Jets are twice as loud, and the sound trails on for twice as long. In fact, I have felt buildings vibrate on some occasions.

I urge you to visit Riverside Park and witness this fact and take into consideration before making a decision on the application. The outcome is likely to determine whether some people will have to live with their windows closed all year and summers in the garden become less than pleasant. Spoiling the quality of life for a good deal of people, seems a very high price to pay, for such little reward.

The main beneficiaries will be the shareholders of AGS Airports, the new airlines and the local economies of many European Tourist destinations. The likes of Easy Jet are not concerned with the current levels of traffic currently travelling to Gatwick, London etc. They are just concerned with getting more passengers, and this will mean encouraging more people to fly. especially from our area. They are currently offering flights to European destinations for as little as £29.00. This only encourages people to take more foreign holidays/Breaks to the detriment of our own Tourist industry. The contribution to the local economy is questionable, ( a figure very difficult to quantify) Often Economists will make up the numbers to fit their argument. However, you cannot deny that billions of pounds will be lost to the national economy. Most flights will be to Tourist destinations with very few inward visitors. A quick calculation of 200 passengers each taking £500.00 out of the economy per flight will give you an idea of the overall loss to the economy.(Billions) I am sure the English Tourist Board and the Chancellor of the Exchequer will not be thanking you should you decide to allow the application.

Surely, we should be persuading people to take less flights rather than encouraging and offering them more opportunities to fly? A recent TV documentary highlighted the fact that some of our UK Tourist destinations such as Ilfracombe are suffering, with their community in decline, as a direct result of the increase in cheap European aircraft travel.

I appreciate you have a difficult decision to make and I do not envy you. However, please bear in mind that this may be a life changing decision for some people and if approved, the Genie will not go back into the bottle.

A better option would be to allow the extension of the Runway but add a caveat that there should not be an increase in the number of passengers. This to be reviewed when and if electric planes come into operation. Or a significant reduction in Aircraft noise and/or emissions has become achievable.

This would then satisfy many of the objections i.e. Noise Pollution, Carbon emissions and road congestion.

The same number of passengers will be carried but the number of flights will be halved. Therefore more economy but with no added burden on the environment

Although the Jets will be noisier, the frequency and number of flights will be a good deal less and make it more bearable for the Residents affected.

The number of cars will remain the same and there may be a slight reduction in the overall carbon footprint. The benefit to local economy will continue.



Thus, greatly improving the efficiency of the Airport, but retaining the option of increasing passenger numbers in the future, when the prophecies of the Airport are actually achieved.

I thank you for your consideration.

Margaret Burnham

18 Camellia Gdns Southampton

Sent from [Mail](#) for Windows 10

Email and attachment

Good morning,

Please find attached some comments on the Habitats Regulation Assessment associated with the airport expansion application, that I trust SCC will find helpful.

Kind regards,

Gareth Narbed

ATTACHMENT

Email

Recently there was an AXO petition with 1900 signatories and now the Southampton city Council will be consulting on what opinion it should have on the airport expansion. Please could the City Council oppose this harmful development reference 19/02021/CONSUL.

The New Forest residents will be affected environmentally as we all are facing a climate crisis. The amount of carbon emissions needs to be reduced to meet carbon neutrality. Is it not possible that passengers taking leisure trips in the future will experience flight shaming and people will fly less, using railways instead in the case of many European destinations? The number of flights could, and should be reduced in the future, not increased. With this expansion it is estimated that there will be an increase at Southampton airport of 3million passengers and then 5million by 2037!

During the construction period the amount of carbon emissions increase per annum will be 350,000t.

The consequences to residents far and wide with noise and air pollution needs to be considered and the question asked if the additional huge input of carbon emissions is worth the consequences?

Susie Laan

## Email

Please find following our comments in response as statutory consultees with regard to the proposed extension of the runway at Southampton Airport:

The increased frequency of jet airplanes taking off from and landing at the airport will have a deleterious effect on the environment in a variety of ways. As a council which has declared a Climate Emergency, these will be of specific pertinence to Eastleigh Borough Council. The UK must reduce, not expand, its aviation traffic to meet our national commitment to net zero emissions within the next 30 years. Expansion will mean that there will be an increase in air pollution; particularly in view of the fact that the extended runway will allow the planes to carry more fuel and more passengers requiring more fuel to be burned on take off and landing (the most polluting parts of a flight) than is presently the case. This will have a negative health impact on everyone, but particularly on the very young, the elderly and those already with chronic health issues.

The rail network will not be able to expand enough to cope with the increase in flow to and from the airport – particularly at key times of the day – which will necessitate very expensive road construction in the area to deal with the inevitable increase in traffic. This does not seem to have been considered as forensically as necessary by the proposed plan. Increased congestion will most likely ensue, along with an increase in harmful traffic emissions.

- There will be increased noise pollution (of the much more intrusive low pitched ‘metallic’ nature as made by jet engines) and a need to enlarge the ‘noise contours’ of the areas affected to differing degrees. The number of properties which will decrease in value due to this increase in noise pollution will also increase rendering these areas less attractive to live in. This would have a knock on negative effect on the state of the local economy and bring about a state of decline in local neighbourhoods.
- Bitterne Park School is directly below the flight path. Research has show that noise pollution impacts negatively not only on children’s learning, but also on their mental health. There are presently 2000+ children attending that school every day. In the summer these effects will be greater as a result of the need to keep windows open and the children spending more time outside. Other schools in the area will be affected, albeit less directly by the increased noise.

Increased noise would greatly affect the quality of life and mental health of a larger number of Southampton residents, particularly at times when windows need to be open, and/or when residents are in their gardens.

Professor Eigenbrod: <https://axosouthampton.wordpress.com/2019/12/06/the-experts-view-prof-f-eigenbrod-dr-m-hudson-dr-p-shaw-dr-j-g-dyke-prof-c-heady/> puts forward expert opinion raising major issues with the current Environmental Impact Assessment produced by Savills for the proposed extension, in their assessment of noise, transport, climate and economic impacts. He states; "As someone who is actively involved in research on sound, I can affirm that the 54 dB and above daytime noise contours modelled by Savills does represent a doubling of perceived loudness over the 45 dB maximum recommended by the World Health Organisation."

- Evidence has already been presented to Eastleigh Borough Council regarding the negative effects of increased air traffic on the ecology of the area trees; damsel flies etc.
- The proposal refers to the times of day at which flights are presently allowed and how these will not be affected. (06:00 -23:00 etc.) It may be the timings will not change, but the quoted timings are incorrect.
- The considerations regarding offsetting needs to happen anyway alongside expansion

Other considerations are as follows:

- There is an Airspace Change consultation in progress – why not wait for the outcome of this first before proceeding with this proposal?
- Much of the increased traffic to the area would be 'through traffic', which has very limited commercial value to the City
- All of the very well documented arguments proposing a curbing in air traffic and a simultaneous encouragement of other forms of sustainable travel
- Changes in various other European Countries' governments attitudes to air travel. Changes in the attitudes of sections of the population towards frequent flying, particularly the young.
- Factories, manufacturing and alternative land use to those considered by/in the airport expansion plan could much better benefit the surrounding area, and in turn, the city. With its acknowledged declaration of Climate Emergency, and with three universities in close proximity, Eastleigh Borough Council could take an imaginative, forward looking approach in trying to set up a climate change hub, where solutions to the current problems might be worked upon and jobs created. This might be more useful to future generations than the possible white elephant project of an expanded airport.

