

PROPOSED RESPONSE TO THE SPECIFIC QUESTIONS IN THE AIRPORT EXPANSION CONSULTATION DOCUMENT

Introduction

This sets out a short analysis and Slough Borough Council's proposed response to the specific questions that are set out in the Airport Expansion Consultation Document (January 2018).

The response to Questions is in the same order in which they appear in the consultation Document.

2.1 Runway Location

The draft National Policy Statement specified that the runway has to be to the northwest of Heathrow.

As a result there is limited scope as to where it can go. HAL have fixed the alignment just over 1,000 metres north of the existing runway which is the required separation distance to enable independent flight operations i.e. two runways can be used simultaneously for landing and takeover.

They are, however, consulting on how long the runway should be and whether it could be moved to the east or west. Although the preference (as stated in the draft NPS) is for a 3,500 metre long runway, in order to give maximum flexibility (i.e. allows the largest commercial aircraft to take-off and land on the runway and allows for steeper decent and take off pathways (land and take off further down the runway (called displaced thresholds) which may reduce noise to wider communities), there is the option of having a 3,200 metre runway.

Two of the options would mean that the Public Safety Zone would extend to some residential properties in Brands Hill.

A new factor that has been introduced in this consultation is the proposal to raise the runway on an embankment of 3 to 5 metres high as it crosses the M25 before coming down close to ground level near Colnbrook. This will potentially increase the impact of the new runway upon the surrounding area in terms of its visibility, noise and potentially impact upon air quality.

Because of the need for taxi ways, all of the options involve substantial additional land take to the south of the runway which would bring the airport south of the Colnbrook bypass. This would eat into the "green envelope" that we would want to see preserved around Colnbrook village.

In fact the proposals also include additional airport supporting operations (fuel depots and de-icing equipment and vehicles) using land south of the airport boundary as outlined in the information leaflet for Poyle, Colnbrook, Brands Hill. This encroachment is significant within green envelope and estimated airport operations are only located only 150m from residential properties on Coleridge Crescent and 300m from Pippins School.

Question:

Please tell us what you think about the options for the new runway.

What factors do you think should be important in fixing the precise location and length of the runway?

It is considered that Option A2, for a 3,200m runway located to the east, is the preferred option for Slough. The key factors for fixing the location and the length of the runway should be:

- the proximity of runway and taxiways and supporting airport operations to residential property and the Pippins school in Poyle village;
- The need to reduce the environmental and visual impacts on the residents and schools within Poyle and Colnbrook Village and Brands Hill; and
- and the need to reduce the amount of residential development that will be within the Public Safety Zone at Brands Hill.

Details of the proposed elevation of the runway should be provided in three dimensional form so that the visual impact can be assessed as the runway is to be located on an embankment over the M25 at a height of 3 to 5 metres. The runway way will level off either side towards Colnbrook and Simpson

Details of the amount of land raising needed for the runway and how this will be imported into the area needs to be provided.

Clarification should be sought as to how the area affected by the proposed Public Safety Zone can be safeguarded against inappropriate development in the short term and what effect the designation of a new zone will have upon existing residential property within it.

Consideration should be given to whether residential development located within the Public Safety Zone should fall within the Compulsory Purchase Zone.

Details of the specific environmental impacts and their mitigation of the proposed runway and taxiway and associated airport operations on residential, schools and other sensitive receptors in Slough shall be provided.

2.2 Terminals, Satellites and Aprons

The consultation document has identified three areas for possible new terminals although it is possible that all three may be needed.

These are:

- Area 1 – East: Expansion of Terminal 2 and the eastern apron
- Area 2 – West: Expansion of Terminal 5 and the western apron
- Area 3 – North: A new satellite and apron between the new north west runway and what will become the central runway

Question:

What factors do you think should be important in locating new terminal and apron space?

The new terminal should be located where direct, easy access can be provided for public transport.

The new terminal should be located and integrated into the airport in a way that gives access to taxi ways and runways in a way which reduces the need for surface aircraft runs and reduces emissions.

Rerouting roads to new terminals using tunnels as necessary for coaches, buses and taxis

A focus to the west may enable direct access points to be developed off the M25 and A0344 (if located in the east side of the M25) thus reducing need to travel around the airport.

The north zone should not prevent the potential to connect the re-routed A3044 to the A4 Option 6C on the east side of the M25, an option which Heathrow are currently not pursuing.

2.3 Taxiways

Three new taxiways may be needed to link the new runway and make aircraft movements more efficient. These are:

- Area 1 – West of T5 and existing southern runway
- Area 2 - West of what will become the central area (existing northern runway)
- Area 3 – North and south of what will become the central area.

The first two proposals will bring the operational area of the airport closer to the M25 and Poyle Village (within 500m of residents and school).

It is not clear how they relate to the options for the terminals. There is a need for a composite plan to understand how the various options for the runway, terminals and taxiways could operate. It is also unclear why Area 1 and 2 need to extend so far west of the current airport boundary and existing runways taking so much potential land take that could instead be used to reposition the A3044 east of the M25 (our preferred option not included in the consultation).

The proposal to provide the taxiways south of the third runway will involve substantial additional land take to the south of the runway which would bring the airport south of the Colnbrook bypass. This would eat into the “green envelope” that we would want to see preserved around Colnbrook village.

It would also bring aircraft very close to existing residential and a school (within 300m of the school and 200m to nearest residential properties in Poyle Village which could be significantly affected by the visual intrusion of the planes, noise, air quality and the smell of aviation fuel. **Question:**

What factors do you think should be important in deciding the location of new taxiways?

The further expansion of the operational area of the airport for uses such as new taxiways cannot be considered in isolation from the need to make decisions about other infrastructure requirements such as roads.

The need to replace the Western Perimeter Road for example, which isn't currently planned for, could have a significant impact upon the ability to provide space for new taxiways to the west of the airport.

The location of the taxiways should not be the prime consideration which dictates the layout of the expanded airport and supporting infrastructure.

The amount of land taken for the proposed taxiway south of the third runway should be reduced in order to retain a “green envelope” around Colnbrook village and protect the environment and amenities of existing residential properties and the school which could be affected by the visual intrusion of the planes, noise, air quality and the smell of aviation fuel.

Area 1 and Areas 2 new taxiways should be relocated much closer to the existing airport boundary to reduce the impact on residents of Poyle and to allow for more local road options and re-routing options.

Roads

Expanding Heathrow will result in changes to the road network and existing traffic flows. It will be necessary to realign the M25 so that it can go in a tunnel under the new roundabout. There will also have to be changes to the junctions on the M25. The A4 will have to be realigned and it is proposed to replace the

A3044 Stanwell Moor Road and the Western and Northern Perimeter Roads to provide north south connectivity.

