

**Roberto Tambini**  
**Chief Executive**

**PLEASE NOTE THE VENUE  
AND START TIME FOR THIS  
SPECIAL CABINET MEETING**

Please contact: Richard Powell  
Please 01784 446240  
telephone: 01784 446333  
Fax Number: [r.powell@spelthorne.gov.uk](mailto:r.powell@spelthorne.gov.uk)  
Email Address: RP/Cabinet  
Our Ref:  
Date:- **7 September 2009**

**NOTICE OF A SPECIAL CABINET MEETING:**

**DATE: THURSDAY 17 SEPTEMBER 2009**

**TIME: 8.15 p.m.** [or at conclusion of a preceding meeting whichever is the later.]

**PLACE: COUNCIL CHAMBER,**

**COUNCIL OFFICES, KNOWLE GREEN, STAINES**

***[Refreshments for Members are available from 6.00pm in the Members' Room.]***

**TO: THE MEMBERS OF THE CABINET LISTED BELOW:-  
[AND TO ALL OTHER MEMBERS OF THE COUNCIL].**

<b>Members of the Cabinet</b>	<b>Cabinet Member Areas of Responsibility</b>
J.D. Packman [Chairman]	Leader of the Council
R.A. Smith-Ainsley [Vice-Chairman]	Planning and Housing
F. Ayers	Community Safety
S. Bhadye	Health and Independent Living
C.A. Davis	Regeneration
G.E. Forsbrey	Environment
Mrs. D.L. Grant	Young People and Cultural Services
A.P. Hirst	Communications and Engagement
Mrs. V.J. Leighton	Corporate Services

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- Interrupt presentations and debates;
- Mean that you miss a key part of a decision taken.

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***THANK YOU FOR YOUR CO-OPERATION IN THIS MATTER.***

**1 APOLOGIES FOR ABSENCE**

To receive any apologies for non-attendance.

**2 DISCLOSURES OF INTEREST**

To receive any disclosures of interest from Members in accordance with the Council's Code of Conduct for Members.

**3 MANAGEMENT TEAM REPORT**

**To consider the report of the Deputy Chief Executive [DCX] on the following item:-**

Airtrack Transport and Works Act Submission [DCX]

**(Report: summary page and pages 1 to 4 and Appendix A: pages 1 to 63)  
[Cabinet Member – Councillor Smith-Ainsley]**

## **AIRTRACK TRANSPORT AND WORKS ACT SUBMISSION**

**Special Cabinet: 17 September 2009**

**Recommendation Required**

**Report Deputy Chief Executive**

### **REPORT SUMMARY**

#### **How does the content of this report improve the quality of life of Borough Residents**

The report assesses the Airtrack scheme and proposes a formal response to the Secretary of State which best secures the interests of Spelthorne residents and business.

#### **Purpose of Report**

To seek approval of the Council's response to the consultation process.

#### **Key Issues**

The Airtrack scheme has been promoted by Heathrow Airport Limited (HAL) to provide improved car access to Heathrow from south and west of London. However, it has a substantial adverse impact on Spelthorne where most of the new infrastructure is to be built. These impacts are explained in **(Appendix A)** to this report. The issues involve are not only matters the Council would normally assess in its role as 'local planning authority', but also the Council's land ownership interests.

#### **Financial Implications**

The scheme involves compulsory acquisition of Council land as well as adverse construction impacts on Staines Town centre car parks and the Elmsleigh Centre. The financial implications of the impacts are uncertain but statutory mechanisms for compensation exist.

#### **Corporate Priority**

Environment, Economic Development.

#### **Officer Recommendations**

- 1. The Cabinet is asked to recommend to Council the objections set out in Appendix A.**
- 2. Officers to be authorised to respond, in liaison with the Leader, to any proposals by Heathrow Air Limited (HAL) to overcome the Council's objections and other matters that may arise before and during the inquiry.**

**Contact: Nigel Lynn, Deputy Chief Executive, Tel: (01784) 446304  
Cabinet Member: Councillor Richard Smith-Ainsley**

## MAIN REPORT

### 1. BACKGROUND

- 1.1 The Airtrack scheme has been in preparation for several years having initially been sponsored by the Airtrack Forum led by Surrey County Council. It provides a suite of new rail services to Heathrow from Waterloo, Reading and Guildford. However, the additional physical works are confined largely to Spelthorne with a limited amount in Hillingdon (tunnel to Terminal 5) and Hounslow (Feltham Depot).
- 1.2 HAL are seeking approval for the scheme via the Transport and Works Act. This is a single approval process, which enables the Secretary of State for Transport to give consent under all relevant legislation for the compulsory purchase of land, planning permission and other approvals including railway operating powers. The Secretary of State is unable to add to the submitted draft order in terms of proposals or land requirements. He can, however, reduce the size of the proposals. This has a bearing on what consultee's can reasonably object to or propose by way of amendment.
- 1.3 **(Appendix A)** provides a detailed explanation of the background to the scheme and assesses it by reference to the specific areas it affects as well as the discreet technical issues it raises. It involves a massive area in Spelthorne from Staines Town Centre to the Borough's northern boundary at Stanwell Moor and raises a very wide range of complex issues, many of which are interrelated.

### 2. KEY ISSUES

- 2.1 Whilst **(Appendix A)** raises nearly 80 specific points of objection, the key issues may be summarised as follows:
- (a) Lack of a clear business case for the scheme.
  - (b) Consequent inadequate justification for the scheme and, in particular, the building of the Staines chord.
  - (c) Significant adverse impact of construction on Staines Town centre through construction of the Staines chord and works to Staines Station and other potential long term impacts, including traffic, air quality, noise and visual impact.
  - (d) Adverse nature conservation, landscape, access and grazing, impacts on Staines Moor and its vicinity.
  - (e) Adverse construction impacts on Stanwell Moor and long term impacts in terms of nature conservation and landscape.
  - (f) Failure to justify the extent of overhead electrification at Stanwell Moor.
  - (g) Inadequate consideration of noise and contamination issues.
  - (h) Increased level crossing "down-time" at Thorpe Road, Egham, with consequent congestion risks and adverse impact on traffic flow in Staines Town Centre.
- 2.2 One issue not rehearsed within **(Appendix A)** is the previous proposal for an additional Station close to the High Street. A second station is no longer proposed and was deleted by HAL prior to the Phase 2 consultation last Autumn. It is excluded from the comments in the appendix because such an addition now

could not be accommodated by the Transport and Works Act process. It is referred to briefly here as part of the context to the report.

- 2.3 Following the Phase 2 consultation by HAL in October 2008 they advised the Council that they had concluded there was no a business case for a second station. They estimated it would only generate a net addition of 47,000 passengers per annum. Since then their passenger projections generally appear to have been adjusted downward. 47,000 passengers annually equates to some 900 a week or 130 per day. Over an operating 18 hour day that is an average of little over seven passengers an hour. With 16 trains an hour in total that is an average less than one passenger every other train.
- 2.4 On this basis any public transport benefit to Staines or even the wider area of north Surrey and east Berkshire appears very slight. This would need in any case to be balanced with the significant disruption construction would cause and longer impacts through proximity of the station to residential properties. Additionally it is now unclear if a second station close to the High Street could satisfactorily operate so close to the existing station.
- 2.5 HAL's proposals for Airtrack claim potential added economic benefits to both Staines and the Borough as a whole in the form of increased economic activity and jobs. These claims and any assumed added benefit of a second station need to be put in the context of a town which is already well located to Heathrow and where developers are actively seeking to progress schemes in the town. For example a revised planning application for the Majestic House site, for in excess of 35,000m<sup>2</sup> of floorspace, has just been submitted. It adjoins the previously proposed site of the second station, and demonstrates the current and continued commercial interest in the town irrespective of that second station.
- 2.6 On the basis of the evidence submitted or otherwise available there appears to be no case to justify reintroduction of the second station.

### **3. OPTIONS ANALYSIS**

- 3.1 The options available are:
  - (a) Not to respond to the submission proposals.
  - (b) Support the proposal with any qualifying concerns.
  - (c) Object setting out the Council's concerns.
- 3.2 Given the wide range of adverse impacts set out in **(Appendix A)**, only option 3 is considered a realistic response in relation to securing the best interests of Spelthorne residents and businesses.

### **4. PROPOSALS**

- 4.1 That Cabinet recommend to Council the objections set out in (Appendix A) and Officers to be authorised to respond, in liaison with the Leader, as appropriate, to any proposals by HAL to overcome the Council's objections and other matters that may arise before and during the inquiry.

### **5. BENEFITS AND SUSTAINABILITY**

- 5.1 The attached report sets out in appropriate detail the limited transport benefits and substantial adverse environmental and economic impacts on the Borough.

## **6. FINANCIAL IMPLICATIONS**

- 6.1 The Council owns several pieces of land which HAL propose to compulsory acquire (see Chapter 14 of **(Appendix A)**) either on a temporary or permanent basis. The Council is the freeholder of the Elmsleigh Centre which would be adversely affected. There will be loss of car parking both short term and long term, which would entail lost income. All these matters will justify compensation. The extent of that compensation would be required to be settled once the 'order' is approved and notice to purchase land or acquire rights is served and becomes effective.
- 6.2 There will be costs associated with pursuing objections to the TWA order. However, at present this is difficult to determine as the likely length of any inquiry is unknown and there is scope for some technical issues to be resolved in advance. Nevertheless, the Council has substantial interests which need to be protected/adequately compensated for.
- 6.3 Members have previously asked about the costs of Airtrack on the authority in exercising its planning function. As the TWA process is not a 'planning application' in the normal sense no fee is payable for the 'deemed planning permission' the Secretary of State will grant – subject to being content with the proposals. However, the 'deemed planning permission' is only in outline with siting only being agreed at this stage. The Borough Council will be responsible for determining the 'reserved matters' applications and discharge of planning conditions of works in Spelthorne. There are fees associated with such applications but at this stage, in the absence of knowing how such applications might be structured, it is difficult to calculate the likely fee.

## **7. LEGAL IMPLICATIONS / OTHER CONSIDERATIONS**

- 7.1 There are a range of legal implications arising from the TWA order itself. A barrister has already been engaged to assist throughout the process and has assisted on the drafting of this report **(Appendix A)**.
- 7.2 In common with planning proposals that go to appeal, there will inevitably be detailed negotiations with HAL around the Council's objections. Responses will also need to be given, often at short notice in the case of the inquiry itself, to issues arising from any additional information given by HAL. As is usual for inquiries Members are asked to formally authorise the Deputy Head of Planning and Housing Strategy, as necessary in conjunction with the Chief Executive and Head of Corporate Governance and the Leader, to respond to matters in a manner which best serves the Council's interest.

## **8. RISKS AND HOW THEY WILL BE MITIGATED**

- 8.1 The risks associated with Airtrack are of the scheme getting approval with critical issues remaining unresolved and inadequate controls on its implementation. The purpose of the report at **(Appendix A)** is to identify these issues and recommend a response.

## **9. TIMETABLE FOR IMPLEMENTATION**

- 9.1 Cabinet's recommendations will be forwarded to the Secretary of State on Friday 18 September as the Council's duly made representation within the statutory consultation period which ends the same day. The TWA process, however, requires a response to be subject to approval by the whole Council and it will be considered at the Council meeting on 29 October. The Department of Transport

has confirmed that confirmation of the Council's petition after the consultation closing date is acceptable.

- 9.2 It is envisaged that a public inquiry will commence sometime in February/March 2010. A Secretary of State decision is unlikely much before the end of 2010.

**Report Author: John Brooks, Deputy Head of Planning and Housing Strategy, Tel: (01784) 446346.**

**Background Papers:**

There are none.



## **Report on Airtrack**

**Appendix A to the Deputy Chief Executive's Report  
to the Special Cabinet  
Thursday 17 September 2009**





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6. Heathrow Airport Limited's Proposed Planning Conditions
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## **Report on Airtrack**

### **1. Introduction**

- 1.1 The purpose of this report is to describe the Airtrack proposal 'submitted' by Heathrow Airport Limited (HAL) to the Secretary of State for Transport and set out a recommended response to the Council.
- 1.2 The report considers the Council's position not only in terms of its statutory role as a 'local planning authority' but also as landowner. The report therefore also considers the compulsory purchase and compensation issues and impacts on the operation of the Council's car parks.
- 1.3 The report firstly considers relevant matters of background and the business case for Airtrack, and then considers the proposal and its impact on a broadly geographical basis, starting at Stanwell Moor (sections 4-9). There are then several distinct themes dealt with in sections 10-18.
- 1.4 Where particular sections of submitted documents are referred to, or terms need explaining, detailed references are provided in sequentially numbered footnotes.

### **2. Background**

- 2.1 Members have already been supplied with a copy of the 'Non-Technical Summary of the Environmental Statement' which provides a useful summary of the scheme as a whole and it is also reproduced as Annex 1 to this report. It includes a number of useful general plans of the Airtrack scheme. For this reason the report does not describe the scheme in detail but includes only sufficient background necessary to provide context to the particular concerns that are raised.

#### **a) Brief Summary of the Scheme submitted by HAL**

- 2.2 The scheme involves new rail services to Heathrow of two trains per hour in each direction from Waterloo, Guildford and Reading respectively to Heathrow Terminal 5, where they will terminate. In addition two Heathrow Express trains per hour each way will run from Paddington, via the Heathrow Central Terminal and Terminal 5, to terminate at Staines Station. This involves eight trains per hour each way either to or through Staines. Only the Waterloo trains will stop at Staines Station as the Reading and Guildford trains will use the new Staines Chord and 'by-pass' the existing station.
- 2.3 The new work involves:
  - a) a new Staines Chord of 516 metres in length connecting the existing Reading line to the Windsor line, of which some 144 metres across much of the existing Elmsleigh Surface car park will be on a viaduct. The remainder will be on embankments. A new ramp access to the Elmsleigh multi-storey car park is required,
  - b) a terminating third line of 436 metres on the Kingston Road side of Staines Station, along with a third platform. This cuts through the site of the existing station building on the north side of the station and also through

the South West Trains offices and existing pedestrian footbridge – these would all have to be replaced,

- c) a new 4081 metre section of track from a junction with the Windsor line to Terminal 5, of which 1551 metres is in tunnel. Of this, 2860 metres of track is in Spelthorne, of which some 330 metres is in tunnel. Of the 2860 metres in Spelthorne some 1080 metres will be on a low level viaduct, with the remainder on a low embankment or broadly at ground level. This section of the proposal also involves provision of compensation land for lost common land, public open space and areas designated as a Site of Special Scientific Interest (SSSI). There are also revised rights of way proposed in this area.

2.4 The above works would be constructed over a four year period with main work sites at:

- a) Bedfont Court – for the tunnelling work (Worksite G),
- b) South of Horton Road, Stanwell Moor – for the southern end of the tunnel and works down to the Windsor line (Part of Worksite F),
- c) Elmsleigh Surface Car Park and South Street Car Park – for Staines Chord (Worksite B),
- d) Staines Station forecourt - for station and work associated with the third platform and terminating line (Worksite A).

2.5 Land for construction is required, in addition to the site area of the completed railway, along the entire length of the route with secondary work sites at the following locations:

- a) off Moor Lane for a short period to construct new pedestrian footbridges over the Wraysbury River and Windsor line (Worksite E),
- b) adjacent to the north end of Two Rivers for track and footpath works (Worksite D),
- c) within the Elmsleigh and Tothill multi-storey car parks to create the new ramped entrance and short term connection of the two car parks (Worksite C).

2.6 Construction work will require a significant amount of building activity and temporary arrangements for access to the Elmsleigh multi-storey car park and public pedestrian access across the railway at Staines Station. Construction work in Staines town centre will involve significant disruption to car parking provision and public access between Staines Station and the town centre. The extent of works is described more fully when commenting later in the report on each geographic section.

### **b) Transport and Works Act Process**

2.7 The proposals submitted by Heathrow Airport Limited (HAL) under the Transport and Works Act (TWA) 1992 allow 'Orders' for specific transport schemes to be approved. The Act enables approval to be given through a single consent process for a range of statutory powers to be exercised in order to implement and operate a 'transport' proposal. In the case of Airtrack the submitted draft Order, if approved, provides powers under the Land Compensation Act 1961, Compulsory Purchase Act 1965, Town and Country Planning Act 1990 and New Roads and Street Works Act 1991, as well as

powers under the relevant Railways Acts, to enable the new services and track to be operated.

- 2.8 Approval for 'Orders' under the TWA are given by the Secretary of State for Transport in the case of railway schemes. In planning terms such an approval provides what is called a 'deemed planning permission' under Section 90 (2A) of the 1990 Planning Act.
- 2.9 HAL has formally requested such an approval subject to 45 planning conditions. The approval is, in effect, an outline planning permission where only the siting of the railway (within prescribed limits of deviation<sup>1</sup>) is given. Subsequent approval of details to satisfy these planning conditions would be for the relevant local planning authorities (in this case Spelthorne, Hillingdon and Hounslow respectively). The scope of the planning conditions and their acceptability are dealt with later.
- 2.10 Any representations on a TWA Order have to be made to the Secretary of State within the requisite consultation period which, in this case, is by Friday 18 September. Importantly, only objectors have a statutory right to appear at an inquiry into objections. The TWA requires that a Council's response should be agreed by the Council as a whole. The Department for Transport has confirmed it will accept the Special Cabinet's decision as the Council's interim position pending the Council's consideration of its recommendations at its meeting on 29 October.
- 2.11 The TWA process requires submission of a wide range of documentation including:
- a) an Environmental Statement (7 volumes submitted),
  - b) plans showing the proposed route and land required for any additional infrastructure and land necessary to enable construction,
  - c) plans showing specific parcels of land or rights over land to be acquired, either permanently or temporarily for construction and long term operation,
  - d) other relevant information to support the application including costs of the works, funding proposals etc.
- 2.12 A significant amount of documentation has been produced with some illustrative material of what various parts of the scheme will look like. The TWA enables a margin of deviation to be approved within which the railway line will eventually sit. Typically a width of some 25 metres is shown on the plans within which a width for operations of some 18 metres is required where the track is on embanked track bed (only 13 metres when on viaduct or slab base). In addition to this further land to construct the project is required and typically the total width of land required is some 44/45 metres, but wider where other associated works are needed alongside.
- 2.13 An approval under the TWA Order would allow construction of the railway track within the above limits of deviation. HAL is not intending to undertake detailed design work until the Order is approved. Only at that stage will the exact alignment be set and the design of structures and associated works e.g. new footpaths and landscaping, be determined. Therefore, whilst some indicative drawings and sketch perspectives are included in the submission

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<sup>1</sup> Limits of deviation – Transport and Works Act proposals allows for the siting of a railway to be identified with a margin for repositioning either side of 'centre line'.

material they can only be taken as general indicators at this stage. As appropriate some of this detail will be referred to later in the report when assessing specific areas.

- 2.14 A requirement of the TWA process is that a scheme must include ‘an outline of main alternatives studied by the applicant and an indication of the main reasons for his choice, taking into account the environmental effects’.<sup>2</sup> The Secretary of State for Transport, in a letter<sup>3</sup> to HAL’s legal advisors responding to a request for a ‘scoping opinion’ on the adequacy of the scope of the proposed Environmental Statement for the scheme, has specifically commented on the assessment of alternatives. He has said ‘ the Environmental Statement should contain an appraisal of the alternative options considered for the Heathrow Airtrack scheme and the reasons for choosing the preferred route, taking into account the environmental effects of the scheme, including any adverse impacts on Staines Moor SSSI’.
- 2.15 Chapter 3 of the Environmental Statement considers alternatives by way of an historical review of previous schemes. However, this does not contain any account of environmental effects in relation to the main alternative scheme called SWELTRAC which could avoid the adverse environmental impacts in Spelthorne. SWELTRAC involved a rail link between Ashford and Feltham to Terminal 4. The Environmental Statement<sup>4</sup> dismisses this by stating it is undermined by the development of Terminal 5, the cost of connecting to it and the expansion of the Heathrow Express resulting in platform capacity at the Central Terminal Area (CTA) being unavailable.

### **c) Policy Context**

- 2.16 The recently adopted South East Plan identifies Airtrack<sup>5</sup> in its list of Strategic Transport Infrastructure Priorities to start by the end of 2013/4 and requires, through Policy T14 amongst other matters, that development plans safeguard their delivery.
- 2.17 Surrey County Council’s Local Transport Plan 2006/7-2010/11<sup>6</sup> supports Airtrack on the basis of its potential significant benefits to Surrey. This support, however, relates to the principle of Airtrack as the Plan was published well in advance of HAL’s submitted proposals.
- 2.18 Spelthorne Council adopted a Planning Brief<sup>7</sup> on Airtrack which sets out the planning and environmental issues and policies that should be examined and its potential impacts and opportunities. It expressed no view on the overall merits of Airtrack and made clear the Council would make a judgement on the scheme as a whole once it had seen the overall proposal in its final form. It made clear it expects the promoters to take account of the Brief’s provisions in finalising the proposals. The document was subject to public consultation and has the status of Supplementary Planning Guidance.

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<sup>2</sup> Transport and Works (Applications and Objections Procedure)(England and Wales) Rules 2006, Schedule 1(2).

<sup>3</sup> Letter of 13 February 2009 from Secretary of State for Transport to Messers Winckworth Sherwood, page 2, third paragraph.

<sup>4</sup> Environmental Statement, Volume 1, Section 3 Alternatives.

<sup>5</sup> South East Plan (May 2009) Policy T14 (page 74) and Appendix A, Table 3, page 78.

<sup>6</sup> Surrey Local Transport Plan 2006/7-2010.11, second edition, pages 141-144.

<sup>7</sup> Planning Brief ‘The Airtrack Corridor’, December 2002, paras 1.31 and 1.3.2.



- 2.19 The Council's Core Strategy and Policies Development Plan Document (DPD)<sup>8</sup> has a section on Airtrack and rail access to Heathrow with a specific policy - CC4. It recognises the potential benefits of a rail link from Heathrow to the south but expressed serious concerns about Airtrack, specifically in relation to the impacts on Staines town centre, Staines Moor and alongside the Windsor line.
- 2.20 The Council was required by the South East Plan to 'safeguard' the Airtrack route. This means that development which might prejudice the implementation of a scheme will not be determined without consultation with those promoting the scheme. The route is shown on the Proposals Map<sup>9</sup>.
- 2.21 Policy CC4 and the supporting text of the Core Strategy are reproduced at Annex 2. It sets out the basis on which the Council has agreed to consider the proposal.
- 2.22 An important part of the policy context is the fact that a significant part of the proposal in Spelthorne lies within the Green Belt. The Council in its response<sup>10</sup> to the Phase 1 consultation identified the need for HAL to justify the development in the Green Belt.
- 2.23 PPG 2 'Green Belts' identifies the most important attribute of Green Belts is their openness (para 1.4). It goes on to explain that there is a general presumption against inappropriate development within Green Belts and such developments should not be approved except in very special circumstances (para 3.1). In relation to engineering operations in the Green Belt, they are regarded as inappropriate unless they maintain openness and do not conflict with the purposes of including land within it (para 3.12).
- 2.24 The proposal involves lengths of track on viaduct as well as low embankments. The cutting which approaches the tunnel portal will have protective structures around it and sub-stations and emergency access buildings will be erected above the tunnel. Overhead electric pick up is proposed for a length of over 1000 metres. There will be other railway infrastructure such as signals, cabinets, etc.
- 2.25 The scheme will have an adverse impact on the openness of the Green Belt. Comment on whether very special circumstances have been justified is given in section 3 of this report (para 3.21) in the context of the business case.
- 2.26 The Council has other relevant policies in its Core Strategy and Policies DPD relating to a wide range of issues raised by this scheme, including EN3 – Air Quality, EN8 – Protecting and Improving the Landscape and Biodiversity, EN11 – Development and Noise and CC2 – Sustainable Travel. Other relevant policies are referred to in the text of this report.

#### **d) Previous Consultations**

- 2.27 HAL held two public consultations in 2008 in February and October respectively. Through these, certain changes were made to the scheme including:

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<sup>8</sup> Core Strategy and Policies DPD, February 2009, pages 74 and 75, paras 11.19-11.23.

<sup>9</sup> Proposals Map Development Plan Document, February 2009.

<sup>10</sup> Report to Executive on Airtrack, 15 April 2008.

- a) improving the alignment of the Windsor line junction near Staines Moor and reducing the degree of impact in this area,
  - b) deletion of the proposed High Street Station (it is understood its deletion was based primarily on a lack of business case, although some objections were also made).
- 2.28 However, the scale of impact of other issues became more apparent, particularly:
- a) level crossing down-time,
  - b) the extent of disruption during construction of the Chord,
  - c) the extent of disruption at Staines Station.
- 2.29 For background, a copy of the Executive report<sup>11</sup> on the October 2008 consultation is set out in Annex 3. It records the 39 separate agreed recommendations of response reflecting a wide range of concerns by the Council.

