

Slough Borough Council response to Airports Commission Consultation

Questions inviting views and conclusions in respect of the three short-listed options

1 Q1: What conclusions, if any, do you draw in respect of the three short-listed options? In answering this question please take into account the Commission’s consultation documents and any other information you consider relevant. The options are described in section three.

1.1 As a borough located in close proximity to Heathrow, Slough borough will experience impacts if any of the three shortlisted options are delivered. Both of the Heathrow options will result in a new runway crossing the borough’s boundary for the first time, and will mark a step change in the relationship between Slough and Heathrow airport. The proposals will variously result in the loss of residential and commercial land uses and green space, with potential significant adverse impact on residents, the environment and the council’s income.

1.2 Expansion at Gatwick whilst minimising the impacts of additional capacity on residents around Heathrow could exacerbate issues raised by the business community in terms of Heathrow’s resilience and ability to operate effectively as a global hub airport serving the needs of the many national and international headquarters located in Slough and the wider Thames Valley region.

1.3 Changing land use would be one of the most significant impacts on Slough if either of the Heathrow short listed options were to be chosen. Both proposals bring part of the runway into the borough for the first time.

1.4 The following table sets out Slough Borough Council’s comments on the two Heathrow runway proposals.

	Extended northern	North west
1 Dislocation of existing land uses	1.1 Greatest loss of residential properties for the borough in Colnbrook with Poyle ward. Loss of commercial space in Poyle Industrial Estate, much of which supports the airport.	1.2 Minimal loss of residential and business premises but requirement to relocate Energy from Waste plant. This is an important local and regional waste management operation which generates power and heat for the local community, soon to supply the airport. This is an important part of the borough’s waste management, and recognised by the Commission as being of ‘regional importance’. Expect replacement at no additional cost to the authority, and no break in service

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<p>2 Compensation</p>	<p>2.1 Fewer details available to assess the compensation package, although Commission suggests could be similar to HAL. The council requires the opportunity to comment at the point detailed proposals are developed for this particular option.</p>	<p>2.2 Generous compensation package but the authority is concerned that the total funding available for compensation is not sufficient to cover all those properties which require sound insulation</p>
<p>3 <u>Income</u> LA funding shifting from government grant to council tax and business rate income</p>	<p>3.1 Loss of substantial income from council tax and business rates which the council would expect to be compensated for</p>	<p>3.2 Potential loss of substantial business rate income from Energy from Waste plant which the council would expect to be compensated for if lost</p>
<p>4 Impact on borough boundary</p>	<p>4.1 Slough is a small densely populated urban borough immediately to the west/north-west of Heathrow. Both proposals would require land take, and it is currently unclear whether this land would remain under the jurisdiction of Slough Borough Council or would be transferred to LB Hillingdon. It is already very challenging for Slough to meet housing demand due to a shortage of available sites, and pressure will increase due to the requirement to accommodate dislocated residential and business properties. The Commission estimates between 22,900 and 70,800 new houses will be required across fourteen boroughs, and while we do not agree that the requirement for new homes will be of this magnitude it is nonetheless likely that expansion at Heathrow will drive housing demand. It will be challenging for Slough to accommodate additional housing need, especially if the borough reduces in size due to loss of land for airport expansion and this is not compensated in some way by providing compensatory land. As the Commission notes there would be a need to take land out of the greenbelt. There will also be a requirement for additional community facilities which will be challenging to provide with available land so limited.</p>	
<p>5 On-site development</p>	<p>5.1 Proposal has limited capacity for commercial space as assumed this will be provided elsewhere. SBC</p>	<p>5.2 SBC is concerned that commercial, industrial, retail and hotel capacity provided at Heathrow may compete with land uses on Poyle Industrial Estate, the</p>