2.4 M25 Alignment

The proposed construction of the third runway will extend over the M25 motorway. Options have been considered which would involve bridging the runway over the Motorway or diverting it to the west of the runway. The current proposal is to move the M25 150 metres to the west and lower it by 7 metres into a tunnel under the runway. This would enable the M25 to remain open.

It would also require the runway to be raised by between 3 and 5 metres as it crosses the M25.

The option of diverting the M25 to the east is presented for public consultation because the land is needed for the new taxiways.

The only option being consulted upon is whether to have collector/distributor roads alongside the M25 through the tunnel in order to provide journey times for traffic. This would be a more expensive option.

Question:

Please tell us what you think about the re positioning of the M25.

The consultation raises two major issues that had not previously been made clear. The first is the proposed realignment of the M25 is much further to the west than had been assumed and now appears to be potentially affecting residential property at Elbow Meadow as well as the Galleymead Trading Estate. It will also bring the new motorway closer to existing residential property in Poyle and Pippins School. By taking up this space it will also have a knock on effect in terms of where other potential new roads and infrastructure can go.

The other major issues is the proposal to raise the runway and taxi ways up to 5 metres above ground level as they cross the M25. This will make the impact upon nearby residential property and upon Pippins School even more serious in terms of visual impact, increased noise and worsening air pollution.

As a result the council does not support this proposal in its entirety and would request that further consideration should be given to a realignment which reduces land take to the west, reduces the need to demolish so much property and avoids the need to raise the runway by 3 to 5 metres in close proximity to the residential properties and school.

The Council would prefer the option that included collector distributor roads provided this did not inhibit also having a new perimeter road to the east.

2.5 M25 Junctions

The proposed westward expansion of the airport to accommodate the taxi ways means that Junction 14a of the M25, which currently gives direct access to Terminal 5, would have to be closed. In order to accommodate the additional traffic, major changes to Junction 14 would be required which would require the demolition of some property at Poyle Trading Estate.

Even without the loss of J14a there would need to be some improvements to Junction 14.

The consultation groups the proposals into Family 1 (in which both Junction 14 and 14a are retained) and Family 2 (in which Junction 14a is closed)

Question:

Please tell us which family of options you prefer for the alterations to Junctions 14 and 14a and reasons why.

The Council would need to see more detail of the Family 1 option before providing full support. It appears to be the better option because it provides better connectivity to the airport. It also reduces the need for further land take to expand Junction 14.

The Family 2 Option would have the disadvantage of removing the existing direct access into Terminal 5 from the M25 and put more traffic onto local roads and local road junctions.

The need for the extensive remodelling of Junction 14 would be expensive and result in a significant land take. It is not clear whether this would improve access to the Poyle Trading estate or make it worse. It is not clear how this would fit with Option 2a, Option 2ai and Option 3d for the A3044 replacement.

The Council does not therefore support Family 2 option because it will reduce connectivity to the airport.

Even if Junction 14a is not retained to provide access to terminal 5 for general traffic from the M25, it is considered that it should be retained to provide public transport links into the terminal from a replacement Western Perimeter Road which would run east of the M25. It should also be retained to provide direct public transport and cycling access from Colnbrook and Poyle into Terminal 5 as a replacement for the Old Bath Road. Consideration should also be given to whether the junction could be retained and modified to provide direct access from Poyle Trading Estate without having to go through Junction 14.

1.6 Local Roads

A4 Diversion

As a result of the construction of the third runway the section of the A4 between Colnbrook and Sipson will be removed. This will affect both the locality and the airport.

As a result the consultation document contains three options for diverting the A4.

Option 2E involves diverting the A4 north of the new runway, bypassing both Harmondsworth and Sipson before connecting through a short tunnel under the runway back onto the existing route of the A4

Option 3A is similar to 2E except that instead of tunnelling south the new road would continue eastwards to meet the M4 spur road at a new junction just south of Junction 4 of the M4

Option 6C involves diverting the A4 to the south of the new runway, north of Colnbrook and Poyle, before it would cross the M25 and then tunnel under the airport before re-joining the A4 to the west of the M4 Spur Road. This would be the most complex and costly option.

All of these options need to be considered in conjunction with the options for the A3044 which are discussed below.

Question:

Please tell us which option you prefer for the diversion of the A4 and the reasons why.

The A4 currently provides a number of functions. It provides access to local property, an important bus route, a secondary route from the M4 into the central terminals and forms part of the outer "ring road" for the Airport.

It should be noted that all traffic on the A4 to the west of the airport has to pass through the Brands Hill Air Quality Management Area and so this needs to be considered as a factor in terms of the amount of traffic that will be attracted to the diverted route.

The stated main purpose of the proposed options appears to be to provide easy access for those making local journeys. It is considered that this is the basis upon which the proposed options should be judged with particular emphasis upon the need to provide improved bus routes.

Option 2E increases journey time for those travelling to the airport. This route does not improve public transport links and will result in the modal shift target not being met. This route also cuts accessibility to public transport which is already constrained and therefore provides no options for residents/passengers/employees to access bus services to the airport.

Option 3A also significantly increases journey time for those wishing to travel by public transport to the airport. This options also increases the need for connections for passengers and employees using the airport.

Option 6C which diverts the A4 south of the new runway does not appear to meet the basic criteria of providing access to properties to the north of the runway. The proposed rail depot and any remaining parts of the Lakeside Road industrial area plus the sewage works will require an access road and so the diverted A4 should provide this function.

Option 6C would also bring a new road through the Conlbook village “Green Envelope” and add to the adverse environmental impacts upon residential property and Pippins School.

In general the Council does not support any of the proposed A4 diversions because they fail to provide direct or dedicated routes for public transport into the airport.

The three options provide no improved capacity for traffic in an already congested location furthermore and more importantly the lack of capacity indicates that the road network has not allowed for improving public transport to meet the modal shift target of 55% by 2040. Options 2E and 3A isolate the community from connecting to the airport when approximately 30% of the population work at the airport.

A3044 Replacement

The consultation document acknowledges that:

“Heathrow currently benefits from two ring roads that surround the airport, routes for through traffic and routes to and from local communities. The inner ring is formed by the airport Perimeter Road (Northern, Western, Eastern and Southern) and the outer ring by the A4, A312, A30 and A3044.”

The consultation states that “We are proposing a replacement route to re provide *local* connections”. This is not, however, what the new road through Colnbrook and Poyle is proposed to do. This is effectively intended to replace the two “ring roads” around the airport and will create a potential short cut for traffic going to and from the M4 and M25 avoiding junction 14.