Yours sincerely,

Drew Mackay. Wendy Mackay and Cary Mackay

85 Dimond Road

Southampton

SO18 1JT

Email

Planning Reference 19/02021 / consul

I wish to object to the proposed runway extension at Southampton Airport.

It is not needed and with all the global warming it would not be a wise thing to do.

The Planes are already very noisy and fly low over my house in Hillside Avenue- louder plane would be unbearable. There is also Bitterne Park School which would suffer with extra noise and pollution. Their health needs to be considered with all the pollution from the planes.

The Airport needs to consider the residents and not their profit.

Mary Windebank

Email

I wish to make my objection to the expansion of southampton airport known. Air pollution is already critical in our city and noise pollution

is increasing unabated. Expansion of the airport will inevitably make both worse at a time when responsible citizens should be doing all they can to reduce pollution. I urge you to oppose any expansion of the airport.

Email

Dear Planning Team

I am emailing you with regard to opposing the above application.

I would like to start with the Airport's view of the advantages for the expansion.

Once again, as with every single planning application regarding commercial gain, this reason is always put forward. There are already job opportunities in Southampton.

Secondly, the expansion will add money to the economy. Can I ask, how does this benefit the general public? With a booming economy, do the general public get a reduction in their rates or their council tax? Monetary-wise, the general public actually gain nothing.

The Airport also says that the expansion will reduce the volume of traffic going to London airports. What about all the extra cars on the road in and around Southampton and Eastleigh? The Airport estimate another three million people using the facilities. These people have to get to the Airport. The roads in this area are already gridlocked with numerous housing developments being built. The situation can only get worse.

The Airport says there is a demand for the expansion. Surely, they are creating the demand for more flights. It is encouraging people to go abroad instead of taking alternative holidays nearer to home.

I would now put forward my personal objections:

The expansion is creating more air pollution (Southampton is well known for its poor air quality already) and will definitely increase noise pollution. Bitterne Park, Townhill Park, West End and other areas near the airport can already hear the planes taxiing on the runway. The noise is even louder when there is a north wind. This is in addition to the constant noise when the planes are flying directly over your property. Perhaps Southampton City Council would like to do a noise monitoring study in Townhill Park, not a study from the airport. Also, when there is a north wind, the above areas can smell aviation fuel. In Townhill Park, especially in winter when there is more fog, the smell is nauseating. When I raised this with the Airport, they could not give me an encouraging answer that the expansion would not add to this problem.

We are all aware of climate change and the concerns for the welfare of our children and what they are inheriting. We should all be preserving open spaces and trees. It is a disgrace that, now the



Airport has acquired Marlhill Copse, there is over 100 trees being cut down and another 100 or more being lopped. This is being done due to "safety reasons" whereas I would dispute this and say it is for "commercial reasons". The woods are ancient and the felling should only go ahead if absolutely necessary. The trees cleanse the pollution from the Airport and act as a barrier for some of the noise. You cannot tell me the Airport purchased the copse for the benefit of the public, they bought it as part of expansion plans.

Can I please ask that all these matters are taken into consideration and support is given to the residents living in the surrounding area and the impact this expansion will have. Ok, some people suggest we triple-glaze our house, but you cannot triple-glaze the garden!!

I would appreciate your feedback on this.

Thank you.

Mrs K L Criddle

Email

Ref 19/02021/CONSUL

Regarding the proposed expansion of Southampton Airport's runway.

The increase in noise and air pollution that would be caused by the airport expansion would be considerably detrimental to the neighbourhoods closest to the airport. I thoroughly object to this expansion.

Thanks

Robert Marris

37 Newton Road

Bitterne Park

Southampton

SO18 1NJ

Email

We object to the Proposed Airport Extension because of 1. Increased traffic. 2, Increased pollution 3. Loss of 'green land' due to larger car park and other documented concerns:: but the biggest problem will be NOISE. We do not want to be marooned in our 'noise insulated home, with the doors and windows shut tight to minimise noise. We want to be able to enjoy our gardens and outdoor areas. From the South Aircraft land over the Highest point at the Copsewood Rd /Castle Rd. Please Come and see the Problem. NO NOISE INCREASE. WOULD YOU LIKE TO LAY IN BED WITH 30 TONS OF A320 landing at 200MPH. 100 ft above your property. NO TO EXPANSION NO TO INCREASED NOISE

Email

Dear Southampton City Council Planning,

19/02021/CONSOL - Eastleigh council planning application no. F\_19\_86707 - Southampton air port extension and other development

We have the following comments to make regarding this application:

The increase of air traffic, and larger size of the aircraft will mean that there is increased discomfort in terms of noise and air pollution at our property. This will mean using our garden will be a poorer experience and our health could be affected by air pollution. Our house is very close to the current flight path of the air port and aircraft fly very close to our property at low level already. The proposal is to increase the capacity of the airport means more air traffic and larger aircraft. The value of our property will also be reduced for the aforementioned reasons. Which is why we object to this proposal.

Regards,

Mr. and Mrs. William and Rachel Goddard

3 Wilmington Close

Southampton

SO18 2RD

Email

Dear Sir/Madam

As residents of Bitterne Park living directly in the flight path, we welcome the opportunity to comment on the current plans to expand the airport.

As you would expect we are against these expansion plans but would like to put our case in a reasoned way as we are conscious that it would be easy to dismiss our concerns as “nimbyism”.

When we moved to the area ten years ago we of course had to consider the impact of living close to an airport. Indeed, our house in Sandringham Road is directly in the flight path and during the summer months especially, the constant planes flying overhead can be irritating. However, it has to be said that as customers of the airport for both business and pleasure, we have also benefitted from the close proximity of the airport to make short trips both home and abroad, and the issue of noise is one that we have learned to cope with over the years.

However, there are two major concerns that play upon our minds when considering these expansion plans. In the ten years that we have lived here, we have, like many others in the area started a family and now have three beautiful young children.

Since having children I have looked into the adverse health effects that living close to an airport can have, particularly on children. Various studies show that the carbon monoxide emissions from aircraft can cause respiratory and cardio-vascular problems. Of course we live here, and that is our personal choice, but it is a calculated risk based on the current number of flights coming into the airport. Any significant increase in flights would naturally increase those health risks to my children, and we would not be good parents if we did not object strongly to this happening.

But we have wider objections to these plans than the health of our own children. Over recent years it has become obvious to us and millions more across the globe that escalating carbon emissions are driving climate change in a way that is putting our children’s future in peril. We are seeing the effects of climate change around the world daily on our tv screens, whether it is the forest fires in Australia or devastating hurricanes in the Caribbean, but increasingly these are effects are also being felt closer to home. The flooding in Riverside Park as an example is becoming almost a weekly occurrence during the winter months – something that almost never happened when we moved here ten years ago.

The speed of change is frightening, and as a society we need to change our habits rapidly in order to preserve the world as we know it for future generations. Now you may tell me that the plans for the airport expansion are a response to public demand and that there is an economic imperative that will bring jobs to the area. You may also point to statistics that demonstrate significant reductions in emissions over the next 20 years. But if we are honest with ourselves we know that this is not sustainable. People as individuals need to be responsible – we will all need to drive less, switch to electronic cars, fly less if we have any hope of preserving our world for future generations. To argue otherwise is wilful ignorance. But moreover, people in power making key decisions affecting our environment such as this one need to step up to the plate. Our leaders need to start making decisions based on the welfare of the citizens they purport to lead, not on unsustainable economics influenced by big business and the politics of greed. Therefore we implore you, more in hope than expectation to do the right thing and decide against approving these plans.

