Surrey County Council

SCC LOCAL COMMITTEE IN SPELTHORNE 10 OCTOBER 2005

Heathrow Airport Interim Master Plan: Draft for Consultation June 2005

Surrey County Council Proposed Response

KEY ISSUE

To agree the County Council's response to BAA Heathrow's consultation on their draft Heathrow Airport Interim Master Plan.

SUMMARY

The report considers the latest plans to enable the further growth of Heathrow Airport both within existing planning limits and within the context of Government policy contained in the Air Transport White Paper (December 2003). It focuses on some of the key issues for Surrey arising from the Master Plan and sets out the County Council's response to a series of questions set out in the consultation.

In particular, the consultation response acknowledges the contribution of Heathrow to Surrey's prosperity, accepts that growth within existing planning limits is unlikely to result in pressure for additional housing in Surrey, and welcomes BAA Heathrow's support for AirTrack. Furthermore, the report questions the assertion that there would be a serious risk to economic growth if Heathrow does not maintain its position as Europe's largest international airport, raises concerns over the impacts stemming from the possible introduction of mixed mode operations and the impacts of airport growth on climate change, and considers that more information should be provided on some of the airport's environmental impacts.

RECOMMENDATION

That a copy of this report be sent to BAA Heathrow once the views of the Transportation Select Committee and the Spelthorne Local Committee have been incorporated, in consultation with the Executive Member for Transport.

INTRODUCTION & BACKGROUND

In June 2005, the airport operator (BAA Heathrow) published their Draft Interim Master Plan for consultation. This followed advice set out in the Air Transport White Paper, and subsequent guidance, expecting airport operators to produce a master plan document explaining their development proposals to 2015 in some detail. Furthermore, they are also expected to include indicative land use plans for the period from 2016 to 2030, and be subject to a five-yearly review. The consultation period ends on 31 October 2005. BAA Heathrow propose to publish their updated Master Plan as soon as practicable in 2006.

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The White Paper supports a new runway at Stansted around 2011/12, followed by a new runway at Heathrow between 2015 and 2020. The new runway at Heathrow is conditional on meeting strict limits on air quality, noise and improving public transport access. If either of these conditions cannot be met, the Government would support a second runway at Gatwick after 2019, and requires land to be safeguarded to that effect. In the meantime the White Paper supports making maximum use of existing runway capacity in the South East.

There remains considerable uncertainty as to whether EU mandatory air quality limits for Nitrogen Dioxide (NO₂) can be met if a third runway is developed at Heathrow. Further detailed technical work is currently being undertaken to consider air quality, noise and surface access issues. The results of this work are due to be published towards the end of 2006, after which, the Government is expected to clarify its position on a possible third runway at Heathrow.

In its response to the national consultation which preceded the publication of the Air Transport White Paper (SERAS), the County Council did not oppose the proposed option for the development of a third runway at Heathrow. This was primarily in recognition of the economic importance of Heathrow and it contribution to the Surrey economy. However the County Council did raise concerns over the environmental impact of a third runway, and made it clear that the impacts on Surrey would need to be mitigated.

TERMINAL 5

In November 2001, the Government approved the development of a fifth passenger terminal at Heathrow. The Government made the decision after concluding that maintaining Heathrow as a world class airport was in the national economic interest. The decision included several important conditions to protect the interests of those living around the airport. These included an annual limit of 480,000 air transport movements (ATMs) from the opening of the new terminal, and a restriction of the area enclosed by the 57 decibel noise contour to 145 sq km as from 2016. Other conditions included a requirement for the Heathrow Express and the Piccadilly Line to be extended to Terminal 5 before the new terminal is opened and a cap of 42,000 on the total number of car parking spaces operated by BAA Heathrow. Of these no more than 17,500 spaces can be provided for staff.

Phase I of Terminal 5 is due to open in March 2008 and includes the core terminal building and first satellite together with associated landside, airside and surface access facilities. Phase II of Terminal 5 is due to open in Spring 2011. This phase adds more stand capacity by virtue of a second satellite located to the east of the first satellite. Both will be connected to the core terminal building via an underground transit system.

