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Dear Sir Howard

Airports Commission Consultation November 2014

I am writing on behalf of Surrey County Council in response to the above consultation. The council welcomes the opportunity to comment on the Commission's assessment of the proposals for a second runway at Gatwick Airport and a third runway or extended runway at Heathrow Airport. Surrey has an interest in all three of the shortlisted schemes as both airports border the county.

Both Heathrow and Gatwick airports play a critical role in ensuring the success of Surrey's economy and the well-being of residents. They are major local employers and important in attracting inward investment to Surrey. Many Surrey residents have jobs that are directly or indirectly related to the airports' operations or work in companies that are located in the area because of proximity to the airports and London. However, these benefits come at a cost in terms of traffic congestion and noise and air pollution.

Expansion at either airport will affect communities in Surrey with some communities affected more than others and in different ways. We are concerned that as much work as possible is done to understand the nature and scale of these cumulative impacts for communities across the county before a decision on airport expansion is made. It is not acceptable for many very significant issues such as noise, traffic and air quality, which will be the issues of most concern to residents, to be left to mitigation after a decision has been made rather than being fully understood in advance.

Surrey County Council's position on airport expansion agreed at the meeting of the full Council on 16 July 2013 is to oppose any proposals that would serve to reduce the capacity of these airports or the role of Heathrow as a hub airport and that expansion at either Heathrow or Gatwick will require the environmental and surface access issues to be satisfactorily addressed. I set out the full resolution below:

'This Council recognises the crucial role of the airports at Heathrow and Gatwick in supporting employment for Surrey residents, generating investment in the Surrey economy and in attracting and retaining major businesses to locate in the county.'



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Given the vital importance of these airports for the continued success of the Surrey economy, this Council opposes any proposals that would serve to reduce their capacity or the role of Heathrow as a hub airport.

This Council remains of the view that expansion at either airport would require the environmental and surface access issues involved to be satisfactorily addressed.

This Council calls on Government and the aviation industry to prioritise investment in road and rail connections to the airports to reduce congestion and overcrowding.'

We have considered the consultation documents in the context of this resolution and focused on what is needed to address the anticipated impacts on communities, businesses and the environment in the county.

Surrey County Council is a provider of key strategic local infrastructure and services. We are responsible for roads, as the local highway authority, and we also provide schools, social services and libraries. Although we are not responsible for planning for new housing, we do have to provide much of the community and other infrastructure needed to support new development.

We therefore have a major interest in the transport infrastructure needed to serve the airport and also in the community and service needs of increased housing and employment development on the substantial scale that is likely to be generated by expansion of a major airport. This will incur costs and will require sound delivery mechanisms to manage the impacts of airport expansion.

We are concerned that the Commission has not fully assessed the wider economic growth brought about by airport expansion and the potential impacts on the non-motorway road network in Surrey. We consider that further transport modelling work needs to be carried out in consultation with the county council to determine these wider traffic impacts.

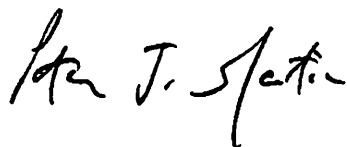
Further work is needed on noise, in particular to identify more clearly the flight paths that would be used if the expansion proposals were to go ahead at either airport, so that the impact on residents can be properly assessed. Only a limited number of indicative flight paths have been considered in the Commission's appraisal, but there are more options which could affect different areas including areas that have not previously been over flown on a regular basis. The lack of clarity on this issue, which is of critical importance to communities in Surrey, is a significant omission from the process to date and one which should not be left to negotiation on mitigation measures to try to address any unacceptable impacts once a scheme has been selected. The Commission should undertake further work with the proposers, the CAA and NATS to identify flight path options and opportunities for respite and consult with those communities that could be impacted before a recommendation on a preferred scheme is made. If it is not possible for the Commission to carry out this work, then it should recommend that further work be undertaken by Government during the preparation of the National Policy Statement.

There is also a need for more work on air quality in certain localities and on the risks for potential downstream flooding if either airport were to expand and to determine what is needed in terms of mitigation measures.

Without knowing how individual communities will be affected, it will not be possible to know what mitigation measures can reasonably and effectively be applied, how much they will cost and how they will be funded and for local residents to be satisfied that any compensation being offered is fair and reasonable.