#### **e) Council's Land Ownership**

- 2.30 The Council owns several areas of land that are required for Airtrack, either on a permanent or temporary basis, to build the line or for accommodation works. Any concerns on the proposed compulsory acquisition of land or rights is not in itself a valid objection to the scheme in 'planning' terms but the Council as a landowner has a right to object to such purchase. The Council will need to give particular consideration to the impact on operational activities such as car parking and on its interest in the Elmsleigh Centre. Aspects of these issues, particularly those bearing on the functioning and attractiveness of the town centre, are also important planning issues.
- 2.31 In summary, the Council's land ownership interests which are affected (temporary or permanent) are as follows:
- a) land at Matthew's Lane and access bridge under the railway to Elmsleigh surface car park (141 sq. metres),
  - b) Elmsleigh surface car park (entire site) including ramp to Elmsleigh multi-storey car park,
  - c) parts of South Street where the Council owns the sub-soil,
  - d) parts of Westbrook Close and South Street (BUPA) car park,
  - e) part of car park to Thameside House (BUPA offices),
  - f) parts of Elmsleigh Road,
  - g) Elmsleigh multi-storey car park,
  - h) Tothill multi-storey car park,
  - i) part of Elmsleigh Centre,
  - j) section of the former Staines to West Drayton railway, north east of the Windsor line.

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<sup>11</sup> Report on Airtrack Phase 2 Consultation to Spelthorne Council Executive, 9 December 2008.

## **f) Relationship to Heathrow Terminal 5 and further airport expansion**

- 2.32 By way of background, nothing within the decision on Terminal 5<sup>12</sup> gave any endorsement to the Airtrack scheme. Condition A84 in the Terminal 5 (T5) decision simply required that a westward extension of the Heathrow Express railway from the new station to the Great Western lines at Langley and/or with the South Western lines near Staines should not be physically precluded. Condition A88 did set a cap of 42,000 car park spaces at the airport, of which no more than 17,500 spaces should be for employees. This second condition in effect drives the need for HAL to improve non-car access to Heathrow to meet the requirements generated by Terminal 5.
- 2.33 HAL's longer term target<sup>13</sup> is to ensure public transport's share of surface access to Heathrow reaches 40% by 2012 and one of the objectives of Airtrack is to contribute to this. Such improvements are required irrespective of any further expansion of the airport.

## **3. Business Case for Airtrack**

- 3.1 HAL has not produced a discreet document setting out the business case for Airtrack in terms of comprehensive information on projected passenger numbers and locationally specific and robust economic benefits. It is understood that HAL intend to produce a business case prior to the inquiry. Such information that is currently provided is limited, in places inconsistent and has not been presented in a manner which makes evaluation of benefits and disbenefits straightforward. It is of particular concern that a transport proposal of this scale and range of adverse impacts has not been properly justified at the TWA 'submission' stage.

### **a) Alternatives**

- 3.2 Such information is particularly important in justifying a scheme that not only has a range of adverse effects but where powers are being sought to compulsorily acquire land. A clear business case with detailed passenger information would have assisted an understanding of why HAL consider their scheme should nevertheless be approved. This is particularly critical where, for example, in relation to the impact on the Staines Moor Site of Special Scientific Interest, government guidance in PPG 9 advocates refusal of proposals causing significant harm where this cannot be mitigated or compensated.
- 3.3 There is a second issue of the adequacy with which alternatives within the Airtrack scheme have been assessed and such consideration also comes within the requirements of the TWA Rules referred to above. Whilst HAL has considered options in relation to the Windsor line junction at Staines Moor, a second station and alterations to the existing station, no alternatives to the Chord have been evaluated.

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<sup>12</sup> Secretary of State for Transport, Local Government and the Regions, Application, Schemes and Orders Relating to a Proposed Fifth Termination at Heathrow Airport – Decision letter 20 November 2001.

<sup>13</sup> Environmental Statement, Volume 6, Annex 2, page 83.

- 3.4 Reference<sup>14</sup> is made in HAL's supporting documents to a 1998 proposal for rail access from the south and west and gave some consideration to reversing trains coming into the existing Staines Station from Guildford and Reading then reversing up the Windsor line to Heathrow. Comment was made that this could avoid building the Chord and would therefore be cheaper. However, it concluded that only 10 reversing movements per hour could be accommodated at Staines and this would add five minutes to journey times from these origins to Heathrow. These reasons are neither further explained in the submission documents nor the costs in relation to environmental implications of Airtrack appraised. It is considered the assessment of Airtrack in relation to other alternatives has not been properly undertaken.
- 3.5 HAL has failed to consider fully the options involved in not having a Chord and thereby avoiding some of the significant adverse impacts in Staines town centre, as well as scope to reduce the problem of level crossing down times in Egham by combining services. Existing services from Reading might take the proposed additional patronage, subject to appropriate train lengths or with just one extra Airtrack service an hour. Services from Guildford are already limited to just one in the am peak. There appears scope to operate a service close to that envisaged with a dedicated Airtrack service and meet the junction capacity constraints at Staines. In terms of business case, Guildford and Reading only account for some 25% of overall passenger numbers from the limited information provided and this is explained more fully below.
- 3.6 Given the environmental effects of a 'with Chord' scheme, it is surprising the merits of this aspect of the scheme have not been appraised in line with the TWA Rules and Secretary of State's letter.

#### **b) Passenger Forecasts**

- 3.7 The supporting information<sup>15</sup> refers to some 22% of Heathrow's passengers living within the Airtrack catchment and some 50% of the current workforce. The submitted Transport Assessment provides some information on projected additional passengers generated by the Airtrack services. Overall only 25% of all passengers using the services are going to Heathrow; the remaining 75% are travelling between the other stations. From the limited information provided, the stations where services will stop and the proportion of Airtrack passengers using each route are:
- a) from Guildford – Woking and Chertsey (19.2%),
  - b) from Reading – Wokingham and Bracknell (5.5%),
  - c) from Waterloo – Clapham Junction, Richmond, Twickenham and Staines (75.3%).
- 3.8 Figures are provided for each station above and other intermediate stations at 2015 and 2030, comparing 'do minimum' and a 'with Airtrack' scenario<sup>16</sup>. The modelling accounts for other planned service improvements and impact on demand. Staines in 2015 is projected in the am peak hours (3 hours) to have a 'do minimum' in-and-out flow of passengers from the station of 2558 and with Airtrack 2603 – a difference of just 45 passengers (22 for the 1 hour 8-9

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<sup>14</sup> Environmental Statement, Volume 1, Chapter 3, para 3.2.21.

<sup>15</sup> Environmental Statement, Volume 1, para 1.2.4, page 5.

<sup>16</sup> Environmental Statement, Volume 6, Transport Assessment Tables 6-1 to 6-3, pages 54 and 56.

am peak). In 2030 the 'do minimum' flow is 2840 with just an additional 61 passengers with Airtrack over the 3 hour am peak (30 for the 1 hour am peak).

- 3.9 Much more significant changes in flows with Airtrack are projected for Waterloo, Guildford, Woking, Chertsey and Reading stations. The following table shows that the flow to the two main stations in Spelthorne is low, relative to other key destinations.

**Net additional passenger entry and exits in am peak - 8-9am**

	<b>2015</b>	<b>2030</b>
Waterloo	1675	1779
Guildford	353	421
Woking	380	421
Reading	133	177
Chertsey	301	324
Staines	22	30
Ashford	38	40

- 3.10 The figures appear to show the business is dependent on passengers being drawn from a wide geographical area. Ashford, which has no Airtrack stopping services, appears to have more Airtrack related entry and exits from its station than Staines. This possibly reflects its larger catchment population and number of passengers who may either change trains at Staines to go to Heathrow or use the additional line services to travel to or towards Waterloo by changing at stations up the line.
- 3.11 There is, however, conflicting information on the overall passenger numbers for the Airtrack scheme. Para 8.1.2 of the Transport Assessment<sup>17</sup>, for example, refers to 12.8 million trips in 2015 and 14.9 in 2030 with 25% accessing Heathrow itself (equivalent to 3.2 – 3.7 million). Para 1.2.2 of the same document, however, refers to up to 10 million passengers a year using Airtrack services, of which 25% would be travelling to Heathrow (2.5 million). This contrasts with figures in Volume 1 of the Environmental Statement, para 15.7.10, where 250 additional passengers per hour are referred to which the report equates to 1.4 million trips per year.
- 3.12 Interrogation of the detailed tables 6-2 and 6-3 of the Transport Statement show a predicted total two-way passenger am peak hour flow of 2247 in 2015 and 2896 in 2030. By applying the conversion factors at the foot of Table 6-1 to get a daily total, and multiplying by 365 to get an annual figure, this equates only to 5.5 million passenger movements in total in 2015, rising to 7.1 million in 2030. This method of assessing a yearly total is probably unrealistically high, but as a 'trip' involves both an in and out movement at the stations listed the figures should in any case be halved. This would give a total trips figure of just 2.75 million in 2015, rising to 3.55 million in 2030. What is clear is that the more detailed figures that are provided, as derived from the PLANET<sup>18</sup> model, do not in anyway equate to the general totals of trips given elsewhere.
- 3.13 As it stands the submission proposal does not have a credible assessment of expected passenger numbers and certainly could not provide a compelling

<sup>17</sup> Environmental Statement, Volume 6, Transport Statement.

<sup>18</sup> PLANET – is a transport model designed to predict changes in rail passenger numbers.

case to support the scheme in the face of a range of adverse impacts described later in this report.

### **c) Economic Benefits**

- 3.14 Guidance issued under the Transport and Works Act<sup>19</sup> states that the Secretary of State will wish to have regard to the applicant's prospects of funding the planning and construction of the works, including the payment of any statutory land compensation. Whilst the applicant is not expected to have secured the necessary funds to implement the proposed works before the TWA Order is implemented, the Secretary of State's concern is to establish that a scheme is capable of attracting the funds required to implement it. An applicant should be able to provide evidence (whether at any inquiry or otherwise) to enable this to be considered and should be ready to respond to questions about the project's financial viability.
- 3.15 The funding proposal provided with the application is exceptionally brief and is couched in conditional terms. There is a funding shortfall of £322 million. HAL has identified £351 million for strategic rail access improvements to Heathrow Airport in its capital expenditure plan for 2008 to 2016. It is hoped that the remainder of the funding (the total cost at 2008 Q1 prices is £673 million) will come from government and the DfT has indicated that the scheme will be 'considered' for funding. Nothing more certain than this has been provided and the 'non-airport benefits appraisal' referred to in the application for that government funding has not been disclosed to the Council. Whilst there is such a lack of information, and against the background of the current recession, there must be serious doubt to the financial credibility of Airtrack given the pressures of the economy on both HAL and the Government.
- 3.16 Information is also provided on the socio-economic benefits of the scheme<sup>20</sup>. The assessment has drawn on both quantitative and qualitative information from specific groups, one-to-one meetings and telephone conversations and emails with key socio-economic stakeholders.
- 3.17 The quantitative information has been taken from a Steer Davies Gleave (SDG) report<sup>21</sup> on the wider economic benefits of Airtrack and from traffic and passenger modelling. The SDG report was published some 18 months before the submission and did not use the latest passenger projections, information on where trains were likely to stop and was at a time when a second station was proposed for Staines. The methodology of the report was what may be called 'top-down' in that it drew on general Borough and region wide economic data and not informed by how Airtrack would actually operate or have regard to the specific area of influence of the scheme. Subsequent views on its conclusions by focus group and opinion gathering has been input into the socio-economic assessment with no clear explanation of how the latest passenger forecasts have informed the economic conclusions.

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<sup>19</sup> A Guide to the Transport and Works Act Procedures 2006, para 1.31-1.34.

<sup>20</sup> Environmental Statement, Volume 1, Chapter 16, pages 324-340.

<sup>21</sup> Steer Davies Gleave, Dec 2007, for the Air Track Forum 'Wider Economic Benefits of Airtrack.'

- 3.18 The socio-economic assessment makes a number of conclusions about the economic benefits of Airtrack, albeit accepting the work is based on the specification of the scheme as in 2006<sup>22</sup>. These conclusions include:
- a) para 16.6.18 – output for Spelthorne is predicted to ‘increase by about £5.2 million per year’ by 2031,
  - b) para 16.6.18 – the attractiveness of Spelthorne for business is predicted to increase and ‘may lead to benefit from the relocation of some 400 jobs’,
  - c) para 16.6.19 – productivity gains in Surrey, including Spelthorne, would total £21 million per annum as a result of Airtrack,
  - d) para 16.6.19 – productivity per worker in Spelthorne is forecast to benefit at a level of £149 per worker in 2031,
  - e) para 16.6.22, Table 16-5 – indirect and induced benefits to Spelthorne are projected at 350-1000 jobs at 2031 (based on an earlier SDG Report of 2006).
- 3.19 The socio-economic analysis acknowledges the scope for Airtrack to affect the urban vitality and viability of Staines town centre due to the impact of construction and net loss of car parking and noise. However, it also concludes it expects Airtrack to promote growth and development of Staines town centre by improving its access and attractiveness to businesses, shoppers and visitors. It concludes<sup>23</sup> that at the operational stage there will be a ‘minor positive effect’ on the viability and vitality of Staines town centre.
- 3.20 The analysis appears to be both flawed and inadequate in a number of respects:
- a) no account is taken of the extent of disruption to Staines town centre during a construction period of some 2 years (and there is nothing to prevent this being even longer) and the potential long term impact on its perceived attractiveness compared to other centres,
  - b) no proposals have been put forward in the submission on how temporary car parking and access arrangements will be operated to maintain a similar level of accessibility and convenience compared to existing arrangements,
  - c) the methodology for assessing socio-economic benefits does not appear to be founded directly on the submitted projected passenger numbers. There is no explanation of how the very low passenger numbers for Staines and Ashford stations translate into relatively substantial longer term employment and economic benefits.
- 3.21 Section 2 of this report identifies the need to demonstrate the very special circumstances to justify this development in the Green Belt. It is clear no sound justification has been given in terms of benefits to justify the harm to the openness of the Green Belt.

### **Objections:**

- 1. HAL has not produced a business case for Airtrack at the submission stage.**

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<sup>22</sup> Environmental Statement, Volume 1, para 16.6.20

<sup>23</sup> Environmental Statement, Volume 1 Main Report, Section 16, para 16.6.30, page 338.

2. HAL has not demonstrated that the project is financially viable and likely to secure sufficient funding to ensure its completion.
3. HAL has not provided detailed passenger information to provide a full and clear picture of patronage levels expected.
4. The socio-economic benefits bear no credible relationship to the passenger figures entering or leaving stations in Spelthorne.
5. Failure to properly evaluate alternatives to demonstrate Airtrack is the most appropriate option.
6. The transport case appears insufficiently robust in terms of passenger forecasts and wider economic benefits to justify the massive short term disruptions and long term adverse impacts of the Chord. Therefore the submitted application should be required to demonstrate that the Chord is a vital component of Airtrack and that passengers from Reading and Guildford could not be conveyed by other forms of rail service.
7. HAL has failed to demonstrate how interim parking arrangements will operate in Staines town centre in a way which provides adequate parking and maintains the town's attractiveness as a shopping and business centre.
8. Very special circumstances to justify the adverse impact of the scheme on the openness of the Green Belt have not been justified.

#### **4. Assessment of the Scheme by Geographical Area**

- 4.1 The following sections assess the scheme by geographical area and within this also picks up on cross-cutting themes where they arise.

#### **5. Terminal 5 to Horton Road**

##### **a) Description of Works**

- 5.1 This section of the route is wholly within the London Borough of Hillingdon and comprises land at Bedfont Court and the former RMC gravel pit just to the south. The railway is within tunnel through this section although there will be some above ground structures containing ventilation equipment and emergency exits. It is in this section that the greatest amount of construction activity will actually take place. An underground cross-over junction has to be created at Bedfont Court, and from this 'box', once constructed, it is then intended to tunnel north east to Terminal 5 and south under Horton Road to the start of the 'cut and cover'<sup>24</sup> tunnel works within Spelthorne where the track rises to surface level.

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<sup>24</sup> Form of tunnel construction involving digging down to construct the tunnel and then covering it over, rather than below ground construction such as boring.



- 5.2 From this area 328,000 cu. metres of material has to be excavated of which 240,000 will be backfilled<sup>25</sup>. Daily flows of construction traffic to the site will exceed 500 vehicles a day between May 2011 to January 2012, reducing to some 200 a day and then rising again to over 400 in late 2012 and early 2013<sup>26</sup>.
- 5.3 Access to the Bedfont Court site will be off Stanwell Moor Road, north of its junction with Airport Way. Routing of vehicles will be controlled through the Code of Construction Practice. Tunnel working is proposed to be undertaken on a 24 hour basis.

#### **b) Comments**

- 5.4 Section 11 of this report assesses in more detail the issue of noise and section 12 the issue of dust and contamination, and specific recommendations in relation to Stanwell Moor are made.

### **6. Horton Road to southern end of Hithermoor**

#### **a) Description of Works**

- 6.1 This section includes the 330 metres of tunnel within Spelthorne followed by a 210 metre section where the track rises from the tunnel between retaining walls to broadly ground level. Due to the need to avoid disturbance to adjoining landfill sites and the uncertain nature of the ground the track bed is required to be laid on a piled concrete slab.
- 6.2 In this section some 82,000 cu. metres of material will need to be excavated for the cut and cover tunnel and cutting, of which 35,000 cu. metres is previous landfill. Some 11,000 cu. metres of material is required for backfilling. A further 15,000 cu. metres of landfill would be excavated for the Stanwell Moor piled slab to carry the railway southward from the tunnel. Of this 14,000 cu. metres is former landfill<sup>27</sup>.
- 6.3 An intervention and emergency escape building for the southern section of the tunnel will be built immediately south of Horton Road, with a compound of some 50 x 30 metres. A sub-station will be constructed some 220 metres south of that with a compound of some 35 x 25 metres.
- 6.4 Overhead line electrification (OHLE) is proposed for a distance of 1060 metres south of the tunnel entrance to a point some 230 metres north of Staines Moor. OHLE involves wires suspended above the track and mounted between a system of support pylons spaced approximately every 50 metres.
- 6.5 OHLE is required within the tunnel and underground station at Terminal 5 because that is the existing power source at the station, and there are technical problems and risks of mixing OHLE and third rail pick up due to the nature of AC and DC electricity supply.

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<sup>25</sup> Environmental Statement, Volume 1, para 2.7.50, page 27.

<sup>26</sup> Environmental Statement, Volume 6. Transport Assessment, Annex 5, figure A6.1, page 94.

<sup>27</sup> Environmental Statement, Volume 1, para 2.7.50, page 27.

## **b) Comments:**

### **i) Overhead Electric Lines**

- 6.6 OHLE would add significantly to the visual clutter and impact of the railway and would be harmful to views of the railway by users of the bridleway/cycle track to the west side and footpath to its east.
- 6.7 It was originally proposed to extend OHLE to Staines but this was revised by the time of HAL's Phase 2 consultation in October 2008. The Council accepted a 'switch-over' south of the tunnel entrance, subject to the length of switch-over being justified and being kept to an absolute minimum and confirmation that the switch-over arrangement commence immediately trains leave the tunnel. No explanation is provided as to why such a long distance is required for the switch-over or effective mitigating landscaping proposed.

### **ii) Greenham's Pond**

- 6.8 The route passes through the edge of a pond – referred to as Greenham's Pond – which is designated as a Site of Nature Conservation Importance (SNCI) by the Council. The Council has previously accepted the principle of relocating the pond, subject to satisfactory evidence that its 'interest' will be properly protected and enhanced. No such evidence has been submitted.
- 6.9 Critically HAL has not identified where the pond may eventually be extended/repositioned or sought to acquire the necessary land. At present HAL has no mechanism to satisfactorily provide for this SNCI.

### **iii) Landscaping**

- 6.10 Some 200 metres south of Greenham's Pond is a triangular shaped area of trees (some 40m x 40m x 40m) to the east side of the existing bridleway. These were planted over 20 years ago as off-site landscaping for the M25. The trees are now of a significant scale and in landscape terms achieve their intended effect of contributing, with other planting, to reducing the visual impact of the motorway on the wider area. The trees are wholly within the 'limits of deviation' and will need to be felled. No land is proposed to be acquired to replace them. This is unacceptable.
- 6.11 HAL has in their submission referred to the landscaping that is proposed as part of Brett's recycling facility on land to the east of the railway at this point. Whilst the recycling facility has only temporary permission for 10 years, it is intended that the landscaping would remain and the 'plant' area also landscaped. However, such landscape benefits only arise if the scheme is implemented and there is no certainty of this. HAL need to ensure that their proposals are developed independently and landscaped appropriately. They are not.

### **iv) Horton Road Works Site**

- 6.12 A major works site will be located south of Horton Road to support construction work from this point down to the Windsor line. It will be accessed off Horton Road. The greatest amount of construction traffic is proposed to be

between September 2011 and July 2012 with peak flows for a short period exceeding 300 vehicles a day<sup>28</sup>.

- 6.13 A Code of Construction Practice is proposed which is intended to control construction activity and its potential adverse impacts. However, at this stage there is insufficient information available to be certain that the residents of Stanwell Moor will not suffer from unacceptable adverse construction impacts. This is addressed further in subsequent sections of this report dealing with Noise (section 11) and Air Quality and Contamination (section 12).
- 6.14 Comments on the acceptability of the rights of way arrangements are dealt with in the following section dealing with Staines Moor/Windsor line junction.

### **Objections:**

- 9. The length of 'change over' from OHLE to third rail south of the proposed tunnel and consequent adverse visual impact on the landscape has not been justified.**
- 10. The loss of Greenham's Pond is unacceptable in the absence of details to demonstrate it can be satisfactorily relocated in nature conservation terms and that land has been made available for this to be implemented.**
- 11. The proposals have failed to replace existing landscaping intended to mitigate the impact of the M25 alongside Stanwell Moor and which is proposed to be removed.**

## **7. Staines Moor/Windsor line junction**

### **a) Description of Works**

- 7.1 This section of track runs from the north boundary with Staines Moor to the Windsor line junction. The following section of the report also deals with the revised rights of way arrangements for this locality and areas either side, as well as compensation land for lost common land, public open space and SSSI. A map<sup>29</sup> extract in Annex 4 to this report shows these areas.
- 7.2 The 'limit of deviation' within which the track will sit has been pushed virtually as close as is possible to the M25 with a relatively tight curve to join the Windsor line, to avoid as much as possible of the SSSI and common land.
- 7.3 The route retains the existing bridleway (BW50) and cycle way between the M25 and railway as this surface needs to be retained for service access by the Environment Agency and Three Valleys Water as well as there being a 30 inch gas main running under most of it. The need to retain a service access prevents the railway going closer to the M25.
- 7.4 For a distance of some 1080 metres from the point the new line separates from the Windsor line, the new track is on a low viaduct. This is partly

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<sup>28</sup> Environmental Statement, Volume 6, Transport Assessment, Annex 6, fig A6.1, page 94.

<sup>29</sup> Environmental Statement, Volume 5, General Appendices, Appendix 2.1, Staines Moor Mitigation Strategy, figure A2.1.3, page 20.

because this area is in the flood plain and free flow of flood water needs to be maintained as far as possible, but also to limit the amount of land taken. Wildlife can also pass under the line but subject to appropriate fencing, for which no details are provided in the Environmental Statement.