AIRPORT GROWTH

In 2004, Heathrow handled 67.1 million passengers per annum (mppa) and 469,763 ATMs. BAA forecast that by 2015/16, Heathrow will handle 87 mppa within existing planning limits. Over the period to 2030, BAA believe that traffic will continue to grow, reaching somewhere between 90 and 95 mppa within existing limits. These forecasts

assume that Heathrow continues to operate with two runways in segregated mode, and with five terminals. Given that Heathrow's two existing runways are already operating at close to capacity, the increase in passenger numbers is largely dependent upon airlines seeking to make the best use of their slots through the introduction of larger aircraft types, such as the new Airbus A380, which is due to enter service at Heathrow towards the end of 2006.

FURTHER RUNWAY CAPACITY

New runway capacity at Heathrow could be created by either the introduction of mixed mode, and/or through the addition of a third runway. Mixed mode is the practice of simultaneously operating arrivals and departures on each runway at Heathrow. This contrasts with the existing use of segregated mode which involves operating one runway for arrivals and the other for departures. Under the current practice of segregated mode, the use of the runways for landing and take-off alternates at 3pm daily, and the pattern alternates weekly, to provide noise relief for local residents. The government is currently examining how mixed mode would operate in practice. This includes detailed consideration of the capacity benefit along with an analysis of what the environmental impacts would be. The Government intends to undertake a consultation on the introduction of mixed mode at Heathrow in Spring 2006.

It is estimated that Heathrow could be capable of handling around 116 mppa in 2030 with the addition of a new short runway, 2,000 metres in length, to the north of the airport and with the existing runways operating in segregated mode. The new third runway would operate in mixed mode throughout the day.

BAA Heathrow have stated that they are not in a position to provide traffic forecasts or discuss potential impacts of mixed mode on the two existing runways at this stage. However, according to the national consultation document which preceded the publication of the Air Transport White Paper, Heathrow could be capable of handling about 128 mppa with the introduction of mixed mode operations on the two existing runways, combined with the development of a third runway. However, should the Government conclude that mixed mode is acceptable in environmental terms, then the actual capacity figure will depend on the actual duration of mixed mode operations and the potential need for the development of further passenger handling facilities.

THE DRAFT INTERIM MASTER PLAN

The primary purpose of the Master Plan is to set out BAA Heathrow's expectations as to the scale of the growth in activity at Heathrow over the coming decade, to explain the extent to which the airport operator believe the airport's facilities will need to be enhanced in order to accommodate that growth and to consider the economic, social and environmental dimensions of the airport's operation in 2015. Given the current uncertainty surrounding the possible introduction of further runway capacity, it is only possible for BAA Heathrow to prepare an interim Master Plan at this time. This assumes that Heathrow will operate with five terminals and two runways in segregated mode in 2015.

Due to the ongoing technical work into the impacts of mixed mode and the possible development of a third runway at Heathrow, it is not possible to include in the Master Plan any detailed proposals to support the growth of the airport up to 2030 at this stage. As a consequence, the Interim Master Plan is only able to include information on the potential land take that might be required for airport facilities to support a third runway.

ANNEX 1

QUESTIONS TO CONSULTEES

Chapter 10 of the Master Plan sets out a number of questions to which responses are particularly welcome from consultees'. The County Council's suggested response is set out below.

Question 1: Overall Structure & General Level of Detail

Do you agree with the plan's overall structure and general level of detail? If not, please explain why.

The plan's overall layout is generally supported. The plan is attractive, user friendly and easy to read and contains a concise account of where the airport is today and how it is anticipated to grow, particularly over the next decade. However, it is considered that the amount of detail provided, particularly on BAA Heathrow's other environmental strategies is insufficient and requires an over reliance on the reader to cross refer to other documents. This relates to publications on air quality, noise, biodiversity, water quality and waste management.