The county council's comments on each of the Commission's consultation questions are set out in the attached annex. I trust you will take them into account in making your recommendations to Government.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Peter J. Martin'. The signature is written in a cursive style with a large initial 'P' and 'M'.

Peter Martin
Deputy Leader of the Council

Surrey County Council's response to the Airports Commission consultation on additional runway options in the South East: Detailed comments to questions

Q1: What conclusions, if any, do you draw in respect of the three short-listed options?

The council has considered the consultation documents and is of the view that further work is needed in relation to all three options if the anticipated impacts on communities, businesses and the environment in Surrey are to be satisfactorily addressed. Work is needed on surface access, noise, flooding and air quality. There is also a need to consider in more detail how the supporting transport and community and social infrastructure will be funded, delivered and maintained and what mechanisms/agreements are required to ensure that those who would be significantly impacted are fairly compensated. The council is acutely aware of the consequences of the failure to deliver critical supporting infrastructure in time to support airport expansion as in the case of Heathrow T5 and Airtrack.

Before any decision is made, we would wish to see more work on transport modelling to identify the additional transport infrastructure and capacity improvements needed to accommodate not just the growth directly associated with the expansion of either Gatwick or Heathrow airport but also the wider economic growth that would result from any expansion if we are to be confident that congestion in Surrey will not be exacerbated. Although background growth related to the existing situation has been taken into consideration, the work to date has not accounted for the indirect traffic impacts associated with airport expansion and the additional movements generated by more housing and new businesses attracted to the area. These could well be considerable.

There is also a need to add resilience into the networks, such as improvements to the North Downs Line, in the event of closures or problems on key access links if parts of Surrey are not to come to a standstill. This work needs to be done in consultation with the local authorities.

The Commission should recommend that Government leads on the establishment of a clear framework for the funding and delivery of transport infrastructure to accommodate growth related to the expansion of either airport to ensure it is in the right place at the right time. There is a need for binding commitments to fund mitigation measures through national and sub-regional programmes and these should be a key part of any decision.

Further work is needed on noise, in particular to identify more clearly the flight paths that would be used if the expansion proposals were to go ahead at either airport, so that the impact on residents can be properly assessed.

At the moment there is a clear risk that a decision on expansion will be made before this crucial information is known. The Commission should undertake further work with the proposers, the CAA and NATS to identify flight path options and opportunities for respite and consult with those communities that could be impacted before a recommendation on a preferred scheme is made. If it is not possible for the Commission to carry out this work, then it should recommend the work be undertaken by Government during the preparation of and consultation on the National Policy Statement so that it forms part of the decision making process. It is important to note that the current interpretation of national aviation policy to concentrate flight paths has not been consulted upon by Government nor the impacts assessed. It is only the reaction to recent flight path trials at Gatwick and Heathrow that have highlighted the significant disturbance that can be inflicted on communities by concentration of over flights. We would therefore ask the Commission to strongly advocate the need for consultation on this issue in its recommendations

to Government and how the new navigation technologies can be used to allow for some dispersal and respite.

At this stage we would urge the Commission to make sure that the sensitivity analysis that it undertakes on potential noise impacts fully considers the scope for changes in flight paths, in trajectories for take-off and landing and for the development of aircraft technology so that the combinations of factors that need to be in place to achieve given noise outcomes can be better understood.

There is also a need for more work on the risks for potential downstream flooding if either airport were to expand and to determine what is needed in terms of mitigation measures. Surrey County Council is currently working with the Environment Agency to progress delivery of the River Thames Scheme to deal with severe flooding issues in the boroughs of Windsor and Maidenhead, Spelthorne and Runnymede. It is critically important that the potential impacts of an additional/extended hard runway at Heathrow, more roads and changes to water courses in the area are fully understood in the context of planned flood alleviation schemes and funding contributions made available if appropriate.

Q2: Do you have any suggestions for how the short-listed options could be improved, ie their benefits enhanced or negative impacts mitigated?

1. Gatwick Airport Second Runway

Surface access

We note the Commission's work on a baseline of road and rail schemes planned to increase capacity to meet background growth in the demand for travel and the identification of additional scheme specific developments that will be needed to meet the increased demand for airport-related travel. Some of these baseline schemes such as those that would enable improvements to the Brighton Main Line are still only planned and not fully funded.

