

DEVELOPMENT MANAGEMENT

Southampton City Council
Lower Ground Floor
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Southampton
SO14 7LY



Please ask for: Andrew Gregory
Our Ref: 20/00943/CONSUL

03 December 2020

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

Dear Mr Morrison,

Application No: F/19/86707

Site Address: Southampton International Airport

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

Thank you for your consultation on the above dated 15 October 2020 and for agreeing an extension until today for our formal response. This Council's Planning & Rights of Way Panel considered this application at its meeting on 01 December 2020.

Southampton City Council Position - OBJECTION

The proposed development, as amended, to facilitate revised growth of Southampton Airport, capped at 3 million passengers per annum up to 2033, would still have significant adverse environmental and social impacts on Southampton and its citizens, particularly in respect of noise and, therefore, **the City Council maintains its objection** to this application and recommend that planning permission be refused.

The runway extension proposed will lead to a 'direct, long-term, adverse effect of major significance' to households, Bitterne Park School (and potentially other local schools with potentially a total of 12 educational establishments exposed to noise levels between the LOAEL and SOAEL in 2033), and businesses within the city of Southampton which cannot be fully mitigated through the scheme of mitigation measures offered, including the offer of acoustic insulation to households, schools and other noise sensitive buildings subject to noise levels over 60dB LAeq.

The WSP Technical Note – Aircraft Noise Assessment supplementing Chapter 11: Noise and Vibration of the Environmental Statement (ES), indicates that in 2033, compared to 2016, an additional 9,350 households (the majority of which are in Southampton) 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 significant observed adverse effect level (SOAEL).

Please note that this consultation response has been informed by paragraphs 8, 9, 11 and 180 of the NPPF (2019) in reference to the issue of noise and an updated independent peer review of the applicant's noise impact assessment. The findings of this review are appended to this letter (Peer Review by 24 Acoustics dated 10th November 2020). Please ensure that these independent findings are reported to your Council's Local Area Committee alongside this objection letter and the attached comments of local resident's (attached – as summarised in the officer report).

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

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

The applicant seeks to mitigate this noise impact by providing financial assistance for sound insulation to the occupiers of impacted premises. However, it is unclear how the offer of up to £5000 will offer any meaningful mitigation against the noise impact to houses subject to a noise level of >60dB Laeq having regard to the costs of glazing installation and loft acoustic insulation. This offer falls short of the acoustic insulation scheme at Heathrow airport which offers the full costs of insulation for residents in the 60dB contour. The financial offer for acoustic mitigation for schools within the 60dB contour is also unclear and, therefore, the increased noise impact arising from the airport growth has the potential to harm the cognitive performance of pupils at Bitterne Park School in particular.

Furthermore the noise insulation scheme will not fully mitigate the impact of the additional noise, for example on domestic gardens or school play areas, which are likely to be used extensively in warmer months. The limitations of sound insulation cannot be overstated. Acoustic insulation would only benefit internal areas at receptors providing residents keep windows closed (which may lead to ventilation and overheating issues). It will not be possible to mitigate against the noise impact to external amenity areas and the full details have not yet been presented for consideration by our own Planning & Rights of Way Panel.

However if, following receipt of this objection, Eastleigh Borough Council are minded to approve the application, you are encouraged to secure the following controls through planning conditions or S106 obligations, in addition to the control measures and mitigation already offered within the planning application submission. The Council would ask that it is formally and properly engaged in securing any mitigation package in support of a planning permission before a permission is granted:

1. Noise monitoring system – this needs to be robust with a clear disincentive for breaching any agreed caps with details of how monitoring will be facilitated and resourced;
2. Public Noise Complaints Handling Service;
3. Sound Insulation Grants Scheme to include houses and schools within the within the >60dB contour(s) – this needs to meet the full costs of mitigation and clearly explain how local schools that are directly affected will be mitigated in a way that all learning spaces are properly protected;
4. Night noise provisions – with restrictions carried forward on night flights and penalties for repeated breaches;
5. Aircraft restrictions to restrict size and movement of aircrafts to include a maximum number of ATMs with 10% buffer. This should include a penalty if the number of ATMs is exceeded by reducing the quota by the same amount the following year. This enforceable control measure can be used to limit both noise impact and also greenhouse gases;
6. Total per annum passenger restriction and associated controls to vehicle movements entering the site with restrictions to access when cap is reached – a clear understanding of how the site is monitored, the penalties for any breach with further details of what happens in the event that the annual cap has been met, and the enforceability of this offer is required;
7. 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;
8. Noise contour areas not to exceed modelled levels in any year;
9. Annual Report in impact of airport – noise/employment/pollution/traffic Etc;
10. Nitrogen cap;
11. Penalties if exceed targets – community compensation fund (to benefit affected communities ie. Scc);
12. Employment and Skills Plan – this needs to include measures for both the construction and operational phase and draw on the local jobs market;
13. Introduction of Noise-related and NOx emissions-related landing charging scheme to encourage quieter and less polluting planes;
14. Secure ecological mitigation measures within the ES ecological assessment and mitigation against any increased deposition of nitrogen onto mudflats within the Solent and Southampton Water SPA as set out in the ES;
15. Operational management plan (or similar) to ensure that airport peak vehicular trips would not coincide with network peak hours;
16. Airport Surface Access Strategy (securing on-going review and further measures ifor when needed) including a Staff Travel Plan & Passenger Travel Plan;
17. Highway Improvements contribution to Wessex Lane/Wide Lane junction and Mansbridge Road roundabout including pedestrian and cycle facilities.

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

Please also find enclosed the Report to the Planning and Rights of Way Panel on 01 December 2020, the Peer Review by Acoustics 24 dated 10 November 2020, redacted public comments received by Southampton City Council in relation to this consultation response (124 representations received) and a letter of support from Go Southampton!.

Yours sincerely,

A handwritten signature in black ink that reads "Paul Barton". The signature is written in a cursive style with a horizontal line underneath the name.

Paul Barton
Interim Head of Planning & Economic Development

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Report to the Planning and Rights of Way Panel on 01 December 2020
Updated Peer Review by Acoustics 24 Dated 10 November 2020
Redacted public comments
Letter from Go Southampton