Yours sincerely

David and Emily Light

Email

I am writing to you as a Southampton resident to plead with you to do all you can to prevent the expansion of Southampton Airport, as this is an urgent and highly important matter for your local community. As the planning application has been submitted over the festive period, presumably to minimise the vociferous objection of most of the locals, I am calling on you as our representatives to make our objection clear.

Public Health England have called air pollution the biggest environmental risk to human health in the UK, responsible for the deaths of 66,000 people per annum. This includes tragic cases such as Ella Kissi-Debrah, who at just 9 years old, died because the Government did not act to clean up the air in her local area. Now Southampton Airport plan an expansion which will further reduce the air quality for Southampton residents. I am a mum of 3 small children, and it is mostly for them that I am sitting up at night trying to write the best email I can to get support from people like you. I don't want their health, their lives, to become the next statistic of why we should have acted sooner to reduce Southampton air pollution. Their schools (Townhill Infants and Townhill Juniors) are near the direct flight path, so every playtime, every PE lesson, every summer fete, they will be exposed to increased air pollution as a result of the airport expansion.

The claims made by the airport regarding CO2 emissions are ludicrous. Increased air travel clearly results in increased emissions. This is simply unacceptable at the time when there is global pressure to reduce travel emissions as part of an emergency climate mitigation programme. Any expansion would worsen the already poor air quality in Southampton, with a direct impact on the health of the local population. As evidenced above, this disproportionately targets the health of local children and those already vulnerable through ill health.

With regards to noise pollution, the estimation put out by the airport has been questioned as very dubious, and their mitigation is to encourage local residents to spend their lives indoors with the windows shut (the only way that the recommended noise insulation can reduce noise pollution). This is in direct opposition to international health guidelines, for vitamin D, for exercise, for mental health. People, particularly children, like being outside and need to be outside – in their gardens, in the beautiful parks – for their physical health and mental well-being. Nobody wants an increase in noisy planes destroying our enjoyment or health benefit of outdoor spaces.

We should be doing all we can to reduce travel emissions. The justifications laid out by the airport developers are completely null and void as there is nothing positive about this expansion for the local community, the national interest or the international efforts to reduce human-mediated climate change. This is a very clear case where corporate greed and the convenience of the very few is being put before the health and well-being of the many. It is in direct conflict with national and global aims of reducing air pollution in the urgent fight against climate change. And it is awful for our children's health and well-being.

Please can you be our voice, and clearly object to this planning application in the strongest terms.

Regards,

Suzy

SO18

Email and attachment

I have objected to the application to expand Southampton Airport and would be grateful if you could take my objections into account when responding as a stakeholder to this application. My submission is attached.

Kind regards

Liz Batten

Bitterne Park resident

I object to this application for the following reasons:

1. The Governor of the Bank of England has announced that climate change is a “tragedy on the horizon” and that all financial institutions should be carrying out climate stress tests in view of this. Any proposal to increase carbon emissions, such as airport expansion, will clearly come within the remit of this imminent restructuring of investment strategy. Airport expansion, on moral as well as financial grounds, presents a high risk of investment in a stranded asset.
2. The Council should give consideration to the place of airport expansion within the regional transport strategy. Transport for the South East has proposals for its draft transport strategy for the period to 2050 out for consultation until 10<sup>th</sup> January:  
<https://transportforthesoutheast.org.uk/transport-strategy/>. A major application such as this should be postponed until this draft strategy for the South East region has been agreed by all stakeholders. It is inappropriate to make such a decision now, especially because there are flaws in the regional strategy (it currently projects an increase in road traffic in 2050 over today’s levels) which need to be addressed.
3. It is inevitable that any increase in passenger numbers will bring more road traffic, as the public transport network is not capable of supporting an increase in passenger numbers of this scale.
4. Lengthening the runway will allow 737 and 757 jets to take off and land with a full complement of passengers, baggage and fuel. The noise from these aircraft is so much louder that life will become unbearable in places like Bitterne Park. I have used an app on my phone to measure the Dash 8s at between 70-80 decibels as they fly over Riverside Park. This is about the level of conversation. A jet is much louder than this and during the summer months the noise from charter jets taking off and landing is too loud to hear conversation or television. Bournemouth Airport is more suited to such aircraft.
5. The Airspace Change initiative is due to be completed early in 2020 and will concentrate flights into narrower spaces, thereby resulting in more noise for people living directly beneath the flight path. The implications of these changes must be considered alongside this application and the draft regional transport strategy, and the real impacts on residents’ lives and wellbeing put front and centre of any decision making. These would include the effects of air pollution, noise pollution, congestion, loss of quality of life, and loss of property value. I suggest any truthful and fully inclusive cost/benefit analysis would lead to the rejection of this application.
6. The Government’s own Committee on Climate Change has requested that ambitions for airport expansion are reined back as current plans will far exceed the Government’s own target for



reduction in CO2 to net zero by 2050. There is no way in which increasing carbon emissions can be seen as good for our community and our children's future prosperity.

Please do not approve this application.

Email

Good Morning,

Ref:19/2021/CONSUL.

I understand that you will be submitting a response to EBC application for extension of the runway at the airport and would ask you could note the concerns of residents who live under the flight path in respect of extra flights that will cause more noise and pollution to the many residents like us who live here and which will also effect a large senior school. AS a nation we are being encouraged to consider the environmental impact of our daily actions and as a city our poor air pollution record will certainly not be helped by extra flights and extra traffic. There is also no clear indication of the long term operating hours – at the moment the first flight out is 6.40 and last flight in is 11pm Will this window be widened.

I hope you will consider my comments when you submit your response.

Many thanks

Carol Wills

21 Sandringham Road

Email

To whom it may concern.

Ref the consultation regarding the expansion of Southampton Airport, on behalf of Clean Air Southampton.

There are many reasons to object to the expansion of an airport given the overall environmental situation, however as this response is on behalf of Clean Air Southampton we will concentrate solely on local air quality issues.

Air pollution represents a major public health challenge and has been linked to cancer, asthma, stroke and heart disease, diabetes, obesity, and dementia. NO<sub>2</sub> in particular is thought to be responsible for over 23000 early deaths annually in the UK.

As a port city, and major transport hub, Southampton is well known to have poor air quality on a wide number of measures, with a variety of pollutants exceeding statutory limits. The city council are legally obliged to take action to reduce these pollutants. Their, in our opinion inadequate, plan claims that with a number of improvements to the typical emissions of the vehicle fleet and cooperation from other parties they will, just, achieve the necessary air quality improvement to avoid legal action. Increasing the emissions from Southampton Airport, along with the extra road traffic that any increased usage will bring, will undoubtedly push the trajectory of the air quality in the city back outside the legal limits.

As such, on behalf of Clean Air Southampton we object to the expansion.

Best regards

Alistair Chaplin

On behalf of Clean Air Southampton.

--

Sent from my Android device with K-9 Mail. Please excuse my brevity.

Email

CAUTION: This email originated from a non UK Government address. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir / Madam

In response to your letter, dated the 20/12/2019.

Adding to the co2 and noise pollution we already have to endure, it seems to be a contradiction to Southampton City Councils stance on climate change to support anything that compromises it unthinkable.

To submit proposals for a runway extension, so larger aircraft can be accommodated, and then chop down trees that would help to offset the extra CO2, is absolutely mindless.

This airport is in the middle of a residential area with parks, lovely walks and amenities, although one of those walks has been barricaded off by the airport with an extremely ugly prison fence, after they promised not to.

Any promises made by these people are not going to be fulfilled!!!

