

## **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 NO<sub>2</sub> increases of up to 3.0µg/m<sup>3</sup> 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 NO<sub>2</sub> 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<sub>Amax</sub> noise levels exceeding 60 dBA - in some cases when aircraft are flying lower than 5000 feet the exceedance of 60 dB L<sub>Amax</sub> will be substantial. An external level of L<sub>Amax</sub> 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 LAmax noise levels exceeding 60 dBA – in some cases when aircraft are flying lower than 5000 feet the exceedance of 60 dB LAmax will be substantial. An external level of LAmax 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.