It is essential that the Government and other bodies are fully committed to funding the baseline strategic road and rail improvements and are able to deliver the enhancements at the right time to avoid unacceptable congestion and overcrowding. Similarly, there needs to be a firm commitment from the scheme proposers to those specific surface access improvements identified by the Commission. Otherwise there is a clear risk that the improvements which may be critical to the context within which decisions are made will not in practice be secured. Experience suggests that this is a very real danger.

The Airports Commission assessment relies heavily on the key strategic north-south road and rail links to Gatwick Airport - the Brighton Main Line and the A23/M23 corridor. However, there will undoubtedly be more pressure on other north-south road links and parts of the local road network to accommodate increased overall demand from growth in the area directly and indirectly associated with airport expansion. These links, which include the A24 and the A23 and A217 corridors, and the A25 will also provide alternative routes to Gatwick in the event of severe congestion/closure of the motorway. We would wish to see further local transport modelling work carried out in consultation with the county council to determine the impacts on the local highway network in Surrey and the improvements needed to address those impacts and how they will be funded. We are particularly concerned about the A24 between the M25 and Dorking and the local road network between Dorking and the airport, which could be significantly impacted if the motorway network is congested.

The council welcomes Gatwick Airport Limited's pledge to improve local transport links and its commitment to ensure local roads are no more congested than they are today, but although

£10m for local highway development seems substantial, spread over two or three counties it will not go very far and the amount should be significantly higher if it is to have any real beneficial impact.

Public transport access to the airport from Surrey and from areas both east and west of Gatwick is very poor, leaving little choice than to travel by car. We believe that significant improvements to the North Downs Line would improve connectivity between Gatwick and Reading with the potential to reduce the traffic congestion generated by an expanded airport and add greater resilience to the rail network. Accordingly, we are disappointed that the North Downs Line does not form part of the core package of strategic transport improvements associated with expansion that has been identified by the Commission.

We have identified the following transport improvements that we consider necessary to mitigate the impacts on Surrey associated with an expanded Gatwick and that will need to be funded.

Highways infrastructure

- A23/M23 Hooley Interchange to improve links to the north and especially Croydon which is seen as housing new employees for the expanded airport.
- Capacity improvements to the A24 corridor including dualling and junction improvements to increase capacity and also resilience by providing an alternative route if the M25/M23 were to be heavily congested or closed.
- M25 Junction 9 improvements (related to capacity improvements on the A24).
- Improvements to the A23 and A217 corridors and the A25 to the north of Gatwick to increase capacity and also resilience by providing an alternative route if the M25/M23 were to be heavily congested or closed. This will need to address the issue of down times at Reigate level crossing.
- A22/A264 Felbridge capacity improvements to facilitate east west movements.
- A long term commitment to contribute to improvements to tackle congestion on the local road network where Gatwick-related traffic adds to demand through GAL's proposed Local Highway Development Fund. The Fund should be administered and managed through a joint agreement with the airport owners and the Local Highway Authorities; West Sussex County Council, East Sussex County Council and Surrey County Council.
- Development and implementation of a car parking strategy to provide for those wishing to access the airport and to reduce the extent of inappropriate car parking in Surrey towns and villages close to the airport.

Rail infrastructure

- North Downs Line – a package of measures on the line to include reducing service headways, line speed enhancements, station upgrades, rolling stock improvements and electrification. This would improve links between key centres of population and employment in Surrey, such as Guildford and Redhill/Reigate, as well as other regional centres including Reading. Improvements on the North Downs Line would also add resilience when there are closures or problems on the Brighton Main Line.

Bus and coach services

- Improvements to local services, including additional express bus services to promote sustainable modes of travel.
- Linked to the above, we would encourage the airport to support marketing and awareness campaigns/ initiatives to support each option that is implemented.

Community infrastructure

In addition to being the local highway authority for Surrey, the county council is also responsible for ensuring sufficient school places and providing other community facilities such as libraries. Although we are not responsible for planning for new housing, we do have to provide much of the infrastructure needed to support new development. We therefore have an interest in the community and service needs of increased housing and employment development that is likely to be generated by expansion of the airport. We welcome Gatwick's pledge of £46.5m to help local authorities deliver essential community infrastructure to support new homes. However, this is based on its own estimate that a second runway will require up to 9,300 new homes whereas the Commission estimates that up to double this amount could be required over 14 local authorities. If just 4,000 of these homes were in Surrey, this could generate a need to provide school places that would cost in the region of £30m.