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	would welcome the opportunity to be involved in the allocation of these ancillary uses.	centre of Slough and Slough trading estate. Careful consideration must be given to the provision of these facilities on-airport to ensure they complement, and not compete with the local area
6 Affected communities	<p>6.1 In-line runways would limit the number of people newly affected by noise with most flights following existing flight paths to the south of Slough, although there will be an increase in noise exposure to the residential population in the southern wards of Slough which is currently experiencing housing growth. Noise could however be more intense for those under existing flight paths. A substantial noise insulation package would be required for any newly affected households or those experiencing an increasing intensity of noise</p>	<p>6.2 A runway further north would expose a substantial new population in Slough at the western end of the runway to noise. Slough would experience some of the greatest knock on impacts of the increase in aviation noise. A substantial noise insulation package would be required to rapidly bring all eligible households up to the required standard, and similar measures would also be required for public buildings, especially schools, as well as ongoing costs associated with maintaining an ambient learning environment in classrooms.</p> <p>6.3 This proposal reduces the total number of people affected by aircraft noise, but only by subjecting more communities, including newly affected Slough residents, to more aircraft noise. Mitigation should therefore be weighted towards those newly affected in this way.</p>
7 Respite	<p>7.1 It is possible that residents at the west of the runway will receive less respite as flights on the northern runway are concentrated on a single flight path</p>	<p>7.2 Respite can be offered as all runways can be operated independently</p>

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8 Air quality	8.1 Four Air Quality Management Areas have been declared in Slough, including all sections of the M4 within the borough, the A4 in the central section of the town, the A355 north and south of the A4 and the A4 east of M4 J5. Air quality is known to exacerbate already poor health outcomes in Slough, with any increase in surface access to the airport potentially causing a further deterioration in air quality across the borough. The town is also highly susceptible to congestion generated by disruption across the strategic network as the A4 which runs through the centre of the town is used as an alternative route. Air quality is a significant public health issue that needs careful consideration and mitigation.
9 Flooding	9.1 Both proposals impact on watercourses and have the potential to increase flood risk. Colnbrook and Poyle experienced flooding in early 2013, therefore the borough council would encourage scheme promoters to utilise local knowledge when setting out flood alleviation proposals
10 Employment	10.1 Expansion at Gatwick would result in a reduction in employment at Heathrow over time due to less labour intensive operations. It is estimated that this could lead to a reduction of 2,251 Slough residents working in catalytic and non-catalytic jobs associated with Heathrow by 2030 ¹ . Under a do-minimum scenario catalytic and non-catalytic jobs in the western wedge region reduce from the current 123,100 to 108,000 by 2030 without expansion ² . A reduction in the number of destinations accessible via Heathrow may adversely impact the desirability of the location around Heathrow for businesses and could consequently lead to a reduction in catalytic employment.
11 Economy	11.1 The high percentage of foreign owned companies located in Slough (36% of total borough employment is in foreign owned companies) is an indication of the importance of international connectivity to these companies, which generally have larger workforces than nationally owned companies. The close proximity of Heathrow is a key determinant of the location of these business, especially adjacent to the M4 corridor with excellent access to Heathrow. There are also a number of companies located in Slough which rely on rapid connectivity for the receipt and delivery of high value freight. Both options appear to provide the capacity required to connect with new markets and provide reliable and frequent connectivity demanded by local businesses.

¹ Heathrow Employment Impact Study, Parsons Brinckerhoff and Berkeley Hanover Consulting, December 2013

² London Heathrow Economic Impact Study, Regeneris Consulting, September 2013

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<p>12 Surface Access</p>	<p>12.1 Both Heathrow expansion proposals rely on a substantial increase in public transport use and constraints on vehicular access to the airport in order that the M4, M25 and local roads do not get overloaded. Significant measures would be needed if this 'no growth' in airport-related road traffic objective is not met.</p> <p>12.2 The ability of the local road network in the Heathrow area to meet the future needs of both airport-related and other traffic has not been demonstrated. Detailed modelling needs to be undertaken to give assurance on this point. The HAL proposal in particular relies on significant changes to the existing network.</p> <p>12.3 In addition to the financial pressures which could fall upon the authority as a result of reducing council tax and business rates, the authority would be concerned if it had to fund surface access improvements as suggested in 3.95/3.146</p>
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2 Q2: Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in section three.