- 7.5 The new line does require a small part of Staines Moor in its north-west corner near Butts Pond, as well as an area of the Moor on the west side of the former Staines to West Drayton railway embankment. Both are designated as common land and SSSI. It also requires a section of the northern end of the embankment which, although not common land, is public open space. HAL is statutorily required to provide compensation land for any lost common land and open space. Three parties in all own the various parcels of land in question and they are shown in Annex 4 previously referred to. Additional land is required on a temporary basis for construction and temporary access.
- 7.6 Compensation land is also required for the lost SSSI and this SSSI includes some land not designated either as common land or open space.
- 7.7 The route of the railway line passes through a site called 'The Willows' which is accessed off Moor Lane. HAL proposes to acquire the whole site and for the larger part of it, which is not required for the new railway line, to be used as compensation land for common land, public open space and for the lost SSSI. In addition some land to the north of Staines Moor is proposed to be acquired for common land. HAL will also need to acquire some land from Thames Water which, prior to the construction of the M25, was part of the Wraysbury Reservoir land holding. Much of this land is also public open space and SSSI although not common land, and again lost public open space and SSSI need to be compensated.
- 7.8 The appropriate exchange of land to meet the various requirements and interests of the three land owners affected is complex.
- 7.9 HAL has yet to demonstrate the adequacy of the compensation land to compensate for lost SSSI.
- 7.10 Staines Moor is an SSSI significant for both its diverse and important ecology as well as its size. HAL has produced a draft Staines Moor Mitigation Strategy (SMMS) to show how in open space, landscape and ecological terms it can mitigate for the losses and impacts of Airtrack.
- 7.11 The SMMS is some 19 pages long. It identifies the distinct habitat types close to Airtrack and potential impact of the scheme on them. It explains the mitigation principles it proposes to use and what it intends to achieve within the various habitat types and compensation land to ensure the special interest of the SSSI is preserved. The areas proposed for ecological mitigation<sup>30</sup> include Butts Pond, an area of land (site E4) to the west of the former Staines to West Drayton railway line and part of Thames Water's land holding, which is not proposed for acquisition by HAL. HAL propose some dredging at Butts Pond.
- 7.12 The SMMS also includes brief sections on the protection of water resources and flood management, landscape management, recreation and amenity,

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<sup>30</sup> Environmental Statement, Volume 5, General Appendices, Appendix 2-1, Staines Moor Mitigation Strategy Figure A2.1.2, page 12.

implementation and on-going management. It comments that the final ownership and responsibility for management including funding is still not determined.<sup>31</sup>

- 7.13 At the north-west corner of Staines Moor some landscaping exists along the west boundary of the Moor, along the line of the former Staines to West Drayton line which, together with additional landscaping planted in the early/mid 1980s to screen the M25, has matured into a substantial landscape buffer. On full maturity this will substantially screen out all views of traffic on the M25 which is elevated in this area and the signal gantries. The proposal, however, involves the removal of all vegetation over approximately 370 metres along the west side of the Moor from the north boundary of the Moor southward. This will open up a view of both the new railway and M25 to the west.
- 7.14 The new line will result in several existing rights of way being stopped-up which give access to Staines Moor. In addition to the retained bridleway (BW50) it is proposed to utilise the embankment of the former Staines to West Drayton railway line as both a route for pedestrians to Staines Moor from Moor Lane as well as being part of a longer pedestrian route. This new route will extend from Footpath 13 at the point it currently crosses the Windsor line at the rear of the Two Rivers Shopping scheme, to the top of Staines Moor and then continuing on the east side of the new railway to the tunnel section where it re-joins the existing bridleway which goes up to Horton Road (see plan on page 7 of Annex 1 of this report). The route requires new bridge decks at the points where the old line crosses the River Wraysbury and the Windsor line. A temporary work site is required off Moor Lane to construct the bridges. The two existing pedestrian level crossings at Moor Lane and on Footpath 13 will be permanently closed on safety grounds.

**b) Comments:**

- 7.15 Comments on the proposals for this part of the route are dealt with below under several sub-sections:

**i) Nature Conservation Issues**

- 7.16 Overall, a development of this scale and impact on an SSSI requires a more thorough and detailed assessment of impacts than has been submitted in this case. Little, if any, data is used to justify the conclusions arrived at and even the impacts that are acknowledged are not clearly presented. A table of impacts would have been appropriate. More specific issues are set out in the following paragraphs.
- 7.17 The policy context for considering developments likely to have an impact on Sites of Special Scientific Interest (SSSI) is national Planning Policy Statement 9: Biodiversity and Geological Conservation. Within that guidance key principle (vi)<sup>32</sup> sets out the approach to be followed:

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<sup>31</sup> Environmental Statement, Volume 5, General Appendices, Appendix 2-1, Staines Moor Mitigation Strategy Section 7, page 21.

<sup>32</sup> Planning Policy Statement 9, Biodiversity and Geological Conservation, July 2005, para 1(vi).

*'The aim of planning decisions should be to prevent harm to biodiversity and geological conservation interests. Where granting planning permission would result in significant harm to those interests, local planning authorities will need to be satisfied that the development cannot reasonably be located on any alternative sites that would result in less or no harm. In the absence of any such alternatives, local planning authorities should ensure that, before planning permission is granted, adequate mitigation measures are put in place. Where a planning decision would result in significant harm to biodiversity and geological interests which cannot be prevented or adequately mitigated against, appropriate compensation measures should be sought. If that significant harm cannot be prevented, adequately mitigated against, or compensated for, then planning permission should be refused'.*

- 7.18 Paragraph 14 of the guidance deals specifically with biodiversity within developments and sets out the expectation that local planning authorities should maximise the opportunities in and around development for building-in beneficial biodiversity and geological features as part of good design.
- 7.19 In assessing HAL's proposals in respect of the Staines Moor SSSI it is important to establish the basis or 'base line' against which any harm, and in turn the standard required for satisfactory restoration/compensation, should be judged. In this case HAL has incorrectly assessed the 'baseline'. The correct approach is set out in the Institute of Ecology and Environmental Management (IEEM) guidance<sup>33</sup> which states 'the existence of [PSA] targets means that the 'favourable condition' of a SSSI/ASSI should generally be the benchmark against which impacts are assessed. The main exception is likely to be where the statutory conservation agency agrees that it is not reasonable to expect that the favourable condition target can realistically be achieved without the developer's intervention'. The only circumstance where this approach may be departed from is where Natural England agrees it is unreasonable to expect the 'favourable condition' target for SSSIs to be achieved without a developer's intervention.
- 7.20 In this case Spelthorne Council, Thames Water and the Staines Moormasters are, with Natural England's guidance, currently working to improve the condition of areas of the SSSI to bring it all to a 'favourable condition'. This includes the area owned by Thames Water to the west of the former Staines to West Drayton railway embankment, where some scrub clearance and grazing management is required. There is no reason to conclude that the above parties will fail to secure the necessary improvement.
- 7.21 Despite the approach required in undertaking assessments and HAL's acknowledgment<sup>34</sup> of the improvement work that Spelthorne Council is leading, this is not adequately accounted for within the Environmental Statement. It states 'Habitats and species on the site and within the zone of influence of the proposal were evaluated following standard guidance on ecological impact assessment published by the IEEM (2006)'.<sup>35</sup> It, however,

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<sup>33</sup> Institute of Ecology and Environmental Management 'Guidelines for Ecological Impact Assessment in the UK', 7 July 2006.

<sup>34</sup> Environmental Statement, Volume 5, General Appendices, Appendix 2-1, Staines Moor Mitigation Strategy, para 3.2.2.

<sup>35</sup> Environmental Statement, Volume 1 Main Report, para 10.2.1, page 141.

goes on to conclude<sup>36</sup> that the area of land owned by Thames Water to the west of the embankment is 'species-poor' and takes inadequate account of the work in-hand to restore it to a 'favourable condition' and against which its own proposal should be assessed.

- 7.22 The information on mitigation includes proposals for the translocation of species to grassland area, fen type area and swamp. Each habitat type raises specific issues and challenges regarding successful implementation. In the case of wetland areas in particular water table, topography, soil type and soil pH are critical. These issues are well rehearsed in research on this subject, which identifies the high levels of risk that exist in successfully translocating.<sup>37</sup>
- 7.23 Research has shown that the technique of translocation is unlikely to ever completely replicate the lost area and at worst can fail. Nevertheless, even if complete success were to be assumed it still only provides a replica habitat in a different location. It should therefore not be used as an argument in favour of development contrary to the presumption of PPG 9 to protect an SSSI in situ.
- 7.24 Within their report in relation to fen habitat for example, HAL make assumptions that with translocation 'no significant effects will occur'. Given the degree of caution within research on this issue the conclusion is not scientifically robust. In other places, even HAL acknowledges 'there are uncertainties in the success of grassland translocation. Therefore, although the areas of grassland affected do not represent the most species-rich areas of the SSSI west of the Colne, it is considered that long-term 'moderate adverse and therefore significant effects' may arise'.<sup>38</sup> This conclusion is of concern given that grassland translocation is, in relative terms, easier than for fen or swamp. It is in any case derived from an assessment based on the grassland part of the site being regarded as 'species-poor' rather than in starting from as assumed 'favourable condition'. It therefore understates the degree of impact that will arise.
- 7.25 Overall HAL's proposals and assumptions are not scientifically robust and reflect an inadequate understanding of the habitats concerned and the implications of the techniques proposed.
- 7.26 HAL's approach also ignores the key principle of PPS 9<sup>39</sup>, summarised in paragraph 7.13 above, regarding the requirement to maximise opportunities for building-in beneficial features. HAL's proposal has been incorrectly assessed and has failed to demonstrate that adequate proposals, including sufficient compensation land, are available to avoid harm to the SSSI.
- 7.27 A critical issue with the SMMS is that HAL is not acquiring all the land that the SMMS is dependent on. It excludes the site E4 referred to above, which is part of the Thames Water land holding.

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<sup>36</sup> Environmental Statement, Volume 1 Main Report, para 10.7.43, page 198 and Table 10-17, sub-section on 'Fen', page 192.

<sup>37</sup> e.g. McLean, I.F.G. (2003). 'A Habitats Translocation Policy for Britain'. Joint Nature Conservation Committee in conjunction with The Countryside Agency for Wales, English Nature and Scottish Natural Heritage.

<sup>38</sup> Environment Statement, Volume 1 Main Report, para 10.9.5, page 208.

<sup>39</sup> Planning Policy Statement 9: Biodiversity and Geological Conservation, para 14.

- 7.28 There are also proposals for the translocation of ancient ant hills which are known to be up to 120 years old. No evidence has been produced to demonstrate the feasibility of successfully achieving this or the implications of destroying the existing habitat at the locations on the parts of the Moor they may be moved to.
- 7.29 The land identified in the deposited plans and sections, sheet no.4, area 75 is inappropriate land for ecological mitigation. Based on the preliminary results of Spelthorne's independent vegetation surveys, this area is one of the richest in the field to the west of the disused railway embankment, and there are other areas in that field that are of less botanical interest and thus more suitable to disturb in order to carry out mitigation. There is insufficient data in the Airtrack Phase 2 survey included in the Environmental Statement to support HAL's conclusions.
- 7.30 Proposals for dredging to secure improvement of Butts Pond have not been supported by inclusion of the site within the temporary acquisition of land. Implementation of this by HAL would require the approval of the land owner – Brett's – amongst other matters.
- 7.31 The draft SMMS contains no details of who will own the compensation land on completion of the work, the mechanisms to ensure it achieves the intended purpose of the strategy, its funding arrangements and the timescales over which implementation will require particular management and attention before it may be regarded as successful. This is a critical omission in the submitted material.
- 7.32 An important element of the successful implementation of any mitigation strategy is effective water management, in terms of ground water and flood water, to ensure the conditions critical to the diversity of the habitat are not materially altered. In connection with this protecting water supply from contamination as a result of construction work and opening up former landfill sites is also vital. These issues will be addressed in detail by the Environment Agency and the Secretary of State will need to be satisfied that HAL's proposals are appropriate.
- 7.33 The tunnelling operations, whilst some distance north of Staines Moor, have the potential to impact generally on groundwater movement and water levels on and near Staines Moor. The effect of the tunnel on groundwater movements is not adequately explored and there are contradictory positions in the Environmental Statement. In 10.7.78 the Environmental Statement states that 'the location of the bored tunnel at M25 Junction 14 to the north of the SSSI could impede the southward movement of groundwater but this will not have a significant effect on the SSSI as the intervening landfill is already a significant barrier to groundwater movements.' However, in 11.6.37, the Environmental Statement states that 'construction of the tunnel portal entrance (the retained cut and cover sections) will result in a total barrier to groundwater flow within landfill material overlying terrace gravels over a length of about 360m; and a partial barrier to groundwater flow over a length of 160m. This barrier is difficult to mitigate actively. Passive mitigation would include backfill over the cut and cover section with a high permeability layer to enable groundwater to flow over the tunnel portal, or by laying a high permeability drain on the up-gradient side (western side) to keep groundwater levels low against the portal and direct flows to the downstream side (east) to the south of the cutting.' Considering that active mitigation is not proposed,



the temporary effects on the ecology of Staines Moor SSSI of creating groundwater barriers should be assessed, particularly if the construction takes place during a time of drought.

- 7.34 It is of concern that de-watering of trenches is likely to be needed during the diversion of utilities onto Staines Moor given the high groundwater levels on the Moor. The Environmental Statement provides no assessment of this and potential risks to habitats. There is particular risk to Butts Pond.
- 7.35 It appears that no consideration has been given to the impacts of HAL's bird strike guidance on the proposal for the compensation land to become wetland. Other proposals have been impacted by this guidance, and no assurance is given that what is proposed for the compensation land would be allowed by HAL itself, potentially posing a threat to the adequacy of the compensation scheme.
- 7.36 There is no emergency plan in the case of flooding during the construction period. This is of concern as the majority of the works are near Staines Moor and are in the floodplain. This should be appropriately covered in the Code of Construction Practice to prevent any damage to the SSSI through flooding of equipment, works areas, fuel stores, etc.
- 7.37 Comment on the risks of contamination from the Hithermoor landfill site is made in section 13 of this report dealing with contamination.
- 7.38 The proposals as presented have little margin for error as replacement land appears to be provided only on an area for area basis, with the consequent risk of a significant loss in the quality and quantity of special scientific interest of the Staines Moor SSSI. No funding is proposed for possible improvements and management of the ecological quality of the SSSI to compensate for potential failure of their proposals. Without this there is no practical mechanism to ensure that after the development is completed the SSSI is in the 'favourable condition' that it should be.

## **ii) Cultural Heritage**

- 7.39 The impact of the scheme on the cultural heritage of Staines is not adequately considered. The scheme is likely to have an impact on the Staines Commoners and the Moormasters for example, through the possible reduced recruitment of graziers due to the disturbance caused by the scheme and its consequent long term impacts. Although the EIA Scope and Methodology Report states that 'common land with historic grazing or other use value will be considered as a resource'<sup>40</sup>, this is not considered in the Environmental Statement. Reduced recruitment of graziers would impact on the whole of the ecological condition of Staines Moor SSSI and has not been considered in the Environmental Statement.

## **iii) Landscaping**

- 7.40 The loss of existing landscaping at the north end of Staines Moor will have a significant impact on the sense of separation of the Moor from adjoining land uses – particularly the M25. It will open up the view of traffic on the motorway as well as full views of gantries and the railway.

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<sup>40</sup> Environmental Statement, Volume 4, EIA Scope and Methodology Report, Section 3.2.1.

7.41 Whilst new landscaping is proposed its extent will be limited by the amount of land available once the railway is built. An alignment of the track to the most western side of the 'limit of deviation' would enable the greatest extent of landscaping to be provided, thereby enhancing its potential long term effectiveness. Whilst HAL is seeking to leave the precise alignment to the detailed design stage, landscaping at this point is crucial and an undertaking now to secure the most westerly possible alignment should be sought. Notwithstanding, the existing landscaping has developed over some 25 years since the closure of the Staines to West Drayton line, at which point regeneration of the embankment proceeded without control and was supplemented by additional planting. This time period is a good indication of the time it will take to get back to similar density and scale of landscaping as it is today. It is more than a quarter of a century. It will be critical that new planting is in place as early as possible following completion of the works and this is already covered in the Code of Construction Practice.

#### **iv) Rights of Way**

7.42 In the proposals the retention of a bridleway and cycle route along the existing bridleway (BW50) is proposed. Currently this has the M25 to the west side, but under the proposals it would also have the railway on the east. As a result the route would have little, if any, amenity value. HAL has at this stage given no consideration as to whether there are risks arising from the relatively close proximity of trains to horse-riders and the risks of horse-scare. The absence of such assessment and any consideration of what mitigation measures may be required is a matter of concern.

7.43 Alternative access arrangements for pedestrians are proposed and are described in paragraph 7.14 above. Whilst HAL proposed three different options for access at the Phase 2 Consultation they have now only presented their preferred option. The pedestrian-only use of the former Staines to West Drayton railway embankment follows from close liaison with several bodies including the Borough Council. Borough Council Officers have strongly favoured a pedestrian-only use of the embankment. This judgment has been made in the light of the wider ecological and landscape matters and the Council's experience of management issues relating to the Moor.

7.44 Officers' views to not include horses and cyclists on this new route on the east side of the railway arise from four key considerations:

- a) There are problems of unauthorised motorcycle access onto the Moor requiring repairs to existing fences/stiles as well as enhanced structures to keep them out. Horses and cycles are not permitted to use the Moor. To enable a route for horse-riders and cyclists to run immediately adjacent to the Moor and ensure unauthorised users could be kept from getting onto the Moor would require significant robust structures. However, experience has shown the limitation of such structures when faced by determined groups. To have access arrangements making it easier to get closer to the Moor than at present would greatly heighten the risk of unauthorised access and associated on-going maintenance problems and damage to the SSSI. The potential risk to the nature conservation value of the Moor has led to the conclusion that its protection far outweighs any benefit of cycle and horse use close to it.
- b) Notwithstanding the above, the provision of a new bridleway, cycle and pedestrian route would require separate surfaces and a greater width of

land to be surfaced. This would further reduce scope for replacement landscaping adjacent to the north end of Staines Moor where the route already involves the loss of all existing planting.

- c) There is scope for an unfenced pedestrian-only route where the section of new railway abuts the north end of Staines Moor, thereby reducing the amount of intrusive structures required. This could not be achieved if a cycle/bridleway existed as they have to be fenced off from the Moor.
  - d) HAL advised that for the two new bridge decks to take horses over the Wraysbury River and Windsor line costs might rise by a further £2 million or so due to greater structural requirements. As potential use was limited it was hard to justify such expenditure.
- 7.45 The route as proposed is supported. The intention of proposing the use of the embankment for the replacement route was to avoid the visual intrusion of free standing bridges with ramped access. It will, however, be important that the new bridge decks are appropriate in design to their setting and as light and limited in scale as possible to minimise damage to landscaping in the construction process.
- 7.46 The submission proposals are, however, unclear as to what temporary arrangements for access will be in place during the period of construction, which also includes diverting a section of gas main beneath part of the existing bridleway.
- 7.47 Access to Stanwell Moor and onward to Poyle for cyclists in particular is currently possible only on the cycle way/bridleway adjacent to the M25 (BW 50). This will be closed<sup>41</sup> for two three month periods and there is no other route north of Staines between the M25 and King George VI Reservoir.
- 7.48 HAL has stated<sup>42</sup> that 'cyclists will be able to use Route 4I' during the closure of the existing bridleway along the east side of Staines Moor, but this is incorrect. Route 4I (also known as footpath 10) is not legally able to be used by cyclists as it is a pedestrian-only route. Spelthorne Borough Council, Surrey County Council and the Colne Valley Park are currently attempting to upgrade this route to a cycle path, but have met considerable difficulties through the Waters Drive housing estate due to the need to use existing relatively narrow footpaths. The only feasible way to upgrade the route to a cycle path is thought to be by building another bridge to cross the River Colne from footpath 10 into Moormede Park. The creation of this cycle route would enable cycle facilities to be maintained at all times during construction from Staines to Stanwell Moor and beyond between the M25 and King George VI Reservoir.
- 7.49 The proposed new railway results in a number of existing rights of way being truncated (e.g. footpaths 17, 18 and 19). Whilst HAL has put forward some proposals for alternative routes the 'Orders' proposed currently fail to satisfactorily deal with the truncation of routes. This results in some routes leading to dead-ends and other with no connection to existing rights of way. The proposals fail to provide for a comprehensive and coherent rights of way network.

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<sup>41</sup> Environmental Statement, Volume 6, Transport Assessment, para 5.23, page 39.

<sup>42</sup> Environmental Statement, Volume 1 Main Report, para 17.6.4, page 349.

**Objections:**

- 12. The baseline ecological assessment has not evaluated those areas of the Staines Moor SSSI affected by the scheme on the basis of its 'favourable condition' in accordance with the Institute of Ecology and Environmental Management guidance.**
- 13. The adequacy of the area of land proposed for ecological mitigation has not been demonstrated as being sufficient to ensure the SSSI is maintained in line with Planning Policy Guidance PPS 9.**
- 14. The adequacy of exchange common land and public open space has not been clearly demonstrated by reference to individual owners and exact areas of land to be offered.**
- 15. HAL is not seeking to acquire area E4 or Butts Pond which the SMMS identifies as a part of the strategy to mitigate for habitat impacts.**
- 16. Insufficient evidence has been produced to demonstrate that the proposed translocation of plant species can be successfully achieved and adequate land area of appropriate quality has the ability to reproduce the ecological functions and conditions of these habitats that have been lost or damaged.**
- 17. The proposal to translocate ancient ant hills has not been demonstrated to be successful or that it can be achieved without further damage to the SSSI by loss of habitat at the new locations.**
- 18. The impact of the scheme on historic rights of grazing has not been satisfactorily assessed.**
- 19. It has not been satisfactorily demonstrated that both de-watering in the tunnel construction and relocating utilities pipelines will not have an adverse impact on the water table of Staines Moor.**
- 20. Failure to demonstrate the scope to implement the appropriate laying out of the mitigation land at the Willows site to achieve its ecological objectives and how it will accord with limitations imposed by HAL due to bird strike risk to aircraft using Heathrow.**
- 21. HAL has failed to ensure the greatest potential effectiveness of replacement landscaping at the north west boundary of Staines Moor by agreeing the new track will be aligned as far west as possible within the limits of deviation.**
- 22. The mitigation proposals contain no details of who will manage the exchange land or the necessary funding arrangements which are critical to their implementation.**
- 23. Appropriate temporary rights of way have not been identified so as to ensure during the construction period that:**
  - a) Staines Moor is no less accessible,**

**b) access is maintained for cyclists and horse-riders between Staines and Stanwell Moor and beyond between the M25 and King George VI reservoir.**

- 24. Failure to demonstrate that Bridleway 50 could be safely used by horse-riders.**
- 25. Failure to ensure all affected rights of way are appropriately re-routed or otherwise accessible and have a coherent function.**
- 26. Generally insufficient information has been provided to justify the scheme and mitigation proposals and specifically information in the form of an appropriate Phase 2 Habitat Survey and Invertebrates Survey.**

**Support:**

- 27. Pedestrian-only use of the proposed new right of way utilising the former Staines to West Drayton railway line subject to:**
  - a) new bridge structures being appropriate to their setting and as light as is possible to reduce adverse visual and construction impacts,**
  - b) appropriate design to prevent unauthorised use and access other than by pedestrians to common land and the SSSI.**

## **8. Staines Chord to Windsor line junction (Moor Lane)**

### **a) Description of Works**

- 8.1** As previously described the new section of the Chord will be 516 metres long to connect the existing Reading and Windsor lines. Of this, 144 metres will be on a viaduct across much of the existing Elmsleigh surface car park. The Chord needs to maintain the track at the same level as the Reading and Windsor lines it connects. It will be on a tight curvature.
- 8.2** Detailed design work has not been undertaken but conceptual design work envisages the viaduct being supported by sets of columns at 16 metre intervals. The depth of the reinforced concrete deck required to support the track and track bed (ballast) results in a clearance of a minimum of 2.1 metres under the viaduct, but not much greater. Where vehicles are intended to pass under the viaduct collision protection beams are required by Network Rail and will be independent of the structure. The total width of the viaduct and beams is approximately 14.25 metres<sup>43</sup>. The viaduct will have noise barriers on top of a retaining wall and give the structure a total height of 5.2 metres above ground. The roof line of the trains will be at about 6.8 metres.

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<sup>43</sup> Environmental Statement, Volume 3 Drawings, HEAT-HA-STR-DRG-30013-Cross Sections.

- 8.3 The viaduct will pass through the current position of the vehicular ramp to the Elmsleigh multi storey car park (EMSCP). It is not possible to construct a new ramp over the viaduct to give both adequate clearance to trains and still link it to the bottom level of the car park. For this reason a new ramp is to be constructed to come down between the new Chord and South Street which will turn towards the Iron Bridge road junction, but with its own junction with South Street some 80 metres south of the Iron Bridge (see map<sup>44</sup>, page 5 of Annex 1 to this report). A reconfigured access is required to the Elmsleigh Surface car park combined with a reconfigured turn-round facility for traffic in South Street. This is, however, still broadly in the same location as the existing arrangements although pinched more tightly against South Street. There are no firm details of the timing of when works will take place on the car parks.
- 8.4 The limited clearance under the viaduct means access for higher vehicles is required for emergency service vehicles and for maintenance of both the car park and for Network Rail to access their track, as provided for in existing access arrangements. An emergency underpass is proposed between the South Street car park, off Westbrook Close (by the Synagogue), to the south east corner of the Elmsleigh Surface car park. This would provide for a height clearance of 5.4 metres and therefore need to descend some 3 metres below the prevailing ground level. It is proposed this would have lockable gates and only be wide enough for one way operation of traffic under signal control. This would result in the permanent loss of some 3 parking spaces in the South Street car park<sup>45</sup> (note: the proposed future car park design as currently shown would not function satisfactorily and it is most likely that a further 4 spaces would be 'lost' at the eastern end). This car park is owned by the Council and leased to BUPA for their use during the week. It is available for shoppers at weekends.
- 8.5 The footprint of the Chord and new access arrangements results in the loss of up to 70 car parking spaces on a permanent basis.
- 8.6 Some re-arrangement of existing rights of way is required from South Street to the underpass at the back of the Elmsleigh Surface car park leading to Station Path. During construction diversions will lead to routes to the town centre from the area of the station being considerably longer.
- 8.7 Temporary car park arrangements are proposed during the construction period. The Elmsleigh Surface car park will be used for construction and a works site for two years with no public car parking available. South Street car park will also be required. For a period, currently estimated by HAL at six months, a separate ramped access to the Elmsleigh multi-storey car park will not be available. HAL proposes to link the Elmsleigh and Tothill car parks on a temporary basis with the Elmsleigh multi-storey car park being accessed via the Tothill car park. Spelthorne Council is only aware of this arrangement based on indicative plans previously supplied, but not part of the submission. The arrangement would involve the loss of a further 16 spaces.
- 8.8 HAL provides some calculations of car park availability during the construction period with the loss of the Elmsleigh surface and South Street car parks. This shows that occupancy levels would be at some 78% on Wednesdays but at

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<sup>44</sup> Non Technical Summary of the Environmental Statement, page 5, Map: Staines Chord.

