LOCAL PLAN FOR SLOUGH - SPATIAL STRATEGY

<u>Protecting the Strategic Gap between Slough and Central London – in the Colnbrook and Poyle area.</u>

1. Introduction

- 1.1 The Council is preparing a new Local Plan for Slough. An important part of this is the Spatial Strategy which will set out what the pattern, scale and quality of development will be in the Borough.
- 1.2 It is proposed that the Spatial Strategy should have the following five key components:
 - Delivering major comprehensive redevelopment within the "Centre of Slough";
 - **Selecting** other key locations for appropriate *sustainable* development;
 - **Enhancing** our distinct suburbs, vibrant neighbourhood centres and environmental assets;
 - **Protecting** the "Strategic Gap" between Slough and Greater London;
 - **Promoting** the cross border expansion of Slough to meet unmet housing needs.
- 1.3 This report sets out proposals for protecting the Strategic Gap in the Colnbrook and Poyle area.
- 1.4 In doing so it is important to understand how this fits in with the Spatial Strategy as a whole. This proposes that the bulk of new housing and most of the other major development is proposed to take place in the Centre of Slough. This follows the overall guiding principle for the Spatial Strategy that development should be located in the most accessible locations which have the greatest capacity to absorb growth and deliver social and environmental benefits.
- 1.5 Elsewhere the suburban areas across the Borough, which contain most of the family housing stock, will be maintained and enhanced. There will be no loss of parks or public open space.
- 1.6 There will be some major redevelopment in selected key locations in the Borough which could include releasing some Green Belt sites for housing.
- 1.7 The shortage of suitable sites means that not all of Slough's needs will be able to be met within the Borough. It is proposed that any housing needs that cannot be accommodated in the Borough should be provided on the edge of Slough.

1.8 It is against this background that proposals for the Colnbrook and Poyle area have been produced as the "Protecting the Strategic Gap between Slough and Greater London" component of the Spatial Strategy.

2 Context

- 2.1 The Colnbrook with Poyle Ward is the largest area of undeveloped land in the Borough and the only part which borders London and Heathrow. It has a distinct identity and an important role in stopping Slough from coalescing with London and losing some of its identity. It is also a vital part of the Colne Valley Regional Park with the open land providing a narrow link between the Chilterns to the north and river Thames to the south. In addition to the villages of Colnbrook and Poyle it also contains the Poyle Trading Estate which is the second largest employment area in the Borough.
- 2.2 The area suffers from a large number of environmental quality problems due to its proximity to the airport and the motorway network and is acknowledged as being one of the most fragmented and vulnerable parts of the Metropolitan Green Belt.

3 Policy Background

- 3.1 Planning policies in the Colnbrook and Poyle area have been largely dictated by proposals for the expansion of Heathrow Airport. Proposals for a third runway at Heathrow emerged from the recommendations of the Airports Commission and the Government's draft Airports National Policy Statement (ANPS).
- 3.2 In January 2018 Heathrow Airport Limited (HAL) published its "Airport Expansion Consultation Document". This set out options for the length of the proposed third runway, location of terminals, realignment of the M25 and diversion of local roads including the A4 and A3044. This demonstrated the extent to which there would be airport related development within the Colnbrook and Poyle area. Although it was general supportive, the Council objected to some aspects of these proposals in it's response, agreed at the Cabinet meeting in March 2018.
- 3.3 In June 2018 the "Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England." was published. This confirmed Government support for the construction of a north-west runway at Heathrow. The illustrative Masterplan showed where the runway should go and set out the requirements that would have to be met in order to get approval through the Development Consent Order (DCO) process.
- 3.4 The Council supported the proposed expansion of the airport on the grounds

that the economic benefits would outweigh the harm to the environment. As a result one of the key elements of the "emerging" Preferred Spatial Strategy (2018) was one of "Accommodating the proposed third runway at Heathrow and mitigating the impact".