2.1 The expansion of Heathrow does not only increase the magnitude of operations but brings Heathrow within Slough and substantially closer to the local population. As a result of this cumulative effect, substantial mitigation will be required to limit the impacts on the local population.

	Extended Northern	North West
<p>1 Noise</p>	<p>1.1 The proposals for noise insulation and property compensation are less well developed for the Heathrow Hub proposal than for the HAL proposal. Fewer new people in Slough would be affected by the extended northern runway in terms of noise, however the intensity of noise would likely increase, and respite will be diminished.</p> <p>1.2 The noise insulation and compensation package proposed by HAL is welcomed, however the council would like reassurances that the funds set aside are sufficient to meet the needs of the newly exposed population in Slough, which will be substantial in number.</p> <p>1.3 If either option is chosen, the council would favour the establishment of an independent noise body/authority, comprising noise and medical experts and representatives from the surrounding local authorities, whose remit would include overseeing the noise insulation scheme, including post-implementation testing and the establishment of an</p>	

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	<p>approved contractors list. We would expect the body to carry out research on noise impacts specifically sleep disturbance. The council wish to have representation on the body and work with it to agree noise thresholds and internal noise standards.</p> <p>1.4 Night flights should not be permitted between the hours of 23.00 and 06.00. Noise Preferential Routes should be routed away from populations, the quietest operating procedures must be mandatory and infringements of noise limits subject to fines that should be redistributed into noise insulation measures and community based projects.</p> <p>1.5 If the HAL north west runway were to be chosen, insulation of public buildings, especially schools, would become a more widespread requirement in Slough. The cost of this work as well as ongoing costs should be met by Heathrow.</p> <p>1.6 Clarity is required on when the cost and implementation of noise insulation of eligible properties and areas transfers from the responsibility of the airport to the responsibility of the planning system. It should be recognised that planning consent for a building may have been granted but not implemented prior to approval of a scheme.</p> <p>1.7 Fixed noise monitoring stations will also need to be expanded to cover affected areas of Slough and the cost of operation needs to be covered by the airport operator.</p> <p>1.8 A comprehensive sustainable noise plan needs to be developed for either option with an independent validation by the external auditors to determine the effectiveness of implementation and effectiveness and to continue to reduce the 55 L_{den} noise footprint with the adoption of quieter aircraft and operating practices.</p>	
<p>2 Respite</p>	<p>2.1 Absolute respite will be more difficult to provide because aircraft from both elements of the extended runway will travel along the same line. Effective respite must be provided to Colnbrook.</p>	<p>2.2 Three independent runways have the potential to offer respite although new communities will be affected.</p>
<p>3 Air Quality</p>	<p>3.1 Significant surface access measures (detailed later) are required to reduce the number of fossil fuel dependent vehicles accessing Heathrow to improve air quality. There is a need for modal shift to public transport and a shift change to low emission vehicle infrastructure. Accessibility between Slough and Heathrow by sustainable transport must be improved given the close proximity.</p>	

