

Date of issue: Tuesday, 27 August 2019

MEETING	CABINET	
	Councillor Swindlehurst	Leader of the Council and Cabinet Member for Regeneration & Strategy
	Councillor Hussain	Deputy Leader of the Council and Cabinet Member for Governance & Customer Services
	Councillor Anderson	Transport & Environmental Services
	Councillor Carter	Inclusive Growth & Skills Planning & Regulation
	Councillor Mann	Housing & Community Safety
	Councillor Nazir	Health & Wellbeing
	Councillor Pantelic	Children & Schools
	Councillor Sadiq	
DATE AND TIME:	MONDAY, 2ND SEPTEMBER, 2019 AT 6.30 PM	
VENUE:	VENUS SUITE 2, ST MARTINS PLACE, 51 BATH ROAD, SLOUGH, BERKSHIRE, SL1 3UF	
DEMOCRATIC SERVICES OFFICER: (for all enquiries)	NICHOLAS PONTONE 01753 875120	

SUPPLEMENTARY PAPERS

The following Papers have been added to the agenda for the above meeting:-

- * Item 2 was not available for publication with the rest of the agenda.
- * Item ? is an updated version of the papers circulated with the agenda.
- * Item ? is an urgent item which the Chair has agreed to include on the agenda.

PART 1

<u>AGENDA ITEM</u>	<u>REPORT TITLE</u>	<u>PAGE</u>	<u>WARD</u>
2.	Heathrow Airport Expansion: Consultation on the Future Layout of the Airport	1 - 86	All

This page is intentionally left blank

SLOUGH BOROUGH COUNCIL

REPORT TO: Cabinet **DATE:** 2nd September 2019
CONTACT OFFICER: Savio DeCruz – Service Lead Major Infrastructure Projects,
(For all enquiries) 01753 875640
WARD(S): All
PORTFOLIO: Councillor Swindlehurst – Leader and Cabinet Member for
Regeneration & Strategy

PART I
KEY DECISION

**HEATHROW AIRPORT EXPANSION: CONSULTATION ON THE FUTURE LAYOUT OF
THE AIRPORT INCLUDING THE NEW RUNWAY AND OTHER AIRPORT
INFRASTRUCTURE**

1. Purpose of Report

- 1.1. The purpose of the report is to draw together relevant professional officers' and lead members' view, and to organise the Council's response to formal Heathrow Airport Expansion proposals, which are out for public consultation until 13th September 2019.
- 1.2. The consultation includes Heathrow's Masterplan for the future layout and operation of the airport, including the new runway and other airport infrastructure such as terminals and road access, and development on and off site.
- 1.3. The consultation also includes Heathrow's plans to operate the future airport, their preliminary assessment of the impacts of the proposals during operation and construction and their plans to manage the effects of expansion.
- 1.4. All responses will have to be taken into account by Heathrow before they formulate their final plans. It is therefore important that all the issues the Council has with the proposals are identified now so that they can be addressed at this stage.
- 1.5. It is anticipated that Heathrow will submit a Development Consent Order to the Planning Inspectorate in 2020 at which point formal objections can be made which will be considered during the six month examination period.

2. Recommendation(s)/Proposed Action

The Cabinet is requested to resolve:

- (a) That the response to Heathrow's Consultation 2 (Airport Expansion Consultation: AEC) be approved.
- (b) That the Director for Regeneration, following consultation with the Lead Members for Regeneration and Strategy and Transport and Environmental Services, be given delegated authority to enter into negotiations with regards to the mitigation package.

- (c) That the Director for Regeneration report back to Cabinet on progress made in regards to the mitigation package.

3. The Slough Joint Wellbeing Strategy, the JSNA and the Five Year Plan

(a) Slough Joint Wellbeing Strategy Priorities

- 3.1. The responses to the AEC will be fed into the design proposals and final submission for the Development Consent Order application and participating in the consultation process will help ensure proposals will support the following priorities:
- i. Increasing life expectancy by focusing on inequalities*
 - ii. Improving mental health and wellbeing*
 - iii. Housing*
- 3.2. The Government have set out the pre-requisites for approval of the DCO in the Airports National Policy Statement (ANPS). That includes requirements for the operator to deliver a range of measures to mitigate the impact on local communities and meet threshold tests for air quality, noise, carbon emissions and modal shift.
- 3.3. Heathrow have also committed to providing an Economic Development Strategy to maximise economic benefits of the project, through skills, employment, training and education for existing and new members of the labour market; and to businesses in the supply chain. This will improve opportunities for local people to improve their quality of life through training and employment.
- 3.4. Supporting the principle of expansion will help the proposals come forward. The consultation is an opportunity to comment on the mitigation package proposed and for the Masterplan to address the specific needs of Slough's business and residential communities, particularly as a large amount of land in Colnbrook and Poyle is within the DCO boundary.

(b) Five Year Plan Outcomes

- 3.5. Heathrow expansion is related to the following priority outcomes:
- ***Outcome 3: Slough will be an attractive place where people choose to live, work and stay.***
 - ***Outcome 4: Our residents will live in good quality homes.***
 - ***Outcome 5: Slough will attract, retain and grow businesses and investment to provide opportunities for our residents.***

4. Other Implications

(a) Financial

There are no financial implications of proposed action.

(b) Risk Management

Risk	Mitigating action	Opportunities
Legal	Presenting the Council's support and views will allow issues important for Slough to be brought to the attention of HAL and make subsequent representations at the Examination into the	Slough is one of only two Boroughs to have the development within its boundaries (known as 'host authorities'). Participating proactively will allow the Council to engage early with

	Development Consent Order.	HAL to deliver the best for Slough.
Property	To re-provide employment land and residential land.	To masterplan Poyle Industrial Estate.
Human Rights	No risks identified	
Health and Safety	Internal advice on noise, air quality and health has been sought.	The DCO submission should support avoidance or mitigation of negative impacts, and meet requirements in the ANPS
Employment Issues	At present the evidence suggests expansion will only generate an additional 100 workplace based jobs in Slough, and around 3000 on airport.	Jobs and skills for Slough residents both during construction and operation are a priority: the policy, plans and strategies should change to ensure this.
Equalities Issues	To provide better access to public transport.	Increased access to jobs, healthcare and wider community facilities.
Community Support	Provision of consolidated services including, healthcare, day provision, and business support.	Increased access to healthcare, and wider community facilities.
Communications	No risks identified	
Financial	Achieving clarity in the DCO now will reduce the risks and costs, for example in producing evidence or debating issues at inquiry.	Supporting the expansion enables the Council to work proactively and positively with HAL to deliver benefits and mitigate negative impacts from the start of the project.
Timetable for delivery	Agreeing delegated powers to produce full response will enable a more technical response to be produced	Presenting a response will demonstrate Slough is engaged in the process.
Project Capacity	Support for Heathrow is cross-council and in the 5YP. The DCO will be resource intensive.	There is a need for a specialist team and funding available from HAL to deliver this.
Other		

(c) Human Rights Act and Other Legal Implications

There are no legal or Human Rights Act implications.

(d) Equalities Impact Assessment

There is no identified need to complete an EIA, as this is a response to a statutory consultation.

5. Supporting Information

I. Introduction

- 5.1. Proposals for the expansion of Heathrow through the construction of a third runway have been under consideration for a long time. In February 2017, the Government published a draft Airports National Policy Statement (ANPS) which set out its preference for a new northwest runway. A second consultation on the ANPS was carried out in September 2017, to allow updated evidence to be taken into account.
- 5.2. In June 2018, the Government approved the Airports National Policy Statement. This establishes the need for the expansion of Heathrow and confirms the principle of a north-west runway and the principle planning policies that should be applied to it. This enables Heathrow Airport Limited to proceed with preparing its application for the expansion of the airport through the Development Consent Order (DCO) process.
- 5.3. In February 2018, Heathrow Airport produced its first consultation on the emerging proposals for what the expanded airport and necessary new infrastructure could look like and be operated. The publication of all of the information in this “Consultation 1” document highlighted that there were some potentially serious implications of elements of the proposed design which were not clear before.
- 5.4. The proposals in Consultation 1 were considered by the Cabinet in March 2018 which agreed the Council’s response.
- 5.5. This included an objection to all of the options for the realignment of the A3044 through Colnbrook and Poyle on the grounds that the increase in traffic will have serious impacts upon the environment and amenities of residents. In addition to taking all of the diverted traffic, it would provide an alternative local route between the M4 and M25. All of this traffic would pass through the Brands Hill Air Quality Management Area.
- 5.6. Concern was expressed about the need to raise the runway and taxiways up to 5 metres above ground level as they cross the M25. This will make the impact upon nearby residential property and upon Pippins School even more serious in terms of visual impact, increased noise and worsening air pollution.
- 5.7. Objections were raised to the lack of any proposed public transport or cycling routes from Colnbrook and Poyle to the airport to compensate for the closure of the Old Bath Road. This means that residents will have much worse access to jobs and flights.
- 5.8. At the same time, none of the proposed new road networks would provide as direct access for buses from Langley and Slough as there is at present. There were no dedicated public transport links proposed and all routes will take much longer to get to the terminals. As a result it is not clear how Heathrow will be able to meet the modal shift targets that it has been set.
- 5.9. Objections were raised to the proposal to locate new infrastructure and airport related construction or operational development within the “Green Envelope” around Colnbrook that will impact on the visual and environmental quality of an already urban area.
- 5.10. Following the concerns and objections raised in Consultation 1, there has been some small changes to the masterplan to reduce the impact on Slough; these changes have included the following:

- the A3044 has been closer to the diverted M25 to minimise the sterile gap and increase the buffer between the Colnbrook and Poyle village;
- the Green Envelope has been agreed in principle;
- part of the Poyle Industrial Est which have been in the Green Belt have now been identified as airport related;

II. Heathrow Airport Expansion Consultation June 2019

5.11. Heathrow are now carrying out a second consultation on the Heathrow Airport Expansion (HAE) with a closing date of 13th September. This consists of:

- A. Their preferred masterplan for expansion**
- B. Their plans to operate the future airport**
- C. Their preliminary assessment of the social, economic, environmental and transport effects of the airport's growth**
- D. Their plans to manage the effects of expansion**

A. Preferred Masterplan

- 5.12. The Preferred Masterplan sets out where the third runway will be along with all of the necessary passenger facilities, infrastructure and airport supporting development. It has been prepared to accommodate up to around 756,000 flights and 142 million passengers per annum (mppa) and a cargo capacity of approximately 3m tonnes per year. To accommodate this growth, the airport operational footprint needs to expand from the around 1,200 hectares to approximately 1,800 hectares in the future.
- 5.13. Part of the new terminal capacity will be focused in the Central Terminal Area. The Terminal 5 Area will also be expanded with additional terminal capacity to the west of the existing terminal and there will be a new satellite terminal located to the south of the new runway, connected via a new passenger transit system.
- 5.14. Two new Parkways are proposed to the north and south of the airport in order to provide much of the airport's future car parking. The Northern Parkway will be capable of accommodating up to 24,000 cars. The Southern Parkway will provide up to 22,000 car parking spaces and will be served by an upgraded road connection to Junction 14a of the M25. It will be directly connected to the Terminal 5 campus by a shuttle system.
- 5.15. New taxiways which will connect the new runway to the existing airport and expanded airport facilities will be provided to the west of T5.
- 5.16. In order to accommodate these and the new runway, it is necessary to reposition the M25 by up to 150m to the west of its existing alignment within Slough Borough. It will be widened and lowered by between 4m and 4.5m below its existing level in order to pass through a tunnel beneath the new runway. There will also be associated parallel 'collector distributor' roads and changes to junctions 14 and 14a in order to handle altered traffic flows.
- 5.17. It is proposed to divert the A4 to the north of the new runway. The A3044, which currently is to the east of the M25, is moved into Slough to the west of the realigned M25.
- 5.18. The project will divert local rivers. These will also mainly be to the west of the airport through Slough and include a river corridor that passes beneath the new runway.

The Preferred Masterplan also shows new areas for the storage of flood water, which is generally in South Bucks to the north of the M4.

- 5.19. New areas for landscaping, protecting habitats and wildlife corridors are included in the Preferred Masterplan. Virtually all of the remaining open land in Colnbrook and Poyle has been included in the DCO application “red Line” so that it can be used for a combination of these purposes. A ‘Green Loop’ is proposed around the airport in order to link communities, landscaped areas and biodiversity areas as well as to provide active travel links for walking and cycling.
- 5.20. New industrial, freight forwarding and flight catering facilities are proposed close to established industrial areas near to the airport; this includes the expansion of Poyle Trading Estate.
- 5.21. It is proposed to realign the existing railhead at Colnbrook so that it can continue to be used for airport related logistics and replace the existing oil depot. A site has been safeguarded for the relocation of the Lakeside Energy from Waste plant but this will not form part of the DCO application.
- 5.22. Proposals for new on airport hotels and offices are located close to public transport in the terminal zones, Hatton Cross and adjacent to the Northern Parkway.
- 5.23. The development of the Preferred Masterplan has been guided by the requirements and direction of a number of major influences, including those contained in Heathrow’s Strategic Brief document 7 Heathrow 2.0.
- 5.24. Heathrow 2.0 sets out a series of goals to guide the future of Heathrow as an expanded airport, and leading up to opening the new northwest runway. It is based upon four pillars, three of which are relevant for the Colnbrook and Poyle area:
 - A Great Place to Work is about helping our people fulfil their potential;
 - A Great Place to Live is about working better with our neighbours to improve their quality of life;
 - A Thriving Sustainable Economy focuses on creating opportunities for business (including SMEs and sustainable business) to deliver a stronger future for the UK.
- 5.25. The Strategic Brief for Heathrow sets out the high-level aspirations for Heathrow’s future business plans to transition to a three-runway airport. It acts as Heathrow’s brief to colleagues and stakeholders on the nature and aspirations of the construction and operation of the airport to deliver its vision of “giving passengers the best airport service in the world”.
- 5.26. It considers the requirements for an expanded Heathrow through five stakeholder groups: passengers, investors, airlines, colleagues and UK communities and environment. It also has the following guiding principles for the programme: safe and secure, simple, affordable and financeable, adaptable, predictable, sustainable, connected and distinctive. These have then shaped three main factors: demand forecasts, operational requirements and commercial imperatives.

(a) Phasing

- 5.27. The Masterplan will be developed over five phases. Whilst construction is taking place in Phase 0 (up to 2026), Heathrow are seeking permission to increase the use the existing two runways by up to 25,000 extra flights a year. This is known as Early Growth (see HSPG section below).

5.28. In Phase 1 (around 2026) the proposed third runway becomes operational. By the end of Phase 2 (around 2030) there would be approximately 115 million passengers a year which would increase to 130 million passengers and 740,000 flights by Phase 3 (around 2035). The Masterplan will not be substantially complete until the end of Phase 4 in 2050 when there will be 142 million passengers and 756,000 flights.

(b) Consultation Event

5.29. As part of the consultation process, Heathrow are holding a consultation event in The Curve on Thursday 29th August between 2pm and 8pm. At this session, all of the relevant documents will be made available for inspection, Virtual Reality Sound Demonstrations in a sound lab and a scale model showing the end result of the preferred Masterplan. Experts will also be available to answer questions regarding the different consultation topics. Members are encouraged to go along to this event if they are able to.

A.1 HSPG Comments on the Preferred Masterplan

5.30. Slough is a member of the Heathrow Strategic Planning Group (HSPG). The HSPG represents many of the local authorities and public organisations who are responsible for planning and land use, transport, environmental quality, and economic and sustainable development surrounding the airport.

5.31. HSPG works proactively to maximise the benefits and minimise the impacts of expansion across the sub-region. It neither supports nor objects to the expansion and individual member organisations have their own policy positions. Its officers work closely with HAL but are independent of them, and its work and outputs are governed by a Leaders Board.

5.32. HSPG officers have produced a response to the AEC which is being presented to the Leader board for sign off on the 5th September. It is a high level response which allows for individual authorities to make their own detailed comments.

5.33. The HSPG response document has three chapters:

Chapter 1: A strategic overview, which sets out the key issues and priorities for HSPG.

Chapter 2: A summary of the issues and priorities raised in the Preliminary Environmental and Transport Impact reports to inform their evolution into the Environmental Appraisal.

Chapter 3: Detailed comments on the ten main documents published as part of the consultation. This includes the Masterplan, Construction Proposals, Surface Access Proposals and DCO Powers.

5.34. The key points arising from the Strategic Overview that are relevant for Slough and the Borough endorses can be summarised as follows:

(a) Further Detail and Consultation Required

5.35. We support the HSPG view that there is still much work to be done to work through the detail of the DCO Masterplan and accompanying proposals ahead of submitting the DCO. Although extensive, the plans in the current consultation open up further issues, do not have full details, and there is a lack of firm mitigation proposals.

5.36. Many of the documents refer to further work and information that “will” be provided in the future. In general, there is a lack of detailed information on environmental

quality and the natural and built environment, surface access and active travel, construction, economic development, delivery and implementation, and governance /process /procedures.

(b) Expansion scheme legacy and ambition

- 5.37. We share the HSPGs concern about the lack of a compelling legacy and ambition for areas beyond the DCO boundary. As set out in the ANPS, Heathrow expansion brings benefits for the entire UK yet local communities will be impacted disproportionately in terms of negative impacts.
- 5.38. Whilst acknowledging the need to create a viable business case, we would urge HAL to ensure that the opportunity to create a world class development which brings real improvements for local communities is not lost through a process of cost engineering, corner cutting, or meeting the minimum of technical requirements to submit their DCO application.
- 5.39. HSPG have highlighted the following as a priority to address:

i. Green and Blue Infrastructure

- 5.40. HSPG considers that the proposals for the natural environment, the Green and Blue Infrastructure, are disappointing. They miss an opportunity to provide high quality, connected green and blue spaces which could improve the quality of life for residents – both in terms of leisure and active travel. **Further assurance is required on how the Green and Blue infrastructure elements of the Masterplan will be delivered.**
- 5.41. Further assurance is required on how the Green and Blue Infrastructure elements of the Masterplan will be delivered given that much of the area identified for this purpose lies outside the DCO boundary. Separate third-party agreements for each land parcel outside the DCO are currently proposed, but the current DCO only provides a guarantee that a minimum level of compensation and mitigation will be delivered.
- 5.42. A clear mechanism to guarantee delivery of the Masterplan needs to be provided to ensure airport provides an enduring legacy for local communities and airport users,
- 5.43. Slough will work through HSPG with HAL to bring forward proposals for high quality and well-connected Green and Blue Infrastructure that is well managed and maintained, both within the DCO red line boundary and outside.

ii. Surface Access

- 5.44. Slough strongly believes that the surface access proposals lack specific detail how the airport's expansion will impact local transport networks. No detail is provided on the specific local impacts, and therefore there are no proposals for the provision of mitigation measures. It is stated that this will be provided prior to the DCO in the Transport Assessment, but this document is not currently available and therefore not something that forms part of the consultation. The anticipated Surface Access Strategy (SAS) document needs to be robust and contain the detail and agreed package of measures Slough has requested from Heathrow A.L., for Slough B.C. to be assured that impacts are manageable.
- 5.45. Members believe any strategy should consider and mitigate the impact of traffic on roads further afield than the immediate areas surrounding of the airport. **HAL**

should look towards a network approach, connecting destinations, stations and transport hubs rather than the limited current ‘spokes’ approach.

- 5.46. The SAS, as set out in the DCO masterplan, shows a serious lack of ambition for meeting objectives beyond these narrow ANPS requirements. The strategy provides very little new transport infrastructure outside the Heathrow campus, and does very little to help facilitate sustainable transport within and across the sub-region. The very sparse active travel network is one example of this.

iii. Design

- 5.47. There is little detail on design or how this will be a world class development showcasing exemplary design, as befits a global gateway. Many issues are referred to as being dealt with through “good design”, but there are no further details. HSPG members, particularly the relevant local planning authorities, want to see more details on design codes and/or have the process for agreeing design codes set into the DCO conditions.

iv. Economic Development

- 5.48. The economic development framework is still very high level and lacks detail. This is a key area where benefits can be maximised for local communities. HSPG members are keen to continue to work closely with HAL to develop their economic development strategy and ensure these benefits are maximised.

v. Preliminary Environmental Impact Report and Mitigation Strategy

- 5.49. The Preliminary Environmental Impact Report (PEIR) is based on a high-level design which lacks detail on the mitigation package. Conclusions of the PEIR often rely on unspecified proposals (e.g. ‘good design’) and there is an overreliance on ‘professional judgement’, perhaps due to the lack of key design information. There are some inconsistencies in the methodological approaches and conclusions are not always fully justified. We consider it would have been a more valuable exercise to have produced the PEIR at a more advanced stage of design development so that the conclusions would be more meaningful. We would be keen to work with HAL to ensure that there are opportunities to engage over the next period of scheme development to ensure the best mitigation package for local communities is delivered.
- 5.50. HSPG have concerns in relation to the divergence of the DCO area and the promoted Masterplan area. This approach leads to potentially significant effects (adverse and positive) of the overall Masterplan being unrepresentative or missed entirely in the assessment process and results in the mitigation strategy in the DCO focussing on minimum requirements rather than delivering enhancements and a lasting legacy for local communities.

vi. Mitigation and Compensation

- 5.51. There is concern that there is not a clear distinction between the two terms, and that, due to the long delivery period (up to 2050), many of the mitigation measures will be identified later in the process and thus the mitigation proposals will not be finalised at the DCO stage.
- 5.52. There is concern then that the Community Fund will be used for ‘mitigation’ purposes rather than compensation. HSPG members want to set out the principle

that the community fund (compensation) should be used to bring additional benefits to local communities, and to improve the quality of life of those most impacted by expansion. It should not be used to mitigate for any of the impacts directly from expansion – whether seen or unforeseen. HSPG agrees that a clear governance structure needs to be in place for the CF, with a body having oversight of the overall Fund and its long term planning, the allocation of spend, and monitoring and reviewing individual projects.

vii. Construction

- 5.53. The Construction Proposals and Code of Construction Practice (COCP) documents are relatively high level and standard in approach to addressing the management of construction activities which will be highly significant for the area and for a considerable amount of time (early works to end state). Both documents commit to a number of future and further strategies and plans which will be submitted with the DCO or will be subsequent to consent. Slough will engage through the HSPG to address these well before DCO submission.

A.2 Slough Borough Council Comments on the Preferred Masterplan

(a) Planning Policy – land use issues

- 5.54. The current Airport Expansion Consultation presents a large amount of information, many elements of which did not form part of Consultation 1, notably the construction proposals and Preliminary Environmental impact reports. The primary concern for Planning Policy is the land use elements. Headline issues for planning are covered below, with detailed comments set out in the supplementary report.
- 5.55. The Council's broad support for the expansion of Heathrow has been incorporated into the review of the Local Plan for Slough. One of the key elements of the "emerging" Preferred Spatial Strategy is to "accommodate the proposed third runway at Heathrow and mitigate the impact." As part of this, it was agreed that the following planning principles should apply to any development at Heathrow which should:
- Protect Colnbrook and Poyle villages in a "Green Envelope" and enhance the Conservation Area and built realm.
 - Prevent all through traffic but provide good public transport and cycle routes to the airport.
 - Provide for the replacement of Lakeside Energy from Waste plant and the rail deport north of the new runway.
 - Ensure that there are good public transport links into Heathrow from Slough.
 - Enlarge the Poyle Trading Estate for airport related development but with access only from the M25.
 - Provide mitigation for the Colne Valley Park and ensure that existing connectivity is maintained through Crown Meadow.
 - Develop tangible measures to improve air quality in the Heathrow area.
 - Ensure that all homes in the Borough that are eligible for noise insulation are provided for under the Quieter Homes Scheme.

- Ensure measures to address flood risk from the proposals include mitigation to reduce the risk of existing flooding for residents and businesses in Colnbrook and Poyle.

5.56. More detail is provided in the appendices, including on the following:

- Expansion scheme – awaiting design statement to present legacy and ambition;
- DCO Application Scheme boundary – welcome extension to ANPS boundary;
- The Preliminary Environmental Impact Report: welcome opportunity to engage on work to develop this into the Environmental Appraisal (EA);
- Environmentally Managed Growth;
- Economic benefits: Lack of workplace-based jobs predicted within Slough, failure to provide preferential journey times and pricing for modal shift (from private car)
- Effects of Construction timescale and proposals on the Colnbrook, Poyle and Brands Hill: risk that some of the major impacts on local residents could continue until 2050, and there are significant local impacts particularly in phase 1 to 2026;
- Design: welcome opportunity for engagement after current consultation
- Consultation Materials for local residents lack details and wider materials are not accessible for local residents

(b) Green Envelope

5.57. The Council’s Spatial Strategy promoted the concept of having a “Green Envelope” around Colnbrook and Poyle villages in order to give them some protection from the proposed expansion of the airport. Although this would form part of the wider Green and Blue infrastructure and the Colne Valley Park, the primary purpose was to provide a buffer for local residents affected by construction and operation and provide local accessible open land for informal recreation, such as dog walking.

5.58. The scope for providing the Green Envelope has been reduced and ‘squeezed’ at its east as a result of the decision to divert the A3044 and realign the M25 through the area.

5.59. The illustrative plans for the extent of the “green space around villages” as currently set out are misleading. For example, they give the impression that the M25 will be a green buffer; that the balancing ponds (for flood alleviation) and the engineered diversion of the Colne Brook will form part of the open area; but these will be dominated by roads or buildings and will not be publically accessible.

5.60. The Masterplan recognises the concept and claims to be proposing improvements to the “Green Envelope” around Colnbrook and Poyle. It is not, however, identified in any of the Airport Expansion Consultation plans.