So PLEASE PLEASE don't support them, and get them to take down that ugly prison fence so we can enjoy Marwell copse again as we have done for over forty years

Thankyou yours in hope  
Ade

# Response to the Environmental Impact Assessment (EIA) of the proposed runway expansion of Southampton International Airport

Prof F. Eigenbrod, Dr M. Hudson, Dr P Shaw, Dr J.G. Dyke, Prof C. Heady

Corresponding address:

December 4th, 2019

## Summary

The proposed extension of Southampton Airport runway and increase of annual passenger numbers to 3 million by 2021 and to 5 million by 2037 will significantly increase climate, noise, and air pollution. These impacts go significantly beyond those originally assumed by the original Master Plan. The Environmental Impact Assessment (EIA) produced by Savills for the proposed extension significantly underestimates the negative impacts of the airport. Indeed, the EIA **does not appear to meet its legal obligation to consider the maximum adverse effects** of the expansion (the so-called ‘Rochdale Envelope established in case law<sup>1</sup>) both in the case of the noise impact of the airport and in the case of the increased traffic the airport will create. Moreover, the EIA understates the climate change impact of the airport expansion; which is approximately the same as adding an additional city of 100,00 people. The projected economic benefits of the expansion are also grossly inflated, as they are based on the unrealistic assumptions, and excludes factors such as the negative impact on house prices that the increased noise will incur, as well as the losses of productivity resulting in increased traffic congestion near the airport. As such, it is clear that the case made in the EIA that the benefits of expansion exceed the negative impacts is simply incorrect – the proposed expansion will have severe, long-term impacts on climate and noise pollution, create unmanageable levels of traffic congestion, therefore greatly outweighing any economic effects.

Details on 1) noise and population health; 2) transport and access; 3) climate change impacts; and 4) economic benefits are outlined below.

## Noise

The effects of plane noise on local residents are addressed in two chapters in the EIA – Chapter 11 (Noise and Vibration) and Chapter 15 (Population Health). In Chapter 15, the EIA clearly lays out current policy:

### Local Planning Policy

#### *Current Planning Policy*

15.2.3 To achieve EBC’s aim to “*protect and improve the Borough for the benefit of local people now and in the future*”, the adopted Local Plan<sup>5</sup> states that new developments will be controlled to prevent undesirable consequences from noisy development, noise-sensitive developments and limit increasing background noise levels. A noise impact assessment is required prior to the consideration of an industrial or commercial development. When considering the acceptability of proposals for noise mitigation, World Health Organisation (WHO) publications will be consulted.

---

<sup>1</sup> <https://transform.iema.net/article/eia-coordinators-and-rochdale-envelope>

The EIA (in Chapter 15) goes on to point out that the maximum level of airplane noise is recommended by the WHO is 45 dB <http://www.euro.who.int/en/health-topics/environment-and-health/noise/publications/2018/environmental-noise-guidelines-for-the-european-region-2018>). The specific WHO guidance ‘strongly recommends’ keeping airport noise below 45 dB, as levels above this are associated with ‘adverse health outcomes’; however Chapter 15 dismisses the 45 dB threshold as not being relevant as ‘these are recommendations not requirements’.

The EIA (Chapter 15) also outlines the UK’s Aviation Policy Framework, which also publishes what it considers maximum noise standards – these are 51 dB during the day and 45 dB during the night (below):

*Aviation Framework Policy*

15.2.1 The Aviation Policy Framework<sup>3</sup>, published by the Government in 2013, provides the current aviation strategy. It provides a framework for the aviation sector to support long-term sustainable economic growth by reducing global emissions.

15.2.2 One of the main aims of the Aviation Framework Policy (2013) is to reduce noise levels. It sets the average noise level to 57dB over the 16 hour period from 0700-2300 as the maximum noise standard<sup>4</sup>. A night time Lowest Observable Adverse Effect Level (LOAEL) of 45dB is proposed by Air Navigation Guidance (GOV, 2017) for the 8 hour night time window. The equivalent daytime LOAEL proposed is 51 db. The LOAEL is the level above which adverse effects on health and quality of life can be detected.

However, the actual modelling of the potential population affected by the proposed expansion (carried out in Chapter 11) only models daytime noise contours at 55 dB and above, not the 51 dB suggested by the Aviation Policy Framework (APF) or the 45 dB recommended by the WHO. Indeed, while Chapter 11 refers to the APF, it makes no mention of the recommendation to keep daytime noise below 51 dB. This is a startling omission as is clearly stated in Chapter 15! Indeed, Chapter 11 suggests there is very little evidence as to what the Lowest Observable Adverse Effect Level (LOAEL) actually is, again apparently ignoring Chapter 15.

**Given the well -documented potential negative health of aircraft noise, only modelling effects starting at 55 dB is clearly inadequate and contrary to the legal obligation to meet the Rochdale Envelope principle of considering the maximum adverse effects of the proposed expansion.**

Chapter 11 makes it clear that the proposed runway extension will lead to very large increases in the number of people affected by noise at the 54, 57 and 63 dB contour noise contours. Therefore, it is likely that considering 51 dB or 45 dB contours would mean a very substantial fraction of the population and Eastleigh and Southampton would be adversely affected by airplane noise resulting from the proposed extension. Note that 54 dB is nearly twice as high as 45 dB, as dB is measured on the log scale.

Moreover, Chapter 11 of the EIA admits (11.6.14) that the:

*“sensitivity of the receptors [i.e. people], both households and [Bitterne Park Secondary] school, is considered to be high, and the magnitude of the 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.”*

*“sensitivity of the receptors [i.e. people], both households and [Bitterne Park Secondary] school, is considered to be high, and the magnitude of the 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.” (our emphasis).*

Crucially, the population affected by noise in 2037 at 63 dB or above (so 1.5 times as high as the maximum noise standard in the EIA, and the level at which the major impact applies, according to the EIA) is a significant underestimate (1550 people) as it fails to consider the student population of Bitterne Park Secondary school (1752<sup>2</sup>). Moreover, the proposed mitigation measure of noise insulating windows (which will be provided by the airport) for Bitterne Park Secondary school and other residents who will be within the 63 dB noise contour by 2021 or 2037, will be largely ineffective during summer days (when noise levels are predicted to be highest by the EIA). This is because neither the school nor most residents have air conditioning, so clearly this insulation will be much less effective in the summer months as people will need to open windows to stay cool. The WHO report on aircraft noise (link above) points out (Page 69) that numerous studies have shown strong links between aircraft noise and reading and oral comprehension in children. As such, it is clear – even from the very limited assessment in Chapter 11 - that the proposed expansion will have a **“direct, long-term adverse effect of major significance”** for over 3300 people – the 1550 residents, and the 1750 students, plus staff, at Bitterne Park school – even after mitigation measures are carried out.

### Transport and access

Chapter 8 ( ‘Transport and Access’) of the EIA, only considers increased traffic due to the airport for 3 million passengers, not the 5 million the airport forecasts by 2037. This is because (in the EIA’s own words) “the supporting infrastructure” limits growth to 3 million passengers a year:

8.2.35 The Airport Masterplan sets out a strategy for accommodating airport passenger growth to 5mppa by 2037. To achieve this level of passenger growth the airport masterplan sets out a strategy for new airport related infrastructure and terminal building expansion. The growth of passenger volumes at the airport is therefore directly linked to the implementation of all development presented in the master plan and measures included within EBC’s preferred SRTM model scenarios, which includes all committed development and associated highway improvements. Although the runway facilitates the growth of the airport to 5mppa, the supporting infrastructure limits this growth to approximately 3mppa, which is the basis of the planning application.