At the same time accessibility to the airport for local residents will be lost as a result of the closure of the Old Bath Road.

Option 2a involves a north-south route that would connect from the newly re aligned A4 north of the new runway in a tunnel under the runway, through Galley Mead Trading Estate and the south east corner of Poyle Trading Estate

to the Horton Road. This would be complex and costly to deliver and would result in the loss of some commercial property.

Option 2ai would be similar to Option 2a but connect to the realigned A4 south of the new runway therefore avoiding the need for a tunnel. . It also assumes that there would be a road through the Colnbrook village “Green Envelope” with the resultant harm that this would bring.

Option 3d would be exactly the same as Option 3ai except that it would connect onto a purpose built east west road which would not form part of the A4 replacement.

Option 3g would involve building a new road from the A4 through the Crown Meadow public open space and then going along the Horton Road which would then link up with Junction 14 of the M25. This would avoid property loss but bring through traffic closed to existing communities.

The consultation is therefore proposing four options for the replacement of the A3044 to the west of the M25 through the Colnbrook and Poyle area which will create a new though route where one does not exist.

The only through route is currently along the A4 Colnbrook bypass. There is no other through route because of the ban on through traffic in Colnbrook High Street. Local people can access Heathrow via the Old Bath Road. HGV traffic serving the Poyle Trading Estate is proposed to be restricted to using Junction 14 of the M25 and so there is no through route for HGV traffic.

Question:

Please tell us which option you prefer for the diversion of the A4 and the reasons why.

All of these options would replace the existing A3044 Stanwell Moor Road and the Western Perimeter Road, which form part of two ring roads around the airport, with a new road through or around Colnbrook and Poyle. In addition to taking all of the diverted traffic it would provide a rat run between the M4 and M25. All of this traffic would pass through the Brands Hill Air Quality Management Area.

None of the options are acceptable to Slough due to loss of industrial and residential land and the environmental impact on residents and the school.

All options would increase congestion in the area without improving accessibility for local people or improving public transport access to the airport.

The Council therefore strongly objects to all 4 options on traffic, environmental, amenity and air quality grounds.

It is recommended that Heathrow should explore the option of replacing the A3044 to the east of the M25 with a new Perimeter Road which connect with the realigned A4 to the north of the runway through a tunnel in a similar way to Option 2a.

This would replace some of the accessibility to the airport, including public transport accessibility, that will be lost as a result of the closure of the A3044 Stanwell Moor Road and Western Perimeter Road. It would avoid the unacceptable impacts upon the Colnbrook and Poyle area.

Stanwell Moor Junction

Changes to the road network, including the closer of the A3044 Stanwell Moor Road and Western could result in the need to upgrade the Stanwell Moor junction on the A3113 Airport Way.

Four options have been proposed, all of which are quite complex.

Question:

Please tell us which option you prefer for the Stanwell Moor junction and the reasons why.

The council has no specific view on this option however Option 2 maintains the connectivity with junction 14 and results in less impact for those accessing the airport.

It is suggested, however, that if Junction 14a on the M25 was retained and a new perimeter road provided to the east of the M25, as suggested above, the proposals for the reconstruction of Stanwell Moor junction would have to be reconsidered.

Central Terminal Access.

The consultation states that it will be important to improve access to the Central Terminal Area.

Two options are proposed, both of which involve a new tunnel.

Option S5 involves re-using the existing airside cargo tunnel and building a new one for cargo elsewhere.

Option S6 involves building a purpose built new tunnel.

Please tell us what you think of the options to improve access to the central Terminal Area.

The council does not have a strong view on these options however it is important that the new tunnels are dedicated for public transport only and not for through traffic as this goes against the principle of making the airport more sustainable.

2.7 River Diversions

The Longford river and Duke of Northumberland's river were previously diverted when T5 was built. The only viable option is to divert both of these rivers in a tunnel under the third runway.

The Colne river and Wraysbury river could be diverted around the third runway in an open channel but this would involve complex construction and the need to cross the M4 and M25 motorways. As all of the options involve diverting both of these rivers in a tunnel under the third runway.

The Colne Brook is the only river where there is the option to divert it in an open channel around the airport or further west through Crown Meadow. It is considered that the latter option should be supported as the best way of helping to provide habitat connectivity and enhancing the landscape. It would also enhance the amenity of the Colne Valley Way footpath cycleway which should also be diverted through Crown Meadow.

Flood Storage

The new runway will be built partly in the flood plain and so will require replacement flood storage to be provided elsewhere in order to ensure that there is no increased risk of flooding.

The consultation is proposing two options for dealing with this. The first is to provide on airport flood storage. This would involve building expensive complex structures under the runway.

The second would involve new upstream storage in locations as far north as Denham.

One of the sites that has been identified for this is the land north of the A4 Colnbrook bypass which will be required for the proposed rail depot and as a possible location for the replacement of the Grundons energy from waste plant.

Question:

Please tell us what you think about the options for the diversion of rivers and the approaches to replacement flood storage.

It is considered that in principle, the maximum amount of river courses should be maintained in natural open channels in order to maintain habitat connectivity and maximise the quality of the landscape and amenity value of the area. The routing of the Colne Brook should be planned in conjunction with proposals to improve the connectivity of the Colne Valley Park in this location and replace the Colne Valley Way.

As a result Option C1E is preferred which would involve the more extensive western diversion of the channel around Colnbrook village.

It is considered that new upstream flood storage is the preferred option because it will provide the opportunity to improve the landscape within the Colne Valley Park.

The Council objects to the use of the site West of Orlits Lake being used for flood storage because this area should be used for the proposed rail depot and the potential replacement of the Grundons energy from waste plant.

The new replacement flood storage should be sufficient to reduce the risk of flooding on all sites that may be developed for airport related infrastructure and employment. It should be sufficient to reduce the risk of flooding within the existing built up areas of Colnbrook and Poyle.

2.8 Airport Supporting Facilities and Airport Related Development

Airport support services include cargo facilities, truck parking, fuel depots, water and waste water treatment facilities, energy generation, on site airport vehicles and plant, aircraft maintenance and repair and testing and car parking. The main issue with these facilities are their proximity to residential and sensitive receptors due to noise impact and air quality, dust, and odours.

The consultation identifies a number of sites in Brands Hills, Colnbrook and Poyle to support airport operations and airport related development these are illustrated in the Heathrow Expansion – Information for Poyle, Colnbrook and Brands Hill communities note.

Question:

Please tell us what you think about the locations and sites that we have identified as being potentially suitable for airport supporting facilities.

It is considered that all of the sites to the north of the proposed runway and A4 should be retained for the proposed rail depot and possible relocation of Grundons.