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	<p>3.2 Significant measures are required to improve very poor air quality around M4 junction 5/Brands Hill, which can be attributed to airport traffic including freight both directly and indirectly related to airport operations. The nature and composition of traffic should be studied by the Heathrow promoters to inform which measures could alleviate congestion and poor air quality here including adoption of low emission zones. Fixed air quality monitoring stations are required to monitor and validate the impact of road traffic on air quality and to provide real time information to residents. We would expect Heathrow to contribute towards the cost of this monitoring and validation.</p> <p>3.3 Slough Borough Council has received funding from Government to establish a low emission strategy for the borough. This strategy will be prepared in consultation with Heathrow to ensure there is an integrated approach to reducing air pollution. A low emission zone will be explored, and adoption of low emission technologies, including EV charging infrastructure, electric taxi and bus infrastructure and low emission freight infrastructure which would require the co-operation of the Heathrow promoters.</p>
4 Surface access	<p>4.1 Slough's transport network is heavily impacted by Heathrow. Slough currently benefits from good connectivity to Heathrow, but the town's transport network is susceptible to heavy congestion if the M4 or M25 are congested. Both Heathrow proposals involve changes to the existing local road network which could affect connectivity and technical work needs to be carried out to demonstrate that these will be able to cater for the future demands from airport-related traffic (passengers, staff, cargo and servicing) as well from other local road users including those who will be required to divert around the new airport boundary.</p> <p>4.2 Limited attention is given in the Heathrow promoters' proposals nor in the Commission's assessment to bus services that connect the airport from communities to the west including Slough. Being outside London most of these services are operated on a commercial basis and their routes, frequencies and fares are set by the bus operators. At certain times of the day and week these services receive financial support from HAL and Slough and Windsor & Maidenhead councils. Investigations need to be carried out into the future role and funding of these services.</p> <p>4.3 Slough Borough Council is currently developing Slough Mass Rapid Transit³ to connect Slough Trading Estate and the town centre with the M4 junction 5. Phase one of the project has been allocated funding from Thames Valley Berkshire Local Enterprise Partnership's Local Growth Deal.</p>

³ <http://www.slough.gov.uk/parking-travel-and-roads/slough-mass-rapid-transit-smart.aspx>

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	<p>This could be extended as part of phase two to connect to Heathrow, and the council sees this as an essential element of the Heathrow promoters' surface access packages.</p> <p>4.4 Western Rail Access to Heathrow is a strategically important project which will improve public transport mode share for many locations west of the airport. The council strongly supports this project and welcomes the Commission's emphasis on the project, regardless of whether Heathrow expands or not.</p> <p>4.5 For the HAL proposal, the council has specific concerns about the potential impact of the southern branch of the Colnbrook bypass/replacement of the A3044. This will be required to cater for airport-related traffic heading to Heathrow West and the cargo area as well as local traffic displaced by the closure of the A3044, but also has the potential to encourage rat running between M25 junction 14 and the M4 junction 5, and may lead to further impact on air quality and congestion in this area. Slough Borough Council would favour a new tunnelled road, parallel to the tunnelled M25 which reconnects with the new Bath Road/northern branch of the proposed Colnbrook bypass east of the M25. This would provide a more suitable and direct replacement of the A3044 and prevent additional traffic detouring around the western end of the new runway which would place an unnecessary burden on the residents of Colnbrook. A similar measure would also be required for the Heathrow Hub extended northern runway but the council has not seen detailed proposals for the proposed local road network.</p> <p>4.6 For those living closest to the airport in the east of Slough, surface access should be made more convenient and accessible. Despite the relatively small distances, journeys can be inconvenient, unreliable or circuitous. Those living closest should have greater choices of access to the airport by more regular bus services which travel on more convenient routes (i.e. not just the Colnbrook by-pass), bearing in mind that both expansion proposals involve the severance of the local link currently available via Bath Road. Residents should also benefit from improved cycle access. The council would welcome the opportunity to work with Heathrow on a strategy for cycling, and to ensure that Heathrow's cycle network connects with Slough's.</p> <p>4.7 To encourage those accessing Heathrow from the west to use public transport, the existing free travel zone should be expanded to Slough for residents and Heathrow employees, and should be expanded to include the Transport for London 81 service.</p>
5 Freight and HGV vehicles	5.1 Both proposals for expansion at Heathrow would result in an increase in cargo but neither have details of how this would impact on Slough, both in terms of established freight