5.61. The area of the Green Envelope between Colnbrook and the Colnbrook bypass has in the current consultation’s plans been identified as a construction compound which could be used up until 2030. Although it may be possible to put some perimeter planting in at an early stage, the rest of the site could be laid out as hard standing. This means that it will have no amenity value and cannot be used for residents for the eight years that construction will be taking place. The use of the compound for construction purposes will increase the level of activity and disturbance in the area which will greatly reduce its effectiveness as a buffer area.

- 5.62. As a result, it is proposed that we should object to the use of site CS1, north of Colnbrook for construction compounds on the grounds that this is an important part of the Green Envelope around Colnbrook and Poyle which is required to be used as a buffer area during the construction process.
- 5.63. In the long term this area appears to be identified in the Masterplan for biodiversity purposes. It is considered that the main purpose of the area should be to act as a buffer and provide a local amenity for residents who could use it for dog walking. This means that its primary use should be as public open space and not for biodiversity purposes.
- 5.64. As a result it is proposed that we object to the designation of site CS1 for biodiversity purposes. It should be designated as public open space which can be used by local people.
- 5.65. The other part of the Green Envelope to the north of Colnbrook, which includes Pippins Park, will only be able to provide a comparatively small buffer between the residential area, the new A3044 and the new runway. The full assessment of the visual impacts of the raised runway has not yet been carried out and so it is not yet clear what additional mitigation will be required. Additional viewpoints for assessing the visual impact from this area need to be included.
- 5.66. **It is considered that a full environmental assessment of the impact of the Masterplan proposals upon Pippins School should be carried out.**
- 5.67. The southern part of the Green Envelope is shown as being proposed green space. It is proposed to move the Heathrow Special Needs Centre to the site on the corner of the Bath Road and Poyle Road. This provides the opportunity for outdoor activity such as horse riding, animal care and horticulture. This is considered to be an appropriate use in this location.
- 5.68. **It is important that the Green Envelope as a whole is designed and laid out for the benefit of the local community and properly managed and funded in perpetuity. As part of this, 'architectural' landscaping must be provided to screen the areas from roads and construction compounds as part of the early works.**
- 5.69. There is also a need to enhance Colnbrook Conservation Area and built realm. We require that:
- **The DCO Heritage Design Strategy includes a strategy for improvements to the Colnbrook Conservation area, in order to mitigate and meet the requirements in the ANPS regarding Heritage at Risk, avoiding worsening the existing conditions, and promoting economic growth. This should include mitigation for noise and visual impacts on the setting of listed buildings from construction works and final associated infrastructure.**
 - **Improved pedestrian and cycling connectivity is provided to connect heritage assets in Colnbrook with Poyle Trading estate, Public Open Space and other green spaces linked to the wider historic environment.**
- (c) ***Mitigation for the Colne Valley Park***
- 5.70. The expansion of the airport will have an adverse impact upon the Colne Valley Regional Park which is at its narrowest and most fragmented in this location.
- 5.71. This part of the Regional Park is the most accessible to Slough residents and a gateway to the wider opportunities the Park offers for informal recreation. It also provides a variety of Green Infrastructure functions such as visual landscape

amenity, biodiversity, agriculture, and flood alleviation. It is important that the identity and integrity of the Colne Valley is retained as a much as possible.

- 5.72. The Masterplan shows that there will be a permanent loss of open land north of the A4 and south of the M4 as a result of the new runway and diverted river corridors and M25, and re-located Energy from Waste plant, railhead and Aggregate Industries. The Old Slade Lake complex is being infilled, and land east of Sutton Lane has also been proposed for use during the construction phase.
- 5.73. The proposal to expand the Poyle Trading Estate for airport related development will also impact upon the Colne Valley Park.
- 5.74. The diversion of the M25 and rivers along with the realignment of the A3044 will have an urbanising effect upon this area.
- 5.75. Within the Colnbrook and Poyle area, the Masterplan is proposing new and enhanced green spaces, biodiversity sites and proposed planting of trees and hedges. It supports the concept of the “Green Envelope” around the villages as explained above.
- 5.76. It proposes a network of routes including the Green Loop, Colne Valley Trail, European Protected Species Corridor and Active Travel hub and spoke network but it is not clear how these relate to each other. **There is a need for these to be presented as part of a coherent and integrated Landscape and Green & Blue Infrastructure Strategy.**
- 5.77. There is a risk that the continuity of the Park could be compromised and the area south of Slough being severed from the north. A critical issue for the integrity of the Park is therefore the quality and attractiveness of the Colne Valley Trail through the narrow part of the Park in this location. The Masterplan shows this being routed north of the A4 and South of the M4. This is, however, compromised by the re-provision of the Energy from Waste plant and Railhead in this location. It is no longer an attractive route past lakes and through open countryside.
- 5.78. **As a result, it is requested that an alternative route for the Colne Valley Trail is provided to the north of the M4, with a new green bridge crossing the motorway further west so that the route is upgraded and can be part of the Active Transport commuting network, as well as the main recreational route through the Park.**
- 5.79. The Colne Valley Park and Local Authorities in the area have produced a joint statement and map of routes that should be included in the Masterplan. This is intended to ensure that routes are attractive for use by both workers and for recreation and can form part of a programme for improved longer distance networks. They should enhance the existing network and create attractive connections with, and between, employment locations, community, heritage, and countryside/leisure facilities.
- 5.80. This level of comprehensive provision for active travel connectivity in this zone is necessary to move towards mitigating the impacts of Heathrow Expansion and support the delivery of its objectives set out in “Heathrow 2.0”.
- 5.81. Overall, it is considered that the scale of development and loss of the valuable open land in the Colnbrook and Poyle area means that the impacts on the Colne Valley Park cannot be mitigated within the Borough. As a result, compensation should be provided for elsewhere in the Colne Valley Park. The Masterplan shows that there will be some new green areas created to the north and south in order to provide for flood alleviation, but the scale of compensation for the Colne Valley Park needs to go much further than this. It needs to provide for major mitigation and compensation

to take place elsewhere in the Colne Valley Park as part of the overall legacy in line with the CVP's recent Landscape Strategy.

- 5.82. **More land should be included in the DCO boundary and more improvement measures proposed in the Masterplan to bring forward a more strategic scale of improved landscape. A fully funded wider area Green Infrastructure improvement strategy is needed**, which amongst other things, takes account of the new requirement in the NPPF that the impact of removing land from the Green Belt should be offset through compensatory improvements to the environmental quality and accessibility of remaining green belt land.
- 5.83. A comprehensive management and maintenance plan should be produced in perpetuity for the whole area around the airport capable of delivering a "cared for" Park across the whole Masterplan zone not just for individual sites.

(d) *Enlarging Poyle Trading Estate*

- 5.84. **The proposal in the Masterplan to allocate two areas of land to the west and south of the Poyle Trading Estate for freight forwarding warehousing is supported.** We consider this should provide high quality boundary treatment for the Grade II listed building, and that the new site includes modern services infrastructure to support competitive employment space such as Superfast Broadband and electricity, SMART buildings; and EV capability.
- 5.85. The employment forecasts show that there will be very few new jobs created in Slough as a direct result of the construction of the third runway and associated development. At the same time, some existing business premises will be demolished as a result of the airport expansion. **It is considered that the expansion of Poyle Trading Estate is the most sustainable option for replacing lost facilities and creating the additional floor space that is needed to support the expansion of the airport. Although this would result in the loss of Green Belt land it is considered that there are sufficient very special circumstances to justify this.**
- 5.86. The Council's Emerging Spatial Strategy for Colnbrook and Poyle shows a larger area to the west of Poyle being used for airport related development. This area, which is currently primarily in agricultural use, is shown as an existing green space in the Masterplan with a new green buffer. **It is considered that some of this land could be used for an enlarged warehousing area with a suitable buffer being provided alongside the Colne Brook. This would not have a significant effect upon the green or blue environment or the Colne Valley Park and can be justified on the grounds that there are the same very special circumstances to allow development in the Green Belt.** Mitigation for the loss of all of this Green Belt land will have to be provided in accordance with the new requirement in the NPPF that the impact of removing land from the Green Belt should be offset through compensatory improvements to the environmental quality and accessibility of remaining green belt land.
- 5.87. **In order to maximise the support for the airport and reduce the number of HGV trips, it is essential that the warehousing is used for airport related freight forwarding only.** This will require controlling the size and type of warehousing that is built and that freight coming out of the warehousing is taken directly to the airport in low emission vehicles. Any development will also have to be of a high quality design with green amenity space and a range of support services. As a result, **it is requested that suitable conditions controlling the design and use of the new airport related development areas should be included in the DCO.**

(e) Rail Depot

- 5.88. Part of the existing railway line which serves the Total Oil Fuel depot, the Colnbrook Logistics Centre, London Concrete and Aggregates Industries will be lost as a result of the construction of the new runway. It is important that a rail depot is retained in this location for these uses as well as for the construction of the proposed runway and associated facilities. This can ensure that bulk construction materials and pre-fabricated elements from the remote Logistics Hubs can be delivered to the construction site without having to use the roads.
- 5.89. The Masterplan shows how new 30 waggon sidings will be provided including fuel storage areas that will ensure that aviation fuel supply is maintained. Seven new buildings are proposed which will be used for engineering and construction work, a replacement for the Colnbrook Logistics Centre and a new Heathrow Consolidation Centre.
- 5.90. Areas have been safeguarded for the replacement of the Lakeside Energy from Waste plant, the Western Rail Link shaft and the relocation of Aggregate Industries. These will not form part of the DCO application.
- 5.91. Mitigation for the loss of all of this Green Belt land will have to be provided in accordance with the requirement in the NPPF that the impact of removing land from the Green Belt should be offset through compensatory improvements to the environmental quality and accessibility of remaining green belt land.
- 5.92. Once the construction of the third runway is completed, consideration will have to be given as to how it should be used for the continued importation of minerals and as a logistics depot for Heathrow. It could also provide a rail link to the relocated Energy from Waste plant.
- 5.93. **To avoid congestion and environmental impacts, it is recommended that conditions should be imposed to prevent the railhead being used as a general a distribution centre.**

(f) Flooding

- 5.94. At present, parts of Colnbrook and Poyle are subject to flooding. In 2014, Heathrow made a commitment to reduce flood risk. This has not been taken forward in the current Masterplan proposals presented in the Airport Expansion Consultation. Heathrow Airport Limited need to demonstrate how they intend to meet this commitment in their other plans and strategies.
- 5.95. The construction of the third runway with its associated infrastructure and supporting development will be partly built in areas that are currently at risk of flooding and remove existing flood storage capacity.
- 5.96. In order to manage the increased risks of flooding, the Masterplan proposes that new areas of flood storage will be provided upstream of the site in the Colne Valley Park as multifunctional spaces, which can also be used for biodiversity and public open space. Section 7.11 of the Master Plan Consultation Document states that “flood risk is being considered in great detail to ensure we protect local homes and businesses”. New flood defence works are proposed to be carried out on the channels through Colnbrook village, to mitigate flood risk resulting from a change in overland flood paths resulting from the DCO project.
- 5.97. Although the modelling has not been completed, the initial results show that after development has taken place, some areas of Colnbrook will still be at risk of flooding.

- 5.98. The Council has repeatedly requested to HAL that flood alleviation work should integrate mitigation to reduce the risk of flooding for existing residents and businesses in Colnbrook and Poyle. Removing flood risk in Colnbrook and Poyle should form part of the mitigation for the impacts on the local communities in the Environmental Impact Assessment.
- 5.99. The Airports National Policy Statement (ANPS) states that: “The National Planning Policy Framework sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. But where development is necessary, it should be made safe without increasing flood risk elsewhere”.
- 5.100. **Given the scale of the proposed development and the identified harm it is considered that the Masterplan should aim to go beyond the position of not making things worse but ensure that sufficient flood alleviation measures are included in the Masterplan to ensure that as a result of all of the development proposed in the DCO, and other related development, there is a net benefit in terms of flood relief.**
- 5.101. The extensive new flood storage facilities are being proposed in the Masterplan and so it would appear that providing additional capacity, to protect existing residential areas that are currently at risk from flooding, would be relatively inexpensive and could provide additional open space and biodiversity benefits.
- 5.102. The failure to support the principle of providing additional flood alleviation is an example of where the expansion proposals have failed to provide any legacy or deliver mitigation to local communities heavily impacted by the expansion of the airport.
- 5.103. **As a result it is proposed that this Council should object to the failure of the Masterplan to plan for and provide sufficient flood alleviation measures to ensure that all properties in Colnbrook and Poyle are made safe from the risk of flooding.**
- 5.104. We welcome the commitment in the Strategic Brief to consider the requirements of UK communities and Environment. We consider that the Vision should also include reference to integrating the airport with its local area and communities disproportionately negatively impacted by the expansion proposals. **Priority should be given to the requirements of the residential and business communities in Colnbrook and Poyle, and that where it is not possible to mitigate all negative impacts; compensation should be delivered directly through the DCO and not via the community fund.**
- 5.105. **These guiding principles fall short of meeting the commitment in Heathrow 2.0. We consider that the program should also include a guiding principle around better integrating the airport with its neighbours in the adjoining area.** At present, we consider the plans for addressing and mitigating impacts outside the Airport boundary are insufficiently connected or integrated with those within the airport boundary. This is particularly the case with Green Infrastructure and cycle access to the terminals, and public transport access.

B. Operation of the future airport

(a) Early growth

- 5.106. It should also be noted that as part of the DCO process, Heathrow are seeking permission to increase the use of the existing two runways by up to 25,000 extra

flights a year before the third runway is expected to be opened in 2026. This will result in more traffic and more adverse environmental impacts at the same time that the construction process will be taking place. The combined effects of these do not appear to have been assessed. At the same time, no mitigation is being proposed to deal with this.

5.107. There is no basis for this early growth in the Airports National Policy Statement and no clear justification for this. As a result, the Council consider accepting an interim increase in the existing limit on the number of flights that are allowed on the two runways is dependent on a proper mitigation package being provided.

(b) Surface access

i. Direct route for buses and cyclists into the airport from the west

5.108. In order to comply with the ANPS, Heathrow has undertaken a pledge to not increase landside airport-related traffic. This will involve:

- Achieving a public transport mode share of at least 50% by 2030 and at least 55% by 2040 for passengers; and
- Reducing all staff car trips by 25% by 2030 and 50% by 2040.

5.109. Measures have been proposed in order to achieve this public transport mode share. This includes new bus and coach services such as a new bus route that connects Slough, Langley, and Colnbrook to the Central Bus Station. Heathrow will also support the DfT and Network Rail with their proposed Western and Southern Rail schemes.

5.110. Whilst these measures are welcome, the design and layout proposed in the AEC Masterplan will actually make accessibility and therefore journey times and reliability to the airport from Slough worse than it is at present by bus and cycle.

5.111. There are currently a number of ways in which buses and cyclists can get directly into Heathrow from the west. Bus services along the A4 serve the Bath Road area and the Central Terminals, and the route through Colnbrook High Street and Old Bath Road.

5.112. The construction of the third runway will mean that these routes will be cut off and buses and cyclists will have to follow the diverted A4 to the north. This is a longer route which doesn't serve Colnbrook or Poyle.

5.113. A large number of Slough residents work at Terminal 5. There is currently a direct bus service from the west into T5 via the bus link onto the Perimeter Road. Cyclists can also get directly into T5.

5.114. The Masterplan suggests that all access to T5 should come via the south where the new parkway will be built. The AEC proposals mean that all busses and cyclists will have to negotiate Junction 14 of the M25 to get to the airport. This will make cycle journeys longer and more challenging and bus journeys both longer and less reliable, if pursued as set out.

5.115. One of the main benefits of the expansion is the creation of jobs on the airport which can be accessed by Slough residents. **As a result the Council has consistently requested that direct access should be provided for cyclists and buses to Terminal 5 from the west. This is one of the reasons why it supported the retention of Junction 14A on the M25 on the basis that this is where suitable links from Poyle could be provided.** However, The Masterplan, as currently set out, has not taken this into account. It is predicted that around half

of the jobs on the airport will be filled by people from the 5 surrounding Boroughs but Slough residents will be at a disadvantage compared to those coming from the east which will have better access to public transport.

- 5.116. Around 3,000 of current employees to the west of the airport live within a 30-min cycle ride. In 2017, only 210 of these cycled to work. The modelling for the expanded airport anticipates this increasing to 850 trips per day. This appears to be unrealistic unless a high-quality direct and convenient network is built.
- 5.117. The proposed cycle route from Colnbrook and Poyle to T5 is longer than it is at present. It not clear what the final design will be but it appears to involve crossing the M25 at Junction 14, going to the southern parkway and then using a tunnel into the terminal. This is not considered to be an acceptable solution for a development which is intended to improve non-car access for workers.
- 5.118. **The Council has consistently requested that there should be a cycleway over the M25 at Junction 14A with a direct access into Terminal 5 in order to provide direct and convenient access from Slough and the west. As a result, Slough BC will object to the failure of the Masterplan to include such a cycle link, and seek its provision.**
- 5.119. The Heathrow Airport Employee Survey from 2016/17 indicated that 33% of employees would consider public transport if there were more direct bus routes, whilst 26% stated more frequent bus services would increase their public transport use.
- 5.120. The 'A Transport Vision for the Centre of Slough' document from February 2019 proposes a Borough Wide Mass Rapid Transit (MRT) with a 100% segregation of vehicles from general traffic. One route would run west to east and connect to Terminal 5. There are current plans to create dedicated bus lanes on the A4 through Brands Hill.
- 5.121. The Heathrow Masterplan does not, however, show any bus lanes on the diverted A4 or the new A3044. It states that we are investigating the option of local widening for bus priority measures.
- 5.122. The Council is concerned that the A3044 will be used as a rat run for traffic going to and from the M25 to the M4 and the likelihood that it will become congested whenever there is a problem on the motorway network. It is vitally important that any bus service to Heathrow is reliable if passengers and workers are going to be encouraged to use it. As a result, sufficient resilience needs to be built into the system. This means that **it is essential that bus lanes are provided on the A3044 and changes to the A4; either to include bus lanes or at least junction arrangements, that mean they can be added outside the DCO by Slough BC, in implementing its transport vision.**
- 5.123. As explained above, there is currently a direct bus route from Colnbrook into Terminal 5 via the bus link onto the Perimeter Road. In the new Masterplan, this is not replaced but all buses have to go along the new A3044 to junction 14 of the M25 and then pass through a new Stanwell Moor junction before going into Terminal 5 from the south.
- 5.124. The Council has consistently requested that there should be a direct bus route into Terminal 5 from the west at Junction 14A of the M25 which would provide a shorter route which avoided these two major junctions. This has not been provided.
- 5.125. In order for the Council to remove its concerns and objections to the preferred masterplan, HAL will need to satisfy the Slough Borough Council that it will provide

a new direct route for cyclists and allocated lanes for buses on the realigned A3044 into Terminal 5 in the vicinity of Junction 14A on the M25.

- 5.126. During construction, as traffic is predicted to increase on the M4 with knock-on effects impacts on the A4, an early implementation of bus priority measures would ensure that the connectivity between Heathrow airport and Slough Borough Council is maintained, as a minimum, to the current levels.
- 5.127. Given advances in technology, that the airport operates 24 hours a day, and the changes in the way people are likely to work and travel, the proposals should consider passive provision for Demand Responsive Transport for Colnbrook and Langley areas.
- 5.128. The proposals from HAL as part of the AEC on surface access concentrate primarily on the east with additional provision in terms of public transport services. The impacts on Slough are significant both through the construction and operational stages with additional traffic being generated in the Colnbrook, Poyle and Langley areas, however the impacts of this growth have not been mitigated and are reliant on the Councils own initiatives such as the SMaRT scheme with Park & Ride to mitigate against the growth. There is no provision for bus lanes and no bus priority in any of the proposals, which leads Slough BC to conclude that the AEC is not considering Slough as untapped area for modal shift or employee growth. The lack of connectivity either through public transport or active travel in terms of walking and cycling routes indicates that HAL are looking for the majority of expansion to be met by the London area however no sensitivity tests have been undertaken to understand if this is possible and therefore what is their Plan B. The indication that Western Rail is not required to meet the ANPS targets is not welcomed as this clearly goes against the ANPS.
- 5.129. The Surface Access Strategy (SAS) has not been innovative outside of the airport and has looked at replacing infrastructure with a “like for like” replacement and hence leaving it to Slough and outer London authorities to pick up the impact. Slough has been very clear in terms of its objectives and public transport infrastructure and services that this needs significant investment to reduce congestion, improve air quality and provide access for employment. The proposals set out in the SAS do not look to address these issues adequately, and we propose to make this clear in our official response.

ii. *The Western Rail Link to Heathrow (WRLtH)*

- 5.130. The Western Rail Link to Heathrow (known as WRLtH) will enable direct services to be provided from Heathrow from Slough, Reading and the West. The service from Slough to Heathrow will take seven minutes and operate four times per hour in each direction.
- 5.131. The link is supported by the ANPS but is being delivered under a separate DCO process. The Council supports Heathrow Airport Limited’s commitment to contribute to the cost, but considers the project is required by the current airport; and so must be delivered prior to expansion being completed to help with modal shift and to contribute to the economy. **It is therefore vital that Heathrow Airport Ltd agree, as a matter of urgency, its contribution to provide a level of certainty on the delivery timescales.**

iii. Transport network users

■ **The impact of active travel mode targets being unmet**

- 5.132. The Airports National Policy Statement (ANPS) determined that trips to the airport made by public transport, cycling, and walking must meet a mode share of at least 50% by 2030 and at least 55% by 2040. Staff car trips will be reduced by 25% by 2030 from 2013 baseline levels, and by 50% for 2040.
- 5.133. The Preliminary Transport Information Report (PTIR) Volume 4 identified that there are approximately 2,300 workers (out of a total close to 100,000) that live in the Slough BC area within 1.5km from Heathrow and they have been classified as having a 'Medium-High' cycling potential. As such, cycling infrastructure improvements could assist in increasing active travel modes for workers including an indicative route connecting Slough to Heathrow.
- 5.134. The share of active transport trips in the Future Baseline scenario is anticipated to remain at 2.5% and the 'With Project' scenario is anticipated to have a growth to 4.5%. This is accounted for through discouraging car use and restricting parking availability.
- 5.135. **Heathrow must improve active travel networks within the airport's boundary and work in conjunction with Slough to improve the quality and level of use of the active travel networks.**
- 5.136. If the 'With Project' scenario projections are not met, then there is predicted to be an increase of 2% of mode share distribution to either private vehicle or public transport, or a combination of both. Should Heathrow restrict parking availability, it is presumed that this 2% would be shifted to public transport.
- 5.137. The PTIR Volume 5 has identified that there are approximately 1,300 daily worker trips made by bus in the north-west quadrant, with Slough identified as the main origin for worker bus trips (78% of the total). In the Future Baseline scenario, there is a forecast of an additional 1,000 daily worker bus trips in which Slough accounts for 90% of the demand.
- 5.138. In the Masterplan, Heathrow proposes to support a new bus route connecting Heathrow Central Bus Station to Colnbrook, Langley, and Slough as well as a frequency enhancement in the connection between the latter three destinations to Terminal 5. This would help to meet the anticipated demand however it requires Heathrow to support public transport partners to implement the proposed new bus schemes.
- 5.139. The road changes to the M25, A4, A3044 and other local roads aim to meet capacity for future traffic levels and it is highly recommended priority measures for buses and cyclists are included on the appropriate routes. However, no consideration has been made for an alternative scenario where uptake of public transport is low, and parts of the schemes are not delivered. **Further consideration of the impact this will have on the capacity of the Strategic Road Network (SRN) is therefore required.**
- 5.140. The Surface Access Proposals (SAP) document recognises that mass transit is the most effective way of reducing congestion on the road. However, sustainable transport has currently not achieved its potential amongst employees or passengers. The SAP explains this situation with several reasons relating to capacity, reliability, affordability, frequency and perceived quality of the services.

- **The quantifiable impact upon SBC**

- 5.141. Due to the transportation network changes required to accommodate the new runway, there is to be a severe anticipated impact on the Slough area. There are several roads that will be realigned or altered to accommodate the development of land for the new runway as well as to accommodate the projected vehicular traffic.
- 5.142. The A3044 will move to the west of the M25. The M25 will be moved west of its current location to be realigned and tunnelled between Junction 14 and Junction 15. The M25 Junction 14 will connect to the Colnbrook Bypass (A4). During this reconstruction phase, a temporary route of up to 2km will be built and located a maximum of 150m west of the existing motorway.
- 5.143. The A4 will also undergo significant enhancements with a new roundabout on the Colnbrook Bypass that will connect to the A3044 and A408. The A4 may also need to accommodate increasing traffic due to the closure of the Northern Perimeter Road. Slough Borough Council has determined that the A4 will serve as an interim conduit, with **the A3044 being used as the main conduit for the Slough Mass Rapid Transit (SMaRT) scheme that will facilitate dedicated bus lanes, and that phase 2 of the project extends between Langley and Heathrow. It is essential that HAL do not disrupt these proposals and therefore signalised junctions on the A4 and A3044 will need to be incorporated into the current masterplan.** The SMaRT scheme therefore is a key scheme to be prioritised by both HAL and Slough Borough Council, which should be delivered and operational at an early stage.
- 5.144. Parking at Heathrow will be consolidated in two parkways and worker vehicle reduction targets will be met through a transfer to public transportation. This indicates potential mode share increases along the proposed SMaRT route as the Future Baseline scenario for 2035 identifies a forecast of approximately 1,000 daily worker bus trips, where Slough accounts for 90% of the anticipated demand.
- 5.145. Because of expansion, construction traffic on the A4 and London Road through Brands Hill is likely to peak in 2022/2023. However, throughout all phases of construction, London Road through Brands Hill is expected to see increased traffic flows of construction traffic. In 2035, traffic levels on the London Road between Brands Hill and Colnbrook are likely to increase due to the expansion. Thus, the proposed changes to the A3044 are likely to support a rerouting of traffic away from the London Road between Sutton Lane and the M4 Junction 5. However, this will still be through the Brands Hill AQMA.
- 5.146. The overlapping of several different traffic flows and transport schemes across all modes of transport and during both construction and operation of the HAE as outlined above, suggest that the A4 corridor should be subject to mitigation and improvement measures at an early stage of the project.
- 5.147. Mitigation should be implemented at an early stage. Therefore, it is critical that direct access from the M4 is ensured so that construction traffic originating from the west can easily access the airport and to mitigate unnecessary construction traffic flows through the Slough Borough Council Major Route Network (MRN). A direct access from the M4 to the construction site would greatly help and should be funded by HAL to mitigate any delay in the opening of the Colnbrook railhead in 2023. This will also significantly reduce the impact on the Brands Hill AQMA and the community.