- 3.5 In order to facilitate this, the Council produced an *Emerging Spatial Strategy for Accommodating Growth at Heathrow* in December 2018. This was primarily a "land use" planning document setting out our principles as to how the Colnbrook and Poyle area should be developed if the third runway went ahead. It also contained a spatial master plan to show how this could happen. The document also set out nine planning principles which were required in order to secure the required mitigation.
- 3.6 Heathrow Airport Limited (HAL) held a second consultation in June 2019 on the detail of its Masterplan and how this would integrate into the core area surrounding the airport outside of the DCO boundary. The Council worked with the Heathrow Strategic Planning Group and details of the Council's response were agreed at a special Cabinet meeting in September 2019. A final detailed consultation was planned for from April- June 2020 with a view to submitting the DCO in December 2020. This did not happen because of a successful challenge in the High Court to the Airports National Policy Statement which underpinned the proposal. The Supreme Court will hear the appeal to reverse the judgment in October 2020, and Heathrow have confirmed it's expansion proposals are on hold for at least two years.
- 3.7 The outcome of the appeal has also been superseded as a result of the Covid-19 pandemic which has severely affected Heathrow airport and the airline industry in general and is likely to have a far reaching impact upon the future demand for air travel. The Heathrow Chief Executive reported to the transport select committee in May 2020 that the third runway remains critical for the growth of the country but that it would be 10 to 15years before it was needed. The Civil Aviation Authority concluded Heathrow's expansion plan was unlikely to be started in the short term. Under the circumstances it is assumed that proposals for the proposed third runway are unlikely to come forward in the next five years. This means that the Local Plan will have to be prepared on the basis that there will not be any expansion of Heathrow. Any proposals that do come forward will have to be dealt with through a review of the Local Plan.
- 3.8 As a result the Council has had to revise its approach to the planning of the Colnbrook and Poyle area in the Spatial Strategy.

4 Protecting the Strategic Gap between Slough and Greater London

4.1 It is not consider that the Colnbrook and Poyle area is suitable for residential development for a number of environmental and amenity reasons.

- 4.2 A particular problem is the high noise climate in the area due to proximity to Heathrow airport. The latest available aviation noise contours for Heathrow Airport (2017) published by the UK Government show that all of Poyle and the majority of Colnbrook lie within the contour where averaged external daytime aircraft noise and aircraft ground noise exceeds the Significant Observed Adverse Effect Level (SOAEL) of 63 dB LAeq, 16h. The contours also show that noise levels are also higher than the external night time SOAEL (23:00 07:00, 55dB LAeq 8h) across much of this area.
- 4.3 However short bursts of aeroplane engine noise can be loud enough on their own to wake or disturb people's sleep, and so it may be appropriate to consider different ways of measuring noise to capture this and apply lower contours..
- 4.4 The Slough Core Strategy (2008) identified this part of the Borough as having an important role in retaining a "Strategic Gap" between Slough and Greater London and so had a restraint policy which prevented development taking place unless it was "essential to be in that location". Core Policy 2 has been upheld by the Court of Appeal as intended to impose a "stringent test over and above ordinary Green Belt policy" to development than the "very special circumstances" test applied to Green Belt.
- 4.5 As a result the Council has consistently refused commercial development or major infrastructure proposals, such as Strategic Rail Freight Interchanges, within the undeveloped areas, because of the adverse impacts that they would have.
- 4.6 Whilst it is recognised that there is considerable demand for warehousing to serve the needs of Slough and the wider area, it is not considered that this needs to be provided in the Colnbrook and Poyle area. This issue is also being considered in the Wider Area Growth Study which seeking to identify suitable locations for unmet employment needs within the Study area.
- 4.7 As explained above, there is currently no Government planning policy support for the expansion of Heathrow. Previous proposals for development in the area were to accommodate airport related needs and replace uses that would have been lost as a result of the construction of the third runway and associated infrastructure. There is no need to plan for this now and no proven need for additional airport related development in the area.
- 4.8 As a result, taking all of these factors into consideration, it is considered that there is now no justification for allowing development, including airport related development, in the open parts of the Colnbrook and Poyle area. Any proposals will therefore need to show how they comply with the policy test in the Core Strategy that any development in the Strategic Gap or Colne Valley park was "essential to be in that location". At the same time it would have to demonstrate that there were "very special circumstances" to justify building in