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	<p>businesses in the Borough and of related traffic movements (HGV and other commercial vehicles). More attention needs to be given to these aspects.</p> <p>5.2 Colnbrook already suffers from the impacts of HGV lorries waiting to access the airport. Anti-social behaviour is commonplace as lorry drivers stay overnight in lay-bys where there are no facilities. This problem must be addressed, regardless of expansion, but the pressure under expansion would be such that lorry parking and waiting facilities must be provided on-airport to eliminate the blight currently experienced by these residents.</p>
6 Parking	<p>6.1 The closer proximity of Heathrow to Colnbrook could result in adverse impacts on parking in residential and other roads in Colnbrook by those accessing the airport as passengers or staff. Scheme promoters must address this issue, and fund the required remedial measures.</p>
7 Community	<p>7.1 More detail is required on measures to support households whose homes are compulsorily purchased to implement the scheme, as well as measures to support social tenants and providers of social housing to ensure that displaced populations are not disadvantaged by the requirement to move.</p> <p>7.2 The council would also like to see more clarity on measures for social tenants who will not be eligible to the same support to relocate as homeowners in the area.</p> <p>7.3 HAL's offer to purchase properties closest to the airport must be managed carefully. It is important that there is a mixed and balanced community continues to exist, and close working with Slough Borough Council would support this. It should not only be those with no choice as to where they can live who are placed in these properties.</p> <p>7.4 Expansion at Heathrow will have a major impact on the Colne Valley Park which is of local and regional significance. We do however welcome the proposed improvements to the Colne Valley Park, and wish to see tree planting along new roads and structures to mitigate urbanisation and provide sound, pollution and visual barriers.</p>

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<p>8 Council finance</p>	<p>8.1 The loss of housing and commercial land in Colnbrook/Poyle would result in a loss of council tax and business rates income for the council, at the same time as additional pressures are placed on the borough. The council expects to be compensated for this loss.</p>	<p>8.2 The loss from the borough of Colnbrook Energy from Waste plant would result in significant loss of business rate income, which the council would expect to be compensated for if the plant is relocated out of borough. A location out of borough would also result in additional pressures associated with waste disposal which the council would expect to be compensated for.</p>
<p>9 On airport facilities</p>	<p>9.1 Facilities provided as part of both schemes should be sufficient to meet the needs of airport users but should not seek to compete with surrounding areas. This applies especially to office, retail and hotel space which if provided as an attractor would compete with Slough town centre and business areas.</p> <p>9.2 Slough should have the ability to influence the facilities included through the planning process, and weight should be given to our views through the planning system, following changes to current arrangements if required. The effects of the airport on the local area are too significant to be determined in isolation, and without the views of officers having the opportunity to play a formal role.</p> <p>9.3 More information is needed on the servicing of these facilities and the potential impact on the local road network.</p>	
<p>10 Construction</p>	<p>10.1 A project of this size in such close proximity to Slough has the potential to exert significant impact on the town for a sustained period of time. It is essential that the Colnbrook freight rail line is retained and utilised to reduce HGV access to the site and that a detailed road traffic management strategy is put in place. Scheme promoters must make provision to house construction workers not residing in the local area to avoid problems experienced during the construction of terminal 5 where construction workers inhabited temporary buildings. Scheme promoters must employ sustainable procurement processes enabling local SMEs to benefit from the opportunity and alleviate the impact of a large external workforce. Plans should be in place well in advance to help local residents access the skills required through apprenticeships to secure employment both during construction and operation of the airport. As a borough in close proximity which has a number of impacts as a result of Heathrow, Slough should receive a fair proportion of employment and training opportunities offered at Heathrow.</p>	

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11 Housing	11.1 The council does not agree with the Commission's assessment of the need for additional housing. Housing targets for Slough make provision for additional housing required by economic growth driven by Heathrow and the strong local economy. The number of unemployed and underemployed in the local area will also provide a proportion of the required workforce, reducing the effect to which those completely new to the area would be required.