- **Summary of key transport risks during construction and operation**

- 5.148. There are several worst-case scenarios during the construction and operational phases of the proposed third runway for Heathrow that have been identified.
- 5.149. The proposed railhead at Colnbrook is set to reduce construction freight vehicles by approximately 20-30% between 2023 and 2025. Furthermore, 32% of construction freight trips will come from the western section of the M4 where Slough is located. If Heathrow is unable to reduce freight vehicles by the proposed 20-30%, that would indicate an influx of these vehicles onto the M25, A4, or other roads undergoing alterations. This would be in addition to the proposed 32% of construction freight trips from the western section of the M4. These are HAL's targets and therefore if not met will cause severe problems on already congested roads in Colnbrook, Poyle and Langley.
- 5.150. HGVs are intended to utilise the realigned M25, the A4, and the A3044, and local roads should be used as little as possible. If not mitigated, local roads would be utilised as rat runs and cause disruption for local users. **Clear construction route plans and management agreements will be required.**
- 5.151. A key aspect during the construction phase that may impact Slough Borough Council is the strain on public transportation. Although only 5% of construction workforce trips will originate from the north-west of Heathrow, this would represent an additional 810 daily construction workforce passenger trips using public transport in Slough in 2022, which should be mitigated through enhanced bus provision as part of the HAE proposals. Additionally, an insufficient set of public transport enhancement measures could reduce the number of construction workers choosing to use buses and generate up to 1,350 additional vehicular trips per day.
- 5.152. The Airports National Policy Statement (ANPS) states it is a requirement that landside airport-related traffic will be no greater than its current status. A worst case-scenario in the operational phase would be that landside airport-related traffic has increased. This would mean that active transport for workers or passengers and staff car trip targets have not been met, or delays for new public transport initiatives. The Surface Access Proposals document recognises that existing sustainable transport has not achieved its potential amongst employees or passengers; therefore HAL must work harder in the next phase to ensure that its NPS targets are met.

■ **Bilateral Issues Log**

- 5.153. Slough Borough Council officers have been liaising with HAL officers on issues that are directly relevant for Slough. This is in addition to the HSPG and allows the Borough to be clear about its requirements, to ensure the benefits of the proposals leave a legacy which outweighs the negative impacts on Slough and its communities.
- 5.154. This section focuses on changes to the Masterplan and operation that Slough Borough Council has made clear it wants HAL to be committed to and how these have been dealt with in the most recent proposal documentation.

Ultra-Low Emission Vehicle (ULEV) Corridor

- 5.155. Earlier consultations between Slough Borough Council and HAL show that Slough Borough Council is committed to the creation of a ULEV corridor or higher (WHO guidelines). The reviewed documents demonstrate that Heathrow is proposing an Ultra-Low Emission Zone (ULEV) within the terminal forecourts and car parks but not on the surrounding road network. Slough Borough Council has previously

voiced their commitment to the introduction of a ULEV corridor and their commitment to a Wellbeing Strategy as outlined in their LTP3 and Transport Vision. Retaining this commitment would benefit Slough Borough Council to help achieve objectives set in the LTP3 and Transport Vision and would benefit HAL to fulfilling the objectives of the ANPS. The proposed HULEZ is likely to displace polluting vehicles into the Slough area and therefore is not deemed suitable. The Council is committed to working with HAL and proposes that HAL work with the Council to ensure that a wider Clean Air Zone is introduced to meet the needs of reducing emissions.

Bus Lanes on A4 & A3044

- 5.156. Slough Borough Council is seeking commitment from HAL to commit to infrastructure to support direct and more reliable bus journeys along the A3044 and the A4 and to provide managed junctions as opposed to roundabouts, as a minimum. This infrastructure is also in line with Slough Borough Council's new Transport Strategy. The reviewed documents have identified that permission has been granted to make the A4 a dual carriageway; however, HAL have determined that a single carriageway is sufficient enough to meet their forecasted demand. The documents do not discuss a possible bus lane on the A3044, and current modelling scenarios for Junction 14 and 14a do not have bus lanes. Given the focus on enhancing current bus services and the proposed provision of new services, the development of a bus infrastructure in respect of allocated lanes is essential on the A3044, and bus lane enabling junctions designed on the A4, will help to ensure that bus services from Slough to the airport improve to be an efficient method of transport, especially as congestion will increase during the construction phase of the development. HAL must commit to mitigating congestion on Slough Borough Council roads, through this approach.
- 5.157. Furthermore, there are no bus priority measures or bus lanes proposed on the VISSIM modelling scenarios. It is imperative that HAL commit to bus lanes on the A4 and A3044 and produce modelling scenarios for such to understand the impacts on the road network.

Improving access to airport workers

- 5.158. Both HAL and Slough BC have made clear their commitment to increasing the number of airport workers using active transport to get to and from the airport daily. This forms a crucial element of HAL's objective to reach ANPS targets and is a key underlying theme in Slough's LTP3. The Green Loop proposed aims to supplement the active transport hub and spoke proposal that gives colleagues commuter access to the airport. As discussed further in this review, it is clear that for Slough Borough Council to fully benefit from this target of increasing active transport to the airport, a detailed plan is needed to determine how the Active Travel and Green Loop will be linked to Slough centre and the surrounding residential areas, and then proposals must be developed further and committed to by HAL. The Council has been working with the Colne Valley Park, South Bucks and RBWM to deliver a connectivity statement to deliver routes that connect north of the M4 and south to RBWM to then extend and connect to the Active Travel route.

Active Transport

- 5.159. A key aspect of the proposal to ensure that the ANPS active travel target is met is the development of the active travel 'hub' route around the airport boundary to encourage more cycling to and from the airport, which is in line with the promotion

of healthy active travel in LTP3. The route could also be used for electric bikes / scooters, and for walking to access public transport. The Green Loop proposals create a network of new footpaths, cycle routes and upgrades to existing paths. It will provide alternatives to the Active Travel route but is primarily for recreational use – e.g. the routes may not be lit or open at night if they go through rural areas or parks. The route of the Green Loop is clearly defined in the proposals and outlined in 'Heathrow Expansion and your area: Brands Hill'.

- 5.160. At present, there is only one proposed 'spoke' link from the hub around Heathrow airport along the diverted A3044, but the commitment to deliver that routing stops near Brands Hill, where it assumes a connection to existing Slough Borough Council routes towards Langley and the centre of Slough. As 2,935 of Western Corridor employees live within a 30-minute cycle of the airport, there is potential for an increased uptake in the number of Slough residents cycling to the airport. The proposed cycle hubs providing parking and showers etc. are on airport but are limited, and none are located along the Western border or at off-site public transport interchange points. **To achieve the required mode share change to cycling, these Active Travel Cycle hubs should be located throughout the proposed site and the access to reach them is cycle friendly.**

Road Changes

- 5.161. The proposed road changes outlined in the reviewed document will impact Slough Borough Council in a variety of ways. The proposed changes will have a knock-on impact to surrounding local roads. Slough Borough Council previously raised concerns about proposed road changes to the A3044 that could create a 'rat run' route between the M25 Junction 14 and the M4 Junction 5, which results in increased congestion on local roads. Ensuring that the proposed road changes do not result in unnecessary prolonged increased traffic flows to the roads in Slough Borough Council is crucial to the future growth proposed for Slough Borough Council. Construction road traffic is expected to peak in 2022/2023 in the Brands Hill area and ensuring that the alternative surface access proposals for construction workers and materials are in place before this time is crucial to prevent extra increases to traffic flows in Slough.

Bus Changes

- 5.162. The proposed improvements to the bus network that serves Slough Borough Council do not provide a clear indication of how the needed mode share change will be achieved to meet the targets of the ANPS. The reviewed documents propose improvements to the frequency of existing bus services towards Slough and enhanced off-peak bus service provision. However, there is a lack of clarity and absence of detailed information on exactly how many more buses will be operating per hour and what time the off-peak bus service provision will begin and end. The new proposed bus routes from Slough to the airport (see Graphic 3.25: Proposed improvements to bus services in SAS Part 1) show that new bus services will be put in place from Slough to the Heathrow Central Bus Station and to Terminal 4. From Graphic 3.25 it is unclear of the exact route of these proposed new bus services and if users will need to change buses to get from Slough to Central Bus Station / Terminal 4. The expected frequency and times of the proposed bus services is also yet to be determined and must be established.

Rail Changes

5.163. The reviewed documents outline several committed and proposed changes to the rail networks that serve Heathrow airport. Improving the rail access through committed rail schemes includes the Elizabeth Line, upgrades to the Piccadilly line and the development of HS2. The introduction of the Elizabeth line will allow people travelling from Slough Borough Council to reach Heathrow airport via a change at Hayes and Harlington. The SAS identifies that discussions between HAL and TfL have indicated that in the short term there is unlikely to be an increase in the provision of Elizabeth Line trains due to concerns of affordability. At present, the proposals regarding the development of the Western Rail Link are still being developed. The Western Rail Link is estimated to connect Heathrow to Slough station in 7 minutes. This will be very beneficial to Slough Borough Council residents if the proposals become part of the expansion of Heathrow airport.

Slough Local Transport Plan and Transport Vision

5.164. The Slough Local Transport Plan 3 (LTP3) covers the period from 2011 – 2026 and identifies key objectives that Slough Borough Council aims to achieve as part of their Well Being Strategy. The LTP3 demonstrates that there are similarities between the transport vision of Slough Borough Council and the proposals made by HAL in the proposal documents.

Travel to Heathrow

5.165. The LTP3 explains that 60% of Slough BC residents live within a 45-minute peak period bus journey of Heathrow, leaving 40% of residents with a longer journey. Many of Slough's 7000 Heathrow employees work shifts and are reliant on off-peak bus services to get to work. These services are less frequent and require changing buses in the town centre. **As Government budget cuts resulted in a trial 24-hour service bus to the airport being withdrawn, it is recommended that Slough BC works with HAL to secure funding to re-introduce this trial to contribute to achieving the objectives of the ANPS for 24 hours per day.**

5.166. The LTP3 identifies that 80% of Slough residents who work outside of the borough are reliant on cars to get to work. Therefore, for the ANPS target of reducing staff car trips to 50% below baseline levels in 2040 to be met, **Slough BC needs to ensure that the proposals to improve existing bus routes in the west corridor are committed to, especially as the LTP3 identifies that there is a need for priority measures to be put in place for public transport.**

5.167. The Thames Valley "Delivering a Sustainable Transport System" (DaSTS) study identified challenges regarding the growing congestion and delays on the M4 which then in turn have a knock-on effect on congestion levels on the A4. It is important that HAL produce further detailed information to demonstrate that their proposals will not risk making these conditions worse.

Slough Borough Council Development

5.168. LTP3 identified the Slough trading estate to increase its connection with the airport and that this is crucial to the development of the local economy. A reliable and well-connected route between Heathrow airport and the trading estate will allow the local economy of Slough to fully benefit from Heathrow retaining its airport hub status.

(a) Scheme development report

5.169. Chapter 2.2, paragraph 2.2.2, outlines how the Masterplan process has been developed. Whilst we agree with most of what is outlined in the summary of the

process, we do not necessarily agree or endorse the way the iterations of the Masterplan have developed. **Thus, we require further clarifications from HAL on their choice rationale and the criteria used for evaluating their preferred options, before we are able to make a formal statement on the final Masterplan.**

- 5.170. Further clarity is required for the public and HSPG throughout the documentation as to what land will fall within the DCO application, with a comprehensive list of what is included within the DCO, and what is excluded from the DCO as this is unclear at present. Many of the materials giving the impression that proposals, such as the Green Loop, are firm and will be delivered within the DCO; yet scrutiny of the detail reveals that these will be addressed outside it.
- 5.171. The area required to deliver mitigation for the Masterplan is wider than the draft Development Consent Order limits; thus, clarity is needed as to what will be included in the DCO boundary and how HAL will be held accountable to deliver what is in the Masterplan (areas outside of the DCO limits Boundary).
- 5.172. More information is needed on the rationale for prioritisation of uses for inclusion in the DCO. Some decisions on what a 'principal' is or 'associated' use or is treated without the DCO appear inconsistent. For example, 100% of hotels not entirely reliant on airport use have been included in the DCO, major ASF offices are without. Some provision is included and some not.
- 5.173. Clarification is required on what aspects will form part of the DCO and what other aspects will be subject to other delivery mechanisms, including separate planning applications or legal agreements. The council will require support for delivering these if they form a fundamental part of the mitigation or are displaced, for example, the relocation of the Special Needs centre in the Green Belt, and the re-provision of the Energy from Waste facility (EfW) also in the Green Belt.
- 5.174. **A more joined-up strategy is required between HALs proposals for the DCO and those needed to be delivered by Local Authority Plans, and the Joint Strategic Planning Framework being produced by the HSPG group to ensure there is an interaction between ASD within the JSPF and the Masterplan.**

C. Assessment of the Preliminary social, economic and environmental impacts Report

CHAPTER 7 AIR QUALITY

- 5.175. Slough has five AQMAs which exceed the EU limit for NO₂ (40µg/m³). More recognition and information is required from HAL about how Heathrow recognise the impact that the expansion will have on Slough residents, and how it will be addressed, reduced or mitigated.
- 5.176. The air quality assessments presented in the PEIR conclude that a persistent issue with NO₂ exceedance is not expected due to the expansion project, as modelling indicates exceedance only occurs in 2022, primarily due to construction traffic. However, the assessment of significance is based on professional judgement; how it is applied is subject to interpretation.
- 5.177. To inform baseline modelling, Heathrow have taken 2017 data from Slough's Annual Status Report (ASR). The way it is presented, gives a false impression that Slough does not have an issue with air quality in the Brands Hill area. Many diffusion tube locations do not represent the poor air quality present on major roads,

and the continuous monitoring station illustrated in the maps within the PEIR was installed mid-2017, therefore is not fully representative air quality concentrations during that year.

- 5.178. Sensitivity testing conducted by Air Quality Consultants Ltd using the CURED v3A model (AQC, 2017) assumes that post-2020 technology does not deliver any benefits as a worst-case assumption. However, data from Slough's ASR (2018) does not reflect this rate of improvement and NO₂ concentrations in Brands Hill are unlikely to decrease at a rate that will meet this target by 2022. The percentage of improvement presented in the ASR shows less than a 2% improvement over a 5 year rolling trend.
- 5.179. Brands Hill continuous monitoring station shows an increase from 37.5µg/m³ in 2017 to 42µg/m³ in 2018. This increase is also represented by diffusion tube monitoring at this location, rising from 37.3µg/m³ in 2017 to 43.3µg/m³ in 2018. NO₂ concentrations peaked at the Brands Hill junction area at 53.2µg/m³. Heathrow's modelling predicts a decrease to 45.1µg/m³ by 2022, which would require significant additional mitigation.
- 5.180. Modelling also predicts that annual particulate matter (PM) concentrations are highest at receptors close to the junction between the A4 Colnbrook Bypass and London Road. However, the concentrations are much lower than the annual mean AQOs, in all modelled years at Brands Hill, with and without the DCO Project; therefore it was not taken further in assessments. Heathrow appear to be dismissing their contribution to PM concentrations as they are below AQOs. However, any increase should be recognised as there is no safe exposure concentration for PM and any increase will impact health.
- 5.181. The construction phase will contribute to a worsening of air quality, both in regards to NO₂ and PM. A considerable proportion of Colnbrook and Poyle are designated as Construction Support Sites (CSSs). The Colnbrook and Poyle area has locations designated as CSS facilities continuously from 2020 to 2040, which has potential to cause "significant" impact on residents, arising from construction noise and poor air quality exposure, particularly due to the significant road alteration works which commence in 2025, where sections of the A4 and A3044 within Slough will be closed and demolished.
- 5.182. Construction traffic is proposed to access the expansion development area via the A4 through Brands Hill. Maps provided as part of the consultation suggest that only 16% of construction traffic will enter from Brands Hill via the M4, however conflicting information presented during the Code of Construction Practice presentation suggests that a larger quantity will be using this route, specifically travelling through Slough (33%). Heathrow have failed to recognise that Brands Hill AQMA has significant air quality issues, which will only be exacerbated by using the identified route through this area of Slough.
- 5.183. Although Heathrow have stated that a persistent issue with air quality is not expected and 2022 is the only year where AQOs for NO₂ are exceeded, a set of mitigation measures have been provided. This is entirely reliant on the Surface Access Strategy, the Code of Construction Practice and the Construction Traffic Management Plans. Within the individual affected communities' documents, the impacts focus on noise rather than air quality; however, the importance of air quality to residents needs to be highlighted.
- 5.184. The overall conclusion of the surface access proposals is that connectivity will be achieved through better rail access, coach and bus routes. The mode share targets will be achieved by Heathrow predominantly through developed public infrastructure to London, to balance increased car use from the west (until the rail links are

established). Heathrow predict that traffic will not increase, but the proportion and distribution will change. Slough Borough Council are unlikely to meet their modal shift goals when areas such as Colnbrook are so poorly connected to the airport. Heathrow have the opportunity to produce innovative solutions to these connectivity issues, but it appears that they are favouring travel options to the east where there is denser population, in order to achieve mode share targets. Slough Borough Council will assert the importance of modal shift and public transport infrastructure to the west.

- 5.185. Recent presentations provided by Heathrow on active travel indicate that Slough will not be as well connected through cycle infrastructure as the PTIR documents suggest. There are particular issues regarding access to Heathrow via a crossing on Junction 14 of the M25. Therefore it is proposed that a more direct route is designed that is suitable and attractive to all age groups.
- 5.186. The Green Loop does not provide a route which links all areas surrounding the airport well. The Green Loop is designed to provide a longer, greener and more scenic route around the airport, and the Active Travel route is a quicker route for cyclists to use. However, colleagues living in this area will not be attracted to using this method of transport because the severance caused by the M25 between Slough and Heathrow results in a longer, more disrupted route. Although geographically Slough is within reach of the airport, the options provided still result in poor accessibility, and Slough BC will assert the need for amendments/improvements to this in our response.
- 5.187. Section 5.21 of the ANPS states “The applicant’s proposals will give rise to impacts on the existing and surrounding transport infrastructure. The Secretary of State will consider whether the applicant has taken all reasonable steps to mitigate these impacts during both the development and construction phase and the operational phase. Where the proposed mitigation measures are insufficient to effectively offset or reduce the impact on the transport network, arising from expansion, of additional passengers, freight operators and airport workers, the Secretary of State will impose requirements on the applicant to accept requirements and / or obligations to fund infrastructure or implement other measures to mitigate the adverse impacts, including air quality”. **As the current Surface Access proposals do not yet adequately address Slough’s needs, Slough Borough Council will continue discussions with Heathrow, to develop routes that will benefit the community. This is required prior to DCO submission.**

CHAPTER 17 NOISE AND VIBRATION

(a) *Early Growth*

- 5.188. HAL’s operations are currently capped at 480,000 annual air traffic movements (ATMs) by a condition imposed on the grant of planning permission for Terminal 5 in 2001. With the grant of the DCO application that restriction would be lifted, and more flights would be permitted before the third runway becomes operational. HAL propose to increase capacity by up to 25,000 ATMs (to 505,000 annually). These additional ATMs would be accommodated by Performance Based Navigation (PBN) technology which would allow improvements to the use of the current two runways, such as Independent Parallel Approaches (IPA), and enhanced Time-Based Separation (eTBS).
- 5.189. One of the key elements of using IPA is that the aircraft will join the approach path later than they do presently; therefore they approach closer than 8 nautical miles to

the airport. This means they will be lower than today as they join their final approach and will potentially be noisier and expose new areas to aircraft noise with low altitude flights. However, aircraft noise is reducing due to improvements in technology.

- 5.190. HAL's consultation on IPA indicates that up to 25 flights at altitudes of up to 5000ft between 0600 and 0700 hrs would result in LA_{max} noise levels exceeding 60 dBA - in some cases when aircraft are flying lower than 5000 feet the exceedance of 60 dB LA_{max} will be substantial. An external level of LA_{max} 60 dB is important as it marks an established threshold for onset of impacts on sleep for people who sleep with a window to their bedroom partially open.

(b) Preliminary Environmental Impact Report review

- 5.191. The PEIR is not considered to provide enough noise information to enable the local community to understand the environmental effects of the proposed development so as to inform their responses regarding the proposed development.
- 5.192. The PEIR claims that significant effects on health and quality of life due to new very high noise exposure are predicted in parts of Slough including Poyle, Colnbrook and Brands Hill, which can be avoided by mitigation measures (package of aircraft noise control measures and noticeable or valued respite from runway alternation – to be confirmed in ES) and compensation measures (full noise insulation).
- 5.193. The PEIR states that the daytime adverse likely "significant" effects from noise increases, which would likely affect quality of life have been identified for approximately two thirds of the Borough including Poyle, Colnbrook, Brands Hill, East Langley, and Langley, Slough, Chalvey, Cippenham and Britwell. The PEIR goes on to state that these will be mitigated and minimised by mitigation measures and potentially compensation measures for parts of Slough closest to the expanded airport (full noise insulation). The Council proposes that HAL work with the council to ensure that the mitigation is suitable to offset the adverse effects.
- 5.194. The PEIR recognises that night-time adverse likely significant effects have been identified for parts of Slough Borough Council including Poyle, Colnbrook, Brands Hill and East Langley. The PEIR claims these have been mitigated and minimised by mitigation measures and potentially compensation measures for parts of the Local Planning Authority closest to the expanded airport (full noise insulation).
- 5.195. A night-time beneficial likely significant effect (from noise decrease that would affect the acoustic character of the area and may be perceived as an improvement in quality of life) for up to 200 persons has been identified for at least one of the indicative airspace design test cases in Poyle. This suggests that there are options available that cause a less significant impact noise impact on Slough residents.
- 5.196. The PEIR includes tables based on comparison of a future 2 runway airport that would be less noisy than the 2013 baseline (due to a greater proportion of less noisy aircraft in the fleet and operating measures such a slightly steeper approaches etc.) with a future 3 runway airport. These tables show a consistently adverse effect for Slough i.e. overall, substantially increased numbers of persons adversely affected with a Third runway compared to a future 2 runway airport.

(c) Review of plans to manage the expansion effects (Heathrow's proposed mitigation)

- 5.197. The primary mitigation measures identified are maintenance of established operational control features e.g. respite due to runway alternation (although the duration of relief each day with fall from 8 to 5 hours), Noise Preferential Routes to

minimise population overflow, continuous descent approaches and introduction of slightly steeper approaches to reduce noise on landing, and the quota count (QC) system to restrict the noisiest aircraft from using the airport at night.

- 5.198. Compensation has been utilised and is in the form of house purchase in the worst affected areas, a three-tiered noise insulation scheme of declining robustness and value relative to noise magnitude, and a community fund. There is also a noise insulation scheme for community buildings such as schools and colleges, hospitals, hospices and nursing homes, libraries and other public buildings where many people will spend long periods of time or where the use is noise sensitive.
- 5.199. There is a concern that the splitting of noise insulation, house purchase and community funding from mitigation to compensation will not address the direct issues faced by residents therefore it is important that HAL provide the necessary mitigation package to comply with the policy/ ANPS requirements to meet and minimise adverse effects, whilst using the compensation measures of noise insulation to avoid Significant Adverse Effects and house purchase to prevent Unacceptable Adverse Effects.
- 5.200. As per the ANPS, the Action Level for schools will be 60dB LAeq,16hr (for a future operational scenario) compared to the current scheme based on the 2002 63dB LAeq,16hr contour. This is not sufficiently low to avoid schools experiencing aircraft noise above the Department for Education's guidelines for acoustics in schools from BB93 where they use open windows for ventilation and control of overheating. Slough Borough Council seek reduction of the threshold for sound insulation to 55 dB LAeq, 16 hr as evidence shows that aircraft noise can have an impact on children's cognitive developments (RANCH study). This is particularly a concern for children at Pippins School in Colnbrook.

(d) *Respite by runway alternation*

- 5.201. Currently on westerly operations the two runways spend half the day either on departures or landings only, with the roles alternating at 1500 hrs. For most of Slough, this means a difference in noise conditions between the two phases of alternation with typically 8 hours of the day with noticeably lower noise conditions. Currently there is no alternation on easterly operations until the infrastructure to allow easterly departures on the northern runway is in place.
- 5.202. With three runways, the alternation cycle becomes complicated and the PEIR assumes that one of the outer runways will operate in mixed mode (landings and take offs separated in time) for a day with the other two runways being rotated between landings or take off only, in a similar manner to today's runway alternation pattern during the daytime. The mixed mode runway is changed each day between the northern and the southern runways - the centre runway is not used for mixed mode. Whilst this provides a more predictable pattern of respite independent of weather conditions, it diminishes the overall duration of relief to only 5 hours each day from the current 8 hours.