Therefore, there will be a substantial funding gap for the community infrastructure improvements needed unless GAL or a future airport operator commits to an increased contribution. Further consideration is required of the mechanism needed to determine the number of new homes that this contribution should apply to, how to ensure payment is paid up front and how the funds will be distributed between providers to help fund the requisite infrastructure.

Noise

The county council is not the authority for noise, but we do receive complaints from local residents about aircraft noise and are concerned that a second runway and the increased numbers of flights and new flight paths will increase those significantly affected, including those living outside the formal noise footprint set out in the Commission's analysis. The proposed noise insulation scheme and compensation in the form of tax rebates offered by GAL should be available to those most affected by noise from the new runway and those suffering disturbance as a result of changes to existing flight paths and new flight paths. As described above, it is important that local people know where the flight paths will be for an expanded Gatwick and further work is needed to identify flight path options and options for dispersal and respite.

We consider it very important that the Commission recommends to Government the need for an effective system so that night flights are severely restricted, and an expanded Gatwick does not lead to an increase in noise disturbance for residents resulting from night flights.

In addition to aircraft noise, it is also important that the impact of increased road traffic noise is monitored on key routes to the airport both before and after any proposed changes to airport infrastructure are implemented. Road traffic noise should be taken account of in the noise insulation and compensation schemes.

Flooding

We welcome the planned additional investment by GAL of up to £30m for ongoing flood risk assessment and mitigation to improve Gatwick's flood prevention measures and resilience. Surrey residents were severely affected by the floods in 2014 including people living north of the airport particularly along the River Mole. We are therefore concerned that the Airports Commission's assessment identifies considerable potential for downstream flooding resulting from a new runway and changes to river flows. Further modelling work is needed to determine impacts and to formulate any necessary mitigation strategy and to secure funding.

2. Heathrow Airport Extended Northern Runway and Heathrow Airport North West Runway

Surface access

Overall, the Commission's position on transport appears to be that improvements can be made to the road network around Heathrow to manage congestion on the M25 and the M4 and that these together with better rail access such as Crossrail will enable the growth in traffic resulting from expansion to be accommodated. It concludes that the impact of airport development would generally be to bring forward marginally schemes which would be needed in any case. The council, however, remains very concerned about how Surrey's road network will cope. Where roads are close to the airport, providing alternatives to motorway access, congestion is likely to be very severe as a result of the extra demands of an expanded airport. We would also wish to see further local transport modelling work carried out in consultation with the county council to determine the indirect traffic impacts associated with the wider economic growth the airport is likely to generate on the local highway network in Surrey.

We note the Commission's work on a baseline of road and rail schemes planned to increase capacity to meet background growth in the demand for travel and the identification of additional scheme specific developments that will be needed to meet the increased demand for airport-related travel. The analysis points out that some of these baseline schemes such as Western Rail Access and the Crossrail and Thameslink Programmes are planned but not necessarily fully funded. It is essential that the Government and other bodies are fully committed to funding the strategic road and rail improvements in the baseline and are able to deliver the enhancements at the right time to avoid unacceptable congestion and overcrowding.

Whilst rail access is relatively good to Heathrow from West London and the wider London area, from the south including most areas of Surrey, there is little viable alternative to travelling to the airport by car. The county council commissioned a Surface Access to Airports Study in 2013 (available to download at <http://new.surreycc.gov.uk/environment-housing-and-planning/development-in-surrey/surrey-future/airports>). This study indicated that travel by car (47%) is the dominant mode for trips to Heathrow from Surrey, followed by taxi (38%). We consider that enhancement of public transport access to the airport from the south of the airport is important to improve connectivity to Heathrow and journey time reliability for airport users and help to mitigate congestion. As well as Southern Rail Access, consideration should be given to improving bus services, particularly from areas that are close to the airport where airport employees as well as passengers are likely to benefit.

Experience of the implementation of the T5 development proposals indicates that if the components of the proposed surface access strategy are not formally agreed and secured through binding commitments, opportunities can be missed. This was the case with the provision of southern rail access to Heathrow, which was originally recognised as being required to service T5. There needs to be a firm commitment from the scheme proposers and Government to those specific surface access improvements identified by the Commission especially Southern Rail Access.