<sup>45</sup> Environmental Statement, Volume 6, para 6.5.1, page 57.

97% on Saturdays and Sundays. HAL accepts that demand will be higher during the Christmas peak and exceed current supply. The Christmas period is a critical time for retailers as it is when a significant amount of the year's sales are secured, and therefore the impact on retailing will be even greater than the length of the Christmas trading period would suggest. They refer to the scope for Park and Ride and use of private car parks, but present no proposals<sup>46</sup>. They also acknowledge that at Christmas time there would be a 'periodic significant adverse effect'.

- 8.9 The new structures and construction work will involve the loss of virtually all of the existing trees and other vegetation between South Street and the current railway lines. Provision of any replacement planting for the Elmsleigh Surface car park and where that might go is subject to planning conditions<sup>47</sup>.
- 8.10 Information is provided on the traffic associated with the construction of the scheme. At the peak of construction in the town centre as a whole (on the Chord and Staines Station) some 85 lorry trips per day are expected. The greatest number (80) is expected on the Chord site<sup>48</sup>.

**b) Comments:**

- 8.11 The Staines Chord, the car park access rearrangements and the loss of car parking both temporary and permanent will have an adverse impact on this part of Staines town centre. In combination with the construction activity at Staines Station and in Station Path (detailed later) there is the risk of an adverse impact on the town centre as a whole. Each aspect of this part of the scheme is dealt with below under sub-headings.

**i) Visual Impacts**

- 8.12 South Street is currently well treed with extensive shrub planting to the back of the highway and around the entrance to the car park. The Windsor line embankment, from the pedestrian underpass up to the Iron Bridge, has substantial mature trees on it, most of which will need to be removed. There is also extensive tree cover on the former railway embankment between the Elmsleigh surface car park and the South Street car park. This will also be removed in its entirety. The land required for the new structures and track limits the scope for replacement planting without the further loss of car parking.
- 8.13 The viaduct can only be located in the position now shown because of the required geometry to create the two new junctions and also hold a 12 car train on the new section of track. There is therefore no realistic option to overcome the above problems through a different siting.
- 8.14 Indicative drawings only have been supplied at this stage but the weight of trains, tracks and track beds require substantial reinforced concrete structures. There is little in terms of general design approach that can be done to disguise the scale and mass of the structures and their inevitable domination of the view of those driving, walking or cycling in South Street and

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<sup>46</sup> Environmental Statement, Volume 6, Transport Assessment, para 5.3.8.

<sup>47</sup> Application and Draft Order and Supporting Documents, Section 10, Schedule 2, Condition 17.

<sup>48</sup> Environmental Statement, Volume 6, Transport Assessment, Annex 6, Figure A6.2, page 94.

using the car parks and bus station. The indicative sketches<sup>49</sup> submitted by HAL of what things might look like are very much of a cartoon style and do not assist in providing a realistic perspective.

- 8.15 Pedestrians seeking to get from the Elmsleigh Centre/town centre via Station Path to the station and its vicinity will need to cross the Elmsleigh surface car park to points underneath the viaduct. New routes will need to be defined. The car park will itself be wholly enclosed by railway lines with only 140 metres of viaduct providing a limited view out to South Street. The loss of openness and visual connection with this part of the town centre area generally will impact on the natural surveillance of the area and sense of security pedestrians derive from this.
- 8.16 All design detail has been left for subsequent approval and the requirement to submit and secure approval is controlled by planning conditions.

## **ii) Highway Impacts**

- 8.17 The new car park ramp for the Elmsleigh multi-storey car park will require an additional road junction on South Street. The additional movements across the flow of traffic and disruption will inevitably impact on the movement of traffic through the town. Currently users of the car park can move between the Elmsleigh surface and multi-storey car parks without going back onto South Street. Any such movements in the future would add to traffic movements on South Street. No mitigating measures have been suggested to overcome this loss of connectivity between the two car parks. At the very least, alterations to the town's variable message signing (VMS) system informing drivers of available parking spaces should be implemented to differentiate between the Elmsleigh car parks.
- 8.18 It is mentioned in the Transport Assessment that the above proposals have been tested by HAL using Surrey County Council's PARAMICS micro-simulation model of Staines Town Centre. No detailed information is provided apart from reference to the fact that more delays will be experienced during the pm peak.
- 8.19 It is considered that the information provided is wholly inadequate and more detailed information ought to have been provided by HAL as part of the TWA submission. In lieu of this information, the Council's consultants have sought details direct from Surrey County Council to look more closely at the data HAL state they have relied on. The County has provided their modelling report. The future year scenario in both 2014, Scheme Opening Year, and 2029, Design Year, have been tested. Apart from applying underlying traffic growth, introducing the new junction to the study network and re-allocating Elmsleigh MSCP trips to a new study zone (16), no other changes have been made. The model has only been tested for the am and pm peaks despite there also being inter-peak data that could have been assessed. In terms of the output, the key point to note is that during the pm peak, journey times from the Crooked Billet to the Laleham Road junction with South Street will be 41 seconds (+15%) longer in 2014, rising to 47 seconds (+17%) in 2029 as a consequence of the Airtrack proposals.

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<sup>49</sup> Environmental Statement, Volume 1, Main Report, Plates 9.1 to 9.12, pages 135-140.



- 8.20 It is of concern that the inter-peak traffic position has not been assessed, bearing in mind that the prime purpose is to test alterations to car park access arrangements. The inter-peak period more closely represents Saturday conditions when background traffic levels are generally lower but when car park activity at the main shopper car parks in the town is much higher. The Local Model Validation Report supplied by SCC shows that in 2005 the 2-way movements associated with the joint Elmsleigh surface and MSCPs was 232 (154 in/78 out) in the am peak (07.15-09.15) and 340 (118 in/222 out) in the pm peak (16.45-18.45). This compares to the inter-peak (11.15-13.15) 2-way movements of 789 (362 in/427 out), i.e. the inter-peak flows were over three times more than the am peak and over twice the pm peak flows. Whilst it is acknowledged that background traffic flows on both streets may be lower in the inter-peak, the car park entry and exit flows are markedly higher to justify this period also being assessed.
- 8.21 No Saturday assessment has been undertaken by HAL, when traffic movements associated with the town centre car parks are at their highest. The Council has therefore assessed the car parking data collected by our VMS system and looked at the most recent "neutral" month in respect of traffic data. Data for the first week of June 2009 was taken (1st to Friday 5th, of which the Friday was the busiest day, and then Saturday 6<sup>th</sup>). This data shows that Friday inter-peak flows were 1665 (844 in/821 out) whilst the Saturday peak (12.00-14.00) flows were 3273 (1672 in/1607 out). The combination of very high vehicle movements associated with the car parks and the additional road junction for the new multi-storey car park ramp is likely to cause traffic problems. It is essential HAL make a more stringent assessment of the impact of the Staines Chord when traffic levels associated with the Staines town centre car parks are much higher than assumed thus far.
- 8.22 The construction of the Staines Chord will consequently also have an impact on traffic movements in Staines town centre as a whole when the Elmsleigh surface car park is closed and particularly during the period when the ramp access to the Elmsleigh MSCP is removed and traffic is diverted via Elmsleigh Road and Thames Street to gain access via the Tothill MSCP. It is mentioned in the Transport Assessment that the proposals have been tested using Surrey County Council's PARAMICS micro-simulation model of Staines Town Centre. However, apart from two illegible plans shown in Annexes 13 and 14 of the Transport Assessment<sup>50</sup>, the only other information provided is reference to the fact that traffic exiting the Tothill MSCP during the evening peak hour would experience increased delays that may be mitigated by adjusting traffic signal settings at the junction of Elmsleigh Road and Thames Street.
- 8.23 In lieu of any further information being provided as part of the TWA submission, the Council has again sought details from Surrey County Council about their information that HAL has appeared to rely on. The County has provided their modelling report. The document deals with the impact of Airtrack during the construction phase, in the period during 2012 when the surface car park is closed and access to the Elmsleigh MSCP is via Tothill MSCP. Apart from applying underlying traffic growth and re-allocating trips bound to the Elmsleigh car parks (Zone 10) and to the Tothill car park (Zone 13), an allowance was made for construction traffic associated with the

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<sup>50</sup> Environmental Statement, Volume 6n, Transport Assessment, pages 135-138.

Staines Chord. Again, the model has only been tested for the am and pm peak models despite there also being an inter-peak model available.

- 8.24 We are again very concerned that the inter-peak period has not been assessed, particularly bearing in mind that the nature of the assessment was to determine the impact of changes to car park access arrangements. By reference to Surrey County Council's Local Model Validation Report, the 2005 2-way movements associated with the joint Elmsleigh surface and MSCPs and Tothill combined was only 509 (382 in/127 out) in the am peak and 721 (228 in/493 out) in the pm peak whilst the inter-peak 2-way movements were 1,141 (544 in/597 out). In other words, the inter-peak flows were over twice the am peak and more than one and a half times the pm peak flows. As noted earlier, more recent data derived from the Borough's VMS system shows even higher figures for both the weekday inter-peak and Saturday peak periods.
- 8.25 In terms of the model output, none was provided apart from one key point that, during the pm peak, traffic had failed to clear the Tothill car park at the end of the modelled period. HAL accepts<sup>51</sup> that construction activity associated with the Staines Chord will cause a 'temporary significant adverse effect'. This of course does not take account of the concerns outlined above. There will be a combination of traffic arising from construction, interim parking arrangements and the additional road junction created in South Street. It is highly likely that the situation will be even worse during the inter-peak and on Saturdays. Apparently further model testing to see how best to mitigate this impact was not undertaken as this was beyond SCC's remit. Again, we consider this to be wholly inadequate and more detailed information ought to have been provided by HAL as part of the TWA submission.

### **iii) Car Park impacts**

- 8.26 Firstly by way of background during the construction period, of the 3193 Council run public car park spaces available on Saturdays, 431 will be lost (373 at Elmsleigh Surface Car Park, 35 at South Street, Car Park, 23 at Staines Station which would be displaced to the Kingston Road Car Park). This loss amounts to 13.5% of total stock. Combining the Tothill (521 spaces) and Elmsleigh (511 spaces) multi-storey car parks with tortuous and lengthy search paths and projected delay on exit due to traffic congestion at Thames Street will seriously compromise their effectiveness and attractiveness. They account for a further 32.4% of car park capacity. There are doubts, however, about the ability to link the Elmsleigh multi-storey car park to Tothill. These issues are addressed along with other matters below.
- 8.27 In the long term the proposals will result in the two Elmsleigh car parks having independent access and some disadvantage to users who may wish to get from one to the other.
- 8.28 The Elmsleigh surface car park is one of the town's most popular car parks, usually filling up before any other Council car park. Surface car parks are popular and this one is particularly well sited for shoppers wanting to go to the Elmsleigh Centre and High Street. It has a high turnover meaning that the 70 lost spaces would otherwise be used many times during a day. The loss of 70 spaces in this surface car park is therefore of greater significance than the numerical loss on its own would suggest.

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<sup>51</sup> Environmental Statement, Volume 6, Transport Assessment, para 5.6.18, page 46.

- 8.29 In addition to the loss of spaces is the impact of the Chord on the remaining car park. The obscuring of most of the car park behind a viaduct/embankment from open views from South Street and the wider area is likely to be less attractive to users.
- 8.30 There are currently no proposals of where the existing car park office would be located. This provides the base for the operation of the Council's car parks as well as a point where the public can go with any queries. A new location is likely to add to the number of car parking spaces that will be permanently lost.
- 8.31 The construction impacts on car parking are particularly significant. HAL currently accepts that on Saturday occupancy levels across the Borough's car parks will reach 97%, but only in respect of Christmas time accept a 'periodic significant adverse effect'. Car parks are generally regarded as full when they reach 90% occupancy because at that point circulation for remaining spaces starts to cause queuing. HAL has clearly failed to understand the operational significance of the 97% occupancy level and the indicator this gives to effective full capacity having already been reached.
- 8.32 Currently HAL proposes to take control of the Elmsleigh Surface car park at the outset of construction and then commence work on temporarily linking the two multi-storey car parks together for the six months, during which the new access ramp to the Elmsleigh multi-storey car park is constructed. This will mean both the Elmsleigh surface car park and the multi-storey car park will be out of action for a short period until the temporary arrangements are in place. The two car parks provide 884 spaces.
- 8.33 The Tothill multi-storey car park is currently the least popular car park and largely used by season ticket holders. Its access is via the Elmsleigh Service Road. It is an independent structure to the Elmsleigh multi-storey car park. Whilst physically a way through can be created for vehicles between structural pillars (after removal of walls) this would result in difficult manoeuvres and a long driving distance for those seeking to park in the Elmsleigh MSCP above the Elmsleigh Centre shops. Currently a user of the Elmsleigh MSCP would travel some 832 metres from the highway in South Street and back to a convenient space close to the central lift core of the car park. Under the interim arrangements the distance from Thames Street and back to a convenient space close to the central lift core in the same car park would, after negotiating the various circulation routes, be some 1555 metres.
- 8.34 Whilst no detail of the physical link between the two car parks was submitted as part of the TWA submission, initial sketch proposals have previously been submitted to the Council. Our consultants have assessed these proposals and have concluded that a large saloon car would have severe difficulties making the proposed exit manoeuvre from the Elmsleigh MSCP into Tothill, owing to the positioning and width of the proposed link, which would result in damage caused by hitting structural protection barriers.
- 8.35 The required route to the Elmsleigh MSCP would be lengthy and inevitably a deterrent to users of the car park. HAL refers to the scope for 'management' measures, but provides no detail. The extent to which use could be made more attractive by staff being permanently available to guide traffic through and combined with reduced car parking fees has not been addressed by HAL or how the costs of providing mitigating measures will be met.

- 8.36 The effect of the proposals is to remove any form of convenient parking for the Elmsleigh Centre for a period of six months, and also significantly limiting it over a period of two years, with potential significant impact on the attractiveness of the centre to shoppers. It is also possible it will make the leasing of shop units more difficult. As they stand the car parking arrangements are clearly unacceptable.
- 8.37 The impacts could be reduced to a degree by re-ordering the currently envisaged sequence of construction work. The existing multi-storey ramp could be removed and replaced before the bulk of the Elmsleigh surface car park were taken over as a construction site. It would be possible to substantially build a new ramp up to the existing bridge element over South Street and make a connection to the new ramp over a short period of time. However, this has not been proposed by HAL as an option. Whilst the two multi-storey car parks would still need to be linked to ensure maximum parking flexibility while the ramp could not be used, much of the surface car park would still be available. This would require work on the Chord construction to be set back by around six months but need not delay the completion date of the scheme as a whole.
- 8.38 HAL provides no detail to support their reference to the scope for park and ride facilities to mitigate the loss of parking during the construction period. No sites or arrangements for managing them are offered.

#### **iv) Relationship to the Elmsleigh Phase 3 scheme**

- 8.39 There is an issue of timing of the project and the Phase 3 scheme for the Elmsleigh Centre. The Phase 3 scheme was envisaged to be completed before the commencement of the construction of Airtrack. This is critical because part of the Elmsleigh surface car park is required for a temporary bus station and compensatory flood storage. The recession has impacted on development schemes and no firm date currently exists for the commencement of Phase 3. However, the construction period for Airtrack as a whole is four years, allowing for some flexibility of when work on the Chord starts. As currently envisaged, and already referred to in relation to car parking, possession of the Elmsleigh Surface car park takes place at the start of the construction period. It allows for no flexibility for the Elmsleigh Phase 3 project and for the compensatory flood storage work to take place at a later stage. This could have a bearing on the ability to extend the Elmsleigh Centre and the longer term retail attractiveness of the town centre. Failure to take account of the Elmsleigh Phase 3 scheme is unacceptable.

#### **v) Other Matters**

- 8.40 Beneath the Elmsleigh Surface car park is a culvert providing a water supply from the Riverside car park to the north end of Sweeps Ditch. There is also a culvert extending northward towards the Iron Bridge through which Sweeps Ditch was historically fed. It will be essential that these facilities are maintained and not damaged or cut off by construction work and/or new structures. The scheme provides no assurances on this point.
- 8.41 Noise impacts are dealt with in section 11 of this report.

## vi) Overall Impact on the Town Centre

- 8.42 It is clear from the preceding sections that construction of the Staines Chord will cause significant disruption to Staines town centre for some two years. This will be through the construction activity itself, loss of car parking to the point of being insufficient to meet normal weekly peak demand with particular impact on car parking available to support the Elmsleigh Centre, and overall risks to the perceived attractiveness of the town centre itself. Construction activity associated with the changes to Staines station will also be substantial (as described in the next section of this report) and add to the level of disturbance to the town.
- 8.43 If the town centre has insufficient car parking and is also less attractive due to temporary access arrangements, this can only deter shoppers and other uses of the town. Staines is located in an area where there are a number of other competing centres within a relatively short distance (e.g. Windsor, Camberley, Woking, Hounslow and Kingston), which would mean that shoppers have a realistic choice of centres to use. There is a significant risk that the adverse impacts through a construction period as described above could not be recovered from instantly on the completion of the work. It could take many years to fully recover lost patronage.
- 8.44 As explained in section 3 of this report, the socio-economic benefits of Airtrack to Spelthorne bear no relationship to the projected passenger numbers (para 3.14b) and no account is taken of the adverse impacts of disruption to Staines town centre during construction and its potential long term impacts. HAL has made no financial assessment of the impact on the Council and other businesses of the disruption and the loss of income, including lost car park revenue and reduced value of freehold and leasehold interests. There is no credible evidence that the small increase in rail use to and from Staines town centre could outweigh the harm that construction activity will cause.
- 8.45 Section 10 of this report deals with the potential impact of increased level crossing down-time. It is considered this will lead to adverse highway impacts likely to add to congestion in Staines town centre once Airtrack is operating. This impact on the town centre has not been acknowledged by HAL.
- 8.46 Critically, given the extent of adverse impacts that even HAL accepts<sup>52</sup>, there appears to have been no attempt to consider whether Airtrack could operate without the Staines Chord, albeit with reduced services from Guildford and Reading, and delivered through the enhancement of existing services.

### Objections

**28. Inadequate assessment of the highways impact of the Chord during both construction and in the permanent arrangements with due regard to the periods of peak car parking activity.**

**29. The scheme will result in car park provision in the town centre during the construction period being reduced to a level with no effective operational spare capacity at weekends and which at**

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<sup>52</sup> Environmental Statement, Volume 1 Main Report, Chapter 18, Cumulative Effects, Section 18.4.

Christmas and other peak periods will be wholly inadequate to meet demand.

30. HAL has failed to consider how works could be phased to reduce the loss of car parking at any particular point in time, including the scope to construct the new ramp to the Elmsleigh multi-storey car park before most of the Elmsleigh Surface Car Park is acquired and taken out of action.
31. Failure to demonstrate that the Tothill and Elmsleigh multi-storey car parks can be structurally linked so as to enable vehicles to use it safely and conveniently.
32. Notwithstanding the above, there are no details of the management measures that would be required to enable the combined multi-storey car parks to be made sufficiently attractive and safe to use by shoppers.
33. No assessment of the financial implications of disruption and loss of car parking on the Borough Council and the impact on the value of its freehold and leasehold assets.
34. No details of suggested Park and Ride or other measures suggested by HAL to address the shortfall in the town's parking provision during construction and demonstration such a proposal could effectively mitigate the loss of existing parking provision.
35. No flexibility in the timing of the commencement of construction work on the Staines Chord and the implementation of the Phase 3 scheme to extend the Elmsleigh Centre and its need to temporarily make use of part of the Elmsleigh Surface Car Park.
36. No detail or particular assurances about the maintenance of existing culverts across the Elmsleigh Surface Car Park which link to the north end of Sweeps Ditch.
37. The proposals will have a significant adverse impact on Staines town centre, both during the construction period and once the rail services and facilities are operating. There has been no evaluation of whether Airtrack could, with modification of service proposals, operate without the proposed Staines Chord.
38. No detail of where the replacement car parks office can be provided.

## **9. Staines Station**

### **a) Description of Works**

- 9.1 The provision of a third line and platform edge at Staines Station requires a substantial amount of new building on the north side of the existing station in particular. (This is illustrated in the plan on page 6 of Annex 1 to this report).
- 9.2 As currently planned the third platform has to be wholly independent of the existing Waterloo bound platform because of different levels arising from the

existing platform being on a slight gradient and rail industry safety rules requiring new platforms to be flat. The differences will result in a step between the two platforms and therefore the need for a dividing barrier and for both platforms being of sufficient width to function as separate entities. Two independent platforms are wider than a combined platform by several metres. This consequently places the new third line, and then the retaining wall for the embankment it will sit on, some 2 metres or more in advance of the front facade (forecourt side) of the existing station building. The line will finish at a point roughly where the temporary South West Trains Offices are to the east of the existing station building<sup>53</sup>.

- 9.3 This requires the existing station building to be demolished and replaced. It is proposed to relocate it to broadly where the existing South West Train staff car park is located, immediately adjacent to the existing public forecourt car park. The new building would accommodate offices for South West Trains on the upper floor. The significant widening of the land required for track and platforms at the station requires a new footbridge to span the greater distance. This now has to be fully accessible with ramps, thereby involving a much larger structure and land-take than the existing,
- 9.4 Indicative plans of the station building and forecourt have been submitted showing the resulting forecourt area laid out for buses to enter and park along with space for taxis, 'kiss and ride' drop off and three disabled spaces, but no space to replace the 20 existing public parking spaces.
- 9.5 The new platform only overlaps the existing Waterloo platform by some 60%, resulting in the remainder extending alongside Station Path to a point some 20 metres short of the east façade of the Oast House building on the west side of the Kingston Road car park. At this point a secondary means of escape is shown from the end of the platform, under the new railway line and onto Station Path.
- 9.6 The new third line joins the Windsor line at a junction commencing some 60 metres on the High Street side of the pedestrian underpass leading from Station Path to the Elmsleigh surface car park. This requires the bridge over the underpass to be widened by the tracks width plus margins. A new retaining wall will support the new embankment and the wall will run from Staines Station alongside Station Path to a point just 50 metres short of the High Street. The foundations are extensive<sup>54</sup> and involve substantial construction work.
- 9.7 Network Rail is currently looking to construct a new pedestrian bridge with lifts at Staines Station to link to 'up and down' platforms. It will be located at the eastern end of the platform. This is to meet Disability Discrimination Act requirements (DDA) and is unrelated to Airtrack's proposals and cannot be delayed to coincide with them. This bridge is on what is called the 'paid' side and not for general public use (non-paying).

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<sup>53</sup> Environmental Statement, Volume 3, A3 drawings, drawing HEAT-HA-STR-DRG-30071 and also page 6 of the Non-Technical Summary.

<sup>54</sup> Environmental Statement, Volume 3, A3 Plans, Plan HEAT-HA-STR-DRG-30071 Cross section B-B.

**b) Comments:**

**i) Interchange**

- 9.8 The proposals entail a substantial amount of construction work and disruption. HAL proposes, however, that the station remains operational at all times and would build the new station building first. Detailed design issues are, however, left to a later stage and proposed to be controlled by conditions.
- 9.9 An increased range of rail services means that the station will assume a more important role as an interchange in the future and it is important that the increasing policy requirement to encourage non-car use generally – including to stations – is reflected in the scheme. Adequate space for buses (including private company mini-buses/coaches), taxis and cycles is important as well as a good visible/secure pedestrian access. It is not only important that functionally the new station provides appropriate facilities and capacity but that in its design it is a visually attractive facility which works effectively for all users and encourages rail use. At present there is insufficient detail within the submitted documents to judge HAL's intentions regarding the proposed quality of the interchange facilities and further assurances on this point should be sought.