It is considered that the two sites south of the new runway should form part of the Colnbrook village “Green Envelope” and so should not be developed.

The site south of Poyle Trading Estate could be used for a range of airport related employment uses.

Car Parking

The construction of the new runway would result in the loss of a lot of existing car parking. As a result it is proposed to re provide this using a smaller number of sites in multilevel sites close to the main local access routes.

One of the potential new parking sites is to the west of Poyle Trading Estate.

Question:

Please tell us what you think about our approach to providing car parking and the potential site options we have identified.

It is considered that car parking should be included within the airport where possible. All parking provision should be included within the car parking cap of 42,000 whether it is within the airport or not. All car parking should be counted when considering whether the airport has met its modal shift targets. Bus trips from off site car parks should not count as being by non car mode.

Area 2 Only one site within Slough has been identified as a potential car park which is the area west of the Poyle Trading Estate. It is not considered that this is a suitable location for a car park because it would take traffic away from the airport and add to congestion. If this site is to be developed it should be for airport related employment uses.

The Council objects to the proposal to have a car parking area west of Poyle which would add to congestion in the area and prevent the site from being used for other airport related employment uses.

2.9 Land Uses Affected by Expansion

The consultation identifies a number of major facilities which could be affected by the expansion of the airport.

The Immigration Removal Centres to the north of the A4 would be demolished to make way for the runway. Five possible locations to replace these have been identified but none of them are in Slough.

The Grundon's Lakeside energy from waste facility will also be demolished and the Total Fuel Depot at Poyle would be cut off.

Question:

Do you have any comments on the land uses that will be affected by Heathrow's expansion.

Please tell us what you think about the sites identified for the relocation of the Immigration Removal Centres, and if you have a preference please tell us why.

With regards to Grundon' the consultation document says that studies are underway to identify suitable relocation sites in the local area and further afield. It is considered that the simplest solution is to relocate it on a like for like basis north of the third runway next to the M4.

The consultation document has identified two alternative locations for the Total Fuel Depot which is currently in Poyle. These are to the north east and south west of the M4/M25 interchange. It is considered that priority should be given to the provision of a multi purpose rail depot south of the M4 which means that the north east location would be preferred for the Total Fuel Depot.

The consultation document states that HAL are working with British Airways to identify a suitable replacement site for their offices but does not give any further details.

It is considered that the new BA Headquarters could be built in Slough town centre.

The Council has no comments on the alternative locations for the Immigration Removal Centres.

2.10 Airport Related Development The development of Heathrow will increase the demand for airport related developments such as hotels and commercial facilities including offices and warehousing.

The consultation document identifies a large number of sites for airport related developments in Colnbrook and Poyle. Many of these overlap with proposals for other uses such as Airport Supporting Facilities.

Question:

Please tell us what you think about the locations and sites that we have identified as being potentially suitable for airport related development.

It is considered that all of the sites to the north of the proposed runway and A4 should be retained for the proposed rail depot and possible relocation of Grundons.

It is considered that the sites which form part of the Colnbrook village “Green Envelope” and so should not be developed.

The sites to the west, east and south of Poyle Trading Estate could be used for a range of airport related employment uses.

Question:

Do you have any views on how the demand for additional airport related development such as hotels and offices might be best delivered?

Some airport related development such as hotels and offices can be accommodated in places like Slough town centre which will have very good access to Heathrow once the Western Rail Connection has been built.

Question:

Please tell us how you think we should best bring the various components together to build our masterplan for the expansion of the airport and what factors you think should be most important in our decision making.

One of the problems with the current consultation is that the options are not presented as part of coherent strategies. The public is being asked to comment on a series of alternative uses for parcels of land, or elements of the new road layouts, without being able to understand how these fit together.

It is considered that within the Colnbrook and Poyle area the proposed masterplan should take account of the following planning principles in that any development should:

- Protect Colnbrook and Poyle villages in a “Green Envelope”
- Enhance the Conservation Area and built realm.
- Prevent all through traffic but provided good public transport and cycle routes to the airport
- Provide for the replacement of Grundons energy from waste plant and the rail depot 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.

In addition CAZ Emission standards should be required on all airport related development and dedicated ULEV corridors provided for public transport and shuttle services.

2.11 Construction

The consultation identifies an large number of possible sites that could be used in the construction along with the approach that is proposed for managing the effects of construction.

Question:

Please tell us what you think about the sites we have identified as potential construction sites and the approaches we are considering to manage the effects.

It is considered that the area north of the runway and A4 should be one of the primary areas for construction activity focused upon the rail head.

The area south of the A4 within the Colnbrook “Green Envelope” should not be used for construction purposes because of the need to protect existing residents and the school and carry out appropriate planning and mitigation measures as soon as possible.

The area south of Poyle Trading Estate could be used as a temporary construction site provided there is no traffic routed from here through Colnbrook and Poyle.

The overall approach to construction is supported which includes the use of rail freight, low emission vehicles, pre-booked slots, pre-assembly off site, dedicated bus services for construction workers, just in time deliveries, code of construction practice, and local skills development and apprenticeships.

As significant land take is needed in Slough to enable the airport expansion to proceed, including temporary construction site around the 3rd runway it is important the environmental impacts are carefully managed and mitigated.

Slough should benefit from the majority of apprenticeship schemes that will be run by construction companies awarded contracts.

A dedicated low emission bus service shall be implemented to transport construction workers along the A4 – and it shall be linked to the Slough MRT A4. It should be accessible to the whole community during the day and weekend.

Detailed air quality impact assessments shall be carried out including for HGV movements on the public highway.

All construction vehicles must meet CAZ standards as they will need to travel through the M4 AQMA and Brands Hill AQMA.

Construction HGV Routes shall be agreed and legally binding and enforceable though ANPR cameras they shall avoid Colnbrook, Poyle and Langley Villages

All plant and equipment above 37kW shall meet NRMM London Standards on site.

All Cement batching works shall take place a minimum of 400m from residential properties to avoid dust impacts.

Dust and Particulate monitoring shall be carried out on construction site boundaries and beyond if necessary within residents gardens.

A clear, logical, detailed Construction Environmental Management Plan must be developed and consulted on with Slough and other neighbouring authorities to ensure all practicable measures to minimise environmental harm are taken.

Noise impact assessment, shall also include enforceable noise limits that cannot be breached during the construction phase.

Consideration to temporary housing and compensation shall be given for residents who are significantly impacted by the construction work.

Construction operating hours shall be legally binding, night time works shall only be permitted for special operational circumstances (i.e. wide loads) and emergencies.