(e) *Property Purchase*

- 5.203. HAL are offering a compensation offer whereby they will purchase eligible properties for the open market value plus a loss payment of 25%. This applies to eligible properties for qualifying owners in the Compulsory Purchase Zone and for eligible residential properties in the Wider Property Offer Zone. In Slough Borough Council these zones mainly affect Brands Hill, Colnbrook and Poyle. Owners of property or land within the Compulsory Purchase Zone whose property does not qualify for, or who do not take-up the enhanced compensation offer, will be eligible

for Statutory Compensation. This also applies for commercial properties and land outside the Compulsory Purchase Zone that may be required for environmental mitigation or other uses.

(f) Noise Insulation

5.204. The proposed noise insulation policy is markedly different and more comprehensive than previous schemes. For homeowners, three levels of scheme will be offered, depending on the existing or predicted noise exposure level, as indicated by the relevant noise contour, source of noise and if confirmed through third-party assessment.

- **Scheme 1:** Full cost of noise insulation fit-out, potentially including new acoustic double glazing or secondary glazing, loft or ceiling insulation, ceiling over-boarding, external door upgrades and ventilation for aircraft noise.
- **Scheme 2:** A package of noise insulation to exposed facades, potentially including acoustic double glazing or secondary glazing to windows, external door upgrades and attenuated ventilation for road, rail and construction noise exposure.
- **Scheme 3:** A fixed £3,000 contribution to approved noise insulation works.

5.205. Eligibility for schemes will be based on published noise contours of the defined Action Levels, or thresholds, as set out in the government ANPS for aircraft noise, extended to include road, rail and construction noise.

5.206. Noise Insulation Schemes will be made available before the defined Action Levels are expected to occur because of the expansion project.

5.207. The noise insulation will apply to combined levels of noise from sources associated with the scheme. But will not apply to the combined total noise level of existing sources plus the contribution from HAL expansion plans i.e. HAL noise in isolation could be below the noise insulation threshold, but in combination with an existing source the resulting cumulative level will be over the threshold, but no offer of noise insulation will be made.

5.208. Noise insulation also only provides mitigation for internal noise conditions and it itself a restriction on use of premises. There is no regard for external amenity.

(g) Community Fund

5.209. In their Proposals for Mitigation and Compensation Growing Sustainably, June 2019 document HAL state that they “acknowledge that constructing and operating an expanded airport will have impacts in the local communities. Our approach is to avoid, minimise and mitigate impacts that arise, but we know that there will still be impacts and that the project will cause disruption that may affect residents and their quality of life. Equally, there will be opportunities arising from the project that could deliver long lasting benefits”.

5.210. Consequently, HAL are proposing a “community fund” with several potential purposes. This fund is for compensation purposes, not mitigation. These include delivering community benefits, addressing impacts particularly where the extent of the effect and/or mitigation are not yet certain, and compensating for ‘residual impacts’. Slough Borough Council require HAL to provide proposals for use of the Community Fund, as well as inviting suggestions from Local Authorities, and additional information including details of scale, scope and duration of the fund.

(h) Noise Envelope

- 5.211. The ANPS requires HAL to develop the “noise envelope” with local communities and other stakeholders. This is being addressed through an independently chaired Noise Envelope Design Group. The group is made up of a small number of technical experts representing the interests of communities, passengers, local authorities and airlines. The noise envelope is part of HAL plans for Environmentally Managed Growth at Heathrow, which in claims means increases in aircraft and passengers are only permitted if they are within strict environmental limits.
- 5.212. However, Slough Borough Council will include in its response an element of challenge to the “noise envelope” control mechanism only being based on the area of the noise contours and the QC count and push for inclusion of a cap on ATMs also, as subtle changes in QC rating of individual aircraft of low volume has the potential to enable more ATMs being permitted.

AIR QUALITY AND NOISE MITIGATION REQUIREMENTS

- 5.213. In support of the ANPS, Slough Borough Council believes that further mitigation is required for Slough’s residents beyond what is presented in this consultation. Therefore, Slough Borough Council propose the following measures are implemented, to ensure the protection of health of residents in Slough:

Construction:

- Insulation package for residents, issued on a case-by-case basis to households that are in close proximity to construction activities;
 - Restriction on excessively noisy activities at night, to prioritise these activities in the day, without any exceptions;
 - Restriction on quantity of HGVs using the A4 through Brands Hill to access the expansion development area;
 - Financial contribution and joint support towards Slough’s Clean Air Zone feasibility study;
- 5.214. It is also stated in the draft Code of Construction Practice that “there may also be opportunities to construct additional temporary infrastructure for sole use of construction vehicles to reduce impacts on junctions such as M4 Junctions 4 and 5”.
- 5.215. With this in mind, Slough Borough Council propose that Heathrow provide an additional route for HGVs which joins the M4 to the A4 to bypass the Brands Hill area, restricted to construction vehicle use only. This will reduce construction traffic travelling through the Brands Hill area by at least 50%.

Operation:

- Development of cycle routes to improve accessibility to Heathrow and assurance that cycle routes will be operational by the year of runway opening (2026);
- Contribution to the development of a cycle hub within the Colnbrook area;
- Funding to support residents in purchasing cleaner vehicles to ensure air quality within Slough is not exacerbated by passengers and colleagues using cars to travel to the airport;
- A compensation scheme for low income residents to support those living close to the airport that will suffer from health impacts related to air quality, to cover costs of healthcare;

- Bus prioritisation measures implemented on the A3044 and A4;
- An additional cycle route which runs alongside the diverted rivers, to allow easier access to Heathrow via Colnbrook.

CHAPTER 9 CARBON AND GREENHOUSE GASES

- 5.216. Given the stricter GHG reduction targets set by the government's Net-Zero target by 2050, it should be noted that the current scope of what constitutes the UK's GHG emissions in the future may not be finalised. The future scope could include international aviation GHG emissions which make up the majority of the attributable GHG emissions of HAL and its operations. Therefore HAL should include international aviation GHG emissions within its projected GHG emission scenarios.
- 5.217. The ANPS states: "Any increase in carbon emissions alone is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the project is so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets." In order to meaningfully demonstrate that the proposed scheme does not materially affect the UK's emission targets the contribution from aviation should be put alongside the UK's aviation industry and other sectors. The application of a Science based targets could provide further evidence to support this also.
- 5.218. Section 9.14.4 of the PEIR states that: "An increase in the relative contribution of Heathrow to UK GHG emissions is expected in the periods covered by the fourth and fifth carbon budgets. Heathrow emissions in the DCO Project without mitigation scenario are calculated to increase from 0.30% to 0.44% of the total UK carbon budget in the period between 2023 and 2027, and from 0.33% to 0.43% in the period between 2028 and 2032." The UK is now adopting a Net-Zero GHG target by 2050. The PIER document discusses targets relative to the Climate Change Act target of 80% reduction relative to 1990 by 2050. Therefore HAL should re-align their GHG mitigation actions to meet a net-zero target by 2050 in line with both the Climate Change Committee interim targets and the UK overall government target.

i. Carbon and Greenhouse Gases Mitigation

- 5.219. The proposed measures to reduce or avoid GHG emissions of the scheme should have their respective GHG emission reduction or avoidance quantified relative to the scheme. This is necessary in order to understand their respective contributions and to gauge their overall significance towards achieving the proposed GHG emission targets relative to the baseline scenario.

Construction:

- 5.220. In 'Table 9.5: GHG emitting activities scoped in for assessment' it states; "New green spaces, provided as part of landscaping and biodiversity measures, will act to sequester carbon." The UKCP18 projections forecast dryer summers and an increase in extreme precipitation events, which has the potential to reduce the reliability of carbon sequestration. As a result carbon sequestration through the storage of carbon in biomass is vulnerable to carbon leakage. If carbon sequestration is to be incorporated into GHG mitigating measures for the proposed scheme this should be clearly stated detailing limitations and uncertainties.

Air transport:

- 5.221. In table 9.13 it states: "Heathrow is exploring potential operational policies which could encourage the take up of sustainable aviation fuels by Heathrow operators,

such as the evolution of landing charges in the future to include consideration of SAF. This is in addition to continuing to provide support to airline partners to develop the market for sustainable aviation fuels.” Biofuels can be classed as a sustainable aviation fuel and have been discussed at consultation meetings as a proposed mitigation action for aviation fuel GHG emissions. If biofuels are to be incorporated into the Environmental Statement then the source and the Scope 3 GHG emissions of the biofuel should be taken into account. Biofuel can have high embodied carbon from its farming, processing and distribution. In addition, depending on the country of origin, biofuels have been linked to increases in deforestation and other environmentally degrading activities which should be accounted for.

Surface Access Transport:

5.222. In ‘Table 9.12: Surface access proposals to manage GHG effects’ it states: “To increase the proportion of journeys made to the airport by public transport, cycling and walking to achieve a public transport mode share of at least 50% by 2030 and at least 55% by 2040 for passengers”. A high proportion of surface access GHG emissions can be avoided with greater utilisation of public transport. The Environmental Statement should reflect this opportunity in its calculations for greater GHG emission avoidance and savings. The Council proposes that HAL need to invest in the public transport infrastructure, more direct and attractive cycling and walking routes for all ages and an increase in public transport services from the airport.

Airport buildings and ground operations:

5.223. It was raised by Slough Borough Council in the Scoping Opinion response that detail was lacking regarding how the future facility would operate efficiently. It is important to know what standards the future airport buildings would adhere to. For example whether it will be complying with BREEAM standards and what EPC ratings will be targeted.

CHAPTER 10 CLIMATE CHANGE

5.224. In 2019, the consequences of climate change have risen in importance in Slough’s Borough Council’s agenda. On the 23rd July 2019 Slough Borough Council passed a Full Council motion on climate change¹. As part of the climate change motion, a key objective of the council was declared: “Supporting council services, residents and businesses to adapt to the impacts of climate change.”

5.225. The proposed Heathrow expansion scheme would involve development in the borough and this will have implications for the impacts and adaptation to climate change. As Slough is a host authority of the proposed Heathrow expansion scheme HAL should be aware of this motion.

i. Urban Heat Island effect:

5.226. In the Scoping Opinion stage Slough Borough Council raised the issue of the proposed scheme exacerbating the Urban Heat Island (UHI) effect in the surrounding area and in Slough. The PIER identifies in Table 10:20: “Potential increase in urban heat island effect due to increase in built environment” as ‘Not significant’ in the context of the proposed environmental measures. However it is also stated that: “The potential Urban Heat Island effect has not been modelled as current modelling techniques are only applicable to larger areas of land than will be taken by the DCO Project.”

- 5.227. The PIER acknowledges that: “Temperatures at Heathrow Airport can be up to 5°C higher than those experienced in the surrounding countryside because of the London Urban Heat Island (UHI) effect (Hacker et. al., 2012; Greater London Authority, 2006)”, which acknowledges the scale of the effect. Accounting for the proposed scheme, expansion of the airport has the potential to exacerbate this effect. During periods of temperature extremes, a 5°C differential with the surrounding area will have a significant impact on the local residents and potentially increase mortality rates. Therefore, identifying the UHI effect as ‘not significant’ requires further justification. The PIER states that the effect has not been modelled so there is an absence of evidence that the proposed mitigating actions are sufficient.
- 5.228. The location of the existing Heathrow Airport experiences elevated temperatures relative to the surrounding area. Based on the earlier projection, the Slough urban area can be seen to have a limited UHI effect; however, with the proposed expansion and its new boundaries extending into Slough’s urban area, this could effectively envelop Slough and the cooler areas between the proposed boundaries and Slough’s urban area. Exacerbating the UHI effect in Slough has the potential to impact communities during periods of temperature extremes. This could include increased mortality rates in the borough of Slough and is supported by the research stated above. Slough BC will comment to the effect that should be measured and modelled before being ruled out as ‘Not significant’. If the effect is determined to be significant suitable mitigation measures should be proposed.

ii. Flood risk

- 5.229. In ‘Table 10.20: In- combination Climate Change impact assessment results’ it states the climate hazard of ‘increased intensity of extreme precipitation events and pluvial flooding’ leading to both; ‘increased intensity of extreme weather events will cause changes in groundwater flow and levels.’, and ‘higher intensity and frequency of rainfall will increase the number of flood events that will occur in the catchment.’, following the proposed mitigating actions are ‘Not significant’. However, flooding as a result of elevated ground water levels in combination with extreme precipitation is not discussed. Parts of Slough are located within flood zones that overlap the proposed scheme boundaries.
- 5.230. The Airports National Policy Statement (ANPS) outlines that: “The National Planning Policy Framework sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. But where development is necessary, it should be made safe without increasing flood risk elsewhere.” The ANPS goes on to say: “The applicant should identify and assess the risks of all forms of flooding to and from the preferred scheme, and demonstrate how these flood risks will be managed, taking climate change into account”.
- 5.231. The ANPS outlines that: “Site layout and surface water drainage systems should be able to cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts.”, and “The surface water drainage arrangements for any project should be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, taking into account climate change, unless specific off-site arrangements are made and result in the same net effect.”
- 5.232. The proposed scheme should incorporate future flood risk into its planning, such as the risk of combined high ground water levels and extreme precipitation events and

how the proposed scheme could exacerbate this effect. Worst case UKCP18 climate projections should be used when assessing risk and suitable mitigation measures should be proposed.

iii. Climate Change Mitigation

5.233. The implementation of the proposed Heathrow expansion scheme has the potential to exacerbate several climate risks, such as increasing temperature extremes and flood risk. Taking this into account the discussed issues in this document relating to the UHI effect and elevated flood risk, Slough Borough Council believes these should be assessed and have appropriate mitigation actions proposed.

CHAPTER 12 HEALTH

5.234. The expansion of Heathrow airport has the potential of bringing positive impacts from some of the wider determinants of health. Specifically, the health summary states that there may be significant positive effects in relation to increased employment, particularly by young adults with limited employment history; people who were previously unemployed, on low incomes, had low job stability or have few progression prospects; and those experiencing high level of deprivation. However this needs to be taken in context of the wider and more substantial negative health implications of the expansion.

5.235. It should be noted that although the mitigation options being presented in this report are substantial, they will not fully mitigate against the significant negative effects on health that could occur and that would directly impact the residents of Slough and to a greater extent the residents in the ward of Colnbrook with Poyle, all of which already suffer from below average levels of health and wellbeing.

5.236. The information in the current PIER and Heathrow consultation health documents suggests that both the detail and the level of mitigation are not adequate as currently presented. **It is suggested that a full health strategy and fully informed health mitigation plan should be presented to local stakeholders, in advance of the commencement of the DCO.**

i. Health Mitigation

5.237. Based on this report and the information provided by Heathrow as part of this consultation, the following table presents a brief summary of what would be considered minimum outcomes for Slough residents in terms of health mitigation.

Area	Potential mitigation
Relocation	<ol style="list-style-type: none"> 1. It is vital that the “Wider Property Offer Zone” needs to be universally inclusive which includes a similar offer and relocation package for those renting property as for those that own property. 2. Substantial input into the remaining local community should be considered for those that choose not to take the wider property zone offer. This should focus on the prevention of social isolation and loneliness and to ensure the remaining community does not become fragmented. This could include an enhanced social and physical activity offer or enhanced local community space. 3. A local support package should be created for the residents that have to, or chose to, move. This would be based on an enhanced relationship with surrounding local authorities to ensure residents receive support in terms of integrating into their new location.
Public Services	<ol style="list-style-type: none"> 1. Access to services and transport within Colnbrook with Poyle has been evidenced as being inadequate and of concern. A primary care hub, either permanent or one with specific clinic outreach times, should be established in Colnbrook with Poyle.

	<ol style="list-style-type: none"> Public transport in to and out of Colnbrook and Poyle needs to be improved. This will help support the more vulnerable elements of the community. A full community consultation with Colnbrook with Poyle should take place to establish whether additional community facilities or infrastructure to help support these need to be built. It is vital that the DCO considers ease of access for the wider Slough community to access Heathrow Airport. For the borough to capitalise on the potential benefit of new jobs, access needs to be improved from a variety of areas across Slough, to the airport itself. This should include a bespoke active travel option which covers a segregated cycle superhighway, new Cycle Hire for Slough docking stations at all airport terminals and secured bike parking at all relevant Heathrow buildings.
Open Space	<ol style="list-style-type: none"> Evidence suggests that growing up and simply by being in green space has a directly positive impact on physical and mental health¹. We support the proposal for the additional provision to be put in place for the communities most affected in Slough to enhance the current green space offer proposed by the Green Envelope, Connectivity Statement, and Green Loop. This could include making parks and open space more visible, more accessible and safer. Mitigation here should also consider the planting of additional trees. To integrate alongside an enhanced active travel option and segregated cycle lines, additional provision should be put in place to ensure current and new cycle routes that follow major roads, for example the A4, should be tree lined. This will support an enhanced green space offer and also help militate against air pollution and the impact of PM_{2.5} on people that walk and cycle.
Construction	<ol style="list-style-type: none"> Detailed controls should be put in place to ensure that residents in the direct construction zone are not adversely affected by increased construction noise, traffic and pollution. Construction noise should be directly linked to current airport runway operation, and outside of these hours i.e. during the respite period, there should be no impact on noise to the local community. I.e. Between 11pm-5.15am.
Air Quality	<ol style="list-style-type: none"> Physical Activity – Additional resource should be provided to Pippins, Colnbrook CofE and Foxborough Primary to support residents in healthy eating, a pre-cursor to childhood obesity (which is linked to poor air quality, see 2.4). Education – A universal diet and nutrition offer should be provided to Pippins, Colnbrook CofE and Foxborough Primary to support residents in healthy eating, a pre-cursor to childhood obesity (which is linked to poor air quality, see 2.4). Additional resources should be invested into local public health services to provide a more universal Tier 2 weight management offer for local residents, specifically children, who have a higher risk of obesity associated with air quality (as well as reduction in open space etc.). This element also includes the recommendation of a more substantial and integrated active travel offer for residents, specifically those in Colnbrook with Poyle; i.e. segregated cycle routes and tree lined walking and cycling routes. A requirement should be put in place of the HAL DCO to include living walls and sustainable energy production. Mitigation from Heathrow should be put towards funding such projects and/or providing subsidies for these areas. Additional resources need to be invested into local primary and secondary care to reflect the increased pressures on local health and care. This could include a direct investment into the local CCG to enhance surgery hours and the numbers of GP's to reflect an increase in attendances due to the adverse effects of air quality experienced by residents.
Noise	<ol style="list-style-type: none"> Mental Health – Additional provision should be invested into the current community mental health services. This enhanced provision will support all residents of Slough with poor mental health and help provide additional support to the residents that are going to be adversely effected by noise Education – A mental health training and education programme should be provided to Pippins and Colnbrook CofE to support residents in maintaining good mental health to help mitigate against a potential rise in poor mental health due to

¹ <https://www.weforum.org/agenda/2019/03/growing-up-near-green-space-is-good-for-adult-mental-health/>

	<p>additional noise.</p> <ol style="list-style-type: none"> 3. The noise insulation offer should be substantial enough to ensure that all residents of Slough have no adverse noise impacts of the airport expansion which would impact on quality of sleep. Consideration needs to be had around the impact of noise during periods of warm weather where residents are likely to have open windows. Current mitigation through property sound insulation does not adequately cover this factor. 4. Additional resources need to be invested into local primary and secondary care to reflect the increased pressures on local health and care. This could include a direct investment into the local CCG to enhance surgery hours and the numbers of GP's to reflect an increase in attendances due to the adverse effects of noise experienced by residents.
Construction workforce	<ol style="list-style-type: none"> 1. Additional resources need to be invested into local primary and secondary care to reflect the increased pressures on local health and care. This could include a direct investment into the local CCG to enhance surgery hours and the numbers of GP's. 2. Additional resources need to be invested into local preventative health care, public health. This will include a direct increase in investment into sexual health provision, smoking cessation, drink/drugs, weight management and NHS health checks. 3. The construction workforce should be required to be up-to-date with their mandatory vaccinations. This will include, but is not limited to, MMR and BCG. An alternative to providing BCG vaccination would be to ensure that the workforce is mandatorily screened for TB. 4. Additional resources should be invested into local public health and NHS services to boost vaccination rates of the local community. This will ensure we reach a level of "Herd Immunity" in the event of an outbreak of an infectious disease due to the DCO Project. This point should not be underestimated due to the current low vaccination rates of the Slough community.

CHAPTER 14 LAND QUALITY

- 5.238. The main sources, pathways and receptors have been identified. At this stage two Conceptual Site Models (CSMs) have been created: a site-wide before and after the development, illustrated in Figure 14.5 & 14.6. Further, detailed CSMs for each identified "package" is anticipated to be presented at the ES stage.
- 5.239. The report acknowledges that the main source of pollution is likely to be represented by the landfills underlying the proposed development site, which totals 60% of the land on site. Detailed design, Materials Management Plans (MMP) and other Strategies must be prepared to deal with this issue at the ES stage.
- 5.240. Work has been carried out so far to determine the land contamination baseline for both soil and water beneath the site. No results data provided yet, only the location of the initial areas investigated. It is anticipated full details will be provided at the DCO stage and Slough Borough Council needs to be satisfied this detail will emerge by DCO submission.
- 5.241. It would be useful to see the CSMs broken down into the different stages/phases of development, and more specific to separate land uses proposed as part of the development. It is acknowledged that this is proposed as a next step to be undertaken, and it is crucial that the ES present the complete set of data, interpretations and where required, remediation strategies.
- 5.242. Preparation of the MMP is vital to the process, because it should go into specific details on how the different landfills will be treated, depending on the area of the development they are present in. It is expected that the completed version will be presented with the DCO submission and Slough Borough Council needs to be satisfied that this will occur.

EQUALITY IMPACT ASSESSMENT: INITIAL FINDINGS

- 5.243. It is clear that there are significant equalities implications around the impact of the Heathrow Airport expansion project (both during the construction and operational phase). This is due to the demographic profile of Slough generally (the wider impact Zone), and more specifically the profiles of our local areas most effected: Brands Hill, Colnbrook and Poyle (the inner impact zone).
- 5.244. Within the AEC document (Table B3, p.146), the proportion of people from equality groups in the wider study area is presented, where the darker shading indicates where there is larger than average proportion/representation of that group.
- 5.245. Where a particular equality group is disproportionately represented within an area and an effect from the DCO Project falls upon them, then the group may be said to experience a disproportionate effect.
- 5.246. Not only are there disproportionate numbers of certain equality groups (especially children and residents from a BAME background) in these areas, the potential negative impacts around the many facets of the expansion project (health, impact of noise pollution, relocation of those in the CPZ etc.) are exacerbated for certain groups. E.g. Children being specifically affected by relocation and access to housing, as they are more vulnerable than other groups to the health impacts of poor quality housing; and that pre-natal exposure to air pollution has been associated with increased risk of wheezing and asthma development in childhood: Brands Hill has a disproportionate number of children aged less than 1 year. The EIA notes (9.76) that there are disproportionately higher numbers of children in Colnbrook and Brands Hill.
- 5.247. The DCO Project will impact vulnerable, low income groups. Poyle, Brands Hill and Colnbrook have a disproportionately higher proportion of people from BAME backgrounds who may find relocation more disruptive due to higher proportion of households on low incomes and loss of social networks and community networks that may not be readily available elsewhere.
- 5.248. Indeed, section 9.2 gives a comprehensive analysis of the potential effects on the equality groups arising from a wide range of DCO Project activities – explicitly stating the probable geographical scale of the potential effects and where equality groups are disproportionately represented. In essence, the groups that are likely to potentially suffer the most severe impacts are more vulnerable groups – by virtue of the demographic profile and their likely propensity to suffer exacerbated adverse effects. For some groups there are multiple negative impacts – “in combination equality effects”. These are listed in section 9.8.
- 5.249. The key issues are:
- People affected need to understand the potential impacts of the DCO activities on them and what their options are, and what mitigation/compensation is available. There is serious concern that often these particularly vulnerable or minority groups are less able to “have a voice”, and to be listened to. Yet in the inner impact zone, these impacts could potentially be significant and long-lasting.

For example, the EIA says on the subject of noise pollution (8.5.3):

Poyle: *Potential for significant effects on HQL (health an quality of life) from construction and road noise during the day (Phase 1) and from air, ground and road noise during the day(Phases 2 and 3).*

Colnbrook: *Potential for significant effects on HQL from air, ground and road noise during the day and night (Phases 2 and 3).*

- Section 9.4 sets out measures to monitor and manage these effects, with mitigation actions. Slough Borough Council question whether these measures are sufficient and if they meet the individual needs of people who share the same equality characteristics, as many of the measures seem to be very generic.
- It is a question of balance: there are clear economic benefits from the expansion and indeed, the local economy of Slough and the livelihoods of many of our residents depend on a flourishing airport. However, it cannot be at any cost and it cannot be that those from certain groups (BAME, children, low incomes etc.) bear the brunt of the negative impacts of construction and operation without Slough getting in return the job generation for a wide range of our residents to maximise. Also, where adverse impact cannot be avoided, the correct awareness, mitigation and compensation must be there to safeguard those most affected.

MITIGATION FRAMEWORK FOR SLOUGH COMMUNITIES

5.250. It is vital to ensure that there is a sufficient supply of land for regeneration, housing & other resources, in order to meet Slough's needs. Thus, we will look at the feasibility of future land use that can be identified for residential use or building for conversion.

5.251. These future uses could be meanwhile modular or permanent, but we can agree a use so long as this use reflects the need for a balanced and sustainable community. This use also needs to be respectful of a sensible masterplan, which offers a broad range of affordable residential uses (e.g. TA, general need, key worker, and low cost Slough shared ownership).