**ii) Platform**

- 9.10 Currently the design of the new platform is a wholly separate structure to overcome the safety issues attributed to the existing platform having a 1:135 degree slope. Whilst genuine safety issues need to be taken seriously, the degree of slope in this case is slight and appears to be dictating a layout which has the effect of removing several metres depth of forecourt space that could assist the more effective layout of that area. It also has the effect of placing the new line even closer to Florida Court which is situated immediately north of Station Path with access off Station Approach.
- 9.11 It is understood that there is a process that Network Rail and HAL could pursue of 'derogation' from prescribed standards. This could avoid the current resulting unsatisfactory layout implications from this requirement. At present Network Rail are apparently unable to agree to any 'derogation' without further details, which are of course not presented by HAL at this stage. The result is that an unsatisfactory layout could be fixed now in the absence of sufficient detail. This is unacceptable and HAL/Network Rail should be required to respectively provide the necessary detail and assurances to enable a combined platform to be provided in order to reduce the land-take with the consequent benefits of:
- a) providing a larger forecourt area,
  - b) placing the new line further away from the residential properties at Florida Court,
  - c) enabling Station Path to be maintained as wide as is possible.



### iii) New Buildings

- 9.12 The proposed new station building currently sits very close to the corner of nos. 37-42 Pullmans Place. There is a gap of only some 3.5 metres<sup>55</sup> from the rear corner of the flats to the corner of the new station building. Whilst the nearest part of the station building is indicated as being single storey, the floor to ceiling height of the buildings sets the roof at a level slightly over half way up the first floor of the flats. In addition, indicative outlines of two additional buildings are shown to the back of the existing platform and immediately to the rear of nos 37-42. These have been proposed as a café facility. They will be built at platform level and therefore elevated above existing ground level. In principle the siting of the station building and the additional ancillary building will have an overbearing effect on Pullmans Place and their siting is unacceptable.
- 9.13 The station forecourt proposal currently has only limited<sup>56</sup> space for cycle parking on the north side of the station indicated by text on the map but no demonstration of size of space available or sufficient information to judge if this can be appropriately provided without conflict with the needs of other users. This is unacceptable.
- 9.14 The loss of 20 public car parking spaces results from a lack of space. HAL proposes that current users park at the Kingston Road car park. The Transport Assessment shows that HAL assumes that of the net additional passengers entering or leaving the station in 2015 and 2030, a third will be dropped by car ('kiss and ride') and two thirds by bus<sup>57</sup>. None are assumed to walk, cycle or drive themselves. Whilst the net additional passengers entering or leaving in the am peak is only 22 in 2015 and 30 in 2030 the assumptions on mode of travel are unsubstantiated. Given that national policy encourages alternatives to car use a more restricted parking provision is arguably appropriate but only if facilities for all other modes are significantly improved. The lack of credible assumptions on travel and space for appropriate facilities is a matter of concern. It is also unclear the extent to which there may be additional parking in nearby roads by commuters if HAL's assumptions on mode of travel to and from the station are incorrect and more people wish to park near the station.
- 9.15 The position of the third line and retaining wall to the embankment will impinge on the width/setting of Station Path. This is an important route linking the station to the town, and its attractiveness is critical to its use and in turn use of rail travel. Currently Station Path is generally fairly wide between the underpass to the Elmsleigh surface car park and the station end of the Kingston Road car park. However, it narrows as it approaches the station and is somewhat overshadowed by several large trees growing out of the lower edge of the railway embankment. At the underpass there is a 'dog-leg' in the path preventing longer views for pedestrians. In this area there are extensive areas of bramble on Network Rail land contained by chain link fencing enclosing otherwise unused land.

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<sup>55</sup> Environmental Statement, Volume 3, A3 Plans, HEAT-HA-CSR-DRG-15090 and HEAT-AR-ARC-DRG-40155.

<sup>56</sup> Environmental Statement, Volume 3, A3 Plans, HEAT-AC-ARC-DRG-40155 First floor plan.

<sup>57</sup> Environmental Statement, volume 6, Table 6-1, page 54.

- 9.16 It is important that this route is both attractive and feels safe. Good visibility and lighting will be critical. Where the new embankment is contained by a retaining wall there is scope for the route to be widened and the removal of certain trees may assist the spread of light from street lights. Current plans are unclear as to whether public access on completion will be allowed up to the retaining wall or if a fenced margin is to be handed back to Network Rail – with the attendant problems associated with the lack of maintenance of vegetation. Further detail and assurances are needed on this point so it is clear who will control this area on completion of work and the extent of public access. This is critical to securing a high quality pedestrian link to the town in support of the station’s intended role as an improved transport interchange.
- 9.17 The existing station house and pedestrian footbridge are ‘locally listed’ structures and contained on a ‘list’<sup>58</sup> adopted by the Council in February 2004 following public consultation. These were built respectively in 1870 and 1881. Policy EN5 of the Council’s Core Strategy and Policies DPD sets out the Council’s intention to preserve the Borough’s architectural and historic heritage by refusing consent unless it is demonstrated retention is not physically possible.
- 9.18 The details appear to demonstrate there is no alternative to the third line and platform passing through the site of the station house. In accordance with the Council’s policy this should be contingent on an agreement that an appropriate record of the building should be made by HAL in line with Policy EN5. However, only the steps on the north side of the bridge need repositioning subject an additional bridge deck to span the new line and platform. It has not been demonstrated that an extension to the deck of the existing bridge and repositioning of the steps could not be secured and thereby retain the structure broadly as it is.
- 9.19 Nevertheless, if it were demonstrated the bridge could not be retained there should be an undertaking about making it available for long term preservation at another side and appropriate records being made.

## **Objections**

- 39. The current proposal for the third platform to be separated from the current up-line platform results in a consequently greater land-take than a combined platform. This therefore further impinges on the resulting size and appropriate function of the re-configured station forecourt. This consequence is unacceptable and HAL and Network Rail should produce solutions to provide a combined platform to enable the new line to be as close to the existing track line as possible.**
- 40. The proposed siting and intended design of the station building and ancillary buildings at the back of the up-line platforms create an unacceptable overbearing impact on nos 37-42 Pullmans Place.**
- 41. The siting of the station building, footbridge and drop off/parking areas fail to provide scope for adequate cycle parking facilities on the north side of the station.**

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<sup>58</sup> Local List of Buildings and Structures of Architectural or Historic Interest, February 2004, page 41.

- 42. The proposals are supported by assumptions of high levels of ‘kiss and ride’ movements and no assumptions of walking or cycling as a mode of transport for the additional passengers. Objection is made that the proposals are not accompanied by a Travel Plan and strategy to encourage non-car access to the station.**
- 43. Insufficient clarity on the intended use and management of land at Station Path currently within Network Rail’s ownership on the Station Path side of the proposed retaining wall.**
- 44. The loss of the locally listed pedestrian footbridge at Staines Station as it has not been justified or that it could not be altered/extended and thereby retained. In the event that the footbridge cannot be retained there are no undertakings to make a record of the structure and seek an alternative location to secure its long term preservation. There are also no undertakings to make a record of the station house.**

## **10. Level Crossings**

### **a) Description of Issue**

- 10.1 Members registered strong concerns about the level crossing issue in the Phase 2 consultation and the potential impact on Staines town centre through queuing traffic, and the lack at that stage of any proposal to mitigate the problem. More detailed information has been provided on the issue.
- 10.2 There are 15 level crossings overall affected by Airtrack services with three in Egham with significantly increased down-times. These crossings are at Thorpe Road, Vicarage Road and Station Road. Increased down-times arise from a doubling of the number of trains along this section of track. Thorpe Road leads due south from the A320/A308 roundabout on the south side of Staines Bridge and the level crossing is 200 metres south along the road, with space for 24 queuing vehicles between the crossing and the roundabout.
- 10.3 Conflicting down-time information is provided by HAL with one table<sup>59</sup> stating the existing down-time as 22.50 minutes and with Airtrack 37.00 minutes, and another<sup>60</sup> stating respectively 20 and 33 minutes.
- 10.4 Of particular importance is the need to assess the down-time position during the peak hours when the likelihood of traffic congestion will be at its greatest. During the current pm peak time barrier closure is 27 minutes which, with an additional 14 minutes of closure with Airtrack, gives 41 minutes of closure time at Thorpe Road.
- 10.5 In terms of queuing traffic, based on the lesser figures above, HAL calculate the number of vehicles queuing per day at Thorpe Road is to rise from 3048 to 4936<sup>61</sup>.

<sup>59</sup> Environmental Statement, Volume 2, Effects at Level Crossings, para 5.2.6, page 29.

<sup>60</sup> Environmental Statement, Volume 6, Transport Assessment Table 6-4, page 57.

<sup>61</sup> Environmental Statement, Volume 2, Effects at Level Crossings, Table 2-2, page 10.

- 10.6 The position is, however, worse than HAL appears to accept. It is generally accepted that in terms of highway capacity that effective junction capacity is reached when a signalised junction is at about 90% of theoretical capacity. Our consultants calculate that under current traffic levels the junction would be operating at 93% and applying TEMPO<sup>62</sup> growth derived traffic growth rates of 1.07% to 2014 the ratio of traffic flow capacity would then be 99%. The additional flows/increased down-time increases queue lengths by some 10 vehicles and in the pm peak (based on current queue patterns) would result in 6 instances within the hour (an average of every 10 minutes) where the queue blocks the A320 roundabout. Our consultants conclude this would be at a level that the roundabout would fail to operate and result in the blocking of all through movements at the A320/A308 roundabout.
- 10.7 HAL accepts that the southbound queue to the crossing is already observed to back up to the roundabout<sup>63</sup>. However, HAL only comment on the 'with Airtrack' position in relation to northbound traffic where it is stated 12% less traffic will be able to cross the railway<sup>64</sup>. The Environmental Statement<sup>65</sup> concludes there will be a 'severe adverse and significant effect' on traffic at this location, particularly when the impacts on the two bus services are taken into account.
- 10.8 The Environmental Statement<sup>66</sup> accepts there may be scope to reduce unnecessary down-time "perhaps changing the way that the crossing is operated, for example devoting a dedicated signalman at the control centre to manage the operation of crossings". The report notes this issue is being discussed with Network Rail. It goes on to note that at Egham the potential for new infrastructure and traffic schemes is being explored.
- 10.9 HAL goes on to state, however, that "responsibility for addressing the issues rests with Network Rail in operating the barriers and with the local highway and planning authorities to develop traffic management, land use and infrastructure solutions in relation to policy and current and predicted traffic flows"<sup>67</sup>.

**b) Comments:**

- 10.10 Despite the variance in figures on down-times, even the lesser figures result in a substantial increase in the amount of traffic queuing where already at times it backs up to the A320 roundabout. There is a sound basis for concern that this will add to the congestion problems already experienced at this roundabout and the consequent risk that congestion will be made worse on the roads leading out of Staines town centre. It is understood that Runnymede has a range of concerns relating to the impact on the Egham area.
- 10.11 HAL accepts there will be a 'severe adverse and significant effect' but take no responsibility for the worsening of the existing problem which is generated by the Airtrack services, instead suggesting it is for Network Rail and the local authorities to resolve. This position is considered unacceptable.

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<sup>62</sup> TEMPO is a transport model.

<sup>63</sup> Environmental Statement, Volume 2, Effects at Level Crossings, para 5.2.3, page 29.

<sup>64</sup> Environmental Statement, Volume 2, Effects at Level Crossings, para 5.2.8, page 29.

<sup>65</sup> Environmental Statement, Volume 2, Effects at Level Crossings, para 5.2.9, page 30.

<sup>66</sup> Environmental Statement, Volume 2, Effects at Level Crossings, para 9.5.1, page 61.

<sup>67</sup> Environmental Statement, Volume 2, Effects at Level Crossings, para 9.5.3, page 61.

- 10.12 There may well be means of reducing the amount of barrier down-time and easing queuing problems by other improvements and to which HAL should be required to commit resources. As it stands, Network Rail has neither a duty nor priority to address the barrier down-time issues as their prime concerns are train punctuality and safety, not the impact of their operations on the highway network.
- 10.13 Runnymede is leading a group, including HAL and Surrey County Council, to explore what practical solutions exist. This work has only identified scope for work at the Vicarage Road level crossing (a bridge) and improvements to the Egham Roundabout to seek to resolve the congestion there. The Vicarage Road level crossing is about a mile from the Thorpe Road crossing, and Vicarage Road itself leads to the edge of Egham town centre. HAL's own studies show that despite any improvements at the Vicarage Road crossing, the distance from Thorpe Road is such that the degree of detour for Thorpe Road crossing users would be greater in time delay. Therefore, the introduction of any improvements at the Vicarage Road crossing site are unlikely to alter the degree of congestion at the A308/A320 roundabout.
- 10.14 It is understood that there are emerging technologies that could be available when Airtrack is implemented and could assist in reducing barrier downtimes. HAL should be required to commit reserves to secure the implementation of appropriate new technology.

**Objections:**

- 45. The proposed increase in barrier down-time will have an adverse impact on traffic seeking to leave and access Staines town centre. This is unacceptable in terms of traffic flow and the attractiveness of Staines as a retail and commercial centre.**
- 46. HAL must be required to identify and fully fund effective measures to reduce barrier down-times at Thorpe Road.**

**11. Noise**

**a) Explanation of noise assessment and proposals**

- 11.1 The submission is accompanied by a noise and vibration assessment of both the operation of the railway and of construction activity.
- 11.2 Locations in the vicinity of Staines town centre and the Station, as well as alongside the existing Windsor Line up to Staines Moor, have benefitted from a quantitative assessment of the potential noise effect with the result of predicted levels during both construction and operation of the scheme being included.
- 11.3 However, no noise assessment results are presented for the line extending from a point just north of the Windsor Line junction up to the northern boundary of the Borough, where the line enters Heathrow in tunnel. Instead, this area is addressed in the Environmental Statement on the basis of an assumption that noise during construction and operation will not be an issue based on the sparsity of residences in this area. No assessment of noise affecting the SSSI has been undertaken.

- 11.4 Vibration and ground borne noise, both during construction and operation, have not been quantitatively assessed. Instead, it is stated that these effects are unlikely to be of significance based on assumptions about the construction methods to be employed and that residential property is sufficiently far from vibration and ground borne noise sources.
- 11.5 The proposals involve not only the provision of new track introducing rail noise to locations where such noise did not previously exist, but also intensifying the use of existing track.
- 11.6 The proposals include noise barriers of 1.5 metres above track level constructed at the following locations<sup>68</sup>:
- a) Barrier A: 1.5 metres above track level: on the west (South Street side) of the Chord from a point east of South street car park to a point just north of the current ramped access to the Elmsleigh multi-storey car park.
  - b) Barrier B: 2 metres above track level: adjacent to Station Path from a point where the footbridge is currently located to a point 40 metres short of the High Street.
  - c) Barrier C: 2 metres above track level: adjacent to the Moormede Estate for 350 metres from a point 80 metres north of the Iron Bridge to a point some 60 metres beyond the southern end of Moormede Park.
  - d) Barrier D: 2 metres above track level: on the west side of the track near Wraysbury Gardens for a distance of 220 metres from a point where the Two Rivers building end to a point beyond Victoria Road.
- 11.7 The report considers these to be areas of higher noise where there is residential property or other noise sensitive uses. The proposals are accompanied by planning conditions<sup>69</sup> relating to noise and specifying the provision of these barriers (numbers 12, 18 and 28). A planning condition (number 10) is also proposed to control noise at the station from public address systems. A Code of Construction Practice<sup>70</sup> (CoCP) deals with controls over construction noise including hours of working and compliance with the Code and is required by planning condition number 2.
- 11.8 It is important to note that the Transport and Works Act contains proposals (Section 35) to remove the powers<sup>71</sup> of the Council to enforce statutory nuisance proceedings against the construction works on the basis of the noise generated, providing these works are undertaken in accordance with the CoCP and prior arrangements under a Section 61 Agreement. Given the lack of detailed and credible information that has so far been provided in relation to construction noise impacts, removal of these powers places residents at risk of no statutory protection against nuisance from construction.
- 11.9 It is proposed to install flange lubricators on the Staines Chord track to avoid excess wheel squeal. However, these are not proposed for the curve leading from the Windsor line.

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<sup>68</sup> Environmental Statement, Volume 1, Main Report, Figure 13.5, page 271.

<sup>69</sup> Application, Draft Order and Supporting Documents, Section 10, Schedule 2.

<sup>70</sup> Environmental Statement, Volume 5, General Appendices, Appendix 4.1, Draft Code of Construction Practice.

<sup>71</sup> Section 82(1) of the Environmental Protection Act 1990.

11.10 HAL's noise assessment identified significant construction noise impacts on residential property in Eton Court, Richmond Crescent, Gresham Road, Pullmans Place, Station Approach, George Street, Station Path and operational noise impacts additionally in parts of Moor Lane, Richmond Road, Laleham Road, Wraysbury Gardens and Waters Drive. The report notes the potential for early construction of noise barriers to mitigate some construction noise. Currently no trackside barriers are proposed to protect residents in Moor Lane, Eton Court, Richmond Crescent, Richmond Road and Laleham Road. No noise barriers are proposed in the vicinity of Stanwell Moor.

**b) Comments:**

11.11 Potential noise impacts require careful technical assessment, effective noise mitigation measures and, in the case of construction noise, effective management to resolve noise problems quickly.

11.12 The operational noise of trains arises from their wheels and also from motor transmission and ventilation and warning horns, which are at a higher physical level. Currently some barriers plus flange wheel lubricators are proposed to mitigate the noise. However, as the railway is on embankment/viaduct throughout Staines town centre such barriers will add to the visual impact of new structures and the apparent height of existing embankments. There is a judgement to be made as to whether noise mitigation outweighs any adverse visual impact. It is concluded there is a strong case in favour of barriers where the noise impacts are significant.

11.13 It is considered that the provision of the currently proposed barriers does not go far enough. Neither do they have regard to the particular character of rail noise. The following additional sections of barrier should be provided as even by the applicant's own assessment criteria, noise barriers are indicated as being required but are rejected on unconvincing arguments regarding the degree of impact and/or the pre-existing noise levels:

- a) extension of the barrier on the north side of the Chord to a point to the west of the Staines Synagogue to protect this noise sensitive use,
- b) provision of a barrier on the south side of the Reading line from the Laleham Road bridge to a point to the east of Richmond Road to protect properties at Eton Court, Richmond Crescent and Richmond Road,
- c) on the south side of Staines Station from the existing station building to a point towards the town to ensure protection of properties in Gresham Road.

11.14 The above will protect properties close to the existing track and where rail curvature is likely to result in excess noise. At Moor Lane noise barriers are not suggested at this stage due to the potential visual damage of such structures in an environmentally sensitive area.

11.15 In some places the new sections of railway will add to existing sources of rail noise, thereby increasing the cumulative impact of rail noise. There are existing high levels of wheel squeal on the Reading line as it approaches Staines Station and it is considered flange lubricators must also be installed on this section of track to reduce overall rail noise.

11.16 The Environmental Statement appears to take a view that noise mitigation is only necessary where rail noise makes a relatively high contribution to ambient noise. This view is not accepted as in areas already suffering from

higher noise any addition becomes more critical, particularly where the new noise might have a quite different character. For this reason it is proposed that flange lubricators must be installed on the curved section of track north of the Windsor line junction. This will benefit both residents of the north end of Moor Lane and users of the common land and open space in the tracks vicinity.

- 11.17 There is a possibility that new technologies and methods of attenuating rail noise might emerge prior to the construction of the scheme and could have significant benefits – e.g. noise dampers which are commonly used in mainland Europe. The proposed conditions refer to noise barriers or other mitigation measures. These should be amended to enable a combination of measures and the conditions be amended to refer to ‘noise barriers and other mitigation measures’.
- 11.18 No noise assessment has been made in the vicinity of either Stanwell Moor village or other outdoor amenity areas. Such work is essential to ensure that any unacceptable noise increases are appropriately mitigated.
- 11.19 The level of assessment undertaken for construction noise generally is vague and potentially misleading. As an example, it is stated that the assessment assumes the measures set out in the Code of Construction Practice will be implemented, including acoustic hoarding. Therefore the calculated noise levels and associated impacts already account for the mitigation incorporated in the CoCP, before any additional attenuation is considered. It should be noted that in many cases the predicted noise levels are substantially lower than those presented with the draft Environmental Statement. The approach taken appears to have been to reduce noise levels in certain construction phases by 10 dB wherever the predicted level previously exceeded 65 dB. The reduction has been achieved by introducing hoarding, which has been assumed to reduce noise levels by 10 dB at all relevant receptors.
- 11.20 This approach is unconvincing for a number of reasons, including:
- a) the assessment assumes that the measures set out in the CoCP are already implemented as a minimum as part of Best Practical Means. Those measures include acoustic hoarding. The use of acoustic hoarding as additional mitigation is therefore invalid.
  - b) the blanket assumption that acoustic hoarding will reduce noise levels at receptors by 10 dB may not be valid in all cases, for example at upper storey windows that might be expected to overlook hoarding of typical height (~2.4m).
- 11.21 Discussions were held with HAL’s noise advisors on receipt of the draft Environmental Statement, and the point was made that the very high construction noise levels indicated, even though they were most likely due to excessively pessimistic assumptions, were not acceptable and could not be tolerated by the people affected. It was recommended that the logical way to remedy this would be to reassess the noise emission based on more reasonable assumptions, but instead the response has been an unjustified blanket reduction on predicted noise levels which does not stand scrutiny.
- 11.22 No assessment of construction noise or construction traffic movements at night has been made. This is important where 24 hour working is proposed. Appropriate controls need to be included in the Code of Construction Practice.



11.23 It is therefore apparent that a number of detailed technical clarifications and amendments are required to the Code of Construction Practice and the evidence base set out in the Environmental Statement.

**Objections:**

**47. That insufficient lengths of trackside noise barriers, or other noise mitigation measures, are being proposed to control operation noise from the railway.**

- a) **An additional noise barrier should be constructed on the south side of the Reading line from the Laleham Road bridge to a point east of Richmond Road to protect residential property in this area.**
- b) **An additional noise barrier should be constructed on the south side of Staines Station and westward sufficient to protect affected properties in Gresham Road.**
- c) **The noise barrier proposed for the west side of the Staines Chord should be extended to the Laleham Road bridge to provide noise protection to the Staines Synagogue.**

**48. Flange lubricators or the best available and approved noise reduction technology at the time of construction should be provided where wheel squeal occurs:**

- a) **on the existing Reading Line between the Laleham Road bridge and Staines Station,**
- b) **on the curved section of new track at the junction with the Windsor line.**

**49. That proposed planning conditions as currently drafted are not adequate:**

- a) **Planning Condition 10 should be amended to provide additional protection at night for residents potentially affected by noise from PA announcements at Staines Station,**
- b) **Planning Condition 12 should be amended to ensure that full supporting documentation is provided that properly justifies the type and extent of barrier,**
- c) **Planning Condition 18 should be amended to ensure that full supporting documentation is provided that properly justifies the type and extent of barrier,**
- d) **Planning Condition 19 should be amended to ensure that use is made of the best available and approved noise reduction technology at the time of construction to reduce noise due to wheel squeal,**
- e) **Planning Condition 28 should be amended to ensure that full supporting documentation is provided that properly justifies the type and extent of barrier.**

**50. That the noise assessment section of the Environment Statement is inadequate in that a proper technical assessment of the noise and vibration impact is missing in several significant areas:**

- a) operational and construction noise and vibration affection Staines Moor, the SSSI and other outdoor amenity areas,**
- b) operation and construction ground borne noise and vibration affecting properties in the vicinity of the tunnelled section of the line at Stanwell Moor,**
- c) construction noise and construction traffic noise generated during the night time period.**

**51. That the assessment of construction noise and vibration impact as set out in the Environmental Statement is inadequate and unconvincing, and further more detailed information and mitigation proposals are required.**

**52. That removal of the Authority's powers in respect of statutory nuisance, as set out in Section 35 of the Transport and Works Act, is unacceptable given the concerns over the construction noise and vibration evidence base set out in the Environmental Statement and the further development required of the proposed Code of Construction Practice.**

## **12. Air Quality**

- 12.1 The assessment<sup>72</sup> considers nitrogen dioxide (NO<sub>2</sub>) and fine particles (<PM10) associated with increases in road traffic during construction and operational phases using a screening tool, DMRB. The Environmental Statement sets out that during construction there will be adherence to best practicable means, as set out within the CoCP to mitigate dust from demolition and construction.
- 12.2 For construction activities the report concludes that the nearest sensitive receptors are generally in Staines town centre.
- 12.3 Pollutant concentrations for effects of construction traffic at the Staines Moor Junction to Heathrow Terminal 5 are predicted. Impacts from construction traffic at these locations are considered to be immeasurable and insignificant. It is outlined that for the majority of the construction period, additional HGV flows are estimated to be less than 1% of background traffic, and no significant air quality effects are expected to result from construction traffic associated with the scheme.
- 12.4 Overall the additional vehicle movements from Airtrack are considered by HAL to be subsumed within the relatively high future traffic flows that are assumed will prevail on these roads in the absence of Airtrack and the conclusion is that no significant effects on air quality are considered likely.