However, “Environmental Statement Appendix 6.1 - The Economic Impact Assessment”, clearly states that the projected maximum annual benefits of £400 million in benefits by 2037 will only occur due to the 5 million passengers a year associated with the MasterPlan (enabled by the runway extension). Moreover, most other effects of the airport expansion (noise, emissions, DO consider the 5 million passengers. Again, the Rochdale Envelope approach makes it clear that the EIA should be made within certain bounds, and consistently applied; this is clearly not the case here.

**As such, the EIA is once again importantly flawed and has not met its obligation to outline the maximum adverse affects of the proposed expansion in terms of its consideration of the potentially very large impacts on road traffic.**

---

<sup>2</sup> <https://get-information-schools.service.gov.uk/Establishments/Establishment/Details/116458>

Furthermore, the transport assessment (Chapter 8) only considers percentage increases in traffic on roads associated with an increase from 2 to 3 million passengers, and not the effects these increases will actually have on journey times. As congestion near the airport on the M27 and the key surface roads near the airport and Junction 5 is already a major issue, it is highly likely that even small percentage increases (e.g. 1%) will have cumulative impacts on journey times much greater than 1% even for 3 million passengers, as most roads are already near capacity. Of course, the impact of 5 million passengers on road traffic will clearly will be much greater.

## Climate

The climate impacts produced by Southampton Airport from the aircraft using the airport is estimated to be **998 thousand tons of CO2 equivalent in 2021** (this includes taxing, take off, landing, climbing, cruising, and descent). Total emissions for the Eastleigh area for 2021 (minus aviation) are projected to be 609 thousand tons of CO2 equivalent.

The significant increase in carbon emissions from Southampton Airport is incompatible with the emerging local plan.

13.2.14 In addition, the local plan notes the need to “limit emissions of carbon dioxide and other greenhouse gases from existing and new development, transport and other activity in the Borough, make sure that new development does not worsen climate change or suffer from its effects, including flooding, and find ways of mitigating and adapting to climate change”.

13.2.15 Eastleigh Borough Council’s Climate Change Strategy details Eastleigh’s vision for tackling climate change within the borough, in particular Eastleigh Borough Councils’ desire to “be regarded nationally as a leader in how to tackle climate”. The strategy covers eight areas, including transport, low carbon development and construction and adapting to climate change. The strategy does not include any specifics regarding the Southampton International Airport or aviation. However, it does propose that “All significant new developments will be built to high economically, socially and environmentally sustainable standards”.

**The proposed extension will lead to Southampton Airport producing carbon emissions 160% greater than those produced within the Eastleigh region by 2021. Moreover, during the Fifth Carbon Budget (2028-2032), the 0.14% of emissions accounted for by the proposed extension (Table 13.9) is equivalent to the carbon budget of 98,000 people (assuming a population of 70 million in the UK during this time period). The magnitude of these climate impacts threaten to dwarf any climate mitigation efforts by Eastleigh Borough County Council.**

## Economic Impact

The EIA economic assessment (Appendix 6.1 - The Economic Impact Assessment”) is carried out by Steer Davies Gleave. It states that the projected maximum annual benefits of £400 million in benefits by 2037 due to the 5 million passengers a year associated with the MasterPlan (enabled by the runway extension). It is important to note that the economic benefits of ‘business as usual’ (so NO runway extension) are assumed to be £275 million a year, based on 3.3 million passengers/year associated with an increase to 3.3 million passengers – which is possible **without** the runway extension – so the *maximum* net effect of the expansion is (based on this modelling) £125 million a year, and not £400 million. Similarly, the *maximum* net effect on employment is 1450 additional jobs by 2037, when compared to no expansion. However, in both cases, the EIA assumes a *linear*



*increase* in economic and employment benefits with passenger numbers. **This is wrong** – the economic forecasts should be based on modelling the *marginal* increase of increasing passenger numbers to an existing airport, not treating the effects of the extra 3 million passengers as it was a new airport in a region with no airport (which is what the linear extrapolation in benefits assumes). This is because there is clearly a much larger increase in economic benefits to going from no airport to regional airport like Southampton, then increasing existing passenger numbers on an existing airport. Similarly, the economics of scale mean that increasingly less people are needed to do a given amount of work as the size of a given enterprise increases – it will not take twice as many people to run an airport with twice as many passengers.

Moreover, at present (according the EIA), only 32% of the indirect economic impact of the airport occurs within the Solent region. As indirect impacts are projected to account for £49.5 million of the £125 million benefit of the expansion, this reduces the positive impact of the affected area to a maximum £109 million a year. In addition, the projected maximum effect on economic activity of £109 million (based on the erroneous linear increase assumption) ignores the negative economic impacts associated with reductions in house prices (due to the greatly increased noise near the airport) nor in the losses in productivity associated with traffic congestion induced by the expansion. **Indeed, it is impossible to tell from the economic analysis if the net economic effect of the airport is indeed more likely to be positive, or – after accounting for negative effects of lost productivity due to traffic congestion, a fall in house prices, and the erroneous assumption of a linear increase in benefits – it is actually negative.**

Finally, even the widely optimistic £109 million in benefits would only entail a small increase to the local economy. The GVA (total economic activity; <https://www.ons.gov.uk/economy/grossvalueaddedgva/datasets/regionalgvaibylauthorityintheuk>) of Southampton was approximately £5.8 billion in 2015; for Eastleigh it is £3.6 billion (£9.4 billion in total) – so the yearly economic benefit is at best 1.1% of the total economic activity just in these two cities in 2015 (not including Portsmouth); clearly, the relative contribution will only decrease as the economies of both cities grow.

The estimates of the impacts of the expansion on jobs are similarly inflated, as the off-airport jobs are based on the flawed economic projections of a continued linear increase in benefits. It is also very likely that the projected increase in jobs at the airport is an overestimate. This is because in the 2006, the airport masterplan claimed that by 2015 Southampton Airport would employ 1541 people. However, according to the EIA, the airport only employs 900 people at present (58% of the projection), with a projection of 1500 jobs at the airport in 2037. If the new forecast is a similar overestimate, there may only be minimal new jobs at the airport by 2037.

## About us

**Prof Felix Eigenbrod** is a geographer and Professor of Applied Spatial Ecology at the University of Southampton.

**Dr Malcolm Hudson** is an Associate Professor in Environmental Sciences at the University of Southampton, and an expert on Environmental Impact Assessments.

**Dr Peter Shaw** is an Associate Professor in Environmental Sciences at the University of Southampton, and an expert on applied Environmental Science.

**Dr James Dyke** is a geographer and Senior Lecturer in Global Systems at the University of Exeter.

**Prof Christopher Heady** is a Professor of Economics at the University of Kent

Mon 09/12/2019 17:46

Jeffrey Burnham 

Reference 19/02021/consul -Airport Expansion Plans

I am emailing to ask that Southampton City Council rethink its position in the light of Parliament's declaration of a climate emergency and the 2019 amendment to the Climate Change Act target for zero net carbon by 2050, by publicly stating that the Council objects to the expansion of Southampton International Airport. Aviation is becoming responsible for an increasing proportion of greenhouse gas and other emissions. The Committee on Climate Change (CCC) identifies several aviation measures to achieve net zero emissions by 2050, including restraint on growth of airports.

Aviation growth both nationally and locally is inconsistent with UK emissions targets. In addition, an expanded Southampton airport will increase air pollution in our already polluted city, increase noise for those under the flight path with more flights and bigger aircraft.