Furthermore, it is considered that the structure of the plan could be improved by changing the order of some of the chapters. Currently the chapter on 'Heathrow's Economic Importance' is situated before the chapters on 'The Airport in 2005' and the 'Forecasts'. Following the 'Introduction', it would appear more logical to commence the document with the chapter setting out the 'Statutory and Regulatory Context', followed by 'The Airport in 2005', then the 'Forecasts' and then the chapter on Heathrow's Economic Importance'. In this way it would be easier for the reader to relate the economic considerations to both the state of the airport currently and how it is forecast to develop over the next 25 years.

Question 2: Heathrow's Economic Importance

Do you agree with the analysis of Heathrow's current and future importance set out in Chapter 2? If not, please explain why.

The Master Plan explains how Heathrow acts as the UK's only true global hub and states that the airport is vital to the economic prospects of the country. This is partly because it provides companies based in the South East with a competitive advantage by providing an accessible link to the world, it facilitates tourism and supports other vital industries. The contribution of Heathrow to Surrey's prosperity is fully acknowledged as the proximity of Heathrow (and Gatwick) makes Surrey an attractive business location and this contributes to a buoyant local economy.

In order for Heathrow to maintain its competitive position, the Master Plan explains that BAA Heathrow must continue to develop high quality facilities which will enable airlines to enhance their route network and compete freely with airlines operating from other European airports. If this cannot be achieved, BAA Heathrow believe that there is a serious risk that both the UK aviation industry and future growth in the UK economy would be negatively affected. To support this argument, the Master Plan demonstrates that by 2010, each of Heathrow's three main European competitor airports will have

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capacity for significantly more ATMs than Heathrow, within existing planning limits. As a consequence, the airport operator claims that protecting Heathrow's competitive position is vital to the UK, given the airport's significant contribution to the local, regional and national economy.

However, it is important to consider the robustness of this argument given the significant adverse environmental impact of a new runway. Since 1990, it is clear from the Master Plan that Heathrow has continued to maintain a differential of 15 mppa from its nearest European competitor. Heathrow also has around 30% more passengers per ATM than its closest European competitor, and by a very considerable margin, offers the highest number of flight frequencies to the world's major destinations. For example in the Summer of 2004, Heathrow offered 135 flights per week to New York compared to 60 at Paris CdG. The higher level of frequencies available from Heathrow would appear to reflect London's greater importance as a world financial centre and this is what generates the high demand for air travel.

In the event that there was no more capacity available at Heathrow following the completion of Terminal 5, the Master Plan fails to explain why the national economy would suffer and why London would lose out to Paris CDG, Frankfurt and Amsterdam. This is a fundamental point that needs to be clearly explained. Under this scenario, it is assumed that whilst airlines might decide to go to other European airports in order to expand their route networks, the demand to travel to and from London would be unlikely to wane. This demand could be accommodated by further development at other London airports. Hence, whilst London would retain its high demand for air travel given its status as a major world city, Paris, Frankfurt and Amsterdam would be able to attract a much higher number of transfer passengers as their route networks continue to grow.

This would suggest that the economic argument in favour of further growth at Heathrow is primarily down to attracting transfer passengers that would otherwise change aircraft at other European airports. If this is indeed the case then this should be fully explained in the Master Plan. Furthermore, it is unclear what contribution transfer passengers actually make to the local, regional and national economy and this needs to be demonstrated in the consultation document.

At present, Heathrow supports around 100,000 direct and indirect jobs in the local area. Around 68,400 of these are direct on-airport jobs. Despite the development of Terminal 5, the number of jobs on the airport is forecast to fall to 60,000 by 2015, due to increases in productivity. Furthermore the number of jobs is not expected to exceed 61,500 once passenger growth reaches 90-95 mppa within existing planning limits. As a consequence, the growth of Heathrow within existing planning limits is not expected to result in any significant pressure for additional housing development in Surrey.