Careful siting of floodlights to avoid glare and nuisance impacts to residents.

It is important that adequate provision is made for temporary accommodation for construction workers as part of the overall strategy in order to avoid existing residential areas becoming swamped with Houses in Multiple Occupation.

4. Managing the Effects of Expansion

4.1 Property Compensation, Property Hardship, Land Acquisition

Question:

Please tell us what you think about our property policies?

- It is too simplistic a policy to assume only properties within the Heathrow airport expansion boundary will be fall within the Compulsory Purchase Zone – it is clear that works on re-routeing roads, and associated development to enable to expansion will also need to be compulsory purchased.
- These need to be identified and clearly labelled on the maps – it is important that Slough has access to this information at the earliest opportunity.
- The policy does not include for the loss of community buildings and schools and it should be updated and adopted to allow for purchase of these buildings where they are likely to be significantly impacted.
- From our initial view of the Heathrow Consultation we have identified Pippins School as a site that may need to be CPO and re-provided for in a more sustainable location, and we require dialogue with Heathrow to consider the re-provision of the school and to rebuild it in another more suitable location and compensate for the loss of this important community educational facility.
- The re-alignment of the M25 and re-routeing of the A3044 will potentially results in the loss of residential properties in Elbow Meadows, these need to be identified within the CPO map.

4.2 Noise

Heathrow approach to noise is based on the International Civil Aviation Organisation balanced approach of reducing noise at source (quieter planes); land use planning and management (quieter airport design and noise insulation); noise abatement operating procedures (quieter operations) and operating restrictions (i.e. ban on night flights). Heathrow considers community engagement to be a significant element of our approach.

The revised ANPS (*final policy still to be published*) set outs mitigation measures that Heathrow should deliver. The noise measures are summarised as follows:

- Noise Envelope (framework for noise management)
- Respite through runway alternation
- Quieter airport design and layout
- Airspace design (see comments on airspace consultation below)

- Noise insulation Scheme
- Minimising the effects of noise from night flights and ban on Scheduled Night Flights

Noise Envelope: is a framework for the sustainable management and control of the effects of noise that balances growth and noise reduction and provides certainty about how noise will be addressed for the long term:

Heathrow are proposing to form a Noise Envelope Design Group (NEDG) which will include community and stakeholder representatives who are on the Community Noise Forum, along with recognised noise experts. The NEDG will provide a forum for exploring ideas, developing plans and where possible reach agreement amongst stakeholders for defining and implementing a noise envelope. The NEDG will need to work alongside the Community Engagement Board (CEB).

It is expected that the Independent Commission on Civil Aviation Noise as proposed by the revised draft ANPS will provide independent guidance on our noise envelope proposals.

Question:

A noise envelope is a package of measures that can be used to reduce noise. Please tell us your views on the objectives of the noise envelope and the timeline for its development?

- We agree with the package of six noise measures proposed by Heathrow. The framework approach by Heathrow is acceptable. The focus
- The main emphasis should be a sustained reduction of the noise exposure to local communities and reducing the 57 $L_{Aeq, 16 \text{ hour}}$ noise footprint and population exposed.
- Slough would expect to have representation at Parish Council level (Parish Councillor) and Borough Council level (Councillor) at the NEDG as well as potentially at officer level.
- We expect independent noise experts to site on the NEDG funded by the airport but representing the community interests.
- Our concern is that the NEDG must have influence in Heathrow airport design with respect to noise, and operational needs of the airport must be balanced with interests of the community.
- There is concern that as the NEDG has not yet been established and it will play an important role in the DCO process. It needs to be set up soon or it may not be able to clearly set out the noise management direction Heathrow will be taking to mitigate noise from an expanded airport.

Question:

Is there anything further we should be considering to reduce noise?

- To ensure that ground borne noise associated with the expansion of the airport is properly assessed and mitigated as this can be a source of noise that can give rise to significant noise impacts to local communities (particularly early in the morning and at night).
- To ensure construction noise is also properly assessed and mitigated.
- Road traffic noise will a significant source of environmental noise and requires careful assessment and mitigation.
- The insulation, compensation and relocation criteria should take account of the impact from construction, road traffic and ground borne noise.
- To ensure health impact assessments with respect to noise exposure from aircraft uses the latest peer review evidence
- The scoping of noise impacts needs to be agreed with local authorities through the Heathrow Strategic Planning Group (HSPG).
- To identify, clarify and agree the SOAEL (significant observed adverse effect level) – in Slough view this level should be set at 63 dB $L_{Aeq, 16 \text{ hours}}$.
- To identify community buildings and schools that will be significantly impacted by noise (experience SOAEL levels above 63 dB $L_{Aeq, 16 \text{ hours}}$) from airport operations early within the assessment.
- To consider relocating such community facilities into quieter areas of the village as well providing noise insulation and ventilation.
- To reconsider the LOAEL (lowest observed adverse effect level) in line with CAA airspace consultation these start at 51 dB $L_{Aeq, 16 \text{ hours}}$.
- To consider compensation for residents who are impacted by airport expansions and its operations above the LOAEL levels.
- Heathrow should be locating the taxiways as far as practicable from residents in Slough, and should be scaling back in the taxiways runs shown in the consultation known as Area 1 and Area 2 that service the current runways.

Question:

Please tell us what you think about our suggested approach to the provision of respite?

- It order for airport to deliver the significant increase in ATMs expanded three-runway airport, a minimum of two runways need to be available at any time for landings and two runways for departures. One of the runways must operate on mixed mode (take offs and landings take place on the

same runway). This means that two areas, one to the east and one to the west will experience noise relief (respite). The centre runway cannot operate on mixed mode due to operational conflicts.

- This means the communities most affected by the southern runway and northern (3rd runway) will be offered less respite than communities affected by the central runway.
- During the 4 operating modes there would be one period of predictable respite for communities of Slough.
- Slough is supportive of the approach to provide known respite periods to its residents.
- However there is currently no detail how and when these respite periods will operate and how they will be equitably balanced?
- The approach to the provision of respite is critically important and must be fairly balanced to ensure communities are not adversely affected by the operation of a 3rd runway.
- It is noted the airport operates with a westerly preference to aircraft movements will be retained due to wind direction. However, with technological advance in aircraft can there be a more equitable balance between westerly and easterly operations. The wind blows predominately from south west.
- This means the majority of landings are over London and take offs over Berkshire.
- An example of how respite will work for Slough residents should be presented at the earliest opportunity and prior to Consultation 2.

Question:

Please tell us what you think of our proposals for noise insulation and phasing of delivery?