There will be few, if any, benefits for Southampton residents (we get a worse quality of life to enable more people to fly – and nationally 70% of flights are taken by just 15% of people). The promise of low-paid jobs is not enough to cover the cost to us, as Southampton citizens, of all the above The planned expansion to the Runway is to accommodate larger 190+ seater Passenger Planes.

Their destinations will be predominantly to Tourist Destination in Europe and beyond. Millions of pounds will be taken out of the National Economy far outweighing any benefit to the Local Economy. There was an interesting feature on T.V recently on Ilfracombe, whose economy had declined drastically over the last few years. The main reason given was the expansion and increase of cheap flights to Europe which was destroying their Tourist Trade. I am sure this is also true for many other British Tourist destinations.

More flights by a Green City Charter signatory will undermine the Charter and make a mockery of the Southampton Council's efforts to achieve a low carbon future for our city. I accept the need for a small regional airport at Southampton whilst acknowledging that the Climate Crisis means we must all fly less. Offsetting is not a viable solution, makes one think of the selling of Indulgences in the Middle Ages. I assume that the airport is only making its own activities carbon neutral as there is no way they can make the activities of the airlines using the airport carbon neutral.

I know that the planning decision will be made by Eastleigh, but Southampton City Council will be a consultee and we would like you to stand up and say you oppose expansion (as Twyford has) for the above reasons. I want you to retract any support you may have already given to the idea of airport expansion, as key stakeholders in the consultation for the airport's master plan last year. I urge you to rethink your position.

I am of the opinion that if the expansion plans are ratified, then all flights will take off to the South, so that **only Southampton Residents** will be subject to the increased noise pollution. Maybe you may wish to get this confirmed, unfortunately the Airport are not answering my emails on the subject.

You may wish to read some experts reaction to some of the statistics issued by the Airport's P.R. Dept on the subject –

Response to the Environmental Impact Assessment (EIA) of the proposed runway expansion of Southampton International Airport Prof F. Eigenbrod, Dr M. Hudson, Dr P Shaw, Dr J.G. Dyke, Prof C. Heady Corresponding address: F.Eigenbrod@soton.ac.uk December 4th, 2019 Summary The proposed extension of Southampton Airport runway and increase of annual passenger numbers to 3 million by 2021 and... [Read more](#)

Thank you for your consideration.

Jeffrey Burnham

Mon 16/12/2019 19:05

Chris Gillham

FW: Southampton Airport Expansion

Dear Sir/Madam

I have made the following submission to Eastleigh Council. Exactly the same arguments apply to Southampton, in that the Council has a Declaration of Climate Emergency which cannot be reconciled with support for airport expansion and growing emissions (carbon and pollution) over the City.:

The Government, Hampshire County Council and Eastleigh Council have all declared Climate Emergencies. Are these just meaningless declarations? Are they sheer hypocrisy? Do people not understand what the Climate Emergency is? It takes distortion of truth to Trumpian levels to not know that the Emergency means reducing carbon emission, not increasing it. With air travel it means reducing the number of flights not increasing them; it means reducing the road travel associated with airports, not increasing it.

Amongst the registered supporters here there are even people who claim to think that expanding airport capacity somehow improves the environment –like the Red Queen readily believing impossible things. We've had the same sort of absurd arguments for decades from the road builders, when they know that increased capacity means increased use and increased emissions (carbon and pollution).

Other supporters claim an economic benefit, when no such economic benefit has ever been demonstrated by the aviation industry, simply because nobody ever calculates the externalities. Apart from the externalities arising from the road transport that serves aviation, consider the externality of noise alone. Ask the sufferers of the noise what they would pay to avoid any one flight. 5pence? Ask how much would a school class pay to avoid 2 minutes of time in which nobody can be heard. 50p? Then add up these costs over the population under the flight path and it would amount to thousands of pounds per seat on the plane. Consider the externality of reduced property value? How much is lost from the selling value of a house that is so affected? Then ask the same of the air pollution externality. If only a fraction of these externalities were recovered from the users of aircraft (i.e. if true costs were paid) the amount of aviation would plummet.

Nor is the jobs argument credible. If we were serious about adjusting our behaviour to the Climate Emergency, our economy would move towards sustainable activity. Eastleigh Council cannot at once claim to be serious about its Climate Emergency and approve of this capacity increase.

Chris Gillham  
16 Upper High Street  
Winchester SO23 8UT

Tue 17/12/2019 17:56

Madeleine Ayling

19/02021/CONSUL

I strongly urge Southampton City Council to oppose the expansion of Southampton Airport.

I understand that you have declared a Climate Emergency - I cannot see how expanding the airport could possibly fit with this. Emissions from flights will increase, as will emissions from cars travelling to and from the airport on roads that are often gridlocked. I understand that the airport have suggested that large amounts of future passengers will take the train, as so many trains are at capacity this doesn't seem likely. Neither the local road or rail network can cope with these increases.

The noise from the current airport operations is disruptive to local residents, especially those near the flight path. Personally, I am woken at 6:40am every weekday by the noise, I cannot hold a conversation outside or hear my TV with windows open when flights are overhead, and the vibrations make my house shake. The noise is also extremely worrying at Bitterne Park Secondary School, surely this must be affecting pupils' concentration levels. The increase in noise from the airport expansion is a horrifying thought. I understand the airport may offer money towards windows and insulation - this is pointless if residents want to open their windows or use their gardens.

Thank you

Madeleine Ayling  
38 Newton Road  
Bitterne Park  
Southampton SO18 1NL

## **Proposed Southampton Airport runway extension ref 19/02021/CONSUL**

I live in Bitterne Park, SO18, and I am extremely worried and concerned about the proposal for extending the Southampton Airport runway. I appreciate the planning application is with Eastleigh council and I am a Southampton resident, but I live on the top of the hill at Bitterne Park and the planes fly directly over the hill and my rooftop to the runway. I object the plans for the following reasons:

### Noise

Due to the position of Bitterne Park properties being on a hill, the planes are so much closer to our houses because we are on higher ground. I can see the windows of the planes as they are so close when they are coming in to land. When they are taking off this way over Bitterne Park they are even more noisy. The noise levels from planes are already unhealthy and the airport has admitted it will get worse if they expand. This really is noise pollution.

The runway should never have been built with a flight path over a hill as the planes are so much closer to the houses - its common sense that the planes should not come in over high ground, but should come in over lower ground. When I am in my garden with friends and family we have to stop talking every time a plane comes over. I cannot have my living room window open as I cannot hear the TV or music when a plane comes over; the noise is loud even when the windows are shut. Not only do we have the noise of the engines but also the subsequent backdraft noise.

I attended the airport's public information session and I was told by the lady wearing the "Noise" badge that the number of planes will increase by 30%! Also there will be bigger planes. I asked her how she would feel if she lived in Bitterne Park and she could not answer me. Imagine yourself if you were faced with nearly a third more planes over your house causing such disruption.

They said at the information session we can apply for payments for triple glazing which proves that the planes will be significantly more noisy; this does not help with the noise in my garden. I cannot have planes flying over my rooftop 30% more frequently, it is totally unacceptable.

The Aviation Policy Framework (APF) suggests 51 dB noise maximum whilst the World Health Organisation guidelines for average noise exposure strongly recommend reducing noise levels produced by aircraft to below 45 dB as aircraft noise above this level is associated with adverse health effects. The airport's models of projected noise from the airport is 54 dB. The planning information makes no mention of the recommendation to keep daytime noise below 51 dB or 45 dB. Other reports make it clear that the runway extension will lead to very large increases in the number of people affected by noise at 54, 57 and 63 dB noise levels. At 51 dB or 45 dB this would mean a very substantial fraction of the population and Eastleigh and Southampton would be adversely affected by airplane noise resulting from the proposed runway extension. From what I have read, 54 dB is nearly twice as high as 45 dB due to the way dB scale is measured.

