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Your ref:
Our Ref:
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Airports Commission Consultation
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PO Box 1492
Woking
GU22 2QR

Dear Sir

AIRPORTS COMMISSION CONSULTATION

These are Westminster City Council's officer level comments in response to the Airports Commission's consultation, dated November 2014, on three shortlisted options for additional runway capacity, two at Heathrow Airport and one at Gatwick Airport.

General Comments

The City Council's formal policies are set out in the adopted City Plan - Strategic Policies adopted in November 2013.

Policy S43 of the Plan, Major Transport Infrastructure, states that:

The council will support and promote improvements to transport infrastructure, including the public realm and servicing improvements necessary to mitigate the impacts of increased passenger numbers and integrate the infrastructure into the city and broader impacts of those central London networks that impact on Westminster, including the following major projects over the lifetime of the plan:

- ***Crossrail, including new stations at Paddington, Bond Street and Tottenham Court Road;***
- ***High Speed 2, which will impact on Westminster;***

- ***Improvements to stations, prioritising access for all, reducing pedestrian congestion within and around the station, and providing a safe, convenient and attractive environment, including Victoria, Paddington, Marylebone, Tottenham Court Road and Bond Street;***
- ***Improvements to the public realm, focusing on meeting the needs of people with disabilities and more vulnerable people, and enabling people and businesses to make more sustainable choices;***
- ***Increasing cycle parking and improving safety for cyclists where this would not compromise pedestrian movement including public cycle hire schemes throughout Westminster, and indoor cycle storage and supporting facilities at major transport interchanges;***
- ***Improving way-finding and legibility around Westminster to facilitate pedestrian movement;***
- ***Improving the convenience, connectivity, attractiveness and safety of Westminster's linear walking routes, including the Blue Ribbon Network and connections within and between Westminster's open spaces;***
- ***Improvements to local bus and taxi infrastructure; and***
- ***Improvements to river services and piers, subject to Policy S37 Blue Ribbon Network and the ability to secure adequate space to accommodate the peak flows to / from boats.***

Although physically distant from London's airports, Westminster is affected by the current surface access provision to them. In particular, the existing Gatwick Express, Heathrow Express and Heathrow Connect rail services have their central London termini in Westminster at Victoria and Paddington. This leads to increased pedestrian activity in and around the stations; additional demand for other public transport services, particularly underground services, serving the termini; and additional traffic, particularly taxis, on the road network, including residential roads, surrounding the stations.

Westminster is also affected by aircraft noise (particularly flights to and from Heathrow Airport and London City Airport) even though it is remote from the airports. A new runway at Heathrow Airport is likely to affect additional areas of Westminster as different flight paths would be required, and the City Council would welcome any measures to mitigate any potential aircraft noise issues resulting from flights to and from Heathrow Airport and London City Airport. In a survey of Westminster residents carried out in 2008, 21% said they had been bothered by aircraft noise. These were primarily in the south of Westminster where, for example, the 48 dB $L_{Aeq\ 1hr}$ contour from aeroplanes approaching Heathrow in the morning 'night shoulder period' covered a significant area of Pimlico and Millbank, and the 51 dB contour clipped the southern edge of Westminster. Daytime noise from aircraft is also an issue for Westminster residents, particularly those living in the quieter back streets of the city. In fact, 8-10% of residents in the south of the city were reported to be 'highly annoyed' by aircraft noise in general. The City Council's 'Westminster Noise Strategy 2010-2015' states that ***"the Council will actively seek to reduce noise impacts from air traffic and will resist changes to routes and volumes which would lead to increased noise impacts on the city"***.

These concerns were set out in the City Council's response to the earlier consultation by the Department for Transport on airport capacity in the South East in 2003, and were also set out in the initial response to the Airports Commission in 2013. The City Council's principal concerns, which have held since the 1980s, are still relevant in terms of improving access to central London and the important contribution of aviation to London and the UK economy has always been recognised.

The City Council has no particular views or policies about whether any additional airport capacity should be provided in London or where any new airport capacity should be provided. However, in the City Council's view, it is important to ensure that the provision of any new airport capacity is accompanied by adequate road and rail links to the airport and the provision of adequate onward transport facilities at the central London termini. The City Council also considers that the provision of any new airport capacity should address environmental concerns such as carbon reduction, climate change adaptation, air quality and noise pollution.

The City Council welcomed the Government's decision to set up the Airports Commission to identify and recommend options for maintaining the country's status as an international hub for aviation, including the scale and timing of any requirement for additional airport capacity and how any need for additional capacity should be met.

The City Council also recognises that in the longer term London's economic future would be harmed by not having more airport capacity and given the global nature of the economy in Westminster this would undoubtedly impact on Westminster businesses

Heathrow

The City Council has specific policies which seek to minimise the impact of traffic and parking generated by development proposals in the Paddington area and new rail services on the surrounding residential area. The City Council has also produced a Planning Brief for Paddington Station and Environs which reiterates the concerns about surface access to Heathrow Airport and which has been adopted for development control purposes.