- There is a definite need for a facility in Colnbrook to meet the needs for health, employment and the community; whilst we have the Westfield Estate facilities, these are very small and provide more for the Westfield Estate and not really for Colnbrook and Poyle. The Village Hall is not very accessible, and is full of private hires, that do not meet community need. It is therefore essential that the Council and HAL collaborate to identify the right solution for this area.
- Anti-Social Behaviour is a real concern for residents; the above point might help address this issue.
- Enhancing Crown Meadow so that it can be re-designated a local wildlife site.
- Enhancing the current Heathrow Ranger scheme so that there is a greater visible presence in Colnbrook and Poyle.
- Access to Leisure facilities is an issue for the area; this needs to be addressed;

CAPITAL REQUIREMENTS IF PIPPINS WAS SUBJECT TO A CPO

5.252. At this point, Heathrow is not able to provide any details on the likely number of families that will be living in the eastern part of Colnbrook and Poyle ward. This is the detail that would be needed to assess if a larger number of places were required and the number of school places required in that area of the town. This detail would be needed in 2 phases, numbers during the construction phase and numbers once the runway opens and works are complete.

- 5.253. Without this level of detail, Slough will assume that the places provided by Pippins School will be needed over the long term. If the school is subject to a CPO by Heathrow or it is deemed that the location is unsuitable for the school due to noise and/or pollution, then it will be necessary to relocate the school to another part of the ward. To do this and not cause any detriment to the educational experience of the pupils, it will be necessary to provide facilities that match those currently existing.
- 5.254. Slough would require:
- A site of 5,000m². Ideally a site would be provided by Heathrow but if not, a site needs to be purchased. The range of possible costs would be £1.23m for an empty developable site and £7m for purchasing 20 homes at £350,000 per home.
 - A building equal to the existing GIFA of 1,255m² (subject to accurate measure).
 - Build costs estimate of £4.675m plus inflation from 2018.
- 5.255. Build cost estimates are based on the National School Delivery Cost Benchmarking 2019 report produced by EBDog <https://ebdog.org.uk/article/national-school-delivery-cost-benchmarking-4/>.
- 5.256. The table on p.12 sets out costs per school size. To minimise cost risks to Slough, we have used the mid-point between the average cost of £3462 per m² and the max cost of £3988. This produces a figure of £3725 per m².
- 5.257. In summary Slough would require up to £7m, buying a site, and a further £4.675m to build the school, but minus current maintenance requirements and capital upgrade in the current aged site.

D. Management of expansion Impacts

(a) The Construction Proposals and Code of Construction Practice (COCP)

- 5.258. The documents are relatively high level, and standard in approach to addressing the management of construction activities which will be highly significant for the area and for a considerable amount of time (early works to end state). Both documents commit to a number of future and further strategies and plans which will need to be submitted with the DCO or will subsequent to consent. We would encourage an early engagement on these documents, well before DCO submission. In addition, there will be significant work in monitoring end enforcement which we would need to work with HAL and other bodies on.
- 5.259. It is vitally important that we are fully engaged in the development of the detailed COCP and related work streams. The expectation in the Construction Proposals document and the PEIR is that the COCP will set out detailed mitigation proposals, but there is a lack of detail and clarity on such mitigation proposals at present. There are some particular areas of focus for Slough, particularly in regard to noise and vibration, biodiversity and ecology, land quality, pollution control, flooding and water environment. HAL are proposing a joint planning committee to assess/determine conditions that will arise from the DCO application. At this stage it is unclear as to how this would work and therefore the Council will need to see more evidence on the associated benefits. The council position in terms of planning will be to keep its current powers to determine and agree whether conditions have been met and on any further associated development.

- 5.260. The construction period for expansion will last nearly a decade in Slough; construction traffic at its peak will be reached in 2023 with circa 33% more movements (HGV's and construction workers). The current proposals indicate that 80% of construction workers will come from home with the remaining 20% being located in the construction villages/sites. In terms of Slough, this will mean the majority of workers coming from the west will be doing so by private cars adding to the impacts on the network, due to the lack of good public transport provision. HAL have not proposed any mitigation other than shuttle services for the last part of the journey from the construction sites.
- 5.261. The lack of provision for workers will have a detrimental impact on residents as HAL's proposals on the ULEZ do not come into Slough, therefore polluting vehicles will be displaced into the Colnbrook, Poyle and Langley areas causing new AQMA's to be formed and also extending existing AQMA's. Under normal conditions for a planning application this would be grounds for refusal. **To help mitigate against this, Slough has proposed that the construction of the railhead should have a spur from the M4 to cut movements through Brands Hill. This could serve as a legacy piece of infrastructure for the EfW that is proposed nearby.**

(b) *Economic Development Framework*

- 5.262. Slough Borough Council welcomes the EDF and recognises this only sets out the broad approach that Heathrow intend to take in developing the Economic Development Strategy to deliver benefits and mitigate for negative impacts from the expansion in Slough. We request the EDS and Action Plan are substantially complete before submission of the DCO.
- 5.263. The document has much of merit regarding skills, employment and business engagement. However there is still a lack of information about how much of this will be delivered and how it will impact on individual areas surrounding the airport.
- 5.264. The Environmental Statement evolving from the PEIR must commit to embedding mitigation within the scheme, and the mechanisms to deliver monitor and manage this appropriately must be included in the Economic Development Strategy.
- 5.265. Slough is currently an economic powerhouse with a consistent relationship of support for Heathrow.
- 5.266. Slough's regeneration proposals for the town centre include creating a community through growing youth and multicultural arts, well-being service industries and SMEs. It is also committed to protecting land in Poyle for employment use dedicated to Heathrow.
- 5.267. The impact of noise, congestion, journey times and air quality, for example, has the potential to have a negative impact on the Borough's businesses, employees, and their customers. It is critical that the Borough's residents and businesses see the specific commitment from HAL to mitigate for the possible negative impacts on the Borough.
- 5.268. We therefore strongly support the further evidence work committed to maximise the benefits to the supply chain, innovation, inward investment, tourism and employment.
- 5.269. For the reasons above it is essential that Slough Borough Council is a partner in the evolution of the Economic Development Framework to the strategy as the Borough falls within the Core area significantly affected by the expansion proposals.
- 5.270. Slough is currently working on its own economic development strategy, including an evidence baseline. It is important for HAL to ensure alignment to these findings in

terms of opportunities around employment, businesses generation and inward investment. In relation to this there are two key activities HAL can support Slough's economy with:

- i. Assistance in the preparation and development of our Incubation Hub for business start-ups in the digital creative Industries Sector – Slough Borough Council is in the process of applying for European Regional Development Fund (ERDF) funding to support a Hub in the Town Centre. Thames Valley Berkshire LEP has agreed, in principle to provide part match funding. Slough expects HAL to also provide match funding to this project which will hugely benefit both Slough and HAL in their commitments to support HAL's surrounding economies.
- ii. Financial support and commitment towards Slough Campus (an SME type incubation facility for of new business start-ups)which can support the upskilling and training for workforce needed for the construction sector. This will respond to the expected numbers of workers needed to deliver the expanded airport and other major regeneration in the region.

5.271. The economic development framework is still very high level and lacks detail. This is a key area where benefits can be maximised for local communities. HSPG believes there is also an opportunity to work collaboratively as a sub region to maximise income opportunities and deliver strategic interventions to maximise benefits for local communities with such income. Slough, as a member of HSPG and the administration hub, agrees.

5.272. The detailed response of the HSPG will be agreed at a meeting of Council Leaders on 5th September but it is suggested that the overall comments emerging from HSPG and highlighted above should be endorsed via Slough Borough Council's own response.

(c) *Environmentally Managed Growth*

5.273. As part of the consultation Heathrow is proposing a new way of measuring and monitoring the permitted level of activity on the airport.

5.274. Currently this is controlled by setting a maximum number of aircraft movements that can take place in a year.

5.275. Heathrow are proposing a new approach known as Environmentally Managed Growth. This will require them to monitor, review and report on the effects of growth in relation to surface access (traffic), air quality and aircraft noise in relation to defined limits.

5.276. These limits would be derived from the tests set out in the ANPS and would be legally binding through the DCO.

5.277. Whilst there may be some merit in adopting this approach it has not been clearly explained how this would work. It may still be necessary to have an aircraft cap as a default position.

5.278. In order to enforce the limits upon growth, Heathrow is proposing that the DCO should create an Independent Scrutiny panel which would have binding enforcement powers.

5.279. Whilst there is also some merit in having such a body, **it is important that the Council, as the Local Planning Authority, retains some enforcement powers to deal with local issues within the borough. All of this will have to be properly resourced.**

(d) Property & Land Acquisition and Compensation Policy - Interim Residential Property

- 5.280. Section 3, paragraph 3.1.7 mentions that Heathrow are proposing to acquire properties until development consent is granted at the end of 2021. This is likely to leave some residents in the Wider Property Offer Zone in limbo for at least 2 years, as their properties are blighted, and are unlikely to be able to sell. There needs to be clarity on whether Heathrow envisages purchasing properties that come on to the market or are offered prior to the end of 2021.
- 5.281. 'Unaffected open market value' – Properties in the Compulsory Purchase Zone and Wider Property Offer Zone are affected by their proximity to Heathrow. When and to what extent property prices may have been affected is a subjective point it is therefore important that HAL provide sufficient detail on how property prices will be evaluated to ensure that homeowners are not adversely affected.
- 5.282. Further consideration should be given to calculating the property value. This can be based on a fixed market price at some reference year before blight effects affect property value, caused by the announcement of 3rd runway, or potentially work on a rolling market price. This value would then have to be inflated, perhaps in line with average house prices across Slough. The current average price for CPZ properties in Elbow Meadow was £321,833 in July 2019.
- 5.283. The question remains if the current average house price in Slough will force communities' displacement out of Slough, even with the 25% uplift, or will they be able to afford houses in other wards in Slough.
- 5.284. The present assumption is that they could only afford to acquire properties in the lower value areas in Slough (Britwell, Northborough, Chalvey, and Manor Park). With the enhanced payment and payment of moving costs, stamp duty, etc. they may find they can get into Cippenham, Wexham and Langley. However, prices may move on, come 2021, particularly with the expansion, and reiterates the point that Colnbrook values need to be inflated accordingly as time goes by.

6. Comments of Other Committees

There have been no comments from other committees however Overview and Scrutiny have requested that Heathrow attend a scrutiny meeting on 12th September to discuss impacts on the communities with regard to air quality, noise, surface access etc.

7. Conclusion

The Council's position on Heathrow expansion has been very supportive since 2014, and through that period, officers have worked in collaboration with HAL to ensure that Slough residents are protected and have opportunities to develop through job creation, excellent public transport provision, improved air quality and an enhanced open space provision among many other priorities.

In the last six to nine months, however, the master-planning and proposed improvements for the Slough area have been significantly scaled back to a position that the Council can no longer support several aspects of the detail as set out in the proposed Heathrow Masterplan such as the lack of airport related development in Poyle, direct active travel routes, allocated bus lane provision and the HULEZ proposal. The HAL Masterplan has focussed to the east in terms of new business, public transport connectivity, addressing air pollution and supporting broken communities. A study looking at economic growth predicted expansion without policy intervention will create an additional 31,000 jobs in the nine boroughs around the airport, with 29,600 in Hillingdon and Hounslow. At present only 100 will be within Slough. The forecast suggests that around 3,000 of the new jobs will be taken by Slough residents commuting.

To achieve or increase the number of Slough residents working at the airport, it is essential that public and active transport connections are improved. It is also important that we support the proposals in the DCO Masterplan to include land in Poyle in order to increase the number of jobs in the Borough.

HAL claim the Surface Access Strategy will provide further solutions but this has not been published and the information included in the consultation is not adequate for Slough Borough Council to believe that journey times from Slough's airport neighbourhoods travelling from the airport will be improved. Therefore, without further measures to support modal shift for Slough journeys into Heathrow and infrastructure to support Slough's MRT and bus travel it is felt that journey times will be longer, making it difficult to arrive and meet scheduled start times for shifts. The lack of infrastructure to support public transport made from the West also leads to less growth as a result of poor connectivity and journey times.

The DCO documents reveal that the levels of impact during construction will cause community cohesion and business sustainability to be heavily challenged for a decade or more. The community that is left due to circumstances out of their control (tenants, low income families) will be impacted for a considerable period, while the new runway is under construction. The Council will need to consider whether to enter into negotiations with Heathrow, to have options to purchase homes either pre or post construction to support short term social housing. It is clear that if the impacts are not mitigated sufficiently by measures set out in the final DCO submission document resulting from the Slough Borough's consultation response; and demonstrate improved infrastructure and full details of mitigation then Slough may need to consider qualifying our full support for expansion. We generally support the expansion, because of some of the benefits delivered for communities, but this is not "at any cost".

It should be recognised that this is not Slough BC no longer supporting the potential benefits, that a robustly planned expansion might bring, but more about the Council standing front and centre to protect its residents, and improve growth for our communities. The Council's support for expansion is based on the benefits to the area, some of these now need to be advanced and confirmed by HAL. It is for this reason that the recommendation is to submit the strongest response to HAL as part of this statutory consultation, and then commence hard negotiations over the mitigation package between now and Spring of 2020.

8. Appendices Attached

'A' Filled in Airport Expansion Consultation Feedback Form – June 2019 (Supplementary technical comments have been collated and used as reference for this report. These are included as part of the response to the AEC in the Notes section.)

9. Background Papers

- '1' Cabinet Report 19th March 2018 on Response to Heathrow Airport Consultation – HAL – January 2018
- '2' The Airports National Policy Statement, designated by the Secretary of State for Transport 26 June 2018: new runway capacity and infrastructure at airports in the South East of England (<https://www.gov.uk/government/publications/airports-national-policy-statement>)
- '3' Airport Expansion Consultation (available online) – HAL- June 2019

Masterplan

1. **Please tell us what you think about any specific parts of our Preferred Masterplan or the components that make up the masterplan.**
 - 1.1. The proposals are based on the delivery of third-party schemes in order to make them viable, as well as assumptions about associated schemes being provided. No guarantees are provided as to the delivery of these schemes, and the documents are notably silent on “Plan B” options that will be provided if these schemes do not occur.
 - 1.2. As they stand, the proposals present a series of incoherent assumptions about the construction and operation of the airport.
 - 1.3. Major air quality impacts are expected as a result of the construction of the scheme. Communities in the Borough of Slough will be affected for several years by increased pollutant levels, yet little is offered to mitigate these. In particular, the existing Brands Hill Air Quality Management Area is negatively affected, exposing residents to both an increase in pollutant load, and for a longer period of time.
 - 1.4. The combined effects of construction, increased traffic, noise disturbance, severance and community change are considerable in Slough and have not been adequately assessed.
 - 1.5. The current Airport Expansion consultation presents a large amount of information, many elements of which did not form part of Consultation 1; notably the construction proposals and Preliminary Environmental Impact reports. The primary concern for Planning Policy is the land use elements. Headline issues for planning are covered below, with detailed comments set out in the supplementary report.
 - 1.6. The Council’s broad support for the expansion of Heathrow has been incorporated into the review of the Local Plan for Slough. One of the key elements of the “emerging” Preferred Spatial Strategy is to “accommodate the proposed third runway at Heathrow and mitigate the impact.” As part of this, it was agreed that the following planning principles should apply to any development at Heathrow, which should:
 - Protect Colnbrook and Poyle villages in a “Green Envelope” and enhance the Conservation Area and built realm.
 - Prevent all through traffic but provide good public transport and cycle routes to the airport.
 - Provide for the replacement of Lakeside Energy from Waste plant and the rail deport north of the new runway.
 - Ensure that there are good public transport links into Heathrow from Slough.
 - Enlarge the Poyle Trading Estate for airport related development but with access only from the M25.
 - Provide mitigation for the Colne Valley Park and ensure that existing connectivity is maintained through Crown Meadow.
 - Develop tangible measures to improve air quality in the Heathrow area.

- Ensure that all homes in the Borough that are eligible for noise insulation are provided for under the Quieter Homes Scheme.
- Ensure measures to address flood risk from the proposals include mitigation to reduce the risk of existing flooding for residents and businesses in Colnbrook and Poyle.

1.7. The following comments are also related to the Masterplan and referred to elsewhere in the response:

- Expansion scheme – awaiting design statement to present legacy and ambition
- DCO Application Scheme boundary – welcome extension to ANPS boundary;
- The Preliminary Environmental Impact Report: Insufficient information, agree significant work required to develop this into the Environmental Appraisal (EA)
- Environmentally Managed Growth: no support for independent body to implement
- Economic benefits: Lack of workplace-based jobs predicted within Slough;
- Effects of Construction timescale and proposals on the Colnbrook, Poyle and Brands Hill: risk that some of the major impacts on local residents could continue until 2050, and there are significant local impacts particularly in phase 1 to 2026;
- Design: Scheme design statement lacking;
- Consultation Materials are not accessible for local residents;

(a) Green Envelope

- 1.8. The Council’s Spatial Strategy promoted the concept of having a “Green Envelope” around Colnbrook and Poyle villages in order to give them some protection from the proposed expansion of the airport. Although this would form part of the wider Green and Blue infrastructure and the Colne Valley Park, the primarily purpose was to provide a buffer for local residents affected by construction and operation and provide local accessible open land for informal recreation, such as dog walking.
- 1.9. The scope for providing the Green Envelope has been reduced and ‘squeezed’ at its east as a result of the decision to divert the A3044 and realign the M25 through the area.
- 1.10. The illustrative plans for the extent of the “green space around villages” as currently set out are misleading. For example, they give the impression that the M25 will be a green buffer; that the balancing ponds (for flood alleviation) and the engineered diversion of the Colne Brook will form part of the open area; but these will be dominated by roads or buildings and will not be publically accessible.
- 1.11. The Masterplan recognises the concept and claims to be proposing improvements to the “Green Envelope” around Colnbrook and Poyle. It is not, however, identified in any of the Airport Expansion Consultation plans.
- 1.12. The area of the Green Envelope between Colnbrook and the Colnbrook bypass has in the current consultation’s plans been identified as a construction compound which could be used up until 2030. Although it may be possible to put some perimeter planting in at an early stage, the rest of the site could be laid out as hard standing. This means that it will have no amenity value and cannot be used for residents for the eight years that construction will be taking place. The use of the

compound for construction purposes will increase the level of activity and disturbance in the area which will greatly reduce its effectiveness as a buffer area.

- 1.13. As a result, it is proposed that we should object to the use of site CS1, north of Colnbrook for construction compounds on the grounds that this is an important part of the Green Envelope around Colnbrook and Poyle which is required to be used as a buffer area during the construction process.
- 1.14. In the long term this area appears to be identified in the Masterplan for biodiversity purposes. It is considered that the main purpose of the area should be to act as a buffer and provide a local amenity for residents who could use it for dog walking. This means that its primary use should be as public open space and not for biodiversity purposes.
- 1.15. As a result it is proposed that we object to the designation of site CS1 for biodiversity purposes. It should be designated as public open space which can be used by local people.
- 1.16. The other part of the Green Envelope to the north of Colnbrook, which includes Pippins Park, will only be able to provide a comparatively small buffer between the residential area, the new A3044 and the new runway. The full assessment of the visual impacts of the raised runway has not yet been carried out and so it is not yet clear what additional mitigation will be required. Additional viewpoints for assessing the visual impact from this area need to be included.
- 1.17. **It is considered that a full environmental assessment of the impact of the Masterplan proposals upon Pippins School should be carried out.**
- 1.18. The southern part of the Green Envelope is shown as being proposed green space. It is proposed to move the Heathrow Special Needs Centre to the site on the corner of the Bath Road and Poyle Road. This provides the opportunity for outdoor activity such as horse riding, animal care and horticulture. This is considered to be an appropriate use in this location.
- 1.19. **It is important that the Green Envelope as a whole is designed and laid out for the benefit of the local community and properly managed and funded in perpetuity. As part of this, 'architectural' landscaping must be provided to screen the areas from roads and construction compounds as part of the early works.**
- 1.20. There is also a need to enhance Colnbrook Conservation Area and built realm. We require that:
 - **The DCO Heritage Design Strategy includes a strategy for improvements to the Colnbrook Conservation area, in order to mitigate and meet the requirements in the ANPS regarding Heritage at Risk, avoiding worsening the existing conditions, and promoting economic growth. This should include mitigation for noise and visual impacts on the setting of listed buildings from construction works and final associated infrastructure.**
 - **Improved pedestrian and cycling connectivity is provided to connect heritage assets in Colnbrook with Poyle Trading estate, Public Open Space and other green spaces linked to the wider historic environment.**

(b) Mitigation for the Colne Valley Park

- 1.21. The expansion of the airport will have an adverse impact upon the Colne Valley Regional Park which is at its narrowest and most fragmented in this location.
- 1.22. This part of the Regional Park is the most accessible to Slough residents and a gateway to the wider opportunities the Park offers for informal recreation. It also provides a variety of Green Infrastructure functions such as visual landscape amenity, biodiversity, agriculture, and flood alleviation. It is important that the identity and integrity of the Colne Valley is retained as a much as possible.
- 1.23. The Masterplan shows that there will be a permanent loss of open land north of the A4 and south of the M4 as a result of the new runway and diverted river corridors and M25, and re-located Energy from Waste plant, railhead and Aggregate Industries. The Old Slade Lake complex is being infilled, and land east of Sutton Lane has also been proposed for use during the construction phase.
- 1.24. The proposal to expand the Poyle Trading Estate for airport related development will also impact upon the Colne Valley Park.
- 1.25. The diversion of the M25 and rivers along with the realignment of the A3044 will have an urbanising effect upon this area.
- 1.26. Within the Colnbrook and Poyle area, the Masterplan is proposing new and enhanced green spaces, biodiversity sites and proposed planting of trees and hedges. It supports the concept of the “Green Envelope” around the villages as explained above.
- 1.27. It proposes a network of routes including the Green Loop, Colne Valley Trail, European Protected Species Corridor and Active Travel hub and spoke network but it is not clear how these relate to each other.
- 1.28. There is a risk that the continuity of the Park could be compromised and the area south of Slough being severed from the north. A critical issue for the integrity of the Park is therefore the quality and attractiveness of the Colne Valley Trail through the narrow part of the Park in this location. The Masterplan shows this being routed north of the A4 and South of the M4. This is, however, compromised by the re-provision of the Energy from Waste plant and Railhead in this location. It is no longer an attractive route past lakes and through open countryside.
- 1.29. **As a result, it is requested that an alternative route for the Colne Valley Trail is provided to the north of the M4, with a new green bridge crossing the motorway further west so that the route is upgraded and can be part of the Active Transport commuting network, as well as the main recreational route through the Park.**
- 1.30. The Colne Valley Park and Local Authorities in the area have produced a joint statement and map of routes that should be included in the Masterplan. This is intended to ensure that routes are attractive for use by both workers and for recreation and can form part of a programme for improved longer distance networks. They should enhance the existing network and create attractive connections with, and between, employment locations, community, heritage, and countryside/leisure facilities.

- 1.31. This level of comprehensive provision for active travel connectivity in this zone is necessary to move towards mitigating the impacts of Heathrow Expansion and support the delivery of its objectives set out in “Heathrow 2.0”.
- 1.32. Overall, it is considered that the scale of development and loss of the valuable open land in the Colnbrook and Poyle area means that the impacts on the Colne Valley Park cannot be mitigated within the Borough. As a result, compensation should be provided for elsewhere in the Colne Valley Park. The Masterplan shows that there will be some new green areas created to the north and south in order to provide for flood alleviation, but the scale of compensation for the Colne Valley Park needs to go much further than this. It needs to provide for major mitigation and compensation to take place elsewhere in the Colne Valley Park as part of the overall legacy in line with the CVP’s recent Landscape Strategy.
- 1.33. **More land should be included in the DCO boundary and more improvement measures proposed in the Masterplan to bring forward a more strategic scale of improved landscape. A fully funded wider area Green Infrastructure improvement strategy is needed**, which amongst other things, takes account of the new requirement in the NPPF that the impact of removing land from the Green Belt should be offset through compensatory improvements to the environmental quality and accessibility of remaining green belt land.
- 1.34. **A comprehensive management and maintenance plan should be produced in perpetuity for the whole area around the airport capable of delivering a “cared for” Park across the whole Masterplan zone not just for individual sites.**

(c) Enlarging Poyle Trading Estate

- 1.35. **The proposal in the Masterplan to allocate two areas of land to the west and south of the Poyle Trading Estate for freight forwarding warehousing is supported.** We consider this should provide high quality boundary treatment for the Grade II listed building, and that the new site includes modern services infrastructure to support competitive employment space such as Superfast Broadband and electricity, SMART buildings; and EV capability.
- 1.36. The employment forecasts show that there will be very few new jobs created in Slough as a direct result of the construction of the third runway and associated development. At the same time, some existing business premises will be demolished as a result of the airport expansion. **It is considered that the expansion of Poyle Trading Estate is the most sustainable option for replacing lost facilities and creating the additional floor space that is needed to support the expansion of the airport. Although this would result in the loss of Green Belt land it is considered that there are sufficient very special circumstances to justify this.**
- 1.37. The Council’s Emerging Spatial Strategy for Colnbrook and Poyle shows a larger area to the west of Poyle being used for airport related development. This area, which is currently primarily in agricultural use, is shown as an existing green space in the Masterplan with a new green buffer. **It is considered that some of this land could be used for an enlarged warehousing area with a suitable buffer being provided alongside the Colne Brook. This would not have a significant effect upon the green or blue environment or the Colne Valley Park and can be justified on the grounds that there are the same very special circumstances to allow development in the Green Belt.** Mitigation for the loss of all of this Green

Belt land will have to be provided in accordance with the new requirement in the NPPF that the impact of removing land from the Green Belt should be offset through compensatory improvements to the environmental quality and accessibility of remaining green belt land.