The approach to insulation considers two zones for residential properties and a community building scheme:

Inner Zone – following a third party assessment, to provide full acoustic insulation for residential property within 60 dB $L_{Aeq, 16 \text{ hours}}$ expanded airport noise contour. These will include residential properties already within the WPOZ (all residential properties in Brands Hill, Colnbrook and Poyle villages).

Outer Zone – contribution of up to £3000 for noise insulation residential properties within the 57dB $L_{Aeq, 16 \text{ hours}}$ or the annual average 55 dB L_{den} noise contour of an expanded airport.

Community buildings – noise insulation and ventilation for community buildings within the average 60 dB $L_{Aeq, 16 \text{ hours}}$ noise contour

- Slough has raised some additional points in the question about community buildings and school in areas that experience the SOAEL and LOAEL.
- What is meant by a third party assessment?
- Why are two noise parameters used for the outer zone this is confusing?
- There are different definitions being used within..... noise contour, and within the average noise contour? Why this is confusing?
- It is not clear where the noise contours for a 3rd runway will lie, therefore we do not know which residents in Slough will be eligible for noise insulation.
- The airspace design changes will not be finalised and so indicative airspace designs are required to be developed, these indicative airspace designs should be published during the next consultation in 2019 so that Slough has some clarity of the noise impacts on our residents.
- The Inner and Outer Zones need to be identified by the next consultation.
- A noise relocation scheme has been considered for villages around the airport this should be targeted areas where the SOAEL is predicted to be exceeded. This will include area within the CPZ and WPOZ. Confirmation is sought the SOAEL will not be exceeded outside these zones?
- The phasing of the programme is acceptable. Phase 1 inner Zone following grant of DCO. Phase 2 Outer Zone at the point the airport becomes operational. There maybe a number of hardship cases brought forward these need to be considered on their merits. Community building should also be included in Phase 1.

Question:

A 6.5 hour night flight ban on scheduled flights is required between 11pm and 7am. Our current preferred option for this is from 11pm to 5.30am. Please tell us when you think the night-flight ban should be scheduled and why?

Slough position is that the night flight ban on scheduled flights should be for the full 8 hours (11pm to 7am) in order to protect our residents from significant noise disturbance from aircraft noise and prevent sleep disturbance.

The Government ANPS expects a ban on scheduled night flights for a period of six and half hours between the hours of 11pm and 7am. Slough view is the ban should take place between 11.30pm and 6am to protect elderly and children being adversely impacted (sleep disturbed) from aircraft movements at night.

Slough supports that all the approaches outside these hours Heathrow incentivises the use of the quietest aircraft at night. In fact it should be conditional requirement to DCO consent.

4.3 Surface Access

Question:

Please tell us what you think about the priorities and initiatives we propose to use to develop our surface access strategy?

- The council supports the broad principles in the Surface Access Strategy and options for using new technology to make travel to the airport more sustainable.
- The council has been asking for a while for the extension of the free travel zone to help employees switch to PT and would expect as part of the expansion proposal for this to be included for residents working at the airport. The council also wants to see affordable public transport extended to Slough residents to help them move to more sustainable transport.
- It is important that the sustainable travel targets are met (exceeded) to take pressure of the public highway - it is imperative that Heathrow start this work prior to completion of the third runway.
- There needs to be absolute clarity how and where these modal shift targets will be monitored and assessed and reported.
- The connection between Slough and Heathrow is only a few miles yet the journey time and the cost prohibit residents and employees from using this. Heathrow will need to improve the links and journey time by helping to fund/support mass rapid low emission transport schemes to the airport. Accessibility to bus stops is a concern for Slough as many stops are not within easy reach of populated areas therefore it is essential to not just provide rapid services but locate them where the demand is. The council will also expect where practicable to limit the number of shuttles operating from hotels and to use MRT facilities access the airport cutting down on un-necessary trips.
- Cycleway's to the airport are also essential for those living on the cusp of the airport as bus routes will not be easily accessible for all residents. It is import that these routes are in place as part of the road network and are provided through dedicated cycleways and not on road facilities.
- Western Rail Link to Heathrow: the council fully supports this project and welcomes Heathrow's commitment to contribute to it. However, it is key to Slough that this project is delivered prior to expansion being completed to help with modal shift and to contribute to the economy. It is therefore vital that Heathrow Airport Ltd agree as a matter of urgency the contribution to provide a level of certainty on the delivery timescales.
- It is clear that the surface strategy provides a range of options which is welcomed but it is unclear how this connects with the road network as there is no clear indication that capacity will be provided for public transport.

Question:

Please tell us what you think about the options to user road-user charging to reduce emissions and to manage vehicular access to the airport?

- The council is not supportive of this option unless all other options are exhausted. It is clear that in order to meet the sustainable travel targets by 2030 and 2040 that Heathrow and Slough will need to work together to provide suitable alternatives that are not only affordable to the user but punctual and reliable. If these are not provided in the first instance then the council could not support road-user charging. It is also important that to meet the emissions targets that both Heathrow and Slough will need to work together to bring in a wider low emission zone (CAZ) that helps address the AQMA's surrounding the expanded airport rather than it being an extension of the TfL LEZ causing more polluting vehicles to travel in the surrounding Slough borough.

4.4 Air Quality and Emissions

Question:

Please tell us what you think about the measures proposed to manage emissions?

- The Council are supportive 'triple lock' approach. We are surface access emissions followed by ground-based sources contribute to the largest impacts on local air quality.
- The surface access is integral to compliance with UK's compliance with EU air quality limits.
- The operation of the expanded airport should also contribute towards sustained compliance with the National Air Quality Objectives which are more important at a local level than EU limits and which are more relevant with respect to local resident exposure.
- The principal concern relates to displaced airport and non airport traffic related traffic into the Slough Road network (through road alterations, re-routing and realignment required to expand the airport) that may give rise to air pollution hot spots in Slough as these will prove very difficult to resolve.
- The scoping of the air quality assessments will need to be agreed with the HSPG.
- Brands AQMA will need to be included with the airports air quality model and study area.
- Construction emissions will need to be very carefully managed close to residential and other sensitive receptors (this includes for particulate emissions)
- The requirement for detail pre and post air quality monitoring is critical to the approach to improve air quality.

Question:

Are there any other measures that should be considered?

- A focus on improving sustainable public transport from Slough to the airport is critical as is designing low emission corridors along the A4.
- The A4 will need to be declared a CAZ and aligned with the airports LEZ.
- Airport related freight routes that use the strategic road network (motorway), and our CAZ compliant.
- Implementation of EV infrastructure within and outside the airport to encourage the acceleration of low emission vehicles.
- Work with Slough to enable all taxis to be ULEV by 2025.