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<sup>72</sup> Environmental Statement, Volume 1, Chapter 12.

**a) Comments:**

**i) Air Quality**

- 12.5 Local Authorities are required to carry out review and assessment of air quality in their area. The Council has declared the whole of its borough as an Air Quality Management Area due to actual and predicted exceedance of the air quality objective for the annual average concentration of nitrogen dioxide. The biggest contributor to poor air quality in Spelthorne is road traffic, and the main road corridors and urban centres are the worst affected areas.
- 12.6 There are some inaccuracies in HAL's established baseline of air quality for Spelthorne. HAL's understanding of Spelthorne's monitoring of particulates is incorrect and the assessment appears to have assumed that locally air quality is improving – on the basis of reference to one monitoring location in the pedestrianised High Street. This does not recognise an uncertain trend of stagnant (or even increasing) levels of nitrogen dioxide being measured at key approaches to Staines such as London Road and Wraysbury Road.
- 12.7 Guidance<sup>73</sup> on dealing with air quality concerns within the development control process recommends that in areas where air quality may be approaching or in excess of relevant standards then a more detailed approach will be required unless changes in emissions are likely to be very small. Therefore during previous consultation the Council had requested that a local scale dispersion model be used to assess all air quality impacts rather than a screening tool. In the Environmental Statement a screening tool, DMRB<sup>74</sup> has been used to assess the construction traffic impacts, while a local scale dispersion model, 'Breeze Roads', has been used to consider the impacts from increased downtime of level crossing barriers.
- 12.8 Each air quality screening tool or model undergoes checking and verification procedures prior to release. However, it is appropriate that any tool or model is verified against local measured concentrations to improve its applicability to local circumstances. Within the Environmental Statement there is no indication of how the screening tool has been validated against actual monitored data. For example, the predicted baseline concentrations for receptors at Horton Road in 2007 seem to be too low, when considered against actual monitored data for 2007 from three nearby monitoring locations – one of which is directly in front of the two receptors considered in the assessment.
- 12.9 The work site at Horton Road will lead to an increase of between 50 to 320 lorries per day for a period of over one year during the construction programme.<sup>75</sup> This equates to Peak HGV flows increasing by 245% due to Airtrack. Within the report the significance of this is dismissed due to the background flows on the adjacent highway network (e.g. the M25 and Airport Way) and commented on as being typically less than 40 lorries per day during the majority of the 30 month construction period.
- 12.10 The Environmental Statement predicts a significant increase in nitrogen dioxide concentrations of 3.7 ug/m<sup>3</sup> to 4.0 ug/m<sup>3</sup> at the receptor locations on Horton Road between the baseline year and peak construction dates in

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<sup>73</sup> NSCA, 2006, Development Control: Planning for Air Quality

<sup>74</sup> Design Manual for Roads and Bridges.

<sup>75</sup> Environmental Statement, Volume 6 Transport Assessment, Annex 6, figure A6.1.

August 2011 and January 2012, with or without Airtrack. This predicted increase in pollutants is not commented on within the report, nor explained. When current actual monitoring data (for 2007 or 2008) is considered, such an increase would see air quality levels at Horton Road exceeding the national air quality objective.

- 12.11 As outlined in section 8 of the Environmental Statement which deals with highway impacts, the traffic model has not been tested for inter-peak flows which are much higher than a.m. and p.m. peak flows in relation to car park movements in South Street and Thames Street. Further scrutiny of the traffic data by our consultants has raised concerns about delays exiting Tothill multi-storey car park during the p.m. peak and that the situation will be even worse during the inter-peak and on Saturdays. The air quality impacts of this queuing traffic and resultant congestion have not been considered in the Environmental Statement.
- 12.12 With regards to construction traffic no roads in Staines Town Centre exceed the assessment criteria and therefore pollutant concentrations have not been considered. For the local roads, the roads are only considered affected if there is, for example, a change in daily traffic flows by 1,000 AADT (annual average daily traffic) or HDV flows changing by 200 AADT or more, or peak hour speed changes by 20km/hr or more. These are sizeable changes, which mean that no roads in central Staines are taken forward for assessment. Yet where there is congestion, and there are traffic junctions close together, there is potential for deterioration of air quality to occur at a lower threshold of change.
- 12.13 The air quality assessment is based on data taken from the transport assessment. The traffic modelling has shown that there will be a 15% increase in the journey time from the Crooked Billet to the Laleham Road junction with South Street in 2014 as a consequence of the Airtrack proposals, including the schemes introduction of an additional junction in South Street with the multi-storey car park access. Consequent delays and queuing at junctions along the London Road approach into Staines will translate to increased emissions from traffic and a worsening of air quality, in what is already a hotspot of poor air quality where the national air quality objectives are being exceeded. This would result in a worsening of a breach of an AQ objective and interfere with the Council's Action Planning, and may be significant.
- 12.14 The air quality assessment has not taken account of cumulative impacts from other developments that have already been granted planning permission in central Staines, such as London Road Phases I and II and the Majestic House redevelopment. From each scheme there will be an increase in traffic and emissions. Their air quality assessments are based on increases resultant from the new developments over the previous office schemes at those sites, but two of the development sites have been vacant and the other only partially occupied for the past year or two, so traffic emissions due to these developments will have a significant impact given the actual monitoring results for 2007 and 2008 remaining in exceedance of the national air quality objective for annual mean nitrogen dioxide levels.
- 12.15 With the Airtrack scheme operational, the daily average and peak hour speeds at the Thorpe Road level crossing will decrease by 8 and 11km/hr respectively. The number of stationary vehicles when the barrier is down (per day) will increase by 62% with Airtrack. Idling emissions account for a

substantial portion of total emissions at a junction. The air quality modelling, using Breeze Roads, has considered what increase there would be in annual mean particulate matter and nitrogen dioxide levels at 20m from the road centre due to the additional downtime of the barrier resulting from the Airtrack scheme. Nitrogen dioxide levels drop off quickly with distance from the road centre; however, there are residential properties, either side of the level crossing, whose facades are within 10m of the road centre. This is an issue for Runnymede Borough Council to pursue.

- 12.16 It is not evident from the Environmental Statement if and how the modelling has been able to take account of further congestion that results on the north side of the level crossing due to the proximity of the junctions into Hythe Road and the Pines Trees Business Centre and queuing back across the A320 roundabout. As discussed in section 10 of this report on level crossings, our transport consultant has undertaken work that demonstrates the additional flows/ increased downtime increases queue lengths by some 10 vehicles and in the pm peak (based on current queue patterns) would result in 6 instances within the hour where the queue blocks the A320 roundabout. Therefore at peak times the increased downtime at the Thorpe Road level crossing due to Airtrack would exacerbate the congestion over Staines Bridge, and would worsen the breach of the annual mean nitrogen dioxide national air quality objective and interfere with Action Planning to improve air quality.

## **ii) Dust and Particulate Matter**

- 12.17 Construction activities also have potential to give rise to dust and particulate matter resulting in possible temporary nuisance and/ or health effects. The Environmental Statement<sup>76</sup> states that the nearest sensitive receptors are generally in Staines town centre and outlines that emissions will be minimised by use of best practicable means. However, it does not offer any judgement on the magnitude nor significance of residual effects, nor does it reference the CoCP for mitigation measures against these impacts.
- 12.18 The CoCP makes reference to the GLA guidance<sup>77</sup> which recommends a scale of mitigation measures dependent on the air quality risks posed by the development. The risk rating system is biased towards the area of land or the number of properties being constructed, and is not framed towards transport schemes with multiple work sites. The CoCP should include a risk assessment procedure for each worksite taking account of factors such as the location of the work site, the timing and length of construction at the worksite and the construction activities taking place there.
- 12.19 The CoCP should also refer to the Building Research Establishment guidance<sup>78</sup> especially with regard to pre-project planning and auditing by the contractor's project environmental manager.
- 12.20 The CoCP<sup>79</sup> is currently only a draft and sets out Part A dealing with Principles only. No Part B details are provided. Consequently there is ambiguity on detailed mitigation measures and arrangements. It is in places conflicting,

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<sup>76</sup> Environmental Statement, Volume 1, Chapter 14, para 14.6.1

<sup>77</sup> Best Practice Guide, November 2006, 'The Control of Dust and Emissions from Construction and Demolition'.

<sup>78</sup> Building Research Establishment, February 2003, BR456 'Control of Dust from Construction and Demolition Activities'.

<sup>79</sup> Code of Construction Practice, Volume 5, Appendix 4.1.

such as whether bonfires will be permitted or not. It states that the contractor will follow a protocol for dust monitoring in accordance with 'relevant discussions' with the local authority. A dust monitoring plan and action plan should be provided within the CoCP to be approved by the Local Planning Authority or pursuant to a separate condition.

- 12.21 Within the CoCP, the contractor is directed to clean windows of dust impacted properties. This should be expanded to include other forms of property, such as vehicles. In Staines Town Centre there are a lot of public and private car parks next to or in close proximity to the construction worksites.

**Objections:**

- 53. The air quality assessment has not satisfactorily established a baseline for Spelthorne in the assessment of temporary and permanent air quality impacts**
- 54. There has been no assessment of the significance of temporary impacts from dust and emissions from construction activities in Staines town centre.**
- 55. A number of detailed technical clarifications and amendments are required to the Code of Construction Practice and the evidence base set out in the Environmental Statement.**
- 56. The air quality assessment of temporary construction traffic impacts has not been undertaken using a local dispersion model for all key junctions and road links impacted by the development and has not taken account of cumulative impacts from other permitted developments**
- 57. No mitigation is offered against worsening of air quality resulting from the permanent impacts of traffic delays in Staines town centre and increased traffic flows at Horton Road, Stanwell from construction activities.**

**13. Contaminated Land**

- 13.1 In respect of contamination, the most significant risks are associated with potential disruption to the landfill site at Hithermoor and extraction of landfill material at the Willows site in Moor Lane. The submitted material contains no risk assessment to judge the potential of harm both to human health and areas of ecological importance. There is no evidence of any site based reconnaissance being undertaken which is an essential part of a Phase 1 risk assessment. The Contaminated Land Summary<sup>80</sup> in the Environmental Statement does not provide an adequate site conceptual model given the complexities of the Airtrack 'site'.
- 13.2 The Environmental Statement presents very limited information about the current and historical land uses, ground conditions and environmental setting of the scheme. Phase 1 risk assessments, even for small development sites, can typically comprise tens to hundreds of pages. The Environmental

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<sup>80</sup> Environmental Statement, volume 1, Table 12-2: Contaminated Land Summary, page 251.

Statement has identified five relevant areas of filled land, including some still under licence, but presents only brief summary information over a couple of pages.

- 13.3 Of concern is that no account has been taken of the age of some of the landfill sites and the extent to which the technical term 'inert waste' has changed over time and that past controls were not as stringent as today.
- 13.4 It is understood that the Willows site, although filled in relatively more recent times, was not authorised when tipping commenced and there must therefore be a degree of uncertainty about all of its content. This is critical to decisions about removing the fill and its successful use for exchange land for lost SSSI. If insurmountable problems were to arise in preparing the site for replacement SSSI the mitigation strategy for Staines Moor would be prejudiced. There is a lack of detailed information to remove these concerns.
- 13.5 In relation to Hithermoor, the railway is proposed to run close to the edge of the general area in which the boundaries of the contamination wall to the filled cells exist, but the lack of precise information raises uncertainty of construction without contamination risks.
- 13.6 An investigation into the risks posed by contamination from the Hithermoor landfill site to Staines Moor SSSI using the Environment Agency's Ecological Risk Assessment Framework for Contaminants in Soils has not been completed as required by the DfT. The DfT's Scoping Opinion<sup>81</sup> states that 'Before the ecological surveys are carried out, a Tier 1 site investigation and quantitative risk assessment should be undertaken in respect of soils and groundwater conditions in the part of Staines Moor that would be affected by the scheme, in accordance with the Ecological Risk Assessment Framework launched by the Environment Agency in October 2008.'
- 13.7 The purpose of the Environmental Statement is to determine the magnitude and significance of any contamination present, but the contamination chapter states that this will only be done once site investigations are carried out during the detailed design stage.
- 13.8 HAL propose to refine mitigation through design in liaison with the Environment Agency. The Environmental Statement, the CoCP, the proposed planning conditions and the TWA Order (s.20) do not recognise that consultation should take place at each stage of a contamination investigation with both the Local Planning Authority and the Environment Agency.
- 13.9 The contamination chapter also repeatedly refers to the CoCP for mitigation of risks. Given that Part A (principles) is only available in draft, the CoCP can not currently be relied upon to mitigate the (hitherto unquantified) contamination risks, with issues such as waste management, odour control, groundwater protection, and landfill gas migration not yet being addressed.
- 13.10 The contamination chapter concludes at 12.7.1 that:

*"No residual significant adverse effects from contaminated land are considered likely to occur. Any remediation, including removal, of contamination will be deemed a significant benefit".*

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<sup>81</sup> Environmental Statement, Volume 4, page 101.

13.11 This conclusion appears unjustified on the basis of the evidence in the submission documents. Any materials removed will need to be handled carefully so as to not cause health risks or nuisance and then transported away for disposal elsewhere. This is not very sustainable nor of significant benefit to the environment. Not all of the contamination will be removed and therefore groundwater aquifers in the local gravels affected by the landfill are not going to be remediated.

**Objections:**

**58. The magnitude and significance of risks from contamination have not been adequately assessed.**

**59. There are deficiencies in the baseline information, use of data and conclusions in respect of contamination. In particular there are risks of pollution from the Hithermoor landfill site and risks of failure of the Staines Moor Mitigation Strategy in its reliance on the former Willows landfill site as mitigation land.**

**60. An investigation into risks posed by disturbance of the Hithermoor landfill site and contamination of Staines Moor has not been undertaken as requested by the Department for Transport in its Scoping Opinion.**

**61. The Code of Construction Practice is inadequate.**

**14. Impact on Council Owned Land**

**a) Published Information**

14.1 Paragraph 2.31 has already described the extent of the Council's land ownership affected by the scheme. The area of land affected is extensive.

14.2 A significant amount of Council land is proposed to be acquired either on a temporary or permanent basis as well as additional temporary rights of access.

14.3 The TWA, supported by a 'book of reference'<sup>82</sup>, identifies every land interest to be acquired, and relates to a set of plans<sup>83</sup> identifying the extent of these interests. It is factually correct so far as Spelthorne Council's land interests are concerned. The following section, however, considers the technical accuracy and appropriateness of the documentation relating to the form and nature of the proposed compulsory acquisition.

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<sup>82</sup> Application, Draft Order and Supporting Documents, Section 7 (book of reference identifies all parties with either land or rights which are proposed to be acquired).

<sup>83</sup> Deposited Plans and Sections, Sheets 1 to 10.



## **b) Comments:**

### **i) Timing of acquisition**

14.4 Whilst Airtrack is programmed for construction over four years, construction activity on works sites in Spelthorne will not extend over the entire period. This is shown in the programme of construction<sup>84</sup>. In particular work on Staines Chord is only programmed for about two years. The Order, however, allows HAL to acquire all land at the outset for the whole period and return it up to one year after completion of the work for which it was acquired<sup>85</sup>. There is therefore no requirement to complete specific phases of the work quickly. This allows HAL to hold land for longer than may be necessary to the disadvantage of residents and businesses. This will significantly affect the value of the Council's land holding and render it virtually unsellable for a considerable period of time. The Order should be amended to enable compulsory acquisition for the temporary use of land only for the period of time it is genuinely required and no longer.

### **ii) Technical accuracy/appropriateness of requirements for particular plots**

14.5 There are particular concerns with the acquisition of particular plots of land:

- c) Plots 20, 21, 22 and 44: Elmsleigh Surface Car Park. The relevant Order map<sup>86</sup> identifies the site under the heading of 'Acquisition of land outside the limits of deviation'. Significantly none of the above plots is shown under the heading of 'Temporary Possession of Land'. It had previously been understood that the ownership of the area of car park not under the railway viaduct or embankment would be given back to the Council. The terms of the Order, however, appear to give power for the land to be retained in the ownership of HAL. This will limit the ability of the Council to operate the car park in a manner it deems appropriate for the town and to intensify/alter the use of the site in accordance with future needs. Retention of the freehold by HAL is unjustified and unreasonable. Whilst documents show the reconfiguration of the remaining car park area there is no supporting documentation to state what rights the Council and public will have to access the site. There are no provisions for replacing the car parks office currently located on plot 20.
- d) Plots 16, 17, 18 (Matthews Lane and subway), 23, 25, 26, 42 (land and access ramp to Elmsleigh multi-storey car park), 27, 28, 29, 30, 43 (sub-soil of South Street and Westbrook Close), 31 (South Street car park), 34 (part of car park to Thameside House) and 43a (service area alongside Marks and Spencer). All these plots are owned by Spelthorne Council and are outside the area required for the operation of the railway itself. None of the land is identified under the heading of 'temporary' possession and the permanent acquisition has not been justified.
- e) Plot 24 including part of the land underneath the viaduct over the Elmsleigh Surface Car Park. Permanent acquisition is sought and no rights for the Council to pass under or use land under the viaduct are set-out in the

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<sup>84</sup> Non-Technical Summary of the Environmental statement, Construction Activities 2011-2014, page 12.

<sup>85</sup> Transport and Works Act Draft Order, Section 28(3)(b).

<sup>86</sup> Deposited Plans and Sections, Sheet 1.

'submission'. This provides no mechanism whereby future use of the proposed reinstated car park can be assured.

- f) Plots 37, 38 and 39. These are all part of Elmsleigh Road which provides access, amongst other uses, to the Tothill Car Park. The Order seeks the permanent acquisition of right or covenants over this land. It is presumed rights of access are sought to the Tothill multi-storey car park to undertake works to link it to the Elmsleigh multi-storey car park and ensure its joint operation for the temporary period when the ramped access to the Elmsleigh car park is not available. The seeking of permanent rights is unjustified and, as there is already a right of way on Elmsleigh Road.
- g) Plots 40 and 41: Tothill and Elmsleigh multi-storey car parks. These are required for 'access and temporary re-modelling of the car parks'. They are identified under the heading of 'Temporary possession of land'. In both cases the car parks sit above retail uses and justification for acquisition of the land underneath the car park structures has not been demonstrated. This extent of acquisition appears unreasonable given that the works that are intended relate only to the car parks. The boundary for Plot 41 covers not only the Elmsleigh multi-storey car park but also the Elmsleigh Centre itself up to approximately the north side of the central atrium and which includes most, but not all, the roof level service area. This additional area of land acquisition has not been justified, and its possession will prejudice the Council's head leaseholders ability to operate the Elmsleigh Centre by losing control of some two-thirds of the centres retail floorspace and the inability to service any units via the service deck.
- h) Plot 42 is a section at the top of the ramp to the Elmsleigh multi-storey car park just before it enters the car park. Acquisition of this 'land' is proposed. As with Plot 20, no just justification for acquisition of the land on a permanent basis has been given and it is not listed in the category of 'temporary' possessions.
- i) Plots 69, 70, 70a and 70b are all parts of the former Staines to West Drayton railway embankment north of the Windsor line. It is required temporarily to provide a public footpath and to construct a footbridge. None of the plots are, however, shown on the Order plan under the heading 'temporary' possession of land. Permanent acquisition is unjustified and unacceptable.

### **iii) Exchange Land**

- 14.6 The amount of common land and public open space to be acquired requires HAL to provide the owners with exchange land of at least equivalent size and which is 'equally advantageous to the users of it'. The embankment of the Staines to West Drayton railway north of the Windsor line is to be acquired. It had been understood that only plot 82 in the Council's ownership would be taken on a permanent basis and amount to 677 sq. metres. However, the previous section identifies that plots 69, 70, 70a and 70b are in the Order and are required on a permanent basis, for which exchange land will also be required.
- 14.7 Whilst discussions have been held on this issue and proposals that the 677 sq. metre should be exchanged with land to the west of the embankment and east of the new railway (and on land currently within the Willows site) this is not specified by reference to the Council by name in the 'submission'

documents and in particular on the plan showing proposed land exchanges<sup>87</sup>. The proposals fail to demonstrate that the required exchange with the Council will occur.

#### **iv) Other legal and land ownership matters**

14.8 These matters are as follows:

- a) Section 28(i)(b) of the draft Order provides powers to remove any buildings from land acquired. This is of particular concern in relation to acquisition of plots 40 and 41 covering the two multi-storey car parks and much of the southern end of the Elmsleigh Centre. Such power in respect of these buildings has not been justified and, without amendment of the Order, will blight the Council's interests albeit with attendant compensation obligations falling on HAL.
- b) There is no obligation within the Order to complete works quickly and within the four year construction programme set out. As HAL has only demonstrated they have financial resources for around half of the scheme<sup>88</sup> there is justifiable reason for concern about the risk of delay in implementation.
- c) Section 28(4) requires removal of any temporary works but not to replace buildings removed on which permanent works have been constructed. This places no obligation, therefore, on HAL to replace the existing car parks office given that the car park (plot 20) is currently not being acquired on a temporary basis.
- d) The Council has proposals in its development plan to bring forward extensions to the Elmsleigh Centre, and a planning application for a Phase 3 extension has been approved by the Council subject to the signing of a legal agreement. This involves using part of the Elmsleigh surface car park for flood attenuation and temporary relocation of the bus station. Nothing in the Order has taken account of the construction time required to build this scheme and complete works before construction of the Chord.
- e) There are a number of legal obligations the Council has within its lease of the Elmsleigh Centre to Clerical Medical. These include the efficient management and control of the multi-storey car parks and other detailed requirements. HAL will need to address the legal implications associated with the land it is seeking to acquire, and the Council will need to be assured that the intentions of the terms of lease designed to ensure appropriate support to the operation of the Elmsleigh Centre are maintained.
- f) If it unclear what access rights the Council will have to maintain that part of the proposed new ramp to the Elmsleigh multi-storey car park which is close to the new railway viaduct.

#### **Objections:**

**62. The power through the Order of acquiring all land and rights at the outset and, in the case of temporary acquisition and rights, for up to one year after completion of particular works, has not been justified**

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<sup>87</sup> Environmental Statement, Volume 5, General Appendices, Staines Moor Mitigation Strategy, Figure A2.1.3 and paragraph 6.1, pages 19-20.

<sup>88</sup> Application, Draft Order and Supporting Documents, Sections 8 and 9.

by a detailed programme of works related to each plot, and reasons for holding land for longer than is necessary.

63. The acquisition of Plot 20 and 22 (Elmsleigh Surface Car Park) on a permanent basis and failure to indicate any rights of the Council to pass under the new viaduct to this land or to use it has not been justified.
64. The permanent acquisition of plots 16, 17, 18, 23, 25, 26, 27, 28, 29, 30, 34, 42, 43 and 43a instead of temporary acquisition has not been justified.
65. The permanent acquisition of plot 24, which removes the rights of the Council to access the intended re-configured surface car park, is unacceptable.
66. The permanent acquisition of rights over plots 37, 38 and 39 has not been justified or the need in principle to acquire rights where public rights of access already exist.
67. The temporary acquisition of land of plots 40 and 41 which include the Tothill and Elmsleigh multi-storey car parks, most of the roof level service deck and retail floorspace below these up to the north side of the central atrium has not been justified.
68. The permanent acquisition of plots 69, 70, 70a and 70b for what are indicated elsewhere as being for a temporary purpose.
69. The submission documents do not explicitly identify what land is being offered to the Borough Council as exchange public open space.
70. The powers of the Order in Section 28(i)(b) allowing demolition of the Tothill and Elmsleigh multi-storey car parks and structures beneath is opposed.
71. There is no requirement within the Order to complete works quickly and in accordance with the construction programme provided.
72. There is no requirement to replace the existing car parks office.
73. The 'submission' proposals make no provision for the implementation of the Phase 3 extension to the Elmsleigh Centre.
74. There is no information as to whether close juxtaposition of the proposed new car park ramp to the railway viaduct will enable independent access by the Council to the outer face of the structure for maintenance purposes.
75. There are no mitigating measures proposed to maintain the attractiveness of Staines town centre during construction and to assist its recovery after the construction period.