- 1.38. **In order to maximise the support for the airport and reduce the number of HGV trips, it is essential that the warehousing is used for airport related freight forwarding only.** This will require controlling the size and type of warehousing that is built and that freight coming out of the warehousing is taken directly to the airport in low emission vehicles. Any development will also have to be of a high quality design with green amenity space and a range of support services. As a result, **it is requested that suitable conditions controlling the design and use of the new airport related development areas should be included in the DCO.**

(d) Flooding

- 1.39. At present, parts of Colnbrook and Poyle are subject to flooding. In 2014, Heathrow made a commitment to reduce flood risk. This has not been taken forward in the current Masterplan proposals presented in the Airport Expansion Consultation. Heathrow Airport Limited need to demonstrate how they intend to meet this commitment in their other plans and strategies.
- 1.40. The construction of the third runway with its associated infrastructure and supporting development will be partly built in areas that are currently at risk of flooding and remove existing flood storage capacity.
- 1.41. In order to manage the increased risks of flooding, the Masterplan proposes that new areas of flood storage will be provided upstream of the site in the Colne Valley Park as multifunctional spaces, which can also be used for biodiversity and public open space. Section 7.11 of the Master Plan Consultation Document states that “flood risk is being considered in great detail to ensure we protect local homes and businesses”. New flood defence works are proposed to be carried out on the channels through Colnbrook village, to mitigate flood risk resulting from a change in overland flood paths resulting from the DCO project.
- 1.42. Although the modelling has not been completed, the initial results show that after development has taken place, some areas of Colnbrook will still be at risk of flooding.
- 1.43. The Council has repeatedly requested to HAL that flood alleviation work should integrate mitigation to reduce the risk of flooding for existing residents and businesses in Colnbrook and Poyle. Removing flood risk in Colnbrook and Poyle should form part of the mitigation for the impacts on the local communities in the Environmental Impact Assessment.
- 1.44. The Airports National Policy Statement (ANPS) states that: “The National Planning Policy Framework sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. But where development is necessary, it should be made safe without increasing flood risk elsewhere”.
- 1.45. **Given the scale of the proposed development and the identified harm it is considered that the Masterplan should aim to aim to go beyond the position of not making things worse but ensure that sufficient flood alleviation**

measures are included in the Masterplan to ensure that as a result of all of the development proposed in the DCO, and other related development, there is a net benefit in terms of flood relief.

- 1.46. The extensive new flood storage facilities are being proposed in the Masterplan and so it would appear that providing additional capacity, to protect existing residential areas that are currently at risk from flooding, would be relatively inexpensive and could provide additional open space and biodiversity benefits.
- 1.47. The failure to support the principle of providing additional flood alleviation is an example of where the expansion proposals have failed to provide any legacy or deliver mitigation to local communities heavily impacted by the expansion of the airport.
- 1.48. **As a result it is proposed that this Council should object to the failure of the Masterplan to plan for and provide sufficient flood alleviation measures to ensure that all properties in Colnbrook and Poyle are made safe from the risk of flooding.**
- 1.49. We welcome the commitment in the Strategic Brief to consider the requirements of UK communities and Environment. We consider that the Vision should also include reference to integrating the airport with its local area and communities disproportionately negatively impacted by the expansion proposals. **Priority should be given to the requirements of the residential and business communities in Colnbrook and Poyle, and that where it is not possible to mitigate all negative impacts, compensation should be delivered directly through the DCO and not via the community fund.**
- 1.50. **These guiding principles fall short of meeting the commitment in Heathrow 2.0. We consider that the program should also include a guiding principle around better integrating the airport with its neighbours in the adjoining area.** At present, we consider the plans for addressing and mitigating impacts outside the Airport boundary are insufficiently connected or integrated with those within the airport boundary. This is particularly the case with Green Infrastructure and cycle access to the terminals, and public transport access.

[2. Please tell us what you think about the sites we have identified for buildings and facilities we are proposing to move.](#)

(a) Rail Depot

- 2.1. Part of the existing railway line which serves the Total Oil Fuel depot, the Colnbrook Logistics Centre, London Concrete and Aggregates Industries will be lost as a result of the construction of the new runway. It is important that a rail depot is retained in this location for these uses as well as for the construction of the proposed runway and associated facilities. This can ensure that bulk construction materials and pre-fabricated elements from the remote Logistics Hubs can be delivered to the construction site without having to use the roads.
- 2.2. The Masterplan shows how new 30 waggon sidings will be provided including fuel storage areas that will ensure that aviation fuel supply is maintained. Seven new buildings are proposed which will be used for engineering and construction work, a replacement for the Colnbrook Logistics Centre and a new Heathrow Consolidation Centre.

- 2.3. Mitigation for the loss of all of this Green Belt land will have to be provided in accordance with the requirement in the NPPF that the impact of removing land from the Green Belt should be offset through compensatory improvements to the environmental quality and accessibility of remaining green belt land.
- 2.4. Once the construction of the third runway is completed, consideration will have to be given as to how the rail head should be used for the continued importation of minerals and as a logistics depot for Heathrow. It could also provide a rail link to the relocated Energy from Waste plant.
- 2.5. **To avoid congestion and environmental impacts, it is recommended that conditions should be imposed to prevent the railhead being used as a general distribution centre.**
- 2.6. We support this safeguarding of an alternative site for the railhead and request that the selection procedure for consolidation centres prioritises those that are rail connected and do not cause additional pressure on Slough roads.

(b) Western Rail Link

- 2.7. We also welcome that plans have been designed to be compatible with the future Western Rail link railshaft. We recognise these will not form part of the DCO application.

(c) Lakeside Energy from Waste

- 2.8. We welcome the safeguarding of a new site for the EfW and provision for access to it during construction of the road diversions.
- 2.9. As HAL are aware the planning application for the relocation of the EfW has now been submitted. The Council understand that the PEIR review predated submission of the application for the EfW. The Council consider that the application for the EfW now has sufficient status for the Environmental Appraisal to be revised.
- 2.10. The Council therefore request that Heathrow liaise with the applicant and the Council to ensure the impacts of construction and operation of the EfW and Airport expansion projects are addressed, particularly with regard to traffic through the Brands Hill AQMA and air quality.

(d) Green Belt

- 2.11. In considering the applications for providing the EfW, Railhead, and Special Needs Centre on land designated as Green Belt the Council will need to consider alternative sites as part of the justification for Very Special Circumstances and the Strategic Gap Policy.
- 2.12. We will require HAL to liaise promptly with the process in order not to delay the decision making process to ensure the provision of these is possible.

3. Please tell us what you think of our boundary design proposals to manage noise and the effects on views around the boundary of the expanded airport.

- 3.1. The visual impacts of the runway, other development and construction works are not shown clearly in this consultation and therefore need additional work to identify and then mitigate for them with suitable landscaping or consultation.
- 3.2. The proposal to raise the runway by up to 5 meters as it crosses the realigned M25 could have a significant visual and environmental impact upon the local area and views from Colnbrook and the Colne Valley Trail and Active travel routes.
- 3.3. We requested details of the elevations at Consultation one in three dimensional form so that the visual impact can be assessed but we have still not seen any diagrams or plans or 3d CGI of this which show how the contours will change.
- 3.4. We also share the HSPG and Colne Valley Park CIC view that there are too few viewpoints at present, and that the PEIR process should provide the opportunity for additional viewpoints to be added.
- 3.5. The Green Envelope to the north of Colnbrook which includes Pippins Park, will only be able to provide a comparatively small buffer between the residential area, the new A3044 and the new runway. As the full assessment of the visual impacts of the raised runway has not yet been carried out and so it is not yet clear what additional mitigation will be required. Additional viewpoints for assessing the visual impact from this area need to be included.
- 3.6. There is also a need to enhance Colnbrook Conservation Area and built realm. We require that The DCO Heritage Design Strategy includes mitigation for visual impacts on the setting of listed buildings from construction works and final associated infrastructure.
- 3.7. The PEIR methodology should also be adjusted to assess the visual impacts at 5, 10 and 15 year intervals from construction starting. At present the final assessment is based on the principle of 15years after completion. This is not fit for purpose in this instance given the uncertainty involved in judging impacts so far ahead, and the scope and extent of the project. Weight should be given to assessments at earlier points to enable the impact of the proposals to be suitably assessed and mitigated for as the project evolves and mitigation requirements become more evident.
- 3.8. We therefore disagree with the PEIR conclusion that there will be no significant effects for landscape/visual and water environment
- 3.9. Landscaping proposals must be developed and implemented as a priority in order that they can mature in time to screen construction and new infrastructure from Colnbrook, Poyle, the Colne Valley Trail, Green Envelope and new active travel routes.
- 3.10. We therefore require that the DCO proposals:
 - Increase the number of viewpoints to assess the visual impacts of the construction works, runway and other new infrastructure from existing and new receptors such as the active transport routes.
 - Ensure the Landscape and Visual Impact Assesment includes additional summer and winter views to enable mitigation for the long view visual impact of

the runway and additional airport infrastructure (eg local roads) on residential communities as well as the open / undeveloped land within the Green Loop/ Green Envelope / Active travel routes that have public access.

- 3.11. Develop landscaping proposals to mitigate for visual impacts and implement these early enough that they can mature in time to screen new development from Colnbrook, the Colne Valley Trail, Green Envelope and new active travel routes.

4. Please tell us what you think about our development proposals and the measures proposed to reduce effects in these areas.

Brands Hill, Colnbrook and Poyle

(a) Air Quality

- 4.1. As mentioned in the response to question 1, major air quality impacts are expected as a result of the construction and operation of the scheme. Communities in the Borough of Slough will be affected for several years by increased pollutant levels, particularly those living within the existing Brands Hill Air Quality Management Area which will expose residents to both an increase in pollutant load and for a longer period of time. Currently, there are no effective measures proposed to reduce effects on Brands Hill.
- 4.2. Controlling emissions from construction vehicles is essential in order to minimise construction impacts. The Brands Hill Air Quality Management Area (AQMA) will suffer from a decrease in air quality and a lengthening of the likely duration of the AQMA. The PEIR predicts NO₂ increases of up to 3.0µg/m³ in Slough in 2022, which will be driven by construction traffic movements.
- 4.3. The scale of construction proposed and potential for significant dust effects (if not adequately controlled) necessitates the incorporation of best practice and efficient monitoring in the CoCP. This is broadly incorporated for dust, although it will be necessary to review further details as they become available.
- 4.4. While measures committed to controlling pollution are moving in the right direction, there is substantial scope for strengthening at least some of these. In addition, 5.10.8 of the draft CoCP has little clear commitment to monitoring pollutants around construction traffic routes.
- 4.5. The following is required in respect of construction vehicle emissions:
- Given the adverse impacts predicted in the Brands Hill area in 2022 (and that these occur within an AQMA), we require ambitious and far reaching proposals for preventing construction traffic movements through the AQMA. **We require detailed consideration of a dedicated construction access directly from the M4, bypassing the AQMA area.**
 - **Stronger commitments for monitoring construction traffic effects**, using HS2 is an example of a major infrastructure project where monitoring of NO₂ impacts from construction traffic is being conducted in detail in air quality management areas (AQMAs). HS2 Ltd has also committed to producing action plans where significant effects (moderate adverse impacts or worse) are found to be occurring.

- We **require tighter emissions requirements for NRMM**, for instance Stage IV initially and Stage V from 2030 (broadly in line with requirements for the London Central Activity Zone).
- **Greater commitment** for proportions of bulk materials to be imported and exported via the railhead.
- **Confirmation of the robustness of assumptions within HHASAM**, given the importance of road traffic emissions for air quality.

(b) Surface Access Proposals

- 4.6. Mitigation of air quality during the operational phase is primarily addressed through the Surface Access Strategy. Although Heathrow propose new bus and coach services, active travel routes and the Western and Southern Rail schemes, the Surface Access Proposals are not innovative, do not enable easy access from Slough to the airport or aid Slough in reaching our own mode share targets. This is discussed in greater depth in the response to question 11.

(c) Active Travel

- 4.7. As mentioned in the response to question 1, Heathrow state that the Green Loop responds to requests for better walking and cycling routes, however this route is disrupted by the A3044 and M25, causing cyclists and pedestrians to cross at Junction 14a of the M25. This is not an attractive option and will not encourage uptake of active travel methods. For further details on the active travel proposals, please refer to the full report.

(d) Noise

- 4.8. In relation to environmental noise, Slough Borough Council have concerns in regards to impacts arising during the construction phase, noise levels due to increased traffic (including the relocation of the A4 and A3044), and noise related to increased flight frequency and airspace change proposals, on residents living in Colnbrook & Poyle and Brands Hill.
- 4.9. Significant adverse effects on health and quality of life due to very high noise exposure on residential properties close to the new A3044 and M25 realignment is expected in Poyle during the day, however Heathrow claims that this can be avoided through mitigation (low noise road surfacing) and compensation measures (full noise insulation). Further mitigation will be considered in the ES. Discussions around these mitigation proposals are expected to commence with Slough after this consultation, and will be refined and agreed prior to DCO submission.
- 4.10. Heathrow state they are in the process of assessing the impact of noise on the local community facilities, including schools, which may increase once the runway is open. This suggests that Heathrow are not proposing to relocate Pippins School, which is a key requirement for Slough. Slough also require Heathrow's noise impact assessment on the local community facilities, including schools, to be presented prior to DCO submission.
- 4.11. HAL's consultation on IPA indicates that up to 25 flights at altitudes of up to 5000ft between 0600 and 0700 hrs would result in L_{Amax} noise levels exceeding 60 dBA - in some cases when aircraft are flying lower than 5000 feet the exceedance of 60 dB L_{Amax} will be substantial. An external level of L_{Amax} 60 dB is important as it

marks an established threshold for onset of impacts on sleep for people who sleep with a window to their bedroom partially open. Sleep disturbance is associated with major health conditions, including cardiovascular impacts such as Acute Myocardial Infarction (heart attack) and hypertension (stroke and vascular dementia), and cognitive development of children. Colnbrook and Poyle residents already exhibit reduced health outcomes, yet are expected to be impacted further by the proposals.

(e) Compulsory Purchase Zone

- 4.12. Elbow Meadow in Poyle will be required in 2022. Heathrow state that they have developed a discretionary enhanced compensation offer where they will buy eligible properties for the open market value plus a home loss payment of 25%. However, Heathrow will need to demonstrate that displacing our communities means they will not have to move outside the borough, due to a lack of affordable alternatives. If this is not possible, Slough require higher loss payments to allow for residents to stay in the borough.

(f) Wider Property Zone

- 4.13. The Wider Property Zone also applies to residents in Elbow Meadow, Poyle. Heathrow must supply an address list and detailed map of this zone. The indicative area presented in the map within the 'communities affected' document appears to cover all of Colnbrook and Poyle wards, including Brands Hill, however this will need to be clarified.

(g) Heathrow Offer of Assistance

- 4.14. Heathrow plan to provide support to homeowners through their Home Relocation Support Service, however Slough require more information to determine if it will provide adequate support and protect vulnerable residents. It is also not clear if the interim Property Hardship Scheme will apply to residents who live outside of the Wider Property Zone, which will need to be clarified.
- 4.15. As described above, community measures and social infrastructure should be in place sufficiently in time before they are required (i.e. when the existing ones are lost or before communities are relocated) to allow staffing, advertising and familiarisation issues to be resolved. This allows staff to be found, local communities to familiarise themselves with new arrangements and avoids situations when communities are left with no reasonable alternatives (or suffer additional disruption).
- 4.16. The assessment of effects on communities are not fully considered, with individual aspects (noise, air quality etc.) being considered in isolation. Whilst the PEIR does reference a future cumulative effects assessment, the current information is not sufficient to adequately consider the implications of the proposals on local communities. From the findings of the PEIR, the quality of life for the residents in the Poyle and Colnbrook ward is likely to be reduced, based on the impacts identified and the accumulation of these different factors. Many of the community effects are difficult to quantify and HAL has either argued that they cannot be quantified or that they have not been at this stage. This being the case, it is still important for these effects to be mitigated through investment in community measures.

Construction

5. Please tell us what you think of our construction proposals and the ways we are proposing to minimise effects on communities and the environment.

- 5.1. Construction support facilities will be present in Colnbrook & Poyle during phase 2 (2026-2030). In the 'Communities Affected' document, the longevity of construction, the intensity of construction phases and associated impacts including noise, dust, air quality, odour, contamination, hazardous waste, water, lighting etc. has not been adequately represented.
- 5.2. The area of the Green Envelope between Colnbrook and the Colnbrook bypass has in the current consultation's plans been identified as a construction compound which could be used up until 2030. Although it may be possible to put some perimeter planting in at an early stage, the rest of the site could be laid out as hard standing. This means that it will have no amenity value and cannot be used for residents for the eight years that construction will be taking place. The use of the compound for construction purposes will increase the level of activity and disturbance in the area which will greatly reduce its effectiveness as a buffer area.
- 5.3. We therefore object to the use of site CS1, north of Colnbrook for construction compounds on the grounds that this is an important part of the Green Envelope around Colnbrook and Poyle which is required to be used as a buffer area during the construction process.
- 5.4. Slough raised, through bilateral and HSPG meetings, that the Masterplan should identify the location of construction compounds and construction worker accommodation, and that our preferred location for this would be the area north of the A4 Colnbrook bypass which would then be restored to countryside.
- 5.5. Heathrow propose that the potential impacts arising from the construction phase is addressed through implementation of the following mitigation measures:
- 5.6. Draft Code of Construction Practice (CoCP): The CoCP outlines best practice measures to ensure air quality and noise impacts are controlled. However, there is a lot of reliance on this document to manage/solve issues, with minimal innovative input and Slough Borough Council have concerns that further mitigation measures will be required. The final document will be certified as a final document by the Secretary of State, with which compliance will be required by the DCO, therefore it is important that details are refined and specific, and can adequately address the construction impacts for Slough.
- 5.7. Heathrow propose to prepare a Construction Movement Strategy (CMS) in support of the DCO application, which is made up of the Outline Construction Traffic Management Plan (OCTMP) and Outline Construction Workforce Travel Plan (OCWTP). The OCTMP is to minimise the impact of construction logistics on the road network, including reducing environmental impact and complying with air quality standards; road risk; congestion and cost. However, Slough Borough Council consider this unsatisfactory, as air quality has not been considered on the major roads which are close to residential locations, such as the Brands Hill area.

- 5.8. At the DCO application stage, Heathrow will be proposing a framework for the management, mitigation and monitoring of construction noise and vibration, implemented through the Control of Pollution Act (1974), however this results in local authorities being unable to impose their own noise conditions and is not supported by Slough Borough Council.
- 5.9. Heathrow propose to construct a new railhead at Colnbrook in order to move freight materials during construction and for airport utilisation after the project is complete. This would potentially reduce the number of HGVs required for construction on national and local roads by approximately 20-30% between 2023 and 2025, however the impact of rail activity on residents is unclear.
- 5.10. For further details on the impacts of construction, please refer to the full report.

Future operations

6. Please tell us what you think of our runway alternation proposals, in particular we would like to know if you think we should alternate the runways at 2pm or 3pm.

- 6.1. The PEIR claims that significant adverse effects on health and quality of life (new very high noise exposure) are predicted in parts of Slough, including Poyle, Colnbrook and Brands Hill. A method of mitigating this is through predictable respite through runway alternation.
- 6.2. Currently on westerly operations the two runways spend half the day either on departures or landings only, with the roles alternating at 1500 hrs. This provides respite periods of typically 8 hours of the day with noticeably lower noise conditions. With three runways, the alternation cycle functions with one of the outer runways operating in mixed mode (landings and take offs separated in time) for a day with the other two runways being rotated between landings or take off only, with alternation of the mixed mode from the northern to southern runway each day. Although a predictable pattern of respite is achieved, it diminishes the overall duration of relief to only 5 hours each day from the current 8 hours. Slough are not supportive of this reduction of respite.
- 6.3. The implications of changing the alternation schedule from currently 15:00 to 14:00 is not clearly presented in the AEC documents. It is likely that residents that have become accustomed to predictable respite periods that change over at 15:00 will want this timing schedule to remain.

7. Please tell us what you think of our preferred proposal for a ban on scheduled night flights, and/or whether you would prefer an alternative proposal.

- 7.1. The PEIR recognises that night-time adverse likely significant effects (from noise increases that would affect the acoustic character of the area and may be perceived as a change in quality of life) have been identified for parts of Slough Borough Council including Poyle, Colnbrook, Brands Hill and East Langley. This is due to both early growth introduced through Independent Parallel Approaches (IPA) which will increase flights from 06:00-07:00, and the increased frequency of flights

introduced after the opening of the third runway. With the current IPA flight envelope plans, Slough will have an additional 50 overflights, 2 of which could exceed 60 dB in the night-time period (06.00 – 07.00).

- 7.2. In regards to the night-flight schedule, the information in the AEC documents indicate that although the night quota period is 6.5 hours, the night time recovery period lasts until 00:00, and the first early morning arrival will land on the runway at 05:15, therefore the worst case scenario with delay recovery is a period of only 5.25 hours of no flights, which is a very short period. The recommended night time hours (23.00 to 07.00) is 8 hours so having a period of 5.25 hours of restricted flight is insufficient, and puts the health of Slough's residents second to the economic benefits to the airport. Slough recommend that the ban should last for 8 hours to allow residents to achieve a full night of undisturbed sleep. This should be an outright ban, with the exception of emergency situations but should not include delayed flights.
- 7.3. The PEIR provides no clarity whether a night noise insulation scheme will be brought forward for the DCO scheme. Some areas where night-time noise effects are likely will become eligible for the full noise insulation treatment under Scheme 1. A larger area impacted at night will fall under scheme 3, but the restriction of the contribution to £3000 may mean residents have to choose between treating bedrooms and living rooms etc. and significant adverse effects may not be avoided. In addition, noise insulation may not be delivered until after opening of the new runway and will therefore not deal with potential impacts at night on sleep from Early Growth in flights.
- 7.4. It is therefore imperative that a night noise insulation scheme is brought forward for both the Early Growth in flights and the DCO scheme aimed at ameliorating not only conscious awakening but also disruption of the sleep cycle and structure i.e. elevation of arousal level, fragmentation of sleep, and consequential redistribution of time spent in the different sleep stages leading to increasing wake and Stage 1 sleep, decreasing slow wave sleep, and Rapid Eye Movement sleep.
- 7.5. As it stands, the PEIR is not considered to provide enough noise information to enable the local community to understand the environmental effects of the proposed development to inform their responses.
- 7.6. Slough require specific assessment of the noise impacts and effects on sleep of individual night-time ATMs based on LAmax levels and number of times a night they occur. Impact should focus on the disruption of sleep cycle as well as conscious awakening, to gain clarity on the impacts associated with capacity increase.

[8. Please tell us what you think about our proposals for managing early growth.](#)

- 8.1. As part of the DCO process, Heathrow are seeking permission to increase the use of the existing two runways by up to 25,000 extra flights a year before the third runway is expected to be opened in 2026. This will result in more traffic and more adverse environmental impacts at the same time that the construction process will be taking place. The combined effects of these do not appear to have been assessed and as a result, no mitigation is being proposed to deal with this.

- 8.2. There is no basis for this early growth in the Airports National Policy Statement and no clear justification for this. As a result, it is considered that the Council should object to the principle of increasing the existing limit on the number of flights that are allowed on the two runways until it is satisfied that a proper mitigation package can be provided.
- 8.3. The proposals for Early Growth are little more than an attempt to increase capacity whilst avoiding the commitments of the remainder of the wider proposals. The Early Growth proposals will see the overflying of areas that are currently not overflowed, resulting in substantial increase of noise levels.
- 8.4. The consideration of the noise impacts in the document Early Growth: Increasing flights on our Existing Runways, June 2019 submitted as part of the PEIR is solely based on the potential changes in average LAeq,16 hr day time and LAeq,8 hr night time noise levels which aggregate all the noise energy from flights during the day or night and then spread it out over the 16 or 8 hour period respectively. On that basis the addition of the relatively small number of additional ATMs to the already permitted 480,000 per year produces an increase of only 0.2 of a decibel, which is not considered significant. On that basis there is no specific assessment of the noise impacts of early Growth in flights on SBC.
- 8.5. However, one of the key elements of using IPA is that the aircraft will join the approach path later than they do now i.e. closer to the airport. Because the aircraft on the IPA routes will join closer than 8 nautical miles, they will be lower than today as they join their final approach and will potentially be noisier. Once on the final approach path they will be the same height as currently however will make their way to the final approach path over areas not commonly overflowed by Heathrow arrivals. IPA will also result in aircraft flying at relatively low altitude over areas that until now have not had overflight. HAL's consultation on IPA indicates that up to 25 flights at altitudes of up to 5000 feet between 0600 and 0700 hrs would result in LAm_{ax} noise levels exceeding 60 dBA – in some cases when aircraft are flying lower than 5000 feet the exceedance of 60 dB LAm_{ax} will be substantial. An external level of LAm_{ax} 60 dB is important as it marks an established threshold for onset of impacts on sleep for people who sleep with a window to their bedroom partially open.
- 8.6. We require finer resolution to the assessment of the impacts of the peak noise levels of individual aircraft movements for early growth.
- 8.7. In addition, noise insulation may not be delivered until after opening of the new runway and will therefore not deal with potential impacts at night on sleep from Early Growth in flights. It is therefore imperative that a night noise insulation scheme is brought forward for the Early Growth in flights.