We have identified the following transport improvements that we consider necessary to mitigate the impacts on Surrey associated with an expanded Heathrow and that will need to be funded.

Highways infrastructure

- M25 junctions 10-16 – confirmation of the Government's Autumn Statement 2014 commitment to provide for 4 lane running through junctions on the M25 in the SW quadrant including widening at Junction 11.
- Bus priority measures on Stanwell Moor Road.

Rail infrastructure

- Southern Rail Access to Staines – a new southern rail link to Heathrow to improve access from the south for passengers and airport employees. This should be

accompanied by suitable provision of cycle parking at stations to help encourage employees especially to use sustainable modes of travel and will need to address the issue of level crossing down times. This option could include the extension of Crossrail services into Surrey.

Bus and coach services

- Additional express bus services to improve access from Surrey and fill gaps in the bus network. Initial locations for Heathrow are identified as Weybridge and Epsom. These services could be accompanied by a package of bus priority measures.
- Develop an Airport Hub and Spoke Bus Service concept. Initial hub locations are identified at Camberley, Woking, Guildford and Walton on Thames. A pilot scheme is recommended to test the concept at Guildford.
- Develop a demand responsive bus network to serve dispersed or low levels of airport demand. Initial operating zones are identified as Camberley, Woking, Guildford, Weybridge, Epsom and Reigate.
- Linked to the above, we would encourage the airport to support marketing and awareness campaigns/ initiatives to support each option that is implemented.

Community infrastructure

In addition to being the local highway authority for Surrey, the county council is also responsible for ensuring sufficient school places and providing other community facilities such as libraries. Although we are not responsible for planning for new housing, we do have to provide much of the infrastructure needed to support new development. We therefore have an interest in the community and service needs of increased housing and employment development that is likely to be generated by expansion of the airport.

The Commission estimates that the total additional households required to support airport expansion could be 70,800 under the Heathrow North West Runway scheme and 60,600 under the Heathrow Extended Northern Runway scheme. On the Commission's assumption that this would be evenly spread across some 14 local authorities around Heathrow, this would mean as much as 8,500 – 10,000 homes could be required in Surrey to 2030 and this could generate a need to provide school places that would cost in excess of £60m. Much, if not all of this funding, will fall on the public purse and the airport operator should commit to making a contribution.

Noise

The county council continues to receive complaints from local residents about aircraft noise and is concerned that an extended/third runway and increased numbers of flights and new flight paths will increase those in Surrey significantly affected by noise, including those living outside the formal noise footprint set out in the Commission's analysis. It is important that local people know where the flight paths will be for an expanded Heathrow and further work is needed to identify flight path options and options for dispersal and respite. For the North West Runway scheme the airport operator is proposing noise compensation mostly in the form of good-quality double glazing and loft insulation in people's homes to mitigate the effect of aircraft noise on homes in the highest noise areas and in areas exposed to significant new noise. It is important that the airport operator commits to compensation measures and a noise insulation scheme for those suffering significant noise disturbance from the extended/third runway and as a result of changes to existing flight paths and new flight paths.

We consider it very important that the Commission recommends to Government the need for an effective system so that night flights continue to be severely restricted, and an expanded Heathrow does not lead to an increase in noise disturbance for residents resulting from night flights.

It is also expected that the county council will receive complaints from local residents about increased road traffic noise associated with increased trips to the airport using what are considered at present to be the primary road routes and also other parallel routes which will be seen as appropriate as traffic demand rises. **It is important that the impact of increased road traffic noise is taken account of in the noise insulation and compensation schemes.**

Air quality

We note that the Commission acknowledges that there is a risk that EU limits will be exceeded in some areas around the airport and that both Heathrow schemes are likely to generate a substantial negative impact on air quality, but that it also considers that the range of mitigation measures related to airport operations, increased use of public transport and changes to the road network will reduce the impacts. We understand that further work is being carried out and the Commission needs to be satisfied that the airport operator can deliver a range of measures to mitigate adverse air quality impacts.