the Green Belt. It would also have to show that there would not be any significant adverse environmental or other impacts. Where, exceptionally, development is allowed suitable mitigation of any adverse effects will have to be provided.

- 4.9 This will not prevent suitable development taking place upon brownfield land which is not in the Green Belt.
- 4.10 Importantly, this would not rule out the expansion of Heathrow happening at some stage in the future. Any proposals could be considered through a review of the Local Plan. Applying a restraint policy now could actually help to facilitate this. The lack of any planning status for the proposed third runway means that it is not possible for the Local Plan to safeguard any land that may be needed for the expansion of the airport. Preventing any development in the wider Colnbrook and Poyle area should make it easier to bring forward proposals for the airport in the future if it was supported by Government policy.
- 4.11 The application of this restraint policy will not prevent essential infrastructure coming forward.

Rail Uses

- 4.12 The area to the east of Lakeside Road, which contains the London Concrete and Aggregates Industries facilities, is safeguarded in the Minerals Local Plan as a rail depot. The adjoining Colnbrook Logistics Centre is also rail linked and there is terminal in Poyle which supplies Heathrow with aviation fuel. It is considered that all of these rail facilities should be safeguarded either for the import of aggregates or for airport related operations.
- 4.13 The sites of the two of the proposed shafts and headhouses for the Western Rail Link to Heathrow, next to the Iver South sewage works and east of Gallymead Road also, need to be safeguarded.
- 4.14 The disused rail line to the south is protected by Local Plan Policy T11. This will continue to be applied in order to safeguard it for use as a footpath.

Park and Ride

4.15 The council identified a possible location for a park and ride site at Brands Hill in the Emerging Strategy. This will be part of the forthcoming Transport Strategy for Slough. This could be allowed on the basis that it can be demonstrated that it is essential to be in this location and there are the necessary "very special circumstances" to comply with Green Belt policy.

Proposed Improvements to the Area

- 4.16 The Colnbrook and Poyle area suffers from many problem associated with the urban fringe and because of activities related to the airport and the motorway network.
- 4.17 The Council's "The Emerging Spatial Strategy for Accommodating Growth at Heathrow" identified a number of environmental and other improvements which could have ben carried out to help mitigate the impact of the proposed third runway. These included:
 - 1. Protect Colnbrook and Poyle villages in a "Green Envelope" and enhance the Conservation and built realm"
 - 2. Prevent through traffic but provide good public transport and cycle routes to the airport
 - 3. Ensure that there are good public transport link into Heathrow from Slough
 - 4. Provide mitigation for the Colne Valley Park.
 - 5. Develop tangible measures to improve air quality in the Heathrow area.
- 4.18 It is considered that these measures should continue to be promoted because they are needed even if the expansion of the airport is not going to take place.

Green Envelope

- 4.19 The concept of having a "Green Envelope" of informal open space around the villages of Colnbrook and Poyle was developed as a way of trying to mitigate the impact of the third runway and proposed new roads upon residents. The proposal was adopted as part of a green infrastructure strategy which integrated waterways and local biodiversity value, and connected with Colnbrook Village Conservation Area. It is considered that it remains a valid proposal even though there are no current proposals for development in the area.
- 4.20 The envelope would provide a buffer and an area for informal recreation for local people. It could contain things like heritage Cox's Orange Pippin orchard,. It could also be a focus for improving and better connecting a network of cycling and walking routes from Colnbrook Village to Stanwell Road, and connect to existing areas such as Arthur Jacobs Nature Reserve. As a result, in addition from being protected from development it would have to be actively managed. This could be funded as part of a mitigation package for any development that took place in the Colne Valley Park.