## 15. Flood Risk Assessment

- 15.1 The submitted scheme has been accompanied by a Flood Risk Assessment<sup>89</sup> (FRA) which has also considered drainage matters. The flood risk assessment is what is referred to as a Stage 2 Assessment and was produced by HAL to guide the form and layout of the submission proposal. It states that the detailed proposal will be developed in accordance with PPS 25.
- 15.2 The document includes a detailed assessment of the proposal from its junction with the Windsor line northward towards Heathrow. This is an area which includes areas of 1:20 and 1:100 flood risk. It shows how excavation of the Willow site, which is above the flood level, can provide adequate 'level-for-level' flood compensation for construction in the vicinity of Staines Moor. Details are provided of how the threshold of the tunnel will be at a level to avoid inundation in a 1:1000 year flood event.
- 15.3 There are, however, several fundamental deficiencies in the FRA. These are as follows:
- a) No account has been taken of the flood policy LO1 in the Council's Adopted Core Strategy and Policies DPD. This was endorsed by the Inspector who examined it and it makes more stringent requirements than PPS 25 because of the particular flood risks in the Borough. It requires, amongst other matters:
    - i) FRAs for sites of 0.5ha or larger even where they are outside flood risk areas (i.e. Flood Zone 1).
    - ii) In the case of redevelopment within urban areas in Flood Zones 3a and 3b a minimum increase of flood storage capacity of 20% is to be achieved.
  - b) No flood risk assessment of works within the town centre has been made. No detailed flood maps of this area are produced in the submission documents.
  - c) It is assumed the Staines Chord is constructed on impermeable areas of Elmsleigh Surface Car Park only. The Chord works will extend outside this car park and in part across landscaped/permeable ground. No account is taken of the net loss of permeable ground and increase 'run-off' from the structure and additional surfaced areas created.
- 15.4 In addition to the above, the assessment of the area close to Staines Moor appears to have given no consideration to the extent to which the new structures and works will influence the movement of flood water and ground water. The particular water environment in this area is a critical element in sustaining the ecological balance and the integrity of the Staines Moor SSSI. Whilst the Council will rely in part on the Environment Agency to assess this issue in further detail, this gap in what is otherwise an essential element of an FRA for a development of this type in such a sensitive location is of considerable concern.

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<sup>89</sup> Environmental Statement, Volume 7, Flood Risk and Drainage.

- 15.5 In conclusion the flood risk assessment is seriously deficient and in its current form could not be relied upon by the Secretary of State in coming to a view as to the merits of the scheme and the granting of a deemed planning permission.

**Objection:**

**76. HAL has failed to submit an appropriate comprehensive flood risk assessment in line with the adopted development plan policy LO1 of the Council's Core Strategy and Policies DPD.**

**16. Other Matters**

**a) Feltham Depot**

- 16.1 The Airtrack proposals also involve the construction of a new train depot on the former Feltham marshalling yards located on the London side of Feltham Station. The site is designated as Green Belt and a nature conservation area of metropolitan importance. The depot would use some 60% of the site.
- 16.2 HAL has considered two other sites within a 'core area' of search at Stanwell Moor and Virginia Water, and four other sites in a 'secondary area' of search at Coppermill Road, Wraysbury, north Chertsey, north Addlestone and South Wokingham. Other than Wokingham all the other side are in the Green Belt.
- 16.3 The site at Stanwell Moor would require the relocation of an entire landfill site. However, it would not enable rail access to both ends of the sidings.
- 16.4 Stanwell Moor and all other sites have been discounted by HAL as inferior to the Feltham site on the basis that they have more serious or equal planning and operational disadvantages. The Feltham site is already in Network Rail's ownership, although closed as a yard in the 1960s, and is well located operationally. There appears to be no evidence to dispute HAL's conclusion on the appropriateness and proposed use of the Feltham site.

**b) Archaeology**

- 16.5 The Airtrack scheme runs through areas in Spelthorne where there is a high probability of archaeological material being present. Archaeology is dealt with in the Environmental Statement<sup>90</sup> but has relied on a review of existing information rather than a focussed site based evaluation.
- 16.6 PPG 16<sup>91</sup> advises that in situ preservation of finds is always the preferred option of safeguarding any archaeological deposits. The Environmental Statement, however, proposes archaeological mitigation through a programme of excavation and recording (i.e. preservation by record) and a phased programme of work will be required. PPG 16 advises that this approach is a second best option.
- 16.7 The Surrey County Council Archaeologist has advised that, whilst preservation by record may be appropriate in areas of previous development

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<sup>90</sup> Environmental Statement, Volume 1, Chapter 7, Archaeology

<sup>91</sup> Planning Policy Guidance, Note 16, Archaeology and Planning.

and mineral extraction where the value of finds has been compromised, recording rather than in situ preservation can be justified. However, in the area from Staines Moor northward where widespread disturbance has not occurred it would have been preferable to have had some field work based evaluation submitted with the proposal. This would have enabled a considered view on whether there was scope for finds which might have justified preservation in situ.

- 16.8 HAL has proposed planning conditions for archaeology for each section of the works (Conditions 6, 14, 21 and 30). This requires a written scheme of investigation to be submitted to and approved by the local planning authority and implemented in accordance with it. The precise form of wording does not follow that recommended in government guidance<sup>92</sup> on planning conditions and the section of this report dealing with Conditions and the Code of Construction Practice sets out appropriate wording.
- 16.9 In the absence of more detailed work HAL will need to be aware of the risk that if significant deposits were found, this could require the development programme to be altered and details of the scheme amended accordingly.

### **c) Alteration to Rights of Way**

- 16.10 Currently the proposals are unclear as to who is responsible for the appropriate timing and funding of processes to amend rights of way and how these will be tied in with the changes to private accesses. This affects both highways in the town centre and other rights of way from Stanwell Moor to Staines Moor. In particular there is a lack of clarity over the coordination of changes to the access to Council car parks and other land.

### **Objection**

#### **77. Lack of clarity over responsibility for the appropriate timing and funding of statutory processes to amend rights of way.**

## **17. Planning Conditions and draft Code of Construction Practice**

### **a) General**

- 17.1 The submission documents include a formal request for planning permission<sup>93</sup> to which are appended a draft set of planning conditions. There is also a proposed draft Code of Construction Practice (CoCP). This section reviews the adequacy of these two documents.
- 17.2 The proposed schedule of planning conditions includes 45 conditions overall. These include four general conditions applying to the whole scheme, with the remainder relating specifically to the five main geographical areas of work including the Feltham Depot. A number of conditions are repeated in each section.
- 17.3 HAL has also prepared a draft Code of Construction Practice of some 26 pages which is required by the second of the general conditions. It has not

<sup>92</sup> Circular 11/95, 'The use of conditions in planning permissions', para 55.

<sup>93</sup> Application, Draft Order and Supporting Documents, Section 10.

been submitted for formal approval by the Secretary of State but to illustrate what will be submitted for approval subject to agreement of the scheme in principle and the granting of deemed planning consent.

#### **b) Code of Construction Practice**

- 17.4 The draft CoCP sets out what would be contained in a Part A of that document but a part B could only be prepared when details of the scheme are resolved and the appointed contractor is able to set out his construction methods to meet what will be a very wide range of environmental issues.
- 17.5 The CoCP will need to take account of the requirements in the following which have to be produced in line with other planning conditions:
- a) Staines Moor Mitigation Strategy
  - b) Flood Risk Assessment
  - c) Drainage Strategy
- 17.6 The CoCP will include an Environmental Management Plan which will itself include further information in the form of:
- a) Traffic Management Plan
  - b) Site Waste Management Plan
  - c) Contaminated Land Management Plan
  - d) Protocols for noise and dust monitoring
  - e) Water and Drainage Management Plan
  - f) Ecology Management Plan
  - g) Written scheme of archaeological investigation
  - h) Settlement Assessment Report
- 17.7 The CoCP also describes various practical arrangements to ensure appropriate management and communication through a Site Environment Manager and Community Liaison Officer. Information and complaints procedures are also described.
- 17.8 Normal working hours for construction are set out and are proposed to be from 7.00am to 19.00pm weekdays, with the first and last hour for 'start-up' and 'close-down' only, and 7.00am to 14.00pm on Saturdays. Work outside these times is required for some elements of construction requiring continuous working, e.g. tunnelling and for work to existing rail lines.
- 17.9 At this stage, in the absence of any detailed proposals for the scheme, the CoCP can only be treated as indicative and, subject to the TWA Order being approved, would need to be the subject of very detailed discussion and evaluation before approval, in accordance with the proposed planning conditions, could be given.
- 17.10 The CoCP would eventually include a lot of detail, some of which would normally be subject to separate planning conditions. The coverage of construction related issues through the CoCP is in principle an acceptable means of exercising control and explains why, for a scheme of this scale and range of issues, the list of planning conditions appear relatively short.



17.11 At this stage the Council should reserve its position on whether the structure and content of the CoCP is adequate as this can only be properly judged in the context of a detailed scheme. Views of the draft CoCP may change in the interim dependant on additional information being submitted on the scheme as a whole prior to the inquiry. A proposed planning condition requiring the approval of the CoCP by the local planning authority ensures this Council's control over its content and adequacy.

### **c) Planning Conditions**

17.12 The preceding sections of this report have already identified some issues in relation to conditions. Annex 6 sets out HAL's proposed conditions and Annex 7 sets out a schedule of Spelthorne's proposed additional conditions and amendments to existing conditions.

17.13 There are a number of shortcomings in the current proposed list of conditions and Annex 7 seeks to identify the changes that are required. However, given the limited information currently available on various aspects of the proposal, it is likely that, as further information is provided by HAL both in advance and during the inquiry, the need for further conditions and amendments will become apparent. It will be prudent for the Council to propose the changes it has so far identified but reserve its position so far as any final agreement on their adequacy as a whole is given.

### **Objections:**

**78. The proposed planning conditions are not adequate and the amendments and additions to the list of conditions set out in Annex 7 must be made. The Council, however, reserves its position to propose further amendments in the light of any additional information submitted by HAL.**

**79. Given the various shortcomings in available information to support the application for deemed planning permission, HAL has failed to satisfactorily demonstrate that the Code of Construction Practice is appropriate. The Council reserves its position to comment further on the Code.**

## **18. Conclusions**

18.1 The Airtrack scheme has support in principle within regional policy and the County Council's Local Transport Plan. The issue that the Secretary of State will need to consider is whether this particular 'submission' proposal is nevertheless acceptable. The Council, however, needs to come to a view on the impacts and benefits to Spelthorne.

18.2 Adverse impact on the Staines Moor SSSI will occur and national policy on biodiversity sets down a clear approach where such harm arises. Firstly the local planning authority needs to be satisfied that Airtrack or equivalent cannot be located on alternative sites with less or no harm. In the absence of such alternatives adequate mitigation must be put in place. Where significant harm cannot be prevented, mitigated or compensated for, national policy requires that planning permission should be refused.

- 18.3 It follows that given the harm of Airtrack in nature conservation terms, HAL firstly needs to demonstrate there are no alternatives to Airtrack. Previous proposals have been described within the supporting material but there has been no proper demonstration by reference to the merits and costs of other options that the Airtrack scheme, with the adverse impact on the Staines Moor SSSI, can be justified. Failure to follow this process is a critical flaw in the 'submission'.
- 18.4 The Council supports the principle of improved non-car access to Heathrow. However, it has hitherto not been prepared to come to a view on Airtrack in the absence of detailed proposals before it enabling a full assessment of the scheme's implications on the Borough. This includes the expectation of an extensive and robust comparative assessment against alternatives<sup>94</sup> including SWELTRAC, options omitting the Chord and means of avoiding the Staines Moor SSSI.
- 18.5 Critical to the acceptability of the submission scheme, with the associated compulsory purchase of land and rights over land, is the existence of a scheme for which a compelling case exists. HAL has not produced a business case for Airtrack and the information on projected passenger numbers is limited, incomplete and in places contradictory. The number of Airtrack passengers arriving and departing from stations in Spelthorne (Staines and Ashford) is very small indeed. There is no clear evidence of a beneficial modal shift and relief of highway congestion which has been long held by the scheme's supporters as a benefit of the scheme.
- 18.6 HAL do seek to set out a range of socio-economic benefits, but their claims for Spelthorne vastly exceed anything that could plausibly be derived from the low passenger projections provided and which must be the starting point for such an assessment.
- 18.7 It follows that there is no clear justification for the harm that is generated by the scheme. That harm is described in the preceding sections and the key elements may be summarised as follows and cover both temporary and permanent affects:
- a) adverse impact on biodiversity (Staines Moor SSSI and other land),
  - b) damage to landscape,
  - c) disruption to rights of way,
  - d) adverse impacts on highways (including from increased level crossing down-times)
  - e) adverse impact on Staines town centre of construction work.
  - f) adverse impact on Staines town centre including disruption of appropriate parking provision and vehicle and pedestrian movement,
  - g) noise impacts,
  - h) visual impact.
- 18.8 In addition to the focus of a number of issues on the Staines Moor area is the impact on Staines town centre. It is intensively developed within a constrained space and residential and commercial activity very close to the existing railway creates particular construction and long term implications from

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<sup>94</sup> Planning Brief: 'The Airtrack Corridor', December 2002, para 3.2.2, page 6.

both the Chord and third line and the rebuilding of Staines Station. Local residents should not be expected to tolerate the impacts that will arise.

- 18.9 The construction of the Staines Chord would cause particular problems and disruption to Staines town centre and increase level crossing down-time in the Egham area, causing significant traffic problems affecting Staines. Only some 25% of Airtrack passengers are projected to travel on the trains which require the Chord from Reading and Guildford and which would lead to the level crossing problems. There are already regular train services from Reading and Chertsey to Staines which, subject to a change of train at Staines, would enable rail access to Heathrow. HAL has failed to demonstrate that the benefits of a dedicated Airtrack service on these two lines outweigh the significant temporary and permanent disruption and adverse impacts.
- 18.10 HAL has failed to properly consider alternatives within the scheme to mitigate some of the issues, and has submitted a proposal with a wide range of significant adverse impacts and little demonstrable benefits or advantages to outweigh the clear harm.

**Objection:**

- 80. That Spelthorne Borough Council opposes in principle the Airtrack scheme as submitted and, along with the detailed recommendations set out above, its response be formally submitted to the Secretary of State for Transport.**



# Non-technical Summary of the Environmental Statement

## Transport and Works Act 1992

THE HEATHROW AIRTRACK ORDER

2009

## The Environmental Statement

The Environmental Statement and this Non-technical Summary have been prepared by Temple Group. Temple Group is an independent environmental and planning consultancy with extensive experience of undertaking environmental impact assessments of transport infrastructure schemes.

Copies of the Environmental Statement and other application documents are available for inspection at the locations listed on the inside back cover of this document.



Temple Group Ltd  
Tempus Wharf  
33A Bermondsey Wall West  
London SE16 4TQ

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## 4 Heathrow Airtrack | Non-technical Summary of the Environmental Statement

## Airtrack

Heathrow Airtrack ('Airtrack') is a proposed new rail service linking Terminal 5 at Heathrow with London Waterloo, as well as areas south and west of London, including Reading and Guildford.

It will mostly use existing rail lines, but will also need about 4km of new track, along the edge of the M25, to link the Windsor line with the airport. This will include a tunnel to take the track into the existing below-ground station at Heathrow.

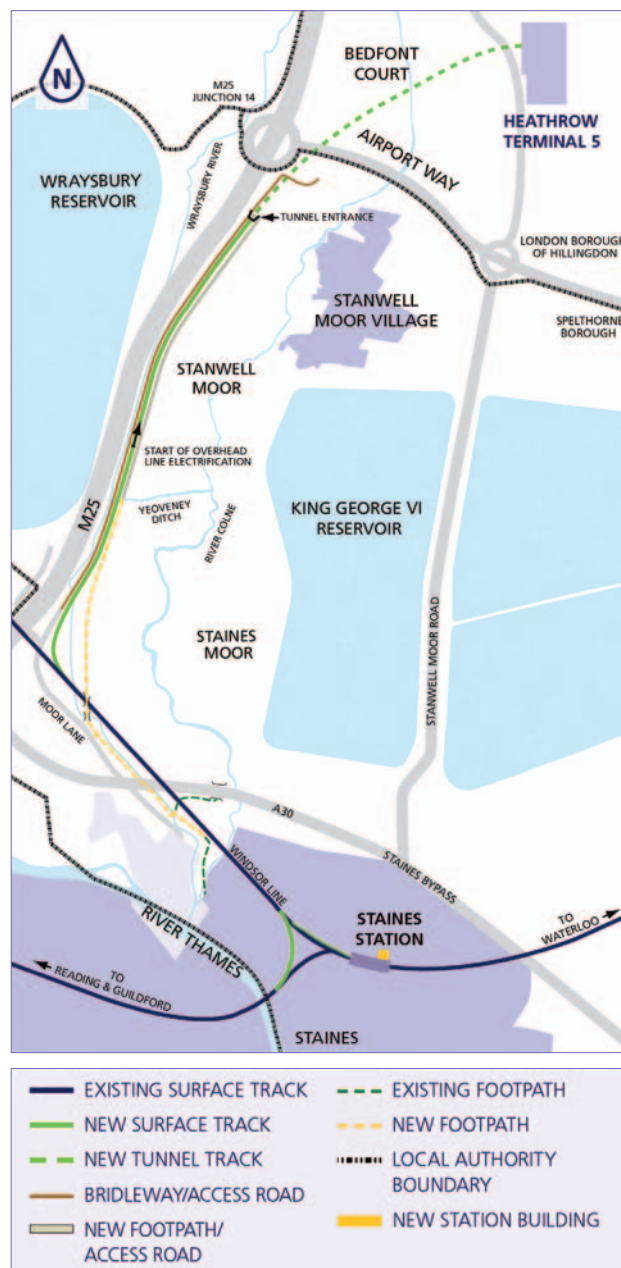
Other features of the Airtrack scheme include a short section of new track in Staines (called the Staines chord) that will link the line from Reading and Guildford with the Windsor line, and a new track into Staines station, together with a new platform and ticket hall.

A depot will be constructed on an old railway site in Feltham to stable, clean and maintain the Airtrack trains.

There have been proposals to build a southern rail link to Heathrow since the 1960s. The current proposal was first put forward by the Airtrack Forum – a group including local authorities and other public bodies set up in 2000. Since 2006, these proposals have been developed by Heathrow Airport Limited (HAL, a subsidiary of BAA) with the aim of improving public transport links to Heathrow and bringing wider improvements to rail services in the area south, west and east of the airport. By making it easier to get to and from Heathrow, Airtrack will also help to spread the economic benefits that come from having good access to one of the world's busiest international airports.

An assessment of the predicted environmental impacts resulting from the construction and operation of the scheme is described in an Environmental Statement, which this document summarises. The environment has been an important consideration throughout the design of the scheme so far, and a great many possible negative impacts have been avoided as a result. This process will continue as the scheme's design is developed in more detail, as construction commences and as the new Airtrack service begins operation.

### AIRTRACK CORE AREA

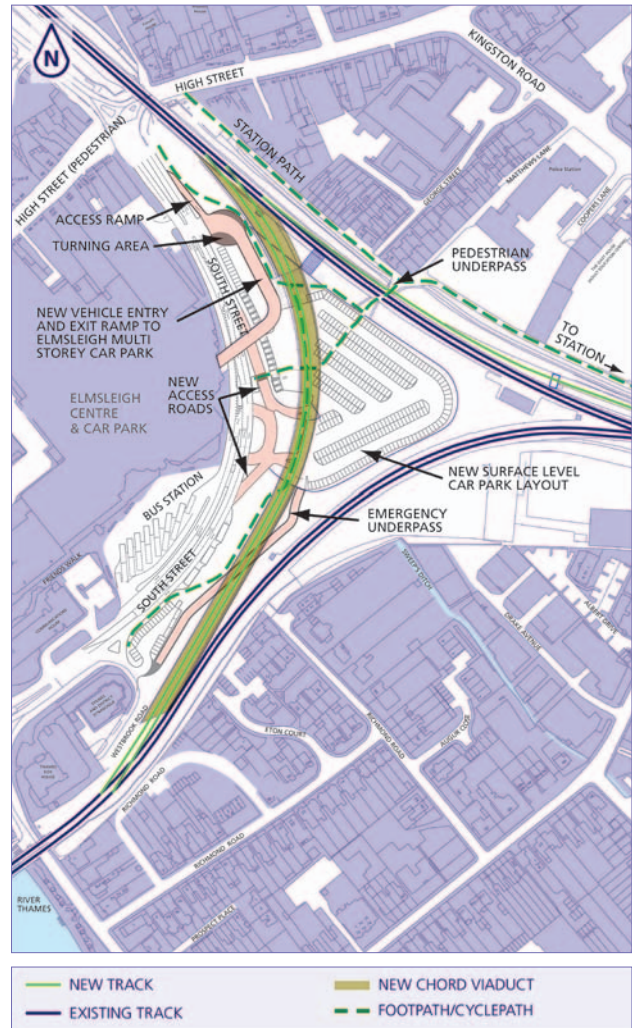


## Scheme Description

### Staines Chord

Within Staines, the new chord will enable trains to run from the airport directly through to Reading and Guildford. The chord will be on a viaduct, about 450m long, that will pass over the Elmsleigh surface car park in Staines. In order to build the chord the existing ramp into the multi-storey car park will need to be replaced with a new structure.

### STAINES CHORD



### STAINES CHORD AND CAR PARK RAMP





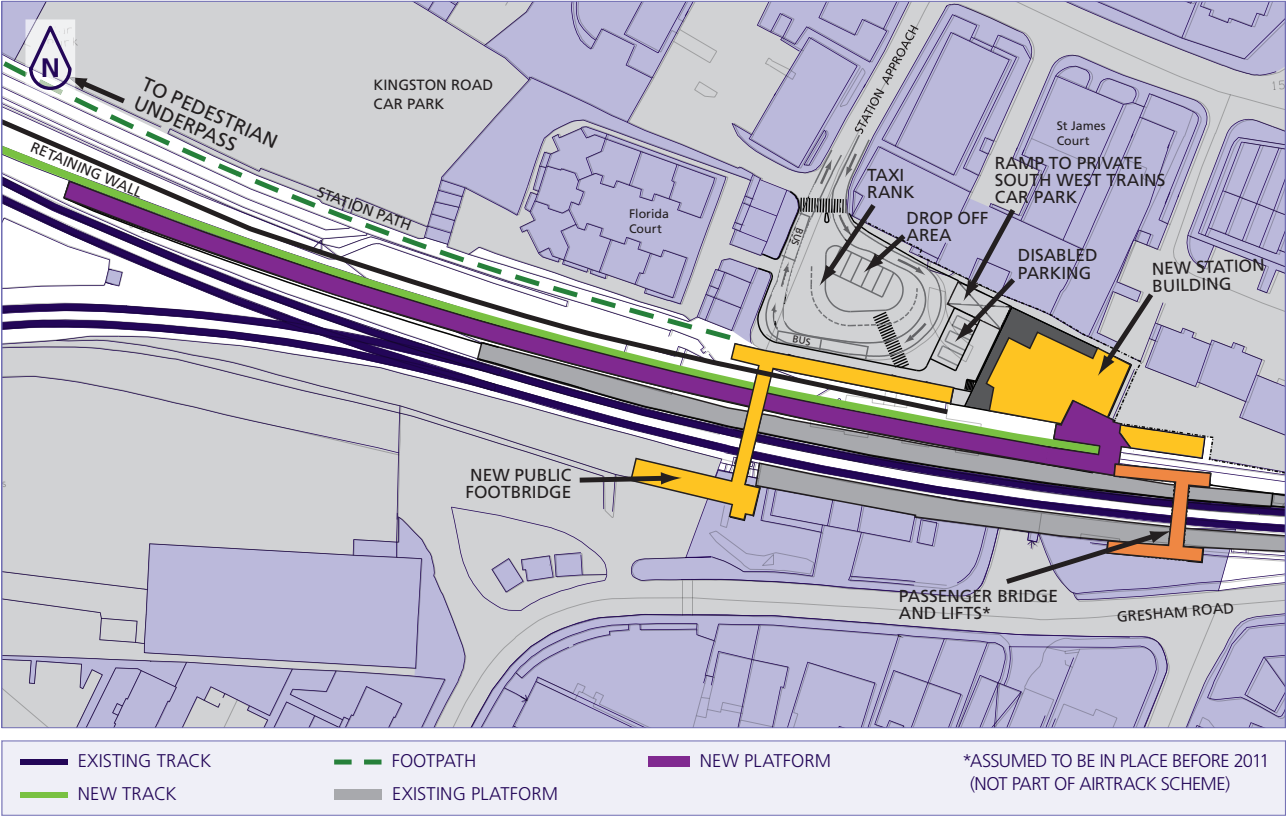
**Staines Station**

A new platform and track will be built at Staines station. This will allow trains, particularly Heathrow Express trains, to terminate at Staines. The existing main ticket hall and the footbridge will need to be demolished but will be replaced with new structures that meet the needs of existing and new passengers and reflect the added importance of the station.