It is considered that the sustainability of the increasing demand for air transport is open to challenge. In this respect, the significant and growing contribution made by aircraft emissions in the upper atmosphere towards climate change is a major concern. Climate change has been described as the most serious threat to society today and has the potential to cause significant economic damage to countries around the world. As a consequence, it remains to be demonstrated that the economic benefits of airport growth will outweigh the environmental harm that this may cause in the longer term.

Question 3: Statutory and Regulatory Context

Do you agree with analysis of the statutory and regulatory context set out in Chapter 3? If not, please explain why?

This chapter includes a brief explanation as to the relevance of a number of policy documents to the operation and development of Heathrow. These include the Government's strategy for sustainable development, the Air Transport White Paper, Regional Planning Guidance and local authority planning policies. In addition, the Master Plan could also usefully refer to the Surrey Structure Plan (2004) which seeks to safeguard the role of Heathrow as a major international airport, and the Provisional Surrey Local Transport Plan: Second Edition (July 2005) which promotes the AirTrack transport scheme in order to significantly improve rail access to Heathrow Terminal 5 from the south and west.

Paragraph 3.32 explains that the airport's development needs to address such matters as restrictions on the number and noise of flights at night, set by the DfT. To improve clarity, the text could also usefully refer to the current duration of the night in which these controls occur from 23:30 to 06:00 hours. Otherwise the wording could give the impression that such controls take place over a longer period of the night than is actually the case.

Question 4: The Airport in 2005

Does Chapter 4 provide a sufficient description of Heathrow's current operation and facilities? If not, in what respects do you suggest it should be elaborated?

Chapter 4 explains the current layout of the airport and describes both the current onairport facilities and some off airport facilities which support the day to day operation of Heathrow. The chapter contains a helpful description of the operation of Heathrow's two parallel runways which is worth highlighting.

Runway Alternation - This is a system which switches over the allocated departure and arrival runways at 15:00 hours every day, and the pattern alternates weekly, to provide noise relief for local residents.

Westerly Preference - This nominates the direction of take-off to be to the west, away from the densely populated areas of West London, unless the strength of the easterly winds is 5 knots or more.

Cranford Agreement - When Easterly operations are in force, the Cranford Agreement precludes aircraft, under normal circumstances, taking-off from the northern runway in order to protect residents of Cranford, a residential area very close to the eastern end of the northern runway.

Tactically Enhanced Arrival Measures (TEAM) - Between 07:00 and 23:00 hours, the main runways are principally operated in segregated mode. However during peak periods, particularly in the morning, National Air Traffic Services (NATS) are able to interleave landings with take-offs on the same runway to ease airspace congestion.

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It would also be helpful to explain the pattern of runway operations at Heathrow at night in terms of directional preference. This stemmed from the Government's consultation in 1999 on 'Proposals for Changes to the Preferential Use of Heathrow's Runways at Night'. In addition, it would be helpful to include a brief explanation of the current Night Flying Restrictions Regime which applies to Heathrow in terms of the current controls on movements that apply in both the Night Period (23:00 - 07:00 hours) and the Night Quota Period (23:30 - 06:00 hours).

Chapter 4 should also include information on the general characteristics of Heathrow's passenger mix in 2004 including the proportion travelling on international and domestic services, the proportion of business and leisure passengers, the proportion of transfer passengers and the proportion of passengers resident in the UK and overseas. It would also be helpful to provide a breakdown of the total number of aircraft movements in terms of passenger flights, air freight, private (general aviation) aircraft and air taxis, and other flights such as the number by empty civil aircraft (positioning flights).

Information should also be provided on the average passenger load per aircraft and the average percentage of aircraft seats occupied. Whilst some information on average load trends is shown in Figure 3, it is not possible to ascertain the actual numerical data from the graph. Finally the chapter could also usefully provide a table showing both the number of flights by the most frequently used aircraft types, and the proportion that each aircraft type represents of the total number of flights at Heathrow.

Chapter 4 also sets out information on the four existing passenger terminals at Heathrow including a graph illustrating the number of passengers passing through each terminal in 2004. Again it would be helpful to supplement this with numerical data as it is not possible to derive this information from the graph. This section of the chapter could also include details of the area of each terminal building, together with the area of Terminal 5.