Surface Access

9. [Please tell us what you think of our proposals and how we could further encourage or improve public transport access to the airport.](#)

- 9.1. In order to comply with the ANPS, Heathrow has undertaken a pledge to not increase landside airport-related traffic. This will involve:
- Achieving a public transport mode share of at least 50% by 2030 and at least 55% by 2040 for passengers; and

- Reducing all staff car trips by 25% by 2030 and 50% by 2040.
- 9.2. Measures have been proposed in order to achieve this public transport mode share. This includes new bus and coach services such as a new bus route that connects Slough, Langley, and Colnbrook to the Central Bus Station. Heathrow will also support the DfT and Network Rail with their proposed Western and Southern Rail schemes.
 - 9.3. The current surface access proposals lack specific detail on how the airport's expansion will impact local transport networks. No detail is provided on the specific local impacts, and therefore there are no proposals for the provision of mitigation measures. It is stated that this will be provided prior to the DCO in the Transport Assessment, but this document is not currently available and therefore does not form part of the consultation.
 - 9.4. Members believe any strategy should consider and mitigate the impact of traffic on roads further afield than the immediate areas surrounding of the airport. **HAL should look towards a network approach, connecting destinations, stations and transport hubs rather than the limited current 'spokes' approach.**
 - 9.5. The proposals from HAL as part of the AEC on surface access concentrate primarily on the east with additional provision in terms of public transport services. The impacts on Slough are significant both through the construction and operational stages with additional traffic being generated in the Colnbrook, Poyle and Langley areas, however the impacts of this growth have not been mitigated and are reliant on the Councils own initiatives such as the SMaRT scheme with Park & Ride to mitigate against the growth. There is no provision for bus lanes and no bus priority in any of the proposals, which leads Slough BC to conclude that the AEC is not considering Slough as untapped area for modal shift or employee growth. The lack of connectivity either through public transport or active travel in terms of walking and cycling routes indicates that HAL are looking for the majority of expansion to be met by the London area however no sensitivity tests have been undertaken to understand if this is possible and therefore what is their Plan B. The indication that Western Rail is not required to meet the ANPS targets is not welcomed as this clearly goes against the ANPS.
 - 9.6. The Surface Access Strategy (SAS) has not been innovative outside of the airport and has looked at replacing infrastructure with a "like for like" replacement and hence leaving it to Slough and outer London authorities to pick up the impact. Slough has been very clear in terms of its objectives and public transport infrastructure and services that this needs significant investment to reduce congestion, improve air quality and provide access for employment. The proposals set out in the SAS do not look to address these issues adequately, and we propose to make this clear in our official response.
 - 9.7. The overall conclusion of the surface access proposals is that connectivity will be achieved through better rail access, coach and bus routes, however the mode share targets will be achieved by Heathrow predominantly through developed public infrastructure to London, to balance increased car use from the west (until the rail links are established). Heathrow predict that traffic will not increase, but the proportion and distribution will change. Slough Borough Council are unlikely to meet their modal shift goals when areas such as Colnbrook are so poorly connected to the airport. Heathrow have the opportunity to produce innovative solutions to these

connectivity issues, and Slough Borough Council expect discussions to continue with Heathrow, to develop routes that will benefit the community, to ensure the Council's needs are met. This is required prior to DCO submission.

- 9.8. In the current information supplied through the AEC exercise, HAL claim the Surface Access Strategy will provide further solutions to achieve connectivity to the airport, but this has not been published and the information included in the consultation is not adequate to state that journey times to the airport will be improved. Therefore, based on no bus lane provision it is felt that journey times will be longer, making it difficult to meet shift time schedules. The lack of bus lanes also leads to less growth as a result of poor connectivity and journey times.
- 9.9. To improve accessibility for Slough, the Council has consistently requested that there should be a cycleway over the M25 at Junction 14A with a direct access into Terminal 5 in order to provide direct and convenient access from Slough and the west.
- 9.10. The Council has consistently requested that there should be a direct bus route into Terminal 5 from the west at Junction 14A of the M25 which would provide a shorter route which avoided these two major junctions.
- 9.11. As mentioned previously, the Council is concerned that the A3044 will be used as a rat run for traffic going to and from the M25 to the M4, and the likelihood that it will become congested whenever there is a problem on the motorway network. It is essential that bus lanes are provided on the A3044 and changes to the A4 (either to include bus lanes or at least junction arrangements), in order for Slough to achieve modal shift goals and for implementing Slough Borough Council's transport vision.
- 9.12. In order for the Council to remove its concerns and objections to the Surface Access Proposals, HAL will need to satisfy the Council that it will provide a new direct route for cyclists and allocated lanes for buses on the realigned A3044 into Terminal 5 in the vicinity of Junction 14A on the M25.
- 9.13. Further details on surface access proposals and Slough's requirements can be found in the full report.

10. Please tell us what you think about our proposals for the Heathrow Ultra Low Emission Zone and Heathrow Vehicle Access Charge as ways to manage congestion and air quality impacts.

- 10.1. The LTP3 demonstrates Slough Borough Council's commitment to the creation of Air Quality Management Zones and Ultra Low Emission Vehicle (ULEV) Corridors along Heathrow bound routes. Slough Borough Council has previously voiced their commitment to the introduction of a ULEV corridor in earlier consultations with HAL. Retaining this commitment would help Slough Borough Council to achieve the objectives set in the LTP3 and would commit HAL to meeting the objectives of the ANPS.
- 10.2. The Mayor of London's "Central London ULEZ – First Month Report", found that in the first month of operation the average compliance rate was approximately 71% during congestion charging hours and 74% in the 24h period. There was also a high reduction in non-compliant vehicles with 9,400 fewer on an average typical day. There was a 16% increase in compliant vehicles in the central zone from March to April 2019. On an average typical day there was a reduction of 36,100 vehicles.

Based on the success of the London ULEZ in the reduction of non-compliant vehicles, there is clearly potential for the same success to be replicated at Heathrow and the surrounding area by HAL.

- 10.3. It is recommended to determine how many non-compliant and compliant vehicles currently access the site and use the perimeter roads. Such benchmarks would allow for appropriate targets to be set and would ensure that the HAL ULEZ would have the desired impact on improvements to air quality.
- 10.4. Expanding the ULEZ to outside the Heathrow boundary is recommended as based on the current proposals, as non-compliant vehicles will simply become displaced to local road networks for drop off / pick up locations. Expanding the ULEZ to include the Strategic Road Network surrounding the airport will prevent the displacement of non-compliant traffic to these roads and act as a further deterrent to both passengers and workers who are considering driving to the airport.
- 10.5. The implementation of a ULEZ in the HAL area will complement and reinforce the proposed improvements in the public transport network. As Heathrow is already in the Low Emission Zone (LEZ) freight vehicles coming to Heathrow during construction will already be subject to the LEZ fees, and as of 2020, the new London LEZ standards will apply to all HGVs and LGVs across all of London. The implementation of a ULEZ on perimeter roads will also require consultation with the London Borough of Hillingdon and TfL. It is noted that LB Hounslow is already looking to introduce ULEZ areas around Heathrow.
- 10.6. In keeping with advice earlier in the document, the ULEZ proposals are required to form a coherent policy that will take full account of impacts to deliver a functioning low emissions scheme.
- 10.7. Although the ULEZ and VAC proposals are laudable, they are not accompanied by coherent plans that would support a proposal that would otherwise be a major scheme in its own right. The ULEZ risks diverting traffic into surrounding areas and in order to support it, Slough Borough Council would need to see more detailed proposals that would guarantee traffic management in the wider area.
- 10.8. In order to mitigate against displacement, as a result of the HULEZ, it is proposed that HAL fund Controlled Parking Zones in the affected neighbourhoods to protect residents and businesses from a loss of parking privileges.

11. Do you have any other comments on our Surface Access Proposals?

- 11.1. The Surface Access Proposals state that parking provision matches managed demand and stays within Heathrow's traffic targets.
- 11.2. **We require that proposed additional air passenger parking spaces will be Heathrow controlled spaces and provisions for them will be made within the boundary of Heathrow. HAL should accept conditions to prevent new off-site airport parking.**
- 11.3. HAL has proposed to reduce the availability of colleague parking and colleague parking permits as part of their commitment to achieve ANPS objectives. Any reduction in parking spaces for colleagues must be done in conjunction with the proposed improvements to public and active transport. Failure to do so may result in unmanaged parking in the areas surrounding the airport. **We require confirmation**

that a reduction in parking will be undertaken as part of a comprehensive travel strategy.

- 11.4. The documentation assumes a strict set of surface access conditions will be met with respect to vehicle movements. Whilst we recognise that this is in line with statements made in the Airport National Policy Strategy (ANPS), merely quoting the ANPS is not sufficient to ensure compliance with the ANPS. No detail is provided on specific means to reach these targets, laudable though they are.
- 11.5. The proposals made are little more than concepts, with no basis upon which to justify their efficacy and effectiveness. In particular, the proposed Ultra Low Emission Zone, whilst certainly a positive move, appears to be a policy “made on the hoof” without any genuine attempts to assess its likely success, or more importantly, its discrete impacts upon the surrounding road network.
- 11.6. There are considerable risks of displaced impacts due to such measures, and uncertainties regarding their delivery and operation. **Thus, we believe that these incoherent assumptions do not constitute a basis for mitigating the impacts of the proposals.**
- 11.7. The assumptions regarding future traffic levels are ambitious and not rooted in any evidence. The successful delivery of the expansion proposals is based on the assumed delivery of third-party schemes that whilst linked, are distinct from the HAE plans.
- 11.8. No detail is provided on how the surface access targets will be reached if one or all of these schemes fail to be implemented.
- 11.9. For further detail on surface access proposals, please refer to the full report.

Preliminary Environmental Information and managing the effects of expansion

12. Please tell us what you think about our proposals to manage the environmental effects of expansion.

- 12.1. The Preliminary Information Report focuses on a range of environmental themes, including air quality, noise, carbon and greenhouse gases, health and land quality. Supporting comments have also been provided in a planning policy context. Specialists within the Council have reviewed and commented on these specific themes, as follows:
 - **Air Quality:** As previously mentioned, air quality is primarily addressed through surface access proposals, which do not provide connectivity to Heathrow. This requires development in order to satisfy Slough Borough Councils requirements. For details on proposed mitigation, please refer to the response to question 13.
 - **Noise:** The introduction of IPA, additional runway capacity after 2026 and increased traffic during construction and operation all contribute to increasing noise levels and cause parts of Slough including Poyle, Colnbrook and Brands Hill, to experience significant effects on health and quality of life due to noise. Heathrow claim that these will be mitigated and minimised by mitigation measures and potentially compensation measures for parts of Slough closest to

the expanded airport (full noise insulation). Proposed mitigation includes provision of insulation package for residents, issued on a case-by-case basis to households that are in close proximity to construction activities, and restrictions on excessively noisy activities at night, to prioritise these activities in the day, without any exceptions. For details on additional requirements, please refer to the full report.

- **Carbon and Greenhouse Gases:** Regarding the impacts of climate change the PIER failed to represent serious issues relating to flood risk during periods of extreme precipitation and high groundwater, and the impact of extreme heat exacerbated by the Urban Heat Island effect. Management of these issues has not been discussed as a result and therefore the PIER has not proposed suitable mitigation.
- **Health:** It should be noted that although the mitigation options being presented in this report are substantial, they will not fully mitigate against the significant negative effects on health that could occur and that would directly impact the residents of Slough and to a greater extent the residents in the ward of Colnbrook with Poyle, all of which already suffer from below average levels of health and wellbeing. The information in the current PIER and Heathrow consultation health documents suggests that both the detail and the level of mitigation are not adequate as currently presented. It is suggested that a full health strategy and fully informed health mitigation plan should be presented to local stakeholders, in advance of the commencement of the DCO.
- **Land Quality & Waste:** the proposed methodology, assessments and mitigations seem suitable, but at this point there is not enough detail to make any specific objections. However, it is anticipated the full data sets, interpretations and remedial packages will be ready at the DCO stage.

12.2. A thorough review of the above themes within the PEIR documents is presented within the Technical Report. Please refer to this report for technical details.

12.3. In terms of a planning policy context, the following points have been raised:

- The Non-Technical Summary of the PEIR considers the airport expansion will be most intense around 2025, 2027, and 2035 when proposed early growth of up to 25,000 ATMs will be in operation and construction activities are intensive. Phasing shows CS1 and CS13 will be implemented as part of the first construction Phase 1 and remain beyond 2030. We consider the localised impacts in Colnbrook and Poyle will be highly significant and for a considerable amount of time (early works to end state). We therefore require the conclusion in the PEIR that Construction worker effects will be negligible/minor is revised to include recognition that at the local scale for this area this is not the case, the assessment should then include the impact on the Green Envelope, and conclude there is a need to relocate CS1 to elsewhere.
- Slough welcome the Economic Development strategy and recognises this only sets out the broad approach the Heathrow intend to take in developing the Economic Development Strategy to deliver benefits and mitigate for negative impacts from the expansion in Slough. It states all the right things about skills, employment and business engagement. However there is still a lack of information about the 'how' much of this will be delivered and how it will impact on individual areas surrounding the airport.

- The Environmental Statement evolving from the PEIR must commit to embedding mitigation within the scheme, and the mechanisms to deliver monitor and manage this appropriately must be included in the Economic Development Strategy.

Air Quality

13. Please tell us if there are any other initiatives or proposals that we should consider in order to address the emissions from airport related traffic or airport operations?

- 13.1. Air quality is impacted during both the construction and operational phases of the development, primarily through road traffic increase.
- 13.2. To tackle poor air quality, surface access proposals have been developed, however they are lacking in ambition and innovation.
- 13.3. The following measures are proposed by Slough Borough Council, to improve surface access and consequentially, improve air quality:
- Bus Lanes on diverted A4 and A3044: The local road network currently proposed in the AEC is still single carriageway with no bus lane provision, except potentially closer to the junction. We support bus tagging but not as a means to improve bus travel solely. Slough Borough Council has made it clear that economic growth in Slough, Smart Motorways (M4&M25) and the pressure of 20,000 additional homes in the area will impact our road network so our new Transport Strategy sets Public Transport as the number one priority providing new bus lanes, removal of traffic in certain locations etc. This is our number one priority and will feed into our MRT services and park & ride at junction 5 and improve air quality around the Colnbrook and Poyle area, this must be shown in the wider context of the Masterplan.
 - Improved Access to the Airport for workers living in the Colnbrook and Poyle area: The proposal for the diverted A3044 now includes a segregated cycle lane which we support however this route follows the A3044 and hence is not direct into the airport leading to longer travel time for cyclist and hence not incentivising those who live within a mile of the airport to cycle/walk.
 - The development of all proposed cycle routes must be proven to improve accessibility to Heathrow, with assurance that cycle routes will be operational by the year of runway opening (2026). Slough Borough Council propose an additional cycle route that avoids crossing the M25 at Junction 14, which crosses the alongside the proposed runway location and runs alongside the diverted rivers. Cycle uptake could also be encouraged by providing a cycle hub within the Colnbrook area.
 - Pippins School Relocation: The impact on the school in terms of noise and air quality will be significant and therefore a new location will be required
 - HGV movements: must not be directed through Slough AQMAs, especially avoiding the Brands Hill AQMA. SBC propose that Heathrow provide an additional route for HGVs which joins the M4 to the A4 to bypass the Brands Hill area, restricted to construction vehicle use only. This will reduce construction traffic travelling through the Brands Hill area by at least 50%.

- Clean Air Zone (CAZ) emission standards: are required on all airport related development and dedicated ULEV corridors provided for public transport and shuttle services. The CAZ approach must target main access points to Heathrow rather than the motorway, focusing on A4 and A3044 roads. Fleet vehicles must also operate at CAZ standards.
- Commitment to actively manage the Green Infrastructure around Colnbrook and Poyle: This includes positive management of the Green Envelope around Colnbrook and Poyle for the benefit of residents and “legacy” improvements to the Colne Valley Park which would include the creation of a new route for the Colne Valley Trail with a new green bridge over the M4.
- Provision of funding to support residents in purchasing cleaner vehicles, to ensure air quality within Slough is not exacerbated by passengers and colleagues using cars to travel to the airport
- Provision of a compensation scheme for low income residents to support those living close to the airport that will suffer from health impacts related to air quality, to cover costs of healthcare

Health and Well Being

14. Please tell us what you think about our proposals to help health and well-being. Are there any other proposals that you think we should consider to address the effects of the Project on the health and wellbeing of our colleagues, neighbours and passengers?

(a) Health

- 14.1. The expansion of Heathrow airport has the potential of bringing positive impacts from some of the wider determinants of health. Specifically, a potential for increased employment, particularly by young adults with limited employment history; people who were previously unemployed, on low incomes, had low job stability or have few progression prospects; and those experiencing high level of deprivation. However, this needs to be taken in the context of the wider and more substantial negative health implications of the expansion.
- 14.2. The current PEIR and health mitigation is not adequate in its current form. It is recommended that a full Health Strategy and fully informed Health Mitigation Plan should be presented to local stakeholders, in advance of the commencement of the DCO.
- 14.3. Substantial investment should be made into 7 key areas in Slough to contribute towards mitigation. The areas are “Relocation” and support for those in rented accommodation and the remaining community; “Public Services” including primary and secondary care provision and active travel; “Open Space” including additional green space and enhanced cycle lanes; “Construction” through altered transport plans and reduced construction noise; “Air Quality” through investment into schools and primary/secondary care provision; “Noise” through additional mental health support services, education and primary/secondary care provision; and finally through “Construction Workforce” with additional investment into public health, primary/secondary care and immunisations.

- 14.4. It should be noted that although the mitigation options recommended are extensive (see full Public Health response), they will not fully mitigate against the significant negative effects on health that could occur and that would directly impact the residents of Slough. The biggest concern is the extent of the impact on the residents in the ward of Colnbrook with Poyle, all of which already suffer from below average levels of health and wellbeing.
- 14.5. **We believe that the proposals regarding health and well-being are limited, and do not recognise the vulnerabilities of the local population.**

(b) Wellbeing

- 14.6. The Council's Spatial Strategy promoted the concept of having a "Green Envelope" around Colnbrook and Poyle villages in order to give them some protection from the proposed expansion of the airport. Although this would form part of the wider Green and Blue infrastructure and the Colne Valley Park, the primary purpose was to provide a buffer for local residents affected by construction and operation and provide local accessible open land for informal recreation, such as dog walking.
- 14.7. The scope for providing the Green Envelope has been reduced and 'squeezed' at its east as a result of the decision to divert the A3044 and realign the M25 through the area.
- 14.8. The illustrative plans for the extent of the "green space around villages" as currently set out are misleading. For example, they give the impression that the M25 will be a green buffer; that the balancing ponds (for flood alleviation) and the engineered diversion of the Colne Brook will form part of the open area; but these will be dominated by roads or buildings and will not be publically accessible.
- 14.9. The Masterplan recognises the concept and claims to be proposing improvements to the "Green Envelope" around Colnbrook and Poyle. It is not, however, identified in any of the Airport Expansion Consultation plans.
- 14.10. As a result, it is proposed that we should object to the use of site CS1, north of Colnbrook for construction compounds on the grounds that this is an important part of the Green Envelope around Colnbrook and Poyle which is required to be used as a buffer area during the construction process.
- 14.11. In the long term this area appears to be identified in the Masterplan for biodiversity purposes. It is considered that the main purpose of the area should be to act as a buffer and provide a local amenity for residents who could use it for dog walking. This means that its primary use should be as public open space and not for biodiversity purposes.
- 14.12. As a result it is proposed that we object to the designation of site CS1 for biodiversity purposes. It should be designated as public open space which can be used by local people.
- 14.13. The southern part of the Green Envelope is shown as being proposed green space. It is proposed to move the Heathrow Special Needs Centre to the site on the corner of the Bath Road and Poyle Road. This provides the opportunity for outdoor activity such as horse riding, animal care and horticulture. This is considered to be an appropriate use in this location.
- 14.14. **It is important that the Green Envelope as a whole is designed and laid out for the benefit of the local community and properly managed and funded in**

perpetuity. As part of this, ‘architectural’ landscaping must be provided to screen the areas from roads and construction compounds as part of the early works.

Noise Insulation Scheme

15. Please tell us what you think about our noise insulation schemes.

- 15.1. The proposed noise insulation policy is markedly different and more comprehensive than previous schemes.
- 15.2. For homeowners, three levels of scheme will be offered, depending on the existing or predicted noise exposure level, as indicated by the relevant noise contour, source of noise and if confirmed through third-party assessment.
- 15.3. However, the noise insulation proposals only provide mitigation for internal noise conditions and it is itself a restriction on use of premises i.e. has an adverse effect;
- 15.4. Our main requirements are:
 - To increase the limit of the contribution towards noise insulation, in scheme 3, to over £3000;
 - The design target for sound insulation in schools to follow the DfE acoustic guidelines for schools e.g. BB93, not simply an external noise threshold of 60 dB LAeq,16 hr. Alternatively to seek a reduction of the threshold for sound insulation to 55 dB LAeq,16 hr as per the RANCH study on cognitive effects on children of aircraft noise;
 - To seek the noise insulation scheme being based on the combined total noise level of existing sources plus the contribution from HAL expansion plans;

16. Please tell us what factors are most important as we develop our proposals for noise management, in particular our proposals for the design and implementation of a noise envelope.

- 16.1. The Airports NPS requires HAL to develop the “noise envelope” with local communities and other stakeholders, something they are doing with an independently chaired Noise Envelope Design Group. The group is made up of a small number of technical experts representing the interests of communities, passengers, local authorities and airlines. The noise envelope is part of HAL plans for Environmentally Managed Growth at Heathrow, which in claims means increases in aircraft and passengers are only permitted if they are within strict environmental limits.
- 16.2. In order to determine the appropriateness of these mitigation and compensation proposals, further information is required relating to:
 - the **adequacy of the house purchase offer** i.e. will it permit purchase of “like for like”

- recognition that **noise insulation only provides mitigation for internal noise conditions** and is itself is a restriction on use of premises i.e. has an adverse effect
 - **adequacy of a limit of a £3000** contribution for noise insulation
 - ability to **achieve a design target for sound insulation in schools** to be the DfE acoustic guidelines for schools e.g. BB93, not simply an external noise threshold of 60 dB LAeq,16 hr. Alternatively **seek reduction of the threshold for sound insulation to 55 dB LAeq,16 hr** as per the RANCH study on cognitive effects on children of aircraft noise
 - confirmation that the noise insulation scheme being based on the **combined total noise level** of existing sources plus the contribution from HAL expansion plans
 - detail on the scale, scope and duration of the Community Fund, with **ring-fenced funds for Slough**
- 16.3. In addition, we believe that the “noise envelope” control mechanism should not be based only on the area of the noise contours and the QC count; but also **include a the provision of a cap on ATMs** since as subtle changes in QC rating of individual aircraft of low volume has the potential to enable more ATMs being permitted.

Economic Development

17. Please tell us what you think of our proposals for maximising new jobs and training. Are there any other ways that we can maximise skills and training opportunities to benefit our local communities?

(a) HSPG position

- 17.1. Slough support the HSPG view that the economic development framework is still very high level and lacks detail. This is a key area where benefits can be maximised for local communities. Slough will work direct and via the HSPG with HAL to develop the economic development strategy and ensure these benefits are maximised. The surface access strategy and lifelong learning and new skills elements will all be important, as well as utilising Poyle trading estates proximity. Lack of airport related employment for Slough residents and in Slough
- 17.2. The HSPG carried out research into the implications of an expanded airport for Local Authorities most aligned with the Heathrow travel to work area. That included an assessment of the potential impact of the Heathrow proposals on local economic development, demand for employment floorspace and on demand/need for housing resulting from increased employment.
- 17.3. The report (referred to as the Joint Evidence Base Infrastructure Study or JEBIS) does not consider construction workers as it only measured “end state” impacts of the expanded Heathrow. The report also assumes that housing targets will be met in full within the LPA area.
- 17.4. The report confirms the biggest economic impact on most authorities will be residents taking jobs at the airport (Stage 6 Summary, Labour Market Impacts). The

HAL employment survey fed into the Joint Evidence Base Study reported over 50% of jobs at present are taken by the residents of the five closest LPAs.

- 17.5. The study has predicted that if current trends continue without policy intervention expansion will create an additional 31,000 direct, indirect and induced jobs within the nine boroughs considered in the study, mostly within Hillingdon and Hounslow. Of these only 100 will be within Slough; with around an additional 2,800-3,300 commuting from Slough to the airport (half that from Hillingdon and Hounslow).
- 17.6. It also shows that the major employment workplace for jobs will be in Hillingdon and Hounslow – as this is where the airport is located. The report on current employment patterns confirms these in part related to accessibility by public transport to the airport, which is particularly important for local residents and those in lower paid and entry level jobs.
- 17.7. We consider it is essential that the surface access strategy for the DCO expansion delivers a significant increase in the proportion of employees accessing the airport by sustainable means if the expansion proposals will meet its ANPF targets.
- 17.8. The study was carried out to predict what would happen if current situation continued. The Council considers that the third runway is in the Borough, and so physically close there is a need for the new proposals to deliver not only the basic mitigation of preferential journey times for residents working at the airport across Slough, but also a positive legacy.
- 17.9. Slough is currently an economic powerhouse with a legacy of supporting Heathrow. The Trading Estate is also an important employment hub and strongly protected employment land for a diverse range of businesses. Slough's regeneration proposals for the town centre include creating an office quarter, and supporting the WRLTH that will reduce journey times and provide a direct connection to T5.
- 17.10. It is also committed to allowing Green Belt land to be released, protecting land in Poyle for employment use dedicated to Heathrow, dealing with the relocation of the Lakeside Energy from Waste within the Borough and promoting the retention of the railhead. This requires relaxation of Green Belt policy and the locally important Local Plan Strategic Gap policy. At present the site for the EfW is not large enough to accommodate the materials recycling facility or the associated offices.
- 17.11. The Borough is also identified as in a core area significantly affected by the socioeconomic impacts of the expansion proposals. The Preliminary environmental report acknowledges there will be disruption to residents and their economic activity, through environmental changes and changes as a result of changes in journey times resulting in severance. Slough agree with this assessment.
- 17.12. There are also other employment premises being displaced as a result of the expansion. Those that are compulsorily purchased should also be given sufficient compensation to allow them to relocate without economic impacts.
- 17.13. In addition the impact of noise, congestion, journey times and air quality and displaced residential and commercial premises for example have the potential to have a negative impact on the Borough's businesses, employees, and their customers that are both dependent on them or physically impacted. These should also be eligible for support as part of the mitigation measures.
- 17.14. Car parking from employees and passengers wanting to avoid on airport charges is also likely to impact on local residents both on street or unregulated car parks.