Questions on the Commission's appraisal and overall approach

- 3 Q3: Do you have any comments on how the Commission has carried out its appraisal? The appraisal process is summarised in section two.
- 4 Q4: In your view, are there any relevant factors that have not been fully addressed by the Commission to date?
- 4.1 There are a number of issues which Slough Borough Council does not believe have been considered by the Airports Commission.
- 4.2 We would wish to see a recognition of the funding implications for Slough Borough Council (and other local authorities if relevant) of the loss of income as a result of residential and business demolitions. A larger portion of local authority funding now comes from council tax and business rate receipts, as government grant funding has reduced. This is especially pronounced for Slough. Slough is a densely populated urban borough with little remaining land suitable for development, therefore relocating displaced land uses elsewhere in the borough will be almost impossible. In this scenario additional costs will be incurred by the authority in terms of increasing demand as a result of Heathrow expansion while at the same time income will be reduced.
- 4.3 There appears to be little detail from scheme promoters, and little analysis by the Commission on the possible location of replacement housing for displaced households nor to accommodate additional housing required. Provisions for additional housing and community facilities may need to be made alongside the planning process for the airport itself as this may necessitate a change in approach. *something about boundary review/requirement to think outside the airport boundary*
- 4.4 If either of the Heathrow expansion options is delivered, it is unclear who will have jurisdiction for the land required for the airport. The boundary of the airport is currently contiguous with that of London Borough of Hillingdon, however the unprecedented scale of land required for either of the short listed options requires careful consideration. Both would result in loss of income, housing and business premises which would be almost

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impossible to re-provide in Slough given its current boundaries and the extent to which development extends to the local authority boundaries.

- 4.5 We would therefore encourage the Commission to recommend that an independent review panel is set up with Government to investigate the impacts on surrounding local authorities should a Heathrow option be chosen. Issues requiring consideration include the establishment of a boundary review to take into account reactionary and required changes, or Greenbelt changes to facilitate the delivery of necessary supporting infrastructure or facilities.

Questions inviting comments on specific areas of the Commission's appraisal

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

- 5.1 The council notes that the assessment of roads in the vicinity of the airport contained in the Commission's Module 4 documents has been constrained by lack of information about airport-related local trip generation and distribution. Both proposals include significant changes to the local road network and assurance is sought that more detailed work will be undertaken to assess the potential impact of expansion in terms of local road traffic, both airport related and non-airport related.

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

No comment at this time

- 7 Q7: Do you have any comments on the Commission's business cases, including methodology and results?

- 7.1 Slough Borough Council strongly supports the delivery of Western Rail Access to Heathrow to deliver improved journeys to Heathrow from the west, and has been arguing for this project for a number of years. The council is pleased to see Western Rail Access to Heathrow included in the extended baseline for both Heathrow short listed schemes. The council agrees with the Commission's view that Western Rail Access should be delivered regardless of whether Heathrow expands or not, with planning for this project advancing well. The link is expected to generate economic growth of £800 million and efficiency savings of £1.5 billion, as well as deliver 5,100 tonnes of carbon savings and a modal shift to public transport of 10% based on a two runway airport under current operations⁴. WRAtH is necessary to mitigate against congestion, poor journey time reliability and poor journey experience from the west, and to alleviate the impact of the airport on local residents. If Heathrow expands, WRAtH will play a vital part in ensuring convenient, efficient and timely access to the airport, whilst minimising the impact of the local population.

⁴ Western Rail Access to Heathrow Economic Value Study, Atkins, April 2010

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7.2 While WRAtH meets the Department for Transport specification which required direct services to Slough and Reading and longer term opportunities for through running long distance services, it does not appear from the information available that the Heathrow Hub station would meet those requirements. While WRAtH makes good use of existing infrastructure by providing a link between the existing Great Western Main Line and Heathrow Terminal 5 station, the Iver hub proposal would require an additional station which would increase journey times for existing passengers. Studies also demonstrate that passengers travelling to an airport are especially sensitive to interchanges, while the Iver hub proposal increases the number of interchanges. It also appears that the hub station is more expensive to deliver than WRAtH.

Other comments

8 Q8: Do you have any other comments?

DRAFT