Colnbrook Conservation Area

- 4.21 The Conservation Area forms the heart of Colnbrook village. A review of the Conservation Area has recently been carried out along with an assessment of its Listed Buildings and other structures of historic interest. A number of proposals such as enhancing particular shop fronts, improvements to public realm and tree planting have come out of this which will have to be investigated in the future. The enhancement of both the historic and wider public realm in Colnbrook should be a priority.
- 4.22 The Conservation Area is affected by through traffic despite traffic calming measures and it is important that all through traffic should continue to be prevented from going through the village and additional enforcement applied.

Improving the Colne Valley Regional Park

- 4.23 The main functions of the part of the Colne Valley Regional Park in Slough are in maintaining the linkage between the other parts of the park and delivering a local recreation resource, and this is especially true in the area of Colnbrook and Poyle. As such a key theme will need to be on reducing the severance and improving the Colne Valley Way/Trail which acts as the spine, giving local residents access for local amenity, and preserving and where possible enhancing biodiversity.
- 4.24 The Colne Valley Park has prepared a Green Infrastructure Strategy which highlights the unique green infrastructure assets of the Regional Park and sets out approaches to enhance and interconnect these to increase their value for both people and wildlife. This integrates with the Green Envelope and the Council is working with the Colne Valley Park and the Heathrow Strategic Planning Group on prioritising opportunities for enhancements in the area of Colnbrook and Poyle. As such work on the Green Infrastructure strategy needs to continue to refine proposals to allow the Council to identify specific (detailed and costed) environmental enhancement projects that can be funded as part of the mitigation from any development that comes forward.
- 4.25 There are a number of measures being explored including:
 - Access improvements near Colnbrook to improve the safety and connectivity of Colne Valley Trail crossing the A4
 - A new link to the Colne Valley Trail on the section of disused railway through Poyle
 - Conserving & enhancing existing parks and open spaces adjacent to the settlements and links with Colnbrook Conservation Area.
 - Creating connecting routes and biodiversity links between sites including Pippins Park, Albany Park, Colnbrook Recreation Ground and Crown Meadow.

- Create new access to the south of Crown Meadow to link with nearby public rights of way, bus stop and open spaces.
- 4.26 The Prevention of through traffic along the High Street/ Bridge Street/ Park Street in Colnbrook Village is a key action on reducing the level of traffic emissions (and air quality levels) the community is exposed to. Higher levels are experienced on the main roads serving the Poyle Trading Estate, Poyle Industrial Estate and Lakeside Road. Low emission strategies and vehicle routing will need to be considered in any new developments and renewal of existing industrial areas.
- 4.27 Vehicle routing from Colnbrook and Poyle has implications for the Air Quality Management Areas declared at Brands Hill AQMA Order No 1 which encompasses the M4 motorway at Junction 5; and AQMA Order No 2 at Brands Hill along the A4 and Sutton Lane gyratory junction. In recent years the highest levels of pollutants monitored in the Borough have been recorded in Brands Hill. Air quality modelling undertaken in 2014 for the Council's Low Emission Strategy found that making buses and HGVs on the A4 compliant with the latest emission standard (Euro VI) would be effective in reducing annual mean nitrogen dioxide concentrations to below the national limit value at sites close to the A4 at Brands Hill. The Council is currently engaged in further traffic and air quality modelling to test what measures could bring about compliance in the Borough's AQMAs, including in the Brands Hill area. This will include testing of whether a Clean Air Zone is appropriate at Brands Hill.
- 4.28 The Council will also need to continue to work collaboratively with Heathrow Airport to push forward with their sustainability agenda and measures to reduce emissions from airborne aircraft, aircraft on the ground, airfield plant and airport-related traffic emissions. The Council is currently engaging with the Heathrow Area Transport Forum on a surface access strategy for a two runway Heathrow that will aim to reduce the use of private cars to access the site for employees and passengers.

