

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

<b>Application address:</b> Southampton International Airport, Eastleigh,			
<b>Further consultation from Eastleigh Borough Council on amendments to planning application Ref F/19/86707 at Southampton Airport for the following works to facilitate airport expansion:</b> Construction of a 164 metre runway extension at the northern end of the existing runway, associated blast screen to the north of the proposed runway extension, removal of existing bund and the reconfiguration and extension of existing long stay car parking to the east and west of Mitchell Way to provide additional long stay spaces.  This latest round of consultation relates to the proposed introduction of noise controls and restriction on the amount of vehicular traffic entering the airport based on a reduced growth forecast capped at 3 million passengers per annum by 2033.			
<b>Application number</b>	20/00943/CONSUL	<b>Application type</b>	Consultation
<b>Case officer</b>	Andrew Gregory	<b>Public speaking time</b>	15 minutes
<b>EBC consultation Expiry for SCC</b>	03 December 2020	<b>Ward</b>	N/A Eastleigh Borough
<b>Reason for Panel Referral:</b>	At the Full Council meeting on 20 November 2019 it was decided that the final decision on this consultation response would be made by the Planning and Rights of Way Panel.	<b>Ward Councillors (Swaythling and Bitterne Park Wards)</b>	Cllr Fuller Cllr Harwood Cllr White Cllr Mintoff Cllr Bunday Cllr Fielker

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

## **Recommendation in Full**

Instruct the Head of Planning & Economic Development to:

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

## Background

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

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

### **1 The site and its context**

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

### **2 Proposal**

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

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

- 2.3 The collapse of Flybe, which accounted for 90% of flights from Southampton Airport, is a significant material change in circumstances for the airport since the previous consultation response to this planning application was made by Southampton City Council. The Airport have indicated that without the runway extension there would be some backfilling of Flybe routes by other carriers but the routes and number of flights would be reduced with a forecasted reduction in passenger numbers from the 2017 baseline of 2 million passengers per annum to 1 million passengers per annum. The runway extension is needed to facilitate larger jet aircraft (such as Airbus A320 and Boeing 737) to attract low-cost carriers and to access the short haul holiday destination market. Without the runway extension which restricts the size/type of aircraft and limits the fuel load and passenger numbers on jet aircraft, the airport have indicated that the future viability of the airport is at significant risk even with 1 million passengers. The COVID-19 pandemic has adversely impacted the aviation industry globally and has compounded problems for Southampton Airport, however the adverse impacts arising from the pandemic have not been included in the sensitivity tests and the consideration of this application is based on a baseline pre-COVID and growth forecasts which take into account the collapse of Flybe but not the short-term impacts of the pandemic.
- 2.4 Table 1 below provides a comparison between the previous growth forecast of up to 5 million passengers per annum by 2037 (150% growth on 2017 baseline) and the reduced growth capped at 3 million passengers per annum up to 2033 (50% growth compared to the 2017 baseline). The reduced growth forecast would result in a significant reduction in forecasted flights arriving and departing - Air Transport Movements (ATMs) with in fact a 6.5% reduction in the number of flights by 2033 this is because the larger jet aircraft can accommodate more passengers.

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

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

### **3 Relevant Planning Policy**

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

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

#### **4 Consultation Responses and Notification Representations**

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

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

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

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

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

#### 4.4 Consultation Responses

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

#### 4.5 **SCC Highways: No objection**

##### Passengers Numbers

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

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

##### Car Park

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

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

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

##### SRTM/Highway trips and Impact Assessment

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

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

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

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

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

### Mitigation

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

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

### Summary

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### **4.8 SCC Sustainable Development Officer: Objection**

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

##### Climate emergency

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

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

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

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

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

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

### Summary

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### 4.11 **SCC Tree Officer: Holding Objection**