The proposal for noise insulating windows, to be provided by the airport for Bitterne Park Secondary school and other residents who will be within the 63 dB noise levels by 2021 or 2037, will be totally ineffective during summer days when noise levels are predicted to be highest. This is because neither the school nor most of us residents have air conditioning, so clearly this insulation will be much less effective in the summer months as people need to open windows to stay cool and are

spending time in their gardens. The children attending Bitterne Park school have said they cannot concentrate in school with the noise of the planes. They also commented on the layer of black dust on top of the school roof. The WHO report on aircraft noise points out (Page 69) that numerous studies have shown strong links between aircraft noise and reading and oral comprehension in children. So its clear that the proposed expansion will have a “direct, long-term adverse effect of major significance” for over 3300 people – the 1550 residents, and the 1750 students, plus staff, at Bitterne Park school – even if the window insulation mitigation measures are carried out

### Climate crisis

I understand that Parliament have declared a climate emergency and in 2019 there was an amendment to the Climate Change Act target for zero net carbon by 2050, and any aviation growth is inconsistent with UK emissions targets. An expanded Southampton airport will increase air pollution in our already polluted city, increase noise for those of us under the flight path with more flights and bigger aircraft. Planes are becoming responsible for an increasing proportion of greenhouse gas and other emissions. The Committee on Climate Change identifies measures to achieve net zero emissions by 2050, including restraint on growth of airports.

Eastleigh Borough Council’s Climate Change Strategy details their vision for tackling climate change within the borough, in particular their desire to “be regarded nationally as a leader in how to tackle climate”. The strategy covers eight areas, including transport, low carbon development and construction and adapting to climate change. The strategy does not include any specifics regarding the Southampton International Airport or aviation but it proposes that “All significant new developments will be built to high economically, socially and environmentally sustainable standards”.

The proposed extension will lead to Southampton Airport producing carbon emissions 160% greater than those produced within the Eastleigh region by 2021.

Apart from emissions and noise from the planes, the plans show another big car park to be built at the airport so they are expecting more cars, more road congestion and that will result in more air pollution in an already polluted city. Carbon offsetting does not address this adequately. Many people are publicly stating they are committed to reducing their travel by plane. Bearing in mind the advise that growth of airports is reduced in order to achieve net zero emissions by 2050, I cannot understand why Southampton Airport is wanting to increase the number of planes as this will not achieve a low carbon city.

The airport are chopping trees at Marhill Copse which have preservation orders - I don't know how all of this is being allowed to happen.

Airports should not be built, and certainly not be expanded, where they are sited in a town and close to residential property. If it were so necessary to have more planes in the south, there is already an out-of-town airport at Bournemouth that has a runway long enough for the largest of aeroplanes, already has a very large car park, and a large airport terminal; it’s out of town position makes it ideal if is true that more people in the area want more local flights and it doesn't need expansion. It was previously the overspill airport for London as it can take large planes and it only needs transport



links to be improved for this to be the solution. We do not need Southampton to be expanded when there is already the larger runway so close at Bournemouth.

### Economy

There will be few, if any, benefits for local residents, we will get a worse quality of life to enable more people to fly – and nationally 70% of flights are taken by just 15% of people. The promise of low-paid jobs is not enough to cover the cost to us residents of all the above. The estimates of the impacts of the expansion on jobs are inflated because in the airport's 2006 masterplan it claimed that by 2015 Southampton Airport would employ 1541 people. However, the airport only employs 950 people at present (58% of the projection), with a projection of 1500 jobs at the airport in 2037. If the new forecast is a similar overestimate, there may only be minimal new jobs at the airport by 2037.

I have lived here for 12 years and accept I bought my home knowing the aeroplanes fly over my house. However, I did not buy my house in the knowledge that there would be 30% more planes flying over my rooftop with the corresponding increase in noise and emissions.

The airport expansion cannot happen and I request that you support me and all residents in the light of Parliament's declaration of a climate emergency and the 2019 amendment to the Climate Change Act target for zero net carbon by 2050, and the serious noise pollution effect on residents, and that you do not agree to this expansion of Southampton International Airport and to stop this unacceptable plan.

Sheila Ramsay  
56 Sandringham Rd  
Bitterne Park  
SO18 1JJ

**Table 7.15 [Chapter 7] shows an almost quadrupling of airport source emissions from 85.57 tonnes/year (2018 baseline) to 320.96 tonnes/year (2027 with development).**

The Information for the Habitats Regulation Assessment (HRA) submitted with this application states [7.43] "The NO<sub>x</sub> concentrations and nitrogen deposition exceed critical level and critical load in the future with or without the Proposed Development. The 1% screening threshold for contributions from the Proposed Development alone is also exceeded. Therefore, likely significant adverse effects on the River Itchen SAC from air quality cannot be ruled out, either for the Proposed Development **in-isolation or in-combination** with other plans and projects. *An Appropriate Assessment will be required* to assess impacts on the River Itchen SAC and its sensitive qualifying feature Southern Damselfly and supporting habitat 'Rich fen'."

The '*Appropriate assessment*' states [7.77] "The Proposed Development will not prevent the restoration of these supporting processes (adaptation and resilience, air quality, conservation measures, water quantity/quality (Natural England, 2019), **although it may cause a delay with relation to air quality through pollution contributions in-combination with other plans and projects**, and after the restoration has been complete, the ability of the affected area to support the habitats of Southern Damselfly will not be subject to negative influences from air quality."

Section 7.7.1 states the "**known** effect of nitrogen dioxide poisoning is through effects on the lungs and associated mucus membranes, which are absent in insects." I have been unable to find this in the source documents available online. Furthermore I can not find studies asserting that direct NO<sub>x</sub>/NO<sub>2</sub> does **not** affect the Damselfly via its system of trachea – indeed it would be surprising that the system which directly delivers beneficial oxygen to insects cells would also not thus transport a respiratory poison. The interaction effects between airborne NO<sub>x</sub> levels and Nitrogen deposition levels do not appear to have been investigated in the EIS, which further brings the conclusions of the 'Appropriate Assessment' into question.

Section 9.9.4 lists the cumulative (**in-combination**) schemes considered and includes housing developments such as those off Burnett's Lane and Fir Tree Lane.

1. However the following, that Eastleigh BC is in favour of (including its adopted and emerging local plans), have **not** been included:
  - The Allbrook/Bishopstoke/Fair-Oak housing development and associated road construction and operation.
  - The proposed industrial/commercial development of land to the north east of the airport.
  - The Chickenhall Road link.

2. Furthermore future tunnelling under the runway (and subsequent maintenance such as ongoing water extraction) through contaminated land is likely to release at least some of these to the SAC. Whilst not necessarily related to NOx or Nitrogen deposition levels, the potential cumulative affects on the Southern Damselyfly of these contaminants needs to be assessed.

Please note that the HRA relies on Appendix 9.2 Ecological Context. Sections, 1.20, 1.21 and 1.22 refer to evaluating the scheme against Biodiversity Opportunity Areas. This is not up to date:

“Previously, the Hampshire Biodiversity Information Centre had developed and mapped Biodiversity Opportunity Areas (BOAs) as part of a regional project to identify those areas of strategic importance that offered the greatest opportunity for landscape-scale habitat management and restoration. These BOAs were produced in consultation with a great many stakeholders and utilised HBIC’s Habitat Suitability GIS model<sup>2</sup> in combination with data on existing habitats, site designations, geology and historic mapping. **However, it was agreed that BOAs were considered too broad-brush for defining ecological networks for use in planning at the local scale**, plus they excluded large parts of Hampshire. A much more precise delineation of an ecological network was required, whilst retaining BOAs as the “strategic ecological network” for landscape scale projects.” [HBIC ‘Mapping the Ecological Network’ 2018]. To summarise:

3. The ecological impact of the proposed development (particularly interaction and cumulative effects) has not been evaluated on the Local Ecological Network .