In 2005, there were approximately 19,600 passenger and 15,300 staff car parking spaces on the airport provided by BAA Heathrow. An estimated 11,600 additional staff car parking spaces are also provided by tenants' within on-airport leased areas. Furthermore, there are 11,700 off-airport car parking spaces. It would be helpful to include information on the number of these spaces for passengers which are designated as long-stay and short-stay, together with information on the extent to which the practice of block car parking operates both on the airport. Finally, Chapter 4 should also include a best estimate of the number of unauthorised off-airport car parking spaces that currently exist at hotels and other sites.

Paragraph 4.33 states that there is nearly 500,000 sq m of vacant and outstanding office floor space (with planning consent but not built) and over 700,000 sq m of vacant and outstanding industrial and warehousing floorspace in the four surrounding local authorities which includes Spelthorne in Surrey. BAA Heathrow consider that this could potentially accommodate any off-airport related development requirements. However Surrey Structure Plan Policy DN8 (Airport Development) states that provision for all development directly related to an airport should be provided within its boundary. This is in order to minimise the impact of airport related development on surrounding areas and countryside in Surrey.

Question 5: Traffic Growth Forecasts

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Do you have any comments on our expectations for future traffic growth as set out in Chapter 5?

The DfT forecast that passenger numbers across the South East and the East of England Region could rise from 117 mppa in 2000 to around 300 mppa in 2030. It was in response to these forecasts that the Government, in its Air Transport White Paper, supported the development of two new runways in the South East. As explained at the beginning of this report, Heathrow handled 67.1 mppa in 2004. BAA forecast that Heathrow will handle 87 mppa by 2015/16, and 90-95 mppa by 2030 within existing planning limits. These forecasts assume the opening of Heathrow Terminal 5, the 480,000 cap on the number of ATMs remains in force, the Airbus A380 enters service in 2006, and that short haul slots are gradually replaced by long haul services using larger aircraft.

Heathrow's 4 existing terminals are forecast to handle 72.3 mppa by 2007/08, the year before the opening of Terminal 5. Given that BAA Heathrow have stated that Terminal 5 alone could cater for up to 35 mppa (BAA Heathrow press release, "1,000 day Countdown to Opening of T5", 4 July 2005), this would suggest that the combined capacity of Heathrow's 5 terminals could be 107.3 mppa. Chapter 5 should therefore explain why the forecasts predict these lower capacity figures, as the environmental impact of handling a further 12 - 17 mppa would be very significant, particularly in terms of surface access.

The Government is examining how mixed mode would operate in practice, what the capacity benefit would be, together with the environmental impacts. Given the relative close proximity of Heathrow's two parallel runways, the safety implications of introducing mixed mode would need to be fully demonstrated. This is considered very important at Heathrow as there would be less margin for error in an emergency which is a real cause for concern given the high population density in the surrounding area.

Furthermore, there would also be an adverse impact on noise, air quality, and congestion on surrounding roads. The loss of runway alternation resulting from the introduction of mixed mode would have a significant adverse noise impact on surrounding communities, particularly in Stanwell and Stanwell Moor due to their proximity to the southern runway. The airport operator should recognise that runway alternation is considered to be the most appreciated noise control measure around West London.

In the longer term, demand could be curtailed as a result of rising ticket prices as a consequence of increases in the cost of fuel and the possible imposition of new charges to limit the contribution of the aviation industry to climate change. Given these uncertainties, it would seem sensible to include in the Master Plan's forecasts some element of sensitivity testing.

It would be helpful to include an analysis of the capacity of the existing runways based on the average daytime hourly declared capacity, based on the assumption that the number of night flights (23:30 – 06:00) will be no greater than the current government limit on movement numbers.

Question 6: Heathrow's Development Strategy (within existing planning limits) Do you agree with our aim for Heathrow as set out in Chapter 6?