The City Council welcomed the principle of Heathrow Express, although concern was expressed about the proposed vehicular access arrangements at Paddington Station. In view of this concern, a new vehicular access to Paddington Station was implemented in order to focus station traffic, particularly taxis, to and from the main road network and away from the surrounding residential areas which was secured through an undertaking given to Parliament by the City Council and the promoters of Heathrow Express.

The City Council was an objector to the proposal for a fifth terminal at Heathrow Airport given the impact of additional traffic that would be generated by the additional patronage of Heathrow Express. In particular, the City Council made detailed representations to the Terminal 5 public inquiry that any planning permission should be conditional on adequate vehicular access being provided at Paddington Station and additional surface access links to Heathrow, such as Crossrail, being provided. Given, the City Council's concerns, the Secretary of State imposed a condition as part of the Terminal 5 planning permission that patronage of Heathrow Express cannot exceed 12.9 million passengers per annum (mppa) with approval of the local planning

authority. The City Council considers that any additional airport capacity at Heathrow would mean that this patronage would be exceeded and that further improvements to the road network and public transport at Paddington would be required at that time.

The City Council was concerned that no conditions to provide additional rail links to Heathrow Airport were included as part of the Terminal 5 planning permission. Subsequently, the City Council petitioned in support of the provision of Crossrail services to Heathrow Airport during the passage of the Crossrail Bill through Parliament. The City Council welcomes the provision of Crossrail (currently under construction) including through running to Heathrow Airport which, on opening in 2018, will mitigate the impacts of existing conflicting passenger movements at Paddington Station, as passengers will be able travel direct from Heathrow Airport to the West End, City and Canary Wharf without the need to interchange at Paddington. Additional surface access provision to Heathrow Airport is welcomed by the City Council in order to further mitigate the impact of road traffic in residential areas.

The City Council considers that any provision of additional airport capacity at Heathrow should require the provision of new rail services, including those to destinations outside central London. The City Council welcomes the Government's commitment to improve surface access to airports, whilst taking into account the associated environmental impacts. This includes funding for a new rail line from the Great Western Main Line near Slough to Heathrow Airport which could provide significantly improved connections and journey time savings from the Thames Valley, the West of England and Wales to the airport. This new rail link could also reduce interchange (between Great Western and Heathrow services) at Paddington Station. The City Council also welcomes the provision of a southern rail link, included in the surface access strategy of both Heathrow options, which would provide direct rail access from Heathrow to other destinations, including Waterloo.

As set out in the consultation document, a further change which is likely to occur irrespective of any decision about airport capacity is the provision of the HS2 connection at Old Oak Common. Whilst this would improve rail access to Heathrow from the Midlands and North (without the need to travel through central London), it would also lead to interchange by HS2 passengers who wish to travel to Paddington rather than Euston. The number of passengers using Paddington Station will also increase considerably as a result of the planned Network Rail changes including electrification of the Great Western Main Line and associated new rolling stock providing longer trains and shorter journey times.

The City Council is also concerned about the impact of any additional capacity at Heathrow Airport on the patronage of the Piccadilly line, given the existing capacity constraints at a number of Piccadilly line stations in Westminster, particularly Covent Garden and Leicester Square.

With regard to aircraft noise, the City Council is concerned that a third runway at Heathrow Airport is likely to affect additional areas of Westminster as different flight paths would be required. In addition, a third runway would increase noise impacts on some local communities which would be caught up in the 55 Lden noise contour for the first time. The City Council would welcome any measures to mitigate any potential aircraft noise issues resulting from flights to and from Heathrow Airport

Gatwick

The City Council is also concerned about the impact of additional airport capacity at Gatwick on Victoria Station and the surrounding area. As at Paddington, the City Council has produced a Planning Brief for Victoria Station (2011), which has been adopted for development control purposes.

The provision of any additional airport capacity at Gatwick would require new and improved rail services between Gatwick and central London including capacity enhancements by Network Rail. The Gatwick Express service will continue to run to and from Victoria, although there will be a shift in emphasis resulting from the proposed capacity enhancements to London Bridge, Blackfriars and St. Pancras stations. Substantial improvements will need to be made at Victoria in terms of the layout of the surrounding road network and onward travel by taxi, bus and underground. Given the complexity of the Victoria area, this would require the involvement of a number of parties including Network Rail, train operating companies, Transport for London and possibly adjacent landowners and developers. A number of developments, including London Underground's Victoria Station Upgrade, are already underway at Victoria in order to cater for existing passenger numbers and further mitigation measures to cater for any increase in airport capacity at Gatwick should be considered. The City Council welcomes Network Rail's Masterplan proposals for Victoria Station and London Underground's further proposals for the Circle and District lines capacity upgrades. The City Council also supports the provision of Crossrail Line 2 which would serve Victoria Station, for which safeguarding is currently being revised by the Department for Transport, following Transport for London's earlier consultation on route options.

Yours faithfully