Poyle Trading Estate

- 4.29 Poyle Trading Estate is the second largest employment area in the Borough. Unlike Slough Trading Estate it is in multiple ownership and has been developed incrementally. This has resulted in a poor environment and the potential for unneighbourly activities to take place. There is a lack of parking for cars, vans and HGVs. There are also very few facilities or amenities for workers to use.
- 4.30 Although it is very well connected to the strategic road network, the Trading Estate is very poorly served by public transport. It suffers from noise, and part of the Estate is within an airport safety zone where only low density activities

are allowed.

- 4.31 Poyle Trading Estate is, however, perfectly located and already has strong links with Heathrow airport. It is able to provide for the sort of 24 hour operations that are needed to ensure that just in time deliveries can take place.
- 4.32 It is not proposed that there should be any enlargement of the Trading Estate. Because of its location its main function should be to serve Heathrow. In order to reduce the impact of cargo operations the opportunity to develop low emission innovations for the way that freight is delivered to the airport should be explored.
- 4.33 Whist the comprehensive redevelopment of the Estate would be encouraged; this should be done in a way which provides a variety of high quality units which meet the specific needs of freight forwarders. There should not be any large scale non airport related warehousing or distribution centres which would generate more traffic and potentially displace airport cargo operations which need to be close to Heathrow.
- 4.34 One of the proposals in the Council's "Emerging Spatial Strategy for Accommodating Growth at Heathrow" was to prevent HGV traffic from the Poyle Trading Estate being able to pass through the residential areas to the north. This would mean that access would be limited to junction 14 of the M25. There is a current proposal to install a bus gate on the Poyle Road just north of the Trading Estate which would limit HGVs from travelling south. The longer term ambition is still to prevent HGVs from using this road in both directions if a suitable scheme can be devised.
- 4.35 Working with the Business Forum, it may be possible to consider reconfiguring the internal road layout of the Estate to deliver better operational accessibility and safety. There is also a need to improve the facilities and amenities that are available to people working on the Trading Estate which are currently very limited.
- 4.36 Safe walking and cycling connections around the Estate should be created which to connect it to neighbouring areas, bus routes and informal recreation areas. This would include investigating the ability to improve the footpath along the disused railway link to Poyle.
- 4.37 Residential uses are not appropriate in this location because of the poor environment. They are not compatible with Poyle Trading Estate's function as a 24 hour cargo and distribution centre. As a result the introduction of an Article 4 Direction which prevents the change of use of buildings to residential will be considered.
- 4.38 The overall policy should be one of encouraging airport related development upon the Poyle Trading Estate.

5 Conclusion

- 5.1 This report sets out proposals for the "Protecting the Strategic gap between Slough and Greater London component of the Spatial Strategy.
- 5.2 In the "emerging" Spatial Strategy the proposal for the Colnbrook and Poyle area was to "accommodate the proposed third runway at Heathrow and mitigate the impacts"
- 5.3 For the purposes of the Local Plan it is now assumed that proposals for the third runway will not come forward in the short to medium term which means that if they do, they can be dealt with by a review of the plan.
- 5.4 In the absence of any policy support or any demonstrable need for airport related development it is considered that the most appropriate approach is to revert back to restraining development in order to protect the Green Belt, Colne Valley Park and Strategic Gap between Slough and Greater London. This will also effectively safeguard land from being developed which could be needed for the expansion of the airport in the future.
- 5.5 Proposals for the improvement of the area have been included within this component of the Spatial Strategy. Although the Poyle Trading Estate sits within the Strategic Gap, it has been identified as a Selected Key Location where regeneration can take place in order to take advantage of its location next to Heathrow and provide new airport related facilities.