Heathrow is not a new, modern purpose built airport and needs to constantly renew and reinvent itself. The principal elements of Heathrow's development Strategy include the development of Terminal 5, the carrying out of works at a cost of £450 million to physically accommodate the Airbus A380, improvements to the existing terminal buildings, the completion of pier projects to physically separate arriving and departing passengers, and the progressive redevelopment of apron and pier facilities to facilitate the growth in larger aircraft. Once completed, British Airways and Qantas will move into Terminal 5 from Terminal 4. However it is unclear from the Master Plan what the capacity of Terminal 5 will be after the opening of Phase I in 2008.

One of the most significant changes in the airfield facilities will be the widening of the runways and taxiways to accommodate the Airbus A380 and the other new generation of larger aircraft. Similar works have taken place at Gatwick throughout the Summer, albeit on a lesser scale. However this has led to a dispute between BAA Gatwick and the local planning authority as to whether the scale of the works require planning permission. It would therefore be interesting to explain the process through which the widening of the runways and taxiways at Heathrow have been approved.

The Master Plan explains that following the opening of Terminal 5, Terminals 1 to 4 are forecast to operate at throughput levels which are below those for 2004 and 2007, based on the current terminal occupancy strategy. However, these figures do not appear to take into account the potential for achieving future productivity improvements, through for example improvements to the check-in process through the application of self-service kiosks. The Master Plan explains that this could lead to a 30-50% productivity improvement in check-in over the next 10 years. This information should be taken into account in the forecast terminal occupancy levels and a forecast for 2030 should also be provided within existing planning limits. Furthermore, the Master Plan could helpfully include separate terminal occupancy data forecasts for terminals 1-3 instead of grouping this information together as a single figure.

Paragraph 6.51 states that there are currently 34,719 on-airport car parking spaces under BAA Heathrow's control. This is inconsistent with paragraph 4.26 which suggests that there were approximately 34,900 spaces available in 2005, and paragraph 8.29 puts the figure at 34,907. Given that planning permission for Terminal 5 limits the number of spaces permitted to precisely 42,000, it is important for BAA Heathrow to provide an accurate and consistent figure throughout the Master Plan.

Question 7: Environmental Impacts & Mitigation

Do you agree with the analysis of the environmental impacts and mitigation strategy for Heathrow within its existing limits as set out in Chapter 7?

The Master Plan explains that the airport operator fully recognises the social and environmental impact Heathrow has on the local community and are committed to

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minimising these impacts. BAA Heathrow are working closely with the government and other third parties to address longer term air quality, noise and surface access issues.

In December 1999, the whole of Spelthorne was declared an air quality management area in response to predictions that the National Air Quality Strategy objectives for Nitrogen Oxides would be exceeded. The prevailing wind direction within the Spelthorne area is south-westerly. Therefore emissions from Heathrow Airport are not generally blown into Spelthorne. However, when the winds comes from the north, this causes emissions from Heathrow to be blown over the northern part of Spelthorne. There is concern that this could result in elevated concentrations of ground level Nitrogen Dioxide. It would be helpful to include in the Master Plan those areas around Heathrow where limits for Particulate Matter and Nitrogen Dioxide are regularly exceeded, together with the actual extent of the exceedence, and the actual number of households affected.

Paragraph 7.1 states that BAA Heathrow are committed to minimising the impact of the airport on the environment. This does not appear to sit comfortably with Paragraph 7.12 which states that BAA's shareholders and customers will inevitably be more willing to support action to comply with air quality limits if other parts of the UK are also planning to comply with these limits. This statement could be seen to bring the extent of BAA Heathrow's commitment towards environmental mitigation somewhat into question.

The area of the 57 dBA Leq noise contour around Heathrow has reduced from 291 sq km in 1990 to 129 sq km in 2003. Although the Terminal 5 Inspector recommended a limit of 145 sq km, the latest Government forecasts suggest that the area enclosed within the 57 dBA Leq contour will fall to 96 sq km by 2015, within existing planning limits. By comparison, the Government would require the area to be restricted to 127 sq km with the development of a third runway.