Flooding

The Commission's assessments predict that there could be residual risks of flooding downstream from an expanded Heathrow Airport. It is a matter of serious concern to the county council that Heathrow airport expansion could expose residents in parts of Surrey to a serious flooding risk. This is an unacceptable situation for residents likely to be affected. The Thames flooded parts of Spelthorne and Runnymede during last year's heavy rain and if a third runway is built, there will be extra run-off water and gravel extraction that will compound the existing problems in the catchment.

A detailed long term flood mitigation strategy is needed to deal with the potential flooding impacts and further modelling work is needed to ensure that flood risk can be adequately mitigated. Surrey County Council is currently working with the Environment Agency to progress delivery of the River Thames Scheme to deal with severe flooding issues in the boroughs of Windsor and Maidenhead, Spelthorne and Runnymede and so it is important that if expansion were to go ahead at Heathrow then the potential impacts of an additional/extended hard runway, more roads and changes to water courses in the area and the relationship with this major flood alleviation scheme are fully understood. We would also like to know how any necessary mitigation measures will be funded and whether it would be appropriate for the airport operator to contribute to funding the River Thames Scheme.

Q3: Do you have any comments on how the Commission has carried out its appraisal?

The assessment work undertaken by the Commission so far has mainly considered a range of potential impacts at a broad level and it is not easy to identify in detail the implications that a new or extended runway would have on a local area. For example, there is local concern about the loss of open land in the Green Belt around Stanwell Moor. Added to localised noise, air quality and congestion factors the impact of the entire scheme on the local community and their quality of life is likely to be considerable.

It is important to recognise the significance of local impacts and to understand the potential for these to collectively impact on individual communities. Without this information it will not be possible to know what mitigation measures can reasonably and effectively be applied, how much they will cost and how they will be funded and for local residents to be satisfied that any compensation being offered is fair and reasonable. At present we are not confident that the analysis that is required will be undertaken and would urge the Commission to do as much as it can to give communities a clear understanding of potential impacts and measures to limit blight.

Q4: In your view, are there any relevant factors that have not been fully addressed by the Commission to date?

We consider that further work needs to be done on noise, transport modelling to determine the indirect traffic impacts associated with the wider economic growth airport expansion is likely to generate on the non-motorway road network, flood mitigation and air quality. These are detailed in our responses to other questions.

Q5: Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules) including methodology and results?

Local economy (housing and social infrastructure)

The scale of additional new housing provision that will be associated with each of the options is a major issue and the assumption that the new housing will be met evenly across local authorities in the study areas around Gatwick and Heathrow is unrealistic (as indeed the Airports Commission itself also admits). Locations closer to the airports might be expected to house more airport employees if the current distributions were to be replicated, but may not be able to do so. For example, all the local authorities in Surrey are finding it difficult to meet their existing housing needs and there are significant constraints such as Green Belt, Areas of Outstanding Natural Beauty, flooding and other important environmental designations.

The Commission should undertake further work to establish a more realistic view of the areas where the housing pressures will be felt, their capacity to accommodate growth sustainably and the implications for transport, social and community infrastructure and the environment and take this into account in its assessment of the options.

Quality of life

We welcome the Commission's attempt to define and measure quality of life, but consider that it needs further refinement. The bundling of impacts for broad areas means that the overall impact tends to come out as neutral as positive impacts such as transport connections and jobs are balanced out by negative impacts such as noise and congestion even though within the bundled impact different communities are affected in different ways. Therefore, unless this measure can be refined its contribution to the appraisal process can only be limited. As we have stated elsewhere, it is important to understand the extent to which individual communities are affected by different impacts.

Q6: Do you have any comments on the Commission's sustainability assessments, including methodology and results?

Please refer to the comments made in response to Questions 1-5.

Q7: Do you have any comments on the Commission's business cases?

We are concerned that the business cases do not currently fully consider the wider impacts of growth. In particular, as set out earlier in our response, this should include indirect traffic impacts on the non-motorway road network in order to properly reflect costs.

Q8: Do you have any other comments?

The three options are major proposals with wider strategic implications such as for housing growth and transport infrastructure. Such matters are not easily dealt with through the local plan process and are best dealt with through a sub-regional plan or strategy. However, outside

London there are no strategic planning bodies to assist in this process. We would therefore ask the Commission to consider a recommendation to Government asking it to put in place mechanisms that fully involve the local authorities and infrastructure providers to enable these matters to be properly addressed and planned.