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

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

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

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

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

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

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

## **5 Planning Consideration Key Issues**

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

### **5.2 Climate Change**

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

- 5.3 Objection has been received from the Council's Sustainable Development Officer and legitimate concerns have been raised from members of the public and action groups regarding the impacts of the aviation industry on climate change. The operational emissions from the airport are forecasted to be 370,000 tCO<sub>2</sub>e per year which is significant, considering the carbon emissions for homes and industry in the entire city of Southampton (excluding the port) in 2017 equated to 528,000 tonnes.
- 5.4 In the UK, aviation emissions account for about 6% of greenhouse gases from the transport sector. However emissions from the aviation sector are set to rise and aviation is likely to be the largest emitting sector in the UK by 2050. The Committee on Climate Change (the CCC) who advise the government on climate change have indicated that even with industry improvements in fuel efficiency, some use of sustainable biofuels, growth in the aviation sector should be limited to 25% above current levels.  
It is noted that the reduced growth forecast capped at 3m pppa by 2033 forecasts a reduction in ATMs to below 25% of current levels: with a 19% decrease in ATMs by 2027 and a 6.5% decrease by 2033 (table 1 refers).
- 5.5 The Airport National Policy Framework indicates that action against climate change from aviation set at a global level is the preferred and most effective means by which to reduce emissions. Taking action only at a national or regional level has the potential to create the risk of carbon leakage with passengers travelling via other countries and increasing emissions elsewhere (para 2.8 refers).  
Furthermore Paragraphs 1.9-1.11 of the the Government Policy Paper 'Beyond the horizon The future of UK aviation: Making best use of existing runways' (2018) advises that the impacts of increased carbon emissions from increased air traffic should be considered at a national level rather than through local planning decisions.
- 5.6 It should also be noted that a recent Secretary of State decision on a Development Consent Order for the re-opening of Manston Airport overruled a Planning Inspectorate Decision that had said opening Manston would have "a material impact on the ability of government to meet its carbon reduction targets". The Secretary of State Decision dated 9 July 2020, which postdates the Court of Appeal ruling on the 'Airports National Policy Statement' (ANPS), concluded that Manston Airport's forecasted CO<sub>2</sub> contribution of 730,100 tCO<sub>2</sub>e per year (over double of the forecasted CO<sub>2</sub> contribution of Southampton Airport) should be afforded moderate weight against the Development in the planning balance.
- 5.7 The Government have said that they are committed to working closely with the sector to meet our climate change commitments, indicating that global aviation emissions offsetting scheme, sustainable aviation fuels, greenhouse gas removal technology and eventually, electric net-zero planes, will all help play their part in the aviation sector decarbonising. The Government also support an industry led commitment to net zero carbon emissions by 2050 and the range of innovative action this will unlock to achieve this outcome.  
The majority of CO<sub>2</sub> emissions arising from Southampton airport operation are from scope 3 (indirect emissions), such as from aircraft which is the responsibility of carriers rather than the airport. However it is understood that airports can introduce landing charges to encourage quieter and less polluting



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

### 5.8 Noise Impacts

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

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

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

**Table 2 - Comparison of households within aircraft noise contour bands**

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

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

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

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

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

- 5.16 It is also recommended that existing controls on night flights should remain in place with no scheduled night-time flights, defined as 23:00 – 06:00 Monday to Saturday, and until 07:30 on Sunday with the exception of 10 night flights per month or a maximum of 100 per annum to account for any unforeseen delays in the programme should be controlled by conditions. Furthermore it is recommended that landing charges should be introduced and structured towards encouraging quieter planes and such mitigation will be recommended to Eastleigh Borough Council in the event that the planning application is approved by them.
- 5.17 Socio-Economic  
It would appear the future viability of the airport is at significant risk without the runway extension, given the collapse of Flybe and the reduced interest from alternative carriers in backfilling the routes. It appears the airport needs to access the low-cost airline market to remain viable.
- 5.18 The identified need for expansion to Southampton Airport has been questioned having regard to the proximity to other areas such as Bournemouth, Heathrow and Gatwick. However the Airport Policy Framework (2013) indicates that:  
  
*“Airports are in some ways cities in themselves, creating local jobs and fuelling opportunities for economic rebalancing in their wider region or area. New or more frequent international connections attract business activity, boosting the economy of the region and providing new opportunities and better access to new markets for existing businesses.” (para 1.20 refers).*
- 5.19 This would suggest that Airports are entitled to compete for growth to support their viability and the economy of the region for which they serve.
- 5.20 The DfT report ‘UK Aviation Forecasts’ (2017) which looked at the opportunity for additional capacity at UK airports identified a growth level at Southampton of 3 million passengers per annum to 2030 and 7 million passengers per annum by 2040. The proposal to cap growth at 3m ppa by 2033 would be within the capacity allowance identified by DfT for Southampton Airport.

**Table 3 - Direct and Indirect Jobs**

<b>Jobs to 2027</b>			
	<b>2015</b>	<b>2027 without extension</b>	<b>2027 with extension</b>
<b>Direct Jobs</b>	950	475	1083
<b>Indirect Jobs</b>		797	1819

<b>Jobs to 2037</b>			
	<b>2015</b>	<b>2037 without extension</b>	<b>2037 with extension</b>
<b>Direct Jobs</b>	950	483	1410
<b>Indirect Jobs</b>		810	2367

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

## 6 Planning Balance

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

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

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

**Local Government (Access to Information) Act 1985**

**Documents used in the preparation of this report Background Papers**

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

**AG for 01/12/2020 PROW Panel**