The section on noise could also usefully refer to the latest developments regarding the precision navigation (PRNAV) trials that have been taking place at Heathrow for arriving aircraft. It would be helpful to explain what the implications of this might be for improving continuous descent approach (CDA) achievement, the potential for improving airspace management and the likely implications for residents living under the main approach routes into Heathrow.

The section on visual impact does not provide a comprehensive assessment of the extent of visual intrusion at various locations around the airport. Whilst mitigation is clearly being concentrated at the western edge of the airport boundary in association with the Terminal 5 development, there is no information on whether screening is proposed elsewhere. With the planned gradual introduction of larger aircraft, there is no information provided on whether larger hangars will need to be developed or what the visual impact of these buildings will be. The Master Plan should also clarify whether maintenance facilities will be provided to service the new Airbus A380.

The section on waste management could also be more informative. This provides no information on the type of waste generation, the sources of waste, the process of how waste is disposed of, or the type of waste management facilities situated on the airport. Information should be included on the degree of segregation, the total annual waste tonnage say over the past 5 years, the proportion of waste recycled and trends over

recent years, together with any targets for reducing the proportion of waste going to landfill.

Question 8: Surface Access (within existing limits)

Do you agree with the analysis of the surface access strategy for Heathrow within existing limits set out in Chapter 8?

BAA Heathrow's Surface Access Strategy contains a target for 40% of non-transfer passengers to use public transport. In 2004, 35.8% of passengers used public transport and the figure has oscillated around the 35% mark over the last five years. It is considered that BAA Heathrow should include a date for achieving this target when they update their Master Plan in 2006.

Furthermore, the Master Plan should also specify the measures that will be necessary to achieve this target in broad terms. For example, are BAA Heathrow dependent on AirTrack, together with enhanced bus and coach services? If these measures are dependent to some degree on external support and funding such as government capital funding, then it would be helpful to say so as this would then set the baseline for what must happen to meet the 40% target. However, BAA Heathrow should not rely on local government revenue support for bus services as this is unlikely to be available in the foreseeable future.

It is disappointing to note that the proportion of passengers travelling by bus / coach has fallen annually since 1998 from 15% to 12.4% in 2004, whilst other transport modes have remained fairly stable. The Master Plan should clarify whether the fall in journeys relate primarily to coach services or bus usage. If this trend is mainly attributable to a fall in coach travel, then this would reflect a similar pattern experienced at Gatwick. It would be helpful to explain why bus and / or coach use may have fallen and what measures are proposed to improve the attractiveness of bus and coach services to the airport. In this respect, it would be useful to include a summary of the key elements of the draft bus and coach strategy in the Master Plan, including proposals for the £2.5 million redevelopment of the central bus and coach station being carried out in partnership with National Express.

In response to the Government's SERAS consultation, the County Council recommended that the surface access infrastructure package agreed for Terminal 5 at Heathrow was inadequate and should be improved. In addition, it was also recommended if future growth at Heathrow were to be considered then it should be conditional on substantial investment in local and regional surface access and the provision of a major rail investment linking Heathrow with the Midlands, the West and the South, in addition to London.

The County Council is concerned that major surface access improvements at Heathrow have been concentrated along the corridor between the airport and Central London whilst public transport access from areas to the south and west remain poor. Given the significant increase in passenger throughput that will be possible following the opening of Terminal 5, the County Council considers that significant investment is needed in improved public transport access from the south and west to reduce traffic congestion following the opening of the new terminal.

For this reasons, there is an important need for the development of AirTrack, a major rail initiative to provide a link from Terminal 5 to the South West rail network at Staines. If any further expansion takes place at the airport, then there should be a firm requirement to provide this scheme. It is considered that AirTrack would have a more beneficial impact than Crossrail in assisting BAA Heathrow in meeting its 40% public transport mode share target for air passengers. In this respect, the County Council would support paragraph 8.19 of the Master Plan. This supports the principle of AirTrack and explains that of all the rail schemes currently being considered, this looks like the most promising.