4.5 Carbon and Climate Change

Question:

Do you have any comments on our approach to limiting carbon emissions from the design, construction and operation of an expanded Heathrow?

The Council is supportive of Heathrow's approach to limit the carbon emissions from construction and operational phases of an expanded Heathrow.

4.6 Natural Environment

Question:

Please tell us what you think about our approach to natural environment issues?

The general approach is supported.

The Council is particularly concerned that the overall strategy retains the integrity and connectivity of the Colne Valley park as far as is possible and provides adequate off site compensation and mitigation.

4.7 Historic Environment

The consultation recognises that the development will impact the settings of historic assets such as the Colnbrook Conservation Area.

It states that Heathrow wishes to work with others to help provide assistance and support to existing conservation activities and encourage new activities that help to sustain and enhance heritage assets as important parts of the local community.

Question

Please tell us what you think about our approach to historic environment issues?

The Council welcomes the identification of Colnbrook as a Potential Historic Enhancement Area. It would like to see enhancements to the Conservation Area and the general urban realm. It would also like to see the appropriate parts of the Colnbrook and Poyle "Green Envelope" managed and enhanced in a way which reflects the historic importance of the area, including its horticultural heritage.

HEATHROW AIRSPACE DESIGN PRINCIPLES CONSULTATION

Airspace change is required to accommodate significant uptake of aircraft movements and travel, and to allow a shift away from traditional ground based beacon system designed in the 1950s to Performance Based Navigation (PBN) using satellite navigation.

PBN is being introduced across the world. The new technology allows for more flexible positioning on routes and enable aircraft to fly them more accurately. This will help with operational performance, fuel economy, and reduction in delays.

The downside is that the enabling aircraft to follow specific routes using this technology will potentially lead to routes becoming more narrower and concentrated, and this is a concern for communities that are currently overflowed or will be overflowed (with a third runway operation) and the prospect of significant increase in aircraft noise.

Heathrow is consulting on approaches to manage its airspace, and this consultation relation to the design principles. The review considers airspace up to 9000ft. This is an increase in the airspace that will come under Heathrow's control which is currently set at 4000ft by NATS (National Air Traffic Service). Changes to airspace above this ceiling are the responsibility of the National Air Traffic Service providers and not Heathrow.

Changes to Heathrow's flight paths required for expansion are subject to a separate process to the expansion of the airport on the ground. These flight path changes are approved by the Civil Aviation Authority (CAA), following their airspace design guidance. It requires Heathrow to carry out consultation on the airspace proposals with a wide range of stakeholders, including potentially affected communities.

Heathrow is responsible for developing proposals for any changes to flight paths into and out of the airport. To ensure that all stakeholders are engaged and can influence the design of future flight paths, Heathrow will be carrying out consultation over the next few years. This means that future flight path options to consult on at this early stage.

The consultation process will follow 3 stages (year consultation take place) as follows:

- Consultation 1 - Design Principles (2018)
- Consultation 2 - Design Envelopes (2019)
- Consultation 3 – Flight Path Options (2021)

Consultation 1 – Design Principles

This consultation is the first stage and focuses on ‘design principles’. In this consultation Heathrow are seeking feedback on a key set of principles that could be used to guide the design and structure of Heathrow’s future airspace. These ‘design principles’ will be included in a set of rules, Heathrow will use to help Heathrow to redesign its airspace.

Consultation 2 – Design Envelopes

In the second consultation, Heathrow will present the geographic areas within which flight paths could be positioned. Heathrow will ask what local factors should be taken into account when developing new flight paths within these geographically defined areas known as ‘design envelopes’.

Consultation 3 – Flight Path Options

The feedback Heathrow receive will help to inform the design of ‘flight path options’ (i.e. the actual routes aircraft will fly), which will be presented in a third and final stage of consultation.

Heathrow Expansion

There is clearly an alignment issue with the DCO process required for Heathrow to obtain planning permission to expand the airport. The airspace consultation process will not be completed prior to this determination. This means Heathrow will produce indicative flightpaths as part of the DCO proceed to enable the assessment of environmental noise impacts from the operation of a third runway in combination with the existing two runways.

However, the formal consultation 3 on flight path options is currently planned to take place after the DCO decision for the expansion of Heathrow. Therefore the final decision on flight paths will rest with the Civil Aviation Authority.

Airport National Policy Statement (2nd Draft)

The Government’s Airport National Policy Statement sets down requirements airport operators must meet in order to reduce noise impacts. There are:

- a) Avoid significant adverse impacts on health and quality of life from noise;
 - b) Mitigate and minimise adverse impacts on health and quality of life from noise;
- and

c) Where possible, contribute to improvements to health and quality of life.

Heathrow Six Key Principles to Airspace Design

The prioritisation of one of these principles will compromise the ability to use another. For example, designing routes that reduce the total number of people overflown by aircraft might mean more concentrated flight paths over less populated areas, increasing the frequency of overflight for those affected but impacting fewer people.

The recommended responses are in purple enclosed and Cabinet are advised to approve this response to Heathrow Airspace Design Consultation

Principle 1: Flight Paths

There are three options for the design principle Heathrow could apply when deciding where we choose to put our flight paths in relation to where they are today. A trade-off exists between these three options so we want your views on which should be given priority

Option A: Minimise the total number of people overflown, with routes designed to impact as few as people as possible.

This option would minimise the total number of people overflown by directing flights over the areas of lowest population. This is likely to result in some routes over areas that don't currently experience overflight from aircraft using Heathrow. In addition, aircraft will be more concentrated on a route than they are today, meaning those affected people are likely to experience more aircraft overhead than those experienced by people overflown by aircraft today.

Option B: Minimise the number of people newly overflown, keeping routes close to where they are today, where possible.

This option would minimise the number of people newly overflown by keeping routes as close to today's flight paths as possible. This is likely to result in a concentration of aircraft over the areas overflown by aircraft using Heathrow today, meaning that these areas are likely to experience more aircraft overhead than they do currently.

Option C: Share routes over a wider area, which might increase the total number of people overflown but would reduce the total number of people most affected by the routes as the noise will be shared more equally.

This option would spread the routes over a wider area to share the impact of overflight. This would result in a larger number of people being overflown, but each route would be flown less frequently than under option (a) or (b).

The recommended option is B. Whilst Option C would be more equitable, option B would benefit Slough residents the most as the majority of current flight paths do not impact on Slough and thus would keep the number of people newly overflown to a minimum. It should be noted this principle relates to take offs designated flight paths. Landing aircraft will be concentrated and in line with the runway from 10km out hence Slough residents in Cippenham, Chalvey, Upton Court, Langley, Brand Hill will be significantly impacted when the new north-west runway is operating on Easterly operations.