**The HRA assessment is therefore inadequate on at least three counts. Overall it fails to provide proof that the development in combination with other plans will not affect the integrity of this European nature conservation site (SAC). Without such evidence, the "presumption in favour of sustainable development does not apply". [National Planning Policy Framework - (NPPF) 2019]**

P. G. Narbed  
19.12.2019

Mon 23/12/2019 15:14

Deborah Gearing

19/02021/CONSU

I am writing to object to the application to extend the runway at the airport.  
I live in Southampton, in the flight path at Bitterne Park.  
I am objecting on the following grounds

a) noise

Already we are subjected to considerable noise nuisance when planes fly over us - more than WHO recommendations. More planes will mean more noise. When we are in the path that's busy, there will be sometimes be flights at less than ten minute intervals, and using our gardens is impossible. I have taught at Bitterne Park school in the past. Listening and hearing is a critical part of learning for any child: when planes fly overhead, attention is disrupted. I think it is nonsense to say that effects of increased flights are 'moderate' and we will habituate ourselves to them: hearing is not something that happens selectively. We also don't only hear with our ears - low aircraft noise is an allbody experience, not replicated by headphones.

The triple glazing solution is no solution at all in the summer - windows need to be open to allow an exchange of air. There are thirty children in a classroom - it's not reasonable to keep the windows closed.

Noise nuisance leads to heart and vascular problems, and this week depression has been added to the list. Who will bear the cost of increased NHS usage?

b) Emissions

We know that we must do everything we can to reduce emissions of greenhouse gasses. The plan aims to reassure us that there will be no rise in emissions from the airport, but even if the airport manages to reduce car usage, and the number of electric vehicles is as predicted, and people use the already overcrowded trains, this is ONLY about the airport - it does not include emissions from aircraft. These must perforce increase if there are more flights and or bigger planes. Planes are a major contributor to climate gas emissions - with radiative force increasing the effects.

We live in an area that is proud of its aviation heritage and the mantle of the Spitfire sits honourably on our shoulders. Our forefathers and mothers fought hard to protect us. We are not now at war, but we are living in a climate emergency: I like to think our ancestors would put our children's future first. We also live in an area that is rich in research and innovation - would it not be possible to suggest that we just WAIT until emissions free aircraft are available? Progress is being made.

People do not want to stop flying, and aviation is a great feat of human innovation - but now is not the moment to exacerbate the negative effects when we are in an emergency. We can wait.

This planning application is an opportunity for our councils who have declared a commitment to reducing emissions to set a sign. We can say to our children - we said no. We said - wait. It is just a matter of time until clean planes are available. How will our councils achieve their emissions and clean air targets when we allow aircraft pollution to expand?

Regarding clean air targets - Southampton struggles with air quality and so do its inhabitants. My closest neighbour has COPD, two doors down are two children with asthma. The effects of planes and cars are real. Bitterne Park is an asthma hotspot in Southampton - but it is not an area of deprivation, which would usually correlate.

<http://www.publichealth.southampton.gov.uk/Images/Fig%20%20Air%20Qaulity%20managment%20areas%20Asthma.jpg>

c) access and traffic circulation

The motorway crawls at peak times. Access roads to Eastleigh and Southampton are blocked and journeys take two or three times as long as they could. This spreads out to include any road into Southampton. The airport requires more parking spaces, even though it aims to encourage train travel. The increase in traffic will inevitably exacerbate a very poor situation.

Crawling traffic increases emissions. We emphatically do not want worse air in Southampton! It also seems nonsensical to ask people to give up cars, change cars, invest and change themselves, when any improvements made will be counteracted by greater emissions from aviation! Why should the small number of people who take multiple flights have greater influence over our air quality than the thousands of people who live here?

Thank you for your time. I do hope that you will take our concerns seriously. A lot is at stake, and not just for us.

Bizness Party Councillors

B. WILSON

267 Ashmead Rd

Reg #/19/86707

5018 ILX <sup>SOUTHAMPTON</sup>

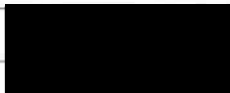
19/02021/CONSUL

Enough Airport

29/12/19

I do not <sup>want</sup> the Airport  
to INCREASE the Length  
of Runway or Developments

IT WILL Cause more noise  
more Pollution and Traffic



PLANNING, TRANSPORT  
& SUSTAINABILITY DIVISION

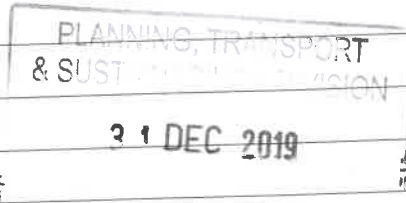
31 DEC 2019

B. WILSON

26A Ashrae Road

Bitter Lake Park

5018 14x



This page is intentionally left blank





**Councillor Christopher Hammond**  
**LEADER OF THE COUNCIL**  
Southampton City Council  
Civic Centre  
Southampton  
SO14 7LY

Direct dial: 0238083 4683  
Email: [Councillor.c.hammond@southampton.gov.uk](mailto:Councillor.c.hammond@southampton.gov.uk)

23<sup>rd</sup> January 2020

Paul Barton  
Interim Head of Planning & Economic Development

You will be shortly considering a response on behalf of the City Council regarding the application to expand Southampton Airport and I am writing to outline the position of the Labour Group at Southampton City Council.

The issue is undeniably complex, and people will disagree about the right approach. As efforts to stop climate breakdown gather momentum, more questions such as this one will arise, and forging consensus will be key. But, at this time and with the application in its current form, we would urge the committee to resolve to write to Eastleigh Borough Council asking it to reject the application.

Southampton City Council recognised that there was a climate emergency in 2017 and is allocating £60 million towards tackling this. In June 2019, we were pleased to launch the first Green City Charter with Southampton Airport as a founding signatory. Sadly, the expansion plans using existing technologies would exacerbate the climate crisis, not end it. The airport's own estimate is that carbon emissions will rise on average by 350,000 tonnes a year, making it harder for the Airport and Southampton to become carbon neutral by 2030 and meet our commitments.

Stopping climate change doesn't mean an outright ban on travel, stopping holidays and linking communities; it's about promoting cleaner international travel and speedy, affordable, clean rail rather than domestic flying. Here, we need Government to set a plan to match their ambition for a Zero Carbon Britain by 2050.

As well as our environmental concerns, a busy airport undoubtedly impacts those who live around it. Currently 5,400 households are affected by noise from aircraft taking off and landing. Should the expansion go ahead, this will eventually rise to 18,400 households, mainly around Bitterne Park, Midanbury and Townhill Park.

You will rightly look at the application impartially, however we wish to give our view that these plans would add to a gridlocked infrastructure, increase the number of households negatively affected by noise pollution from the airport from 5,400 to 18,400, and worsen our climate crisis.

Therefore, we would urge the committee to object to the expansion.

Yours truly

A handwritten signature in cursive script that reads 'C Hammond'.

**Councillor Christopher Hammond**  
**Leader of the Council**

This page is intentionally left blank