Access by bus also needs a bespoke approach as the bus services are not operated by TfL pricing as elsewhere in the airport.

- 17.15. It is therefore critical that the Borough's residents and businesses see the specific commitment from HAL to mitigate for the possible negative impacts on the Borough through a surface access strategy is fit for purpose that includes bus, walking and cycling infrastructure that is suitable for 'non-cyclists' and funds operational and enforcement measures to deal with unregulated parking, and offer heavily subsidised priced bus season tickets.
- 17.16. Heathrow have committed to developing an overarching Economic Development Strategy to accompany the DCO. That will seek to enhance the skills, employment, training and education for both new and existing members of the labour market (in the construction and operational phases). It also commits to developing 'a credible plan' to implement the commitment to deliver a total of 10,000 apprenticeships at an expanded airport (as set out in the ANPS) and a skills, education and training action plan.

(b) SBC position

- 17.17. Slough Borough Council welcomes the EDF and recognises this only sets out the broad approach that Heathrow intend to take in developing the Economic Development Strategy to deliver benefits and mitigate for negative impacts from the expansion in Slough. We request the EDS and Action Plan are substantially complete before submission of the DCO.
- 17.18. While the EDF covers skills, employment and business engagement there is still a lack of information about how much of this will be delivered and how it will impact on individual areas surrounding the airport.
- 17.19. The Environmental Statement evolving from the PEIR must commit to embedding mitigation within the scheme, and the mechanisms to deliver monitor and manage this appropriately must be included in the Economic Development Strategy.
- 17.20. Slough is currently an economic powerhouse with a legacy of supporting Heathrow.
- 17.21. Slough's regeneration proposals for the town centre include creating a community through growing youth and multicultural arts, well-being service industries and SMEs. It is also committed to protecting land in Poyle for employment use dedicated to Heathrow.
- 17.22. The impact of noise, congestion, journey times and air quality, for example, has the potential to have a negative impact on the Borough's businesses, employees, and their customers. It is critical that the Borough's residents and businesses see the specific commitment from HAL to mitigate for the possible negative impacts on the Borough.
- 17.23. We therefore strongly support the further evidence work committed to maximise the benefits to the supply chain, innovation, inward investment, tourism and employment.
- 17.24. For the reasons above it is essential that Slough Borough Council is a partner in the evolution of the Economic Development Framework to the strategy as the Borough falls within the Core area significantly affected by the expansion proposals.

- 17.25. Slough is planning on setting up its own Slough Campus and a Skills and Employment Partnership. This will take a strategic approach to skills delivery in the Borough to ensure Slough is meeting the skills and employment needs of employers as well as brokering services between residents and employers. Partners will also benefit by providing coordinated programmes.
- 17.26. Slough is currently working on its own economic development strategy, including an evidence baseline. It is important for HAL to ensure alignment to these findings in terms of opportunities around employment, businesses generation and inward investment. In relation to this there are two key activities HAL can support Slough's economy with:
- An Incubation Hub for business start-ups in the digital creative Industries Sector – Slough Borough Council is in the process of applying for European Regional Development Fund (ERDF) funding to support a Hub in the Town Centre. Thames Valley Berkshire LEP has agreed, in principle to provide part match funding. Slough expects HAL to also provide match funding to this project which will hugely benefit both Slough and HAL in their commitments to support HAL's surrounding economies.
 - Financial support and commitment towards Slough Campus which can support the upskilling and training for workforce needed for the construction sector. This will respond to the expected numbers of workers needed to deliver the expanded airport and other major regeneration in the region.
- 17.27. The economic development framework is still very high level and lacks detail. This is a key area where benefits can be maximised for local communities. HSPG believes there is also an opportunity to work collaboratively as a sub region to maximise income opportunities and deliver strategic interventions to maximise benefits for local communities with such income.

Historic Environment

18. Please tell us what you think about our approach to addressing effects on the historic environment, including any particular proposals you would like us to consider.

- 18.1. The requests at Con 1 to investing in improving the Conservation area; enforce restrictions on reducing through traffic from the A4 accessing Poyle Trading Estate; and providing a multi-purpose 'green' buffer around Colnbrook village have been responded to in part.
- 18.2. We welcome the Colnbrook Conservation Area Appraisal and Management Plan produced by HAL in response to our request. We also note the PEIR has identified there will be negative impacts on historic assets as a result of the proposals (Extracts provided below).
- 18.3. The Council retains its view that the DCO should include an implementation Plan with funding to deliver the environmental measures suggested in the Appraisal, and that the DCO should include measures to engage with the local community about funding its implementation and compensation including Conservation Projects with suggestions about what can be done and possible funding for the Community to choose and deliver them.

- 18.4. This should be committed to in the first construction phase to compensate for the construction works being carried out at that time.
- 18.5. The PEIR review of Colnbrook lists Heritage Assets within the area and considers the following. These assessments are a result of:
- Poyle Farmhouse, grade II, List reference 1298905, **medium** magnitude of change will have a **significant (negative) effect** from Airport Supporting Cargo Development impacts on its setting
 - The Hollies, grade II, List reference 1187063, **medium** magnitude of change will have a **significant (negative) effect** from Airport Supporting Cargo Development impacts on its setting
 - That there are no direct effects to the designated (listed buildings) heritage assets at Poyle
 - That there are no direct effects to conservation area character or the designated (listed buildings) and heritage assets that make contribute to conservation area character.
 - The DCO Project will indirectly affect the character of the conservation area and the contribution of setting to the significance of designated heritage assets as a result of impacts including the temporary construction compound, Colnbrook river diversions and the permanent redesign of the local road network to the east.
- 18.6. The PEIR It also concludes that the DCO Project has the potential for benefits from
- improved pedestrian and cycling connectivity to connect heritage assets in Colnbrook with Public Open Space and other green spaces linked to the wider historic environment;
 - the Heritage Design Strategy in the revised ES (to be submitted as part of the DCO) to deliver additional measures to reduce the effects on the setting of designated heritage assets;
- 18.7. There is therefore a need to enhance Colnbrook Conservation Area and built realm. We require that:
- The DCO Heritage Design Strategy includes a strategy for improvements to the Colnbrook Conservation area, in order to mitigate and meet the requirements in the ANPS regarding Heritage at Risk, avoiding worsening the existing conditions, and promoting economic growth. This should include mitigation for noise and visual impacts on the setting of listed buildings from construction works and final associated infrastructure.
 - Improved pedestrian and cycling connectivity is provided to connect heritage assets in Colnbrook with Poyle Trading estate, Public Open Space and other green spaces linked to the wider historic environment.

Environmentally Managed Growth

- 19. Please tell us what you think of our proposed approach to manage the future growth of the airport within environmental limits. Is there anything else we should consider as we develop the framework and its potential limits?**
- 19.1. Currently, the permitted level of activity in the airport is controlled by setting a maximum number of aircraft movements that can take place in a year. This is proposed to be replaced by a new approach known as Environmentally Managed Growth, which will require monitoring, reviewing and reporting on the effects of growth in relation to surface access (traffic), air quality and aircraft noise in relation to defined limits. The limits would be derived from the tests set out in the Airports NPS and would be legally binding through the DCO.
- 19.2. Whilst there may be some merit in adopting this approach, it has not been clearly explained how this would work. It may still be necessary to have an aircraft cap as a default position.
- 19.3. In order to enforce the limits upon growth, it is proposed that an Independent Scrutiny Panel is created as part of the DCO, which would have binding enforcement powers. Whilst there is some merit in having such a body, it is also important that the Council, as the Local Planning Authority, retains some enforcement powers to deal with local issues within the borough, which will have to be properly resourced.
- 19.4. Further consideration to the development of the framework and its potential limits should include controls on noise impact of aircraft, noise envelope, and other airspace processes.

Community Fund

- 20. Please tell us what you think about our proposals for the Fund, including what it is spent on, where it is spent, and how it should be funded and delivered.**
- 20.1. In their Proposals for Mitigation and Compensation Growing Sustainably, June 2019 document, HAL state that they “acknowledge that constructing and operating an expanded airport will have impacts in the local communities. Our approach is to avoid, minimise and mitigate impacts that arise, but we know that there will still be impacts and that the project will cause disruption that may affect residents and their quality of life. Equally, there will be opportunities arising from the project that could deliver long lasting benefits”.
- 20.2. Consequently, HAL are proposing a “Community Fund” with several potential purposes. These include delivering community benefits, addressing impacts particularly where the extent of the effect and/or mitigation are not yet certain, and compensating for ‘residual impacts’. Slough Borough Council require HAL to provide proposals for use of the Community Fund, as well as inviting suggestions from Local Authorities, and additional information including details of scale, scope and duration of the fund.

- 20.3. There is concern then that the Community Fund will be used for ‘mitigation’ purposes rather than compensation. HSPG members want to set out the principle that the Community Fund (compensation) should be used to bring additional benefits to local communities, and to improve the quality of life of those most impacted by expansion. It should not be used to mitigate for any of the impacts directly from expansion – whether seen or unforeseen. HSPG agrees that a clear governance structure needs to be in place for the CF, with a body having oversight of the overall Fund and its long term planning, the allocation of spend, and monitoring and reviewing individual projects.
- 20.4. Compensation has been utilised and is in the form of house purchase in the worst affected areas, a three-tiered noise insulation scheme of declining robustness and value relative to noise magnitude, and a community fund. There is also a noise insulation scheme for community buildings such as schools and colleges, hospitals, hospices and nursing homes, libraries and other public buildings where many people will spend long periods of time or where the use is noise sensitive.
- 20.5. The splitting of noise insulation, house purchase and community funding from mitigation to compensation allows HAL to claim they are complying with the policy/ NPS requirement to mitigate and minimise adverse effects, whilst using the compensation measures of noise insulation to avoid Significant Adverse Effects and house purchase to prevent Unacceptable Adverse Effects.
- 20.6. The compensation fund should commit to introducing measures to specifically improve quality of life in the Slough area. Examples would include funding for leisure facilities and GP surgeries. SBC is best placed to understand the needs of the community for these types of facilities, and what is of highest priority. It needs to therefore be central to discussions of the nature of compensation, rather than the community funding solely for community groups. Local NHS Trusts and Directors of Public Health should be consulted directly by Slough (separately to Heathrow) to allow them to identify specific shortfalls in the area, monetise direct health impacts and to establish the most appropriate location. This will enable a joined up and strengthen bargaining position.
- 20.7. The use of modular construction techniques could be considered to enable infrastructure to be used both flexibly and potentially relocate following the construction phase.

Property and Compensation

21. [**Please tell us what you think about our interim Property Policies, including our general approach to buying properties and land and our approach to compensation, including our discretionary compensation offers.**](#)
- 21.1. HAL are offering a compensation offer whereby they will purchase eligible properties for the open market value, plus a loss payment of 25%. This applies to eligible properties for qualifying owners in the Compulsory Purchase Zone, and for eligible residential properties in the Wider Property Offer Zone. In Slough Borough Council these zones mainly affect Brands Hill, Colnbrook and Poyle. Owners of property or land within the Compulsory Purchase Zone, whose property does not qualify for, or who do not take-up the enhanced compensation offer, will be eligible

for Statutory Compensation. This also applies for commercial properties and land outside the Compulsory Purchase Zone, that may be required for environmental mitigation or other uses.

- 21.2. Currently, home owners will be offered three levels of mitigation, depending on the existing or predicted noise exposure level (as indicated by the relevant noise contour), source of noise and confirmation by third-party assessment:
- Scheme 1:** Full cost of noise insulation fit out, potentially including new acoustic double glazing or secondary glazing, loft or ceiling insulation, ceiling overboarding, external door upgrades and ventilation for aircraft noise.
- Scheme 2:** Covers road rail and construction noise and offers a package of noise insulation to exposed facades, potentially including acoustic double glazing or secondary glazing to windows, external door upgrades and attenuated ventilation for road, rail and construction noise exposure.
- Scheme 3:** At a lower threshold than scheme 1 a fixed £3,000 contribution to approved noise insulation works will be offered.
- 21.3. Eligibility for the schemes will be based on published noise contours of the defined Action Levels, or thresholds, as set out in the government Airports NPS for aircraft noise, extended to include road, rail and construction noise. Currently, these noise contours only consider the energy averaged noise levels in the daytime period or the combined 24-hour period energy averaged noise levels with penalties for the evening and night average levels. This means that the peak noise from individual aircraft movements is not being considered for noise insulation purposes, and this is regarded as an omission in relation to noise insulation proposals regarding impacts at night between 2300 and 0700 hrs on sleep.
- 21.4. The noise insulation will apply to combined levels of noise from sources associated with the scheme, but will not apply to the combined total noise level of existing sources. In addition, the contribution from HAE plans (i.e. LHR noise in isolation) could be below the noise insulation threshold, but in combination with an existing source the resulting cumulative level will be over the threshold, but no offer of noise insulation will be made. This should be changed to include the cumulative effects of LHR noise and existing and foreseeable noise sources with LHR associated noise contributing at least 1 decibel to exceedance of the relevant thresholds. LHR has existing day and night-time noise insulation schemes and these will be closed down if the DCO is granted and there is a decision to proceed with construction.
- 21.5. The PEIR provides no clarity whether a night noise insulation scheme will be brought forward for the DCO scheme. Some areas, where night-time noise effects are likely, will become eligible for the full noise insulation treatment under Scheme 1. A larger area impacted at night will fall under Scheme 3, but the restriction of the contribution to £3000 may mean residents having to choose between treating bedrooms and living rooms etc. and significant adverse effects may not be avoided. In addition, noise insulation may not be delivered until after opening of the new runway, and will therefore not deal with potential impacts at night on sleep from Early Growth in flights.
- 21.6. It is therefore crucial that a night noise insulation scheme is brought forward, for both the Early Growth in flights and the DCO scheme. This should be aimed at ameliorating not only conscious awakening, but also disruption of the sleep cycle and structure (i.e. elevation of arousal level, fragmentation of sleep, and

consequential redistribution of time spent in the different sleep stages), leading to increasing wake and Stage 1 sleep, and decreasing slow wave sleep and Rapid Eye Movement sleep.

Development Consent Order

22. Do you have any comments on what we think will need to be contained in our DCO and do you have any views on anything else the DCO should contain?

Slough will work with HAL and the HSPG over the next period of scheme development to ensure the best DCO application limit and mitigation package for local communities is delivered.

(a) Spatial Extent of DCO application

- 22.1. This Consultation introduces a revised and extended boundary for the DCO referred to as the “Draft Development Consent Order Limits”. The Masterplan Consultation document states that the full extent of land needed for the DCO has yet to be fixed, and that this area forms the maximum extent that the DCO will require.
- 22.2. Slough support the revisions in Slough as they are closer to including the all the areas required to integrate the expanded airport’s related development and mitigation into the wider landscape, including for sites required in Slough for the Green Envelope and Airport related employment land in Poyle.
- 22.3. However we are concerned that that much of the area identified for mitigation for the Green and Blue Infrastructure around the airport is presented in the consultation material as integral to the Masterplan but in practise lies outside the DCO boundary.

(b) Strategic Brief

- 22.4. We welcome the commitment in the Strategic Brief to consider the requirements of UK communities and Environment. We consider that the Vision should also include reference to integrating the airport with its local area and communities disproportionately negatively impacted by the expansion proposals. Priority should be given to the requirements of the residential and business communities in Colnbrook and Poyle, and Langley.
- 22.5. Where it is not possible to mitigate all negative impacts, compensation should be delivered directly through the DCO and not via the value judgement or allocation process required by the community fund.
- 22.6. The Strategic Brief guiding principles fall short of meeting the commitment in Heathrow 2.0. We consider that the program should also include a guiding principle around better integrating the airport with its neighbours in the adjoining area. At present we consider the plans for addressing and mitigating impacts outside the Airport boundary are insufficiently connected or integrated with those within the airport boundary. This is particularly the case with Green Infrastructure and cycle access to the terminals, and public transport access.

(c) Legacy

- 22.7. Slough shares the HSPG members' concern that the legacy and ambition in the proposals is not currently evident. As set out in the ANPS Heathrow expansion brings benefits for the entire UK. The proximity of the third runway and its operational and physical infrastructure means our local communities in Brands Hill, Colnbrook and Poyle and Langley will be disproportionately impacted.
- 22.8. Slough also considers there is a lack of coherent approach that demonstrates the benefits to local communities and businesses. The details of proposals to deliver clear mitigation or benefits such as jobs and employment, preferential car-free access and local amenity have yet to be defined or committed to. At present it seems the 'component' approach in the Scheme Development Process, and commercial (cost reduction) priorities are driving plans and this is leading to a delay in delivering an integrated approach.
- 22.9. We welcome the commitment to the Green Envelope and Colne Valley Park with the caveats given elsewhere.

(d) Insufficient detail

- 22.10. The Masterplan forms a critical part of the DCO so it is crucial the area it covers and mechanisms to deliver it integrate the commitment to providing an enduring legacy for local communities and airport users.
- 22.11. Slough agree with the HSPG that in general there is a lack of detail at present across issues including environmental quality (e.g. pollution, noise, Air quality, flood alleviation) and green and blue infrastructure (bio-diversity and ecology, landscape, heritage), surface access and active travel, construction, economic development, delivery and implementation, and governance/process/procedures.
- 22.12. Separate third-party agreements for each land parcel outside the DCO are currently proposed, but there is no guarantee at present that this land can be secured to deliver the Masterplan being promoted by the airport. The current DCO Masterplan only incorporates a minimum level of compensation and mitigation, and the PEIR process by design leaves much to be agreed in terms of operational strategies

(e) Omission - Enlarging Poyle Trading Estate

- 22.13. **The proposal in the Masterplan to allocate two areas of land to the west and south of the Poyle Trading Estate for freight forwarding warehousing is supported.** We consider this should provide high quality boundary treatment for the Grade II listed building, and that the new site includes modern services infrastructure to support competitive employment space such as Superfast Broadband and electricity, SMART buildings; and EV capability.
- 22.14. The employment forecasts show that there will be very few new jobs created in Slough as a direct result of the construction of the third runway and associated development. At the same time, some existing business premises will be demolished as a result of the airport expansion. **It is considered that the expansion of Poyle Trading Estate is the most sustainable option for replacing lost facilities and creating the additional floor space that is needed to support the expansion of the airport. Although this would result in the loss of Green Belt land it is considered that there are sufficient very special circumstances to justify this.**

- 22.15. The Council's Emerging Spatial Strategy for Colnbrook and Poyle shows a larger area to the west of Poyle being used for airport related development. This area, which is currently primarily in agricultural use, is shown as an existing green space in the Masterplan with a new green buffer. **It is considered that some of this land could be used for an enlarged warehousing area with a suitable buffer being provided alongside the Colne Brook. This would not have a significant effect upon the green or blue environment or the Colne Valley Park and can be justified on the grounds that there are the same very special circumstances to allow development in the Green Belt.** Mitigation for the loss of all of this Green Belt land will have to be provided in accordance with the new requirement in the NPPF that the impact of removing land from the Green Belt should be offset through compensatory improvements to the environmental quality and accessibility of remaining green belt land.
- 22.16. **In order to maximise the support for the airport and reduce the number of HGV trips, it is essential that the warehousing is used for airport related freight forwarding only.** This will require controlling the size and type of warehousing that is built and that freight coming out of the warehousing is taken directly to the airport in low emission vehicles. Any development will also have to be of a high quality design with green amenity space and a range of support services. As a result, **it is requested that suitable conditions controlling the design and use of the new airport related development areas should be included in the DCO.**

(f) Response

- 22.17. Slough note that the DCO process integrates a period of technical engagement following this consultation and ahead of "design freeze" and Submission in 2020. We will work proactively with the HSPG and HAL directly to address the outstanding issues within the context of The Local Plan Emerging Spatial Strategy, mitigation commitments in the ANPS and Heathrow 2.0 for example, and ensure that the DCO Limit and other information is included to ensure the DCO Application has the detailed information required.

General comments

23. Do you have any other comments in response to this consultation?

- 23.1. Slough shares the HSPG members' concern that the legacy and ambition in the proposals is not currently evident; as set out in the ANPS Heathrow expansion brings benefits for the entire UK. The proximity of the third runway and its operational and physical infrastructure means our local communities in Brands Hill, Colnbrook and Poyle and Langley will be disproportionately impacted.
- 23.2. Slough also considers there is a lack of coherent approach that demonstrates the benefits to local communities and businesses. The details of proposals to deliver clear mitigation or benefits such as jobs and employment, preferential car-free access and local amenity have yet to be defined or committed to. At present it seems the 'component' approach in the Scheme Development Process, and commercial (cost reduction) priorities are driving plans and this is leading to a delay in delivering an integrated approach.

- 23.3. There is a risk the continuity of the park could be compromised and sites to the South of Slough severed from the North. A critical issue for the integrity of the Park is therefore the quality and attractiveness of the Colne Valley Trail through the narrow part of the Park in this location. The current routing north of the A4 and South of the M4 is compromised by the re-provision of the Energy from Waste, Railhead, and river diversion.
- 23.4. There is a need for the Masterplan to
- Provide clarity over the different roles and routes for the Green Loop, Colne Valley Trail, European Protected Species Corridor and Active Travel hub and spoke network, and how these relate to each other and the Green Envelope.
 - Protect Colnbrook with the Green Envelope but provide for major mitigation and compensation to take place elsewhere in the Colne Valley Park as part of the overall legacy in line with its recent landscape strategy.
 - Provide an alternative route for the Colne Valley Trail to the north of the M4 with a crossing further West than is currently shown, and upgrade the routing in order that it can be part of the Active Transport commuting network.
 - The DCO Scheme needs to include all areas of the land required to deliver the Green Loop, European Protected Species Corridor and Active Travel routes to ensure these are delivered.
 - Work with the Council and Colne Valley Park to design and commit to proposals for the Joint Connectivity Statement
 - To manage and monitor the green infrastructure essential for mitigation for the proposals for the lifetime of the airport.
 - Ensure the design and access statement supports boundary treatments in this location that respects its boundary with new airport related development.
 - Give prominence to the role of the CVP for biodiversity offsetting and climate change mitigation, and the priority for and the opportunity for informal recreation for residents and businesses.
 - Support the GI connectivity statement, Green Loop, Green Envelope, multifunctional and appropriate substitution of land, waterbodies, EPS and biodiversity but more information is needed and a commitment to deliver and maintain it.
- 23.5. Support the principle of an Active Transport route for commuting: The principle of hub and spokes is understood but the connections across the M4 and M25 must be designed to be suitable for minimise journey times; avoid the need to dismount; future proof capacity to allow for two way use and electric bikes, and connect with a green bridge to cross the M4 further west to connect it with the Colne Valley Trail.

24. Please give us your feedback on this consultation (such as the quality of the documents, website and events).

- 24.1. The Council welcome the specialist consultation events organised by HAL for technical officers in the HSPG.
- 24.2. The public is being asked to comment on a complex series of questions, where the issues they may care about are not made clear, and information is presented across

a range of documents, with the pertinent details within technical elements of the Preferred Masterplan. There is also no provision for residents to be assisted in submitting their comments at public events. This is important for those that may not have access or ability to engage in the online portal.

- 24.3. The Airport Expansion Consultation includes two summary documents for Slough's local communities: one for Colnbrook and Poyle, and another for Brands Hill. These are useful but fail to present available detail about the localised negative impacts or positive mitigation for the proposal; and instead direct readers to highly technical and large documents.
- 24.4. We therefore request that a lack of response from residents in this location is not taken as endorsements the proposals are acceptable.
- 24.5. Specifically the documents fail to explain clearly:
- That additional technical work is required ahead of the DCO submission;
 - The significant impacts are regarding increase in traffic flows in the area;
 - Issues around flood risk remaining (or the distinction with flood alleviation) or adaptation to climate change, or the significant negative effects predicted from infilling the Old Slade Lake complex or passing the rivers through the Covered River Corridor (in phase 1);
 - That Safety Zones exist across the area and how these will change, and the implications for development - including private residential properties - beneath them
 - The loss of biodiversity and greenspace in the area and where it will be re-provided;
 - The relationship with the Colne Valley Regional Park;
 - How the existing cycle and bus routes will be affected and new ones function – e.g. the north south and east to public right of way crossings over the M4 and M25 respectively;
 - Any positive legacy or community specific mitigation to mitigate and compensate for the combined outstanding impacts of expansion that cannot be avoided or mitigated for elsewhere – such as the enhancement of the Conservation Area in Colnbrook; improvement to Green Belt remaining or elsewhere;
 - Visual impacts of the proposal, both on existing receptors such as the impact of the raised runway on residents in Colnbrook; long views from the M25 in Poyle; and new views arising from and to additional infrastructure - and primarily the terminal and industrial buildings;
 - Sufficient detail about displaced uses within the area: e.g. an explanation of the Special Needs Centre;
 - The appropriate specific details for phasing of construction, e.g. that construction worker compounds will be located close to existing communities and be operational for several years, including land identified for the Green Envelope;
 - That the site in Poyle has been identified for a potential consolidation centre.
- 24.6. The Masterplan and phasing plans lack the detail to explain to residents important issues for their areas, such as:

- The legends are not clear on the “Proposals for your area” Greenspaces map – for example using shades of green when these will be urbanised. The shades of green for new and existing open space and bio-diversity are also not obvious, especially for those with visual impairments or poor printers.
- There is no detail of the Active Travel access route in to the new terminal to explain the comparative extra time it will take or the safety and amenity standards of the route.
- There is no clear explanation of the loss of biodiversity and the Old Slade lake complex
- The WPOZ or Property Policies Zones are not at low enough scale to inform residents who do not have access to the internet search option
- The new and altered Public Safety Zones are not shown
- The land that will form the Green Envelope is not clear, nor is that for the other Green and Blue infrastructure or the Colne Valley Regional Park.

This page is intentionally left blank