Terminal 5 is intended to be served by an extension of both the Heathrow Express and the tube. However, given the lack of platform capacity at Terminal 5 to accommodate the Heathrow Express, AirTrack and Crossrail, it is considered imperative that platform capacity at Terminal 5 is safeguarded for AirTrack in order to provide better connectivity for through journey opportunities at the new terminal. Furthermore it is important that rail capacity and services are determined on the basis of passenger needs. It would be helpful if the Master Plan acknowledged the need to address any environmental impacts associated with the AirTrack proposal.

BAA plc consider that surface access strategies to support major airport development may need to manage the level of demand for car users through road user charging. If BAA Heathrow decide they wish to proceed with road user charging on the airport road network, it is considered that this must be subject to detailed discussions on the impacts with neighbouring highway authorities. Whilst the Heathrow Master Plan suggests that road user charging may be an appropriate mechanism to reduce car usage to the airport, it is unusual to note that there is no similar statement contained in the draft Gatwick Airport Outline Master Plan. This appears to demonstrate a lack of consistency in how BAA's corporate policy approach towards surface access is intended to be implemented at its two largest airports.

As a consequence of this, there is the danger that this approach could be seen to imply that BAA's main reason for promoting road user charging around Heathrow is really to address the serious air quality issue at the airport, rather than being a genuine attempt to promote more sustainable transport as the Master Plan suggests. This is because air quality is the most challenging issue that BAA Heathrow need to address in order to gain Government support for the development of a third runway. The airport operator is therefore invited to provide further clarification in Chapter 8.

Question 9: Safeguarding Strategy

Do you have any comments on our safeguarding strategy for additional runway capacity set out in Chapter 9?

The Master Plan shows an interim land boundary that BAA Heathrow wish to be safeguarded in order to accommodate a third runway and a sixth terminal to the north of the existing airport. It would be helpful to show the local authority boundaries on this plan. The proposed area to be safeguarded stretches from the airport's northern boundary to the southern boundary of the M4 and contains some 700 houses that would need to be demolished. The area does not include land needed for new road access schemes that might be required as this is subject to further work. Until the likely

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transportation infrastructure has been determined, the actual transport impact of a third runway / sixth terminal on Surrey is impossible to determine.

Paragraph 9.7 implies that this boundary is the safeguarded land boundary for the third runway. This is not the case as the land can only be safeguarded once the land area has been accepted by the local planning authority and incorporated into Hillingdon's Local Development Framework. This needs to be explained in the Master Plan.

The area of land to be safeguarded includes a parcel of land extending from the western boundary of the airport to the M25 immediately to the north of Junction 14. This area infringes upon the Green Belt and the Colne Valley and is close to the county boundary with Surrey. It is assumed that this area of land will be required to provide a direct road link between Terminal 5 and the M25, although it appears to include a significantly larger area than is necessary for this purpose. However as the Master Plan states that the safeguarded area does not include land for new road access schemes, the document should justify the need for safeguarding this area of land and explain exactly why it is required.

Current Government studies are examining whether a third runway and / or more intensive use of the existing runways can meet the stringent environmental limits outlined in the White Paper in relation to air quality, noise and surface access. It is requested that the County Council are consulted on the surface access study as soon as possible after it is published. Until this is available, it is impossible to make any meaningful comment other than the impact is likely to be significant. It is noted that paragraph 9.33 acknowledges that there is great concern in the wider area about the adequacy of surface access infrastructure to accommodate further expansion at Heathrow and this is welcomed.

The introduction of mixed mode operations at Heathrow would have an adverse noise impact on Surrey residents living close to the airport, particularly in Stanwell and Stanwell Moor. This noise impact would be further compounded by the provision of a third short runway for smaller narrow-body planes to the north of the airport. This is because the larger noisier aircraft would be concentrated on Heathrow's two existing runways. As a consequence, the airport operator should provide a generous noise insulation scheme for residents in these areas who do not wish to be bought out by the airport operator. BAA Heathrow should also provide a generous package of relocation assistance for those residents who do decide to sell their homes.

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