Principle 2: Urban and Rural Area

Heathrow are seeking views on about whether they should be prioritising flights over urban or rural areas. Urban areas are more populated than rural areas so airspace designs that seek to minimise the number of people overflown are likely to position routes over rural areas or less densely populated urban areas. However, urban areas have higher general noise levels than rural areas and therefore the presence of aircraft noise might be less noticeable than in rural locations. Heathrow also recognise that rural locations are often valued for their tranquillity by both residents and visitors, who could include residents of neighbouring densely populated urban areas.

Option A: When designing airspace, Heathrow could prioritise routing aircraft over urban areas, recognising that urban areas have higher general noise levels; or

Option B: Prioritise routing aircraft over rural areas where fewer people live.

Option B is recommended for Slough as the majority of the Authority is urban and the parks are also located within the urban conurbation and so there tranquillity should be protected, where possible. Whilst it is recognised that residents will currently enjoy the amenities and tranquillity of surrounding Country Parks (i.e. Burnham Beeches, Black Country Park etc) surrounding Slough they would benefit more from less aircraft noise impacting on their homes and parks. Whilst the Town Centre and residential properties close to 'A' roads and motorways will experience high level of ambient noise where the impact of aircraft noise would be minimised the majority of Slough's urban areas are relatively quiet and aircraft noise could give rise to significant impacts.

Principle 3: Urban Areas

Not all urban areas have the same general noise level, and parks and open spaces within urban areas may be especially valued for their tranquillity. When

overflying urban areas, Heathrow could seek to avoid overflight of parks and open spaces by positioning routes over residential and commercial areas, or we could seek to reduce the number of people affected by overflight by positioning routes over parks and open spaces where possible.

When designing airspace in urban areas, Heathrow could:

Option A: Design flight paths over parks and open spaces rather than residential areas; or

Option B: Design flight paths over residential areas, avoiding aircraft overflight of parks and open spaces.

Option B for Slough is recommended in order to protect and enhance the Borough's parks and to ensure residents can enjoy these amenities. It is recommended that a hybrid approach is taken to flight paths whereby Heathrow focuses flight paths over houses during the day and parks in the evening, night-time and early morning to give respite to residents. As routes will be much more defined this could strike a reasonable balance. It is acknowledged most of the parks in Slough are bordered by residential properties. It is recommended on take-off over Slough the M4, Ditton Park, Eton Wick avoiding the more densely populated parts of Slough.

Principle 4: Noise and Emissions

Avoiding overflight of local communities could result in a longer route, with aircraft burning more fuel and producing more emissions.

When designing airspace in urban areas, Heathrow could:

Option A: Design flight paths that prioritise the reduction of aircraft noise for local communities over those that reduce fuel burn and emissions; or

Option B: Design flight paths that prioritise a reduction in fuel burn and emissions over those that reduce noise for local communities.

Option A is our preferred option. We recognise that carbon emissions are very important and relevant to climate change. The health and wellbeing of our local residents takes priority if this means designing flight paths that minimise noise impact, given the fact Slough will be significantly impacted by Heathrow expansion it is important to meet the needs of our residents. Further, there are International standards and obligations aimed at sustaining reductions in airport operations and airline carbon emissions. Newer aircraft are cleaner, more efficient, and release less emissions. Finally, due to the proximity and small size of Slough the flight paths would not need to be significantly altered to minimise noise exposure whilst ensuring fuel efficiency of aircraft. As advised a flight path south of Slough that avoids the heaviest populated areas is recommended.

Principle 5: Technology and Innovation

This airspace redesign is a once in a generation opportunity to modernise the way our airspace is used. The airspace Heathrow designs now needs to be efficient for the foreseeable future. Heathrow intends to base its airspace on the latest navigation technology.

Heathrow approach is as follows:

- We are working in partnership with our airlines to ensure they invest in some of the older aircraft at Heathrow to bring them up to these more modern capabilities.
- This technology will also be an important factor in how well we can meet the design principles set out previously, because it will give us more flexibility to position routes than is possible with older navigation technologies.
- We are intending to design routes to a minimum Performance Based Navigation standard, and there may be parts of the design where aircraft with a higher specification of navigation technology have an advantage.
- If this design principle is accepted it means that we will not design routes to accommodate aircraft with older navigation technologies.
- We don't offer an alternative to this principle, but we do ask for you to comment on aircraft technology and airline investment as part of this consultation.

Slough is supportive of the approach of improved navigation using the latest technology and defining flight paths that avoid the heaviest urban areas (i.e. highest populations). Slough is supportive too of defined respite periods for our communities based on balanced runway alteration approach. Slough believes significant investment in newer and quieter aircraft is **required now** and should be made a conditional requirement to operate at Heathrow.

The noisiest aircraft shall be phased out by the time a third runway becomes operational; a sustainable airport noise operational plan shall require phasing out of older noise polluting aircraft as well. We expect minimum noise standards for aircraft to operate at Heathrow and robust penalties for any breaches of noise limits imposed with money being redistributed into the local communities around the airport.

Principle 6: Night Flights

Reducing the noise impacts of Heathrow, particularly at night, is a key focus for us – now and in the future. Heathrow has made good progress over the last few years in reducing the number of late running flights that operate from the airport and, with expansion we have committed to extend the ban on scheduled night flights from five hours today to six and a half hours (sometime between 11pm and 7am) with the exact timings to be decided by the Development Consent Order process.

Heathrow will encourage only the newest and quietest planes to fly in and out of the airport, particularly during the night period. The majority of Heathrow's flights in the future will be between the hours of 7am and 11pm, so the set of design principles we apply to flight paths in the future will mainly apply to flights during the day.

However, for the small number of flights that will operate late at night or early in the morning, Heathrow would like Slough to consider whether we should apply the same principles as we do during the rest of the day, or whether we should seek to apply them differently during these times.

Slough's view is the health (mental and physical) and wellbeing of its residents is a priority with respect to an expanded Heathrow Airport. Therefore, it will pursue with vigour policies and principles that minimise the noise impact on its residents. With particular focus on school children and the elderly who are more vulnerable to health impacts associated with noise exposure from aircraft.

Slough will expect robust peer reviewed health impact assessment when it comes to assessing the noise impacts from the airport. Night-time aircraft noise is particularly a concern given the proximity of our residents to the airport and under the flightpath for the new 3rd runway. Our position is that we continue to stress and campaign for the need for a full 8-hour ban on night flights at Heathrow.

With respect to the airspace design principles we expect that flight paths at night are designed to avoid our urban areas and routed through rural, country parks away from our residents even if this means the flight path is slightly longer.