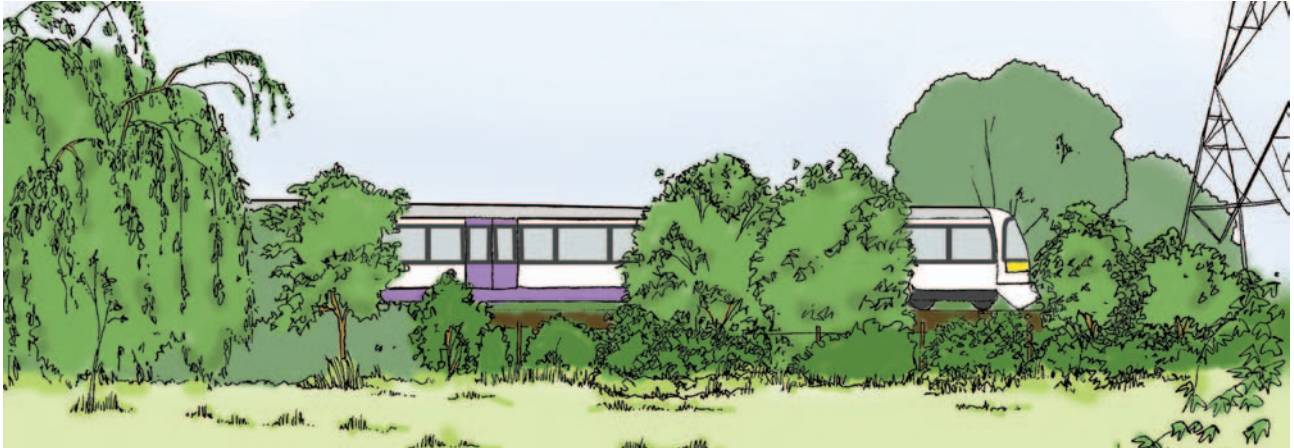
A new passenger footbridge is expected to be built by Network Rail prior to Airtrack and is not part of this scheme. The station car park will mainly be used for bus bays, taxi ranks and cycle facilities, as well as a short-stay car drop off area and disabled parking. New replacement offices and rest facilities for railway staff will also be built here, including an underground car park. Longer term public parking for the station will be at the Kingston Road car park a short distance away along Station Path.



STAINES STATION



STAINES MOOR JUNCTION



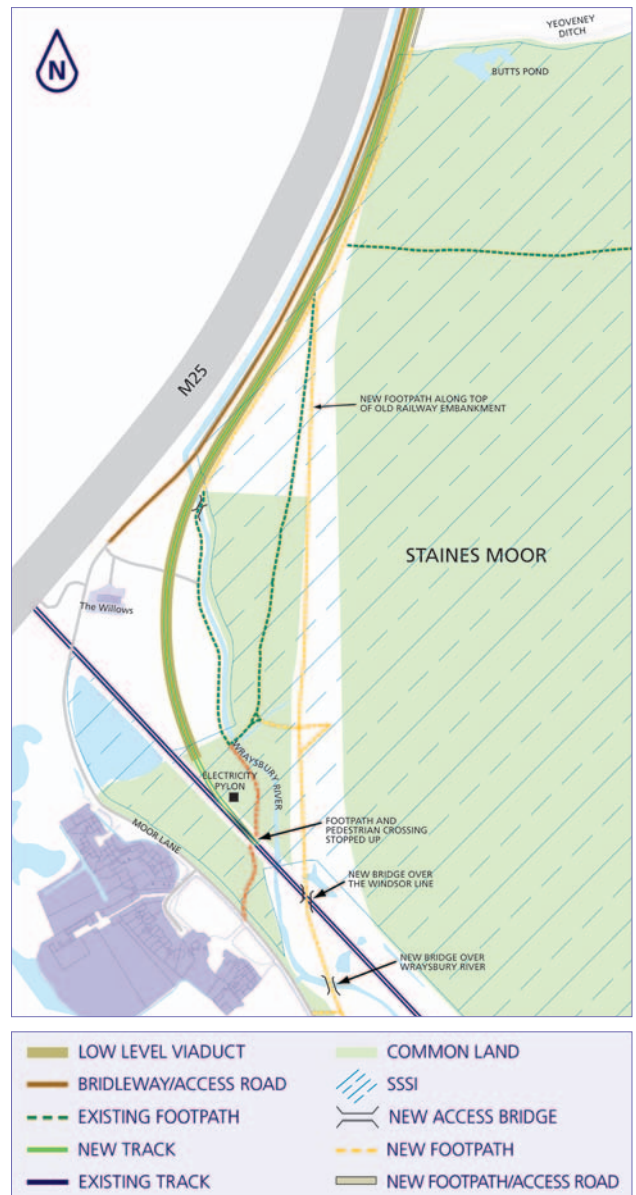
**Staines Moor**

The new 4km line into Heathrow will branch off the existing Windsor line. A low viaduct will curve northwards through the western edge of Staines Moor, crossing over the Wraysbury River. The viaduct will continue along the very edge of Staines Moor before descending to ground level alongside the Wraysbury River and M25 motorway. HAL has committed to a variety of measures to ensure the adverse effects of the new railway are minimised and the value of the Moor for wildlife and people is maintained

The new line to Heathrow will bring about a number of changes to footpaths in the area. The existing path alongside the Wraysbury River between Moor Lane and Horton Road will be kept for use by cyclists and horse riders. However, a new long footpath will be created along the east side of the railway and onto the old railway embankment as far as the western edge of Staines. The two existing pedestrian level crossings over the Windsor line will be closed and the footpaths across them diverted to ensure continued access onto Staines Moor: one via an existing bridge and the second via new footbridges over the Wraysbury River and the Windsor line.



STAINES MOOR JUNCTION

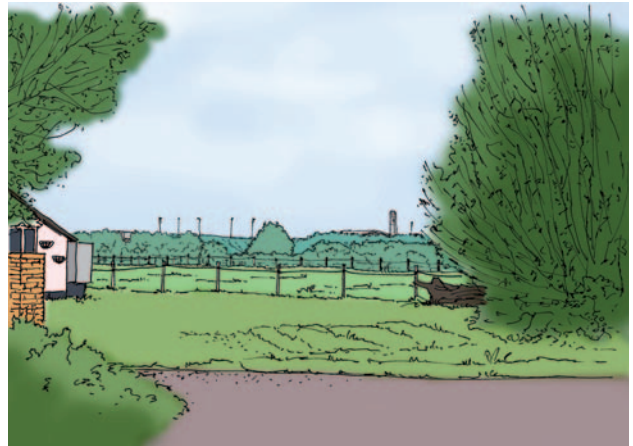


## 8 Heathrow Airtrack | Non-technical Summary of the Environmental Statement

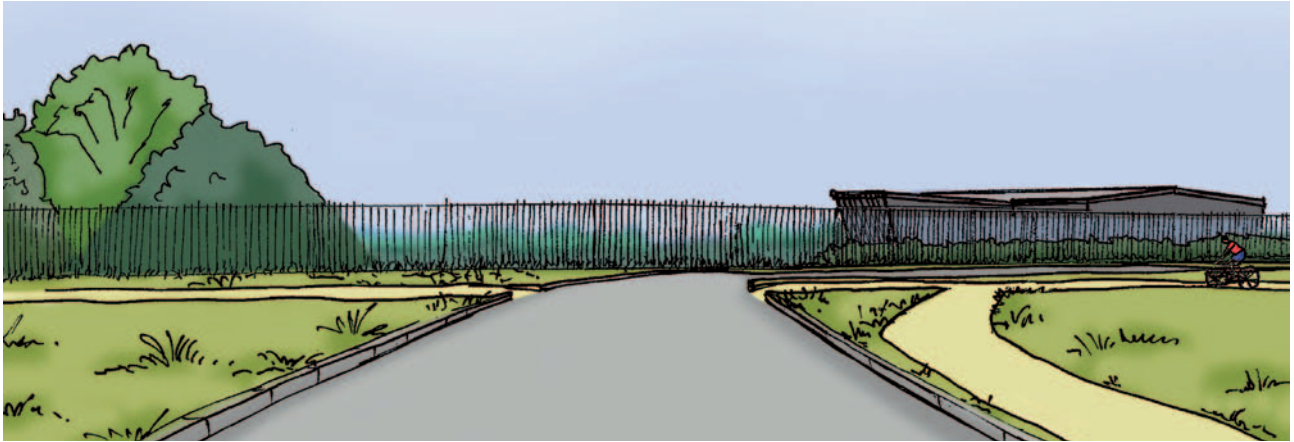
**Route Continuing North**

Continuing north, the line will be at ground level before going into cutting and then a tunnel, which will take the railway below Airport Way, near Junction 14 of the M25. It will be necessary to have shafts linking the tunnel with the surface: one to ventilate the tunnel and three more to enable emergency escape and access. At the surface, the shafts will be covered by small buildings protected within compounds, which will provide for maintenance and emergency vehicles.

The tunnel will continue into the station at Terminal 5. The Heathrow Express service will be extended through this station using the Airtrack line into the new platform at Staines station.

**VIEW OF TUNNEL MAINTENANCE BUILDINGS FROM SPOUT LANE****BRIDLEWAY 50 LOOKING NORTH**

FELTHAM DEPOT ACCESS ROAD AND RIVER CRANE FOOTPATH

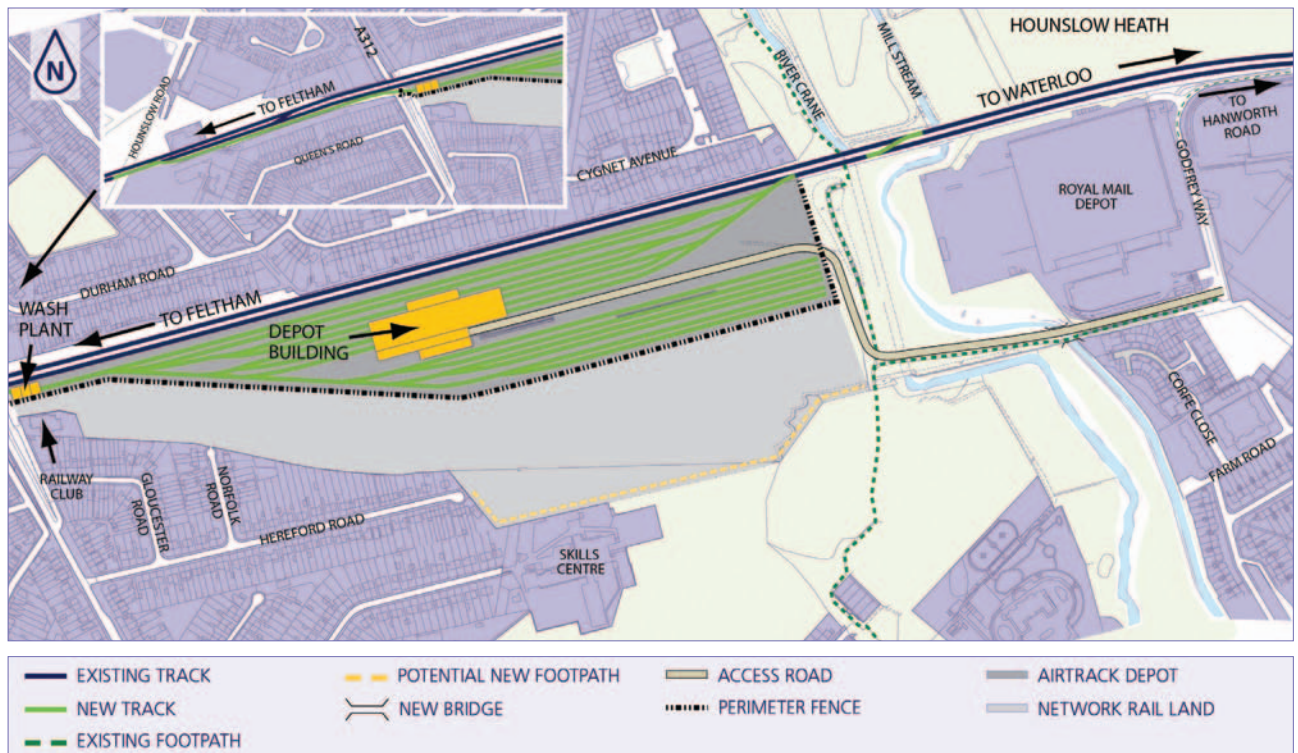


Feltham Depot

A new train cleaning and maintenance depot will be built on the site of the old Feltham marshalling yard, which has been vacant since the 1960s but is still owned by Network Rail. The depot will include a large new shed and a number of rail sidings and will be used to repair, clean and maintain the trains, as well as to stable them at night. A new access road from Godfrey Way to the depot will be built past the Royal Mail distribution centre.



FELTHAM DEPOT



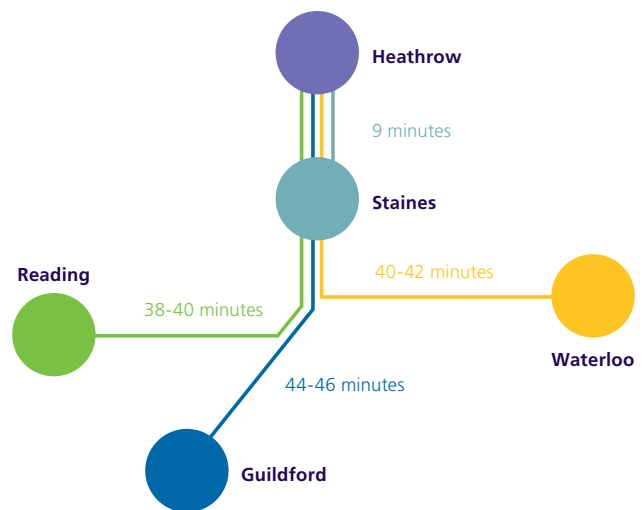
## The Airtrack Service

Towards the end of 2014, Airtrack services will run between Terminal 5 and:

- London Waterloo, with stops at Clapham Junction, Richmond, Twickenham, Feltham and Staines
- Guildford, with stops at Woking and Chertsey
- Reading, with stops at Wokingham and Bracknell

Two trains per hour in each direction will serve each of these routes with journeys taking between about 40 and 45 minutes. These trains will be in addition to existing services. Airtrack will be supplemented by two Heathrow Express trains per hour running in each direction between the airport and Staines station. During the week, services will begin at around 5am and will continue to around midnight.

A new fleet of modern, quieter and more energy efficient trains will be built for the Airtrack service. For Waterloo they will comprise ten cars; those for Guildford and Reading will be five car trains.



## Choosing the Right Scheme

Various alternative schemes for a southern rail link into Heathrow have been put forward over the last 40 years. However, the station at Terminal 5 was built with two platforms for Heathrow Express and space for two more rail platforms, each capable of serving an extension to the west. Consequently, the only realistic routes for the southern link are variations of the alignment now proposed, running along the M25 to the Windsor line.

The site at Feltham was selected for the depot because it is central to the rail network that will be served by Airtrack, has good access to the mainline and is of sufficient size and shape to accommodate the required facilities. Since it was closed, the site has remained within the ownership of Network Rail and retained for future operational use. Other potential sites have been explored, as the Feltham site is designated green belt and a nature conservation area. But the feasible alternatives are all in open countryside and also green belt and are, to varying degrees, all less desirable on operational grounds and in terms of planning policy and other constraints.

Having determined a general route, HAL has been working up the scheme details since summer 2007: for example, deciding the best location for the tunnel entrance, designing an alignment with the least impact on Staines Moor and working out how to minimise impacts in Staines town centre.

Changes to the scheme during the 18 months of its development have been influenced by local people and organisations. A first stage of consultation between February and April 2008 sought comments on the route alignment and station options in Staines and the comments received from local residents and others have contributed to the preferred design.

A second round of consultation between October and December 2008 was undertaken to inform local people of the decisions made about the scheme. It also provided information about the effects of the proposals including the expected changes to the operation of level crossings along the route.



## Building the Scheme

Construction of Airtrack is expected to take place over about four years, between 2011 and 2014. The timing of the different construction works is illustrated in the programme below.

Construction will be undertaken from six large worksites along the route and several smaller ones. These have been selected to provide sufficient working space and relatively easy access onto surrounding roads. The most intense activity will take place at the largest worksite at Bedford Court from which the tunnels will be excavated. Works will commence with the excavation of a large box structure. Tunnels will then be excavated southwards to Stanwell Moor and eastwards to Heathrow. Tunnel spoil will be stored at this site and whatever cannot be re-used (for example to re-fill the Bedford Court box) will be disposed off site. It is estimated that some 161,000m<sup>3</sup> of spoil will need to be removed in this way, of which 47,400m<sup>3</sup> is expected to be contaminated and so will need to be particularly carefully managed in accordance with relevant environmental protection regulations.

Another worksite will be located off Horton Road near the M25 Junction 14 to support the “cut and cover” tunnel construction and other works across Stanwell Moor. Both this site and the Bedford Court site have good access to the motorway.

A third worksite will be necessary in the triangle between the old railway embankment, the Windsor line and Moor Lane. Vehicle access to this site will also be from the north via Junction 14. Access along Moor Lane will only be needed to build the new footpath and footbridges on the embankment over the Windsor line and Wraysbury River.

Construction of the Staines chord and works at Staines station will each occupy surface car parks. The Elmsleigh surface car park will be restored at the end of construction but will be slightly smaller in size. Temporary vehicle access to the Elmsleigh multi-storey car park will be provided through the Tothill car park for a few months, until a new ramp is completed.

The station surface car park will be replaced by a transport interchange area, with dedicated space for buses, taxis and passenger drop-off. A railway staff car park at the station will be replaced by a new basement car park under the new station building. The station will remain open while the works are taking place. Alternative access for pedestrians, cyclists and cars will be maintained throughout construction.

Construction of the new depot at Feltham will be contained within the boundary of the former marshalling yard. New track will be delivered to site by rail; all other materials will be delivered by road. Access from the west along Harlington Road will be required for a short time, until a new permanent route to the east connecting with Hanworth Road via Godfrey Way has been built.

### CONSTRUCTION ACTIVITIES 2011 – 2014

	2011	2012	2013	2014
<b>Main new structures</b>				
Staines station and chord	■	■		
New footpath	■			
Staines Moor and Stanwell Moor sections	■	■		
Tunnels and Bedford Court box	■	■		
Works at Terminal 5 station	■	■		
<b>Track and railway systems</b>				
New track sections	■	■		
Modifications to existing track	■	■		
Power and signalling		■	■	
Testing and commissioning				■
<b>Feltham Depot</b>	■	■		

## Protecting the Environment

Where sensitive environmental features have been identified along the route, the project team has sought to avoid impacts where possible, or to minimise those effects that are likely to occur. If and when powers to build the scheme are received from the Secretary of State for Transport, the detail of the design will be developed further. At this stage the team will look further at the opportunities to reduce these environmental effects.

During construction, contractors will be required to apply strict working methods to ensure that disturbance and environmental impacts are kept to a minimum. These methods are set out in a Code of Construction Practice (CoCP), a draft of which is included with the Environmental Statement.

The CoCP lists the working practices that must, as a minimum, be used by contractors to control environmental impacts during construction. The CoCP will be agreed with the local planning authorities before works begin. HAL will require all its contractors to comply with the CoCP as part of their general environmental management arrangements.

As well as setting out general requirements for good site practice, such as working hours, communicating with local residents and keeping roads clean, the CoCP sets out, for example, how to:

- Control construction noise
- Prevent dust
- Protect water courses from pollution
- Avoid damage to wildlife, especially protected species and habitats
- Control risks from contaminated land
- Manage impacts from construction vehicles





## Assessing the Environmental Effects

Many development proposals due to their size, location or activities must by law have their environmental effects assessed and reported in an Environmental Statement, to be submitted with the application. This helps the design to advance in a way that protects environmental features as well as the future health and amenity of people. It also allows decision-makers, in this case the Secretary of State for Transport, to understand any adverse effects that might occur.

The way that environmental effects should be assessed and the information that should be reported are defined in law and Government guidance; the environmental impact assessment of Airtrack has followed these requirements. Organisations with an interest in the way the assessment was undertaken were consulted and their responses have helped to modify the approach that was used.

A lot of background information has been collected to ensure that the environmental effects have been assessed as accurately as possible. The assessment team has spoken to people with a good knowledge of the area and its environment as part of a wider programme of consultation with key individuals and groups. This has improved the quality and quantity of information used in the assessment so helping to improve its accuracy and detail.

The environmental effects of the scheme have been predicted for each of a number of environmental topics by comparing “baseline” environmental conditions, (i.e. the situation which would be expected to occur without the scheme) against environmental conditions that are likely to arise as a result of the scheme’s construction and operation.



The environmental topics covered by the assessment address effects on people in terms of noise and vibration, air quality, visual impacts, transport and socio-economic effects, as well as wider effects on communities. They also address effects on natural resources in terms of ecology, landscape, water and contaminated land; and they address effects on cultural heritage, particularly built heritage and archaeology.

In predicting what environmental impacts are likely to occur, the environmental impact assessment has assumed that many types of environmental protection will be in place. These are referred to as incorporated mitigation. Powers to build the scheme, should they be granted, will be provided on the basis that this mitigation is adopted.



## Economic and Transport Benefits

Airtrack will bring about a number of economic benefits by improving accessibility to and from existing and planned concentrations of employment. It will expand the area within which people can realistically travel to and from their jobs, benefitting both them and their employers. It will also encourage employers who need good access to Heathrow to locate their businesses over a wider area in Surrey, Berkshire and south west London.

Airtrack will provide more frequent services on existing lines and new services to Heathrow Airport. Around 250 additional people per hour, are expected to travel to Heathrow Airport using Airtrack services. This equates to more than 1.4 million trips per year.

## Impacts in Staines Town Centre

Most of the environmental impacts within Staines will arise during construction, both of the new chord in South Street and of the works at and leading to Staines station. By following the requirements and safeguards in the CoCP, disturbance to local residents, shoppers and people working nearby will be controlled, significant impacts from dust will be avoided altogether, and noise and visual impacts will be limited. Visual impacts for residents at Florida Court will occur because the construction works are located close to these flats and will require the removal of some mature trees. Residents on George Street, off Station Path, will be similarly affected by close views of the construction of the new line into the station. Pedestrians on South Street will be adversely affected by views of works for the chord including loss of trees and other vegetation.

Construction activity and noise will be limited to the daytime. Noise will be most significant for residents on Gresham Road (at Phoenix Place, Friendship House and Carlton Court); at Florida Court and Pullmans Place near the station; on George Street and Station Path; and at Eton Court and Richmond Crescent. A small number of offices and shops, as well as the synagogue, may also be affected. Once construction details are agreed, HAL will look further at measures to limit these impacts.

There is also a risk that vibration, mostly due to piling, may affect a small number of properties that are closest to the works, although in practice these are expected to be slight and short-lived.

Construction of the Staines chord will require the replacement of the existing ramp access into the multi-storey car park. After the existing ramp is demolished and before the new access is built, there will be a period of a few months when it will be necessary for people to use the Tothill car park as a route into the Elmsleigh multi-storey car park via a temporary link between the two. Potential delays to traffic going into and out of the Tothill car park, as well as to traffic in the car park itself will be an adverse consequence.

For almost two years three surface car parks will be used as construction sites and the loss of some 400 parking spaces will be an inconvenience for drivers in Staines. In the long term, the chord will result in the permanent loss of no more than 70 places, but with over 2,500 off-street parking spaces elsewhere in Staines town centre, this will not be a significant loss.

Long term and permanent benefits will arise from the physical changes brought about by Airtrack, as well as from the operation of the new service. Staines station ticket hall and footbridge will both be replaced by improved facilities; the footbridge, for example, with ramps instead of steps will be usable by all, not just the most physically able. But the loss of these 19th century structures, which are locally listed, will be a loss to the town's heritage.

The construction of the new track to the station will result in the loss of up to nine mature trees on Station Path, as well as the trees and vegetation on the railway embankment. Together with the new retaining wall along Station Path, the loss of trees will impair the views of pedestrians on the path and residents at Florida Court, although this effect will diminish over the years as new planting matures. Some residents on George Street will be similarly affected.

The construction of the Staines chord will result in the loss of trees in the surface car park by the Iron Bridge and alongside South Street. Along with the impact of the new viaduct through this area, this will result in adverse visual effects for pedestrians in this part of Staines, although a high standard of design for the new structure and the introduction of new planting will help to limit this effect.

HAL will introduce a number of measures to limit noise from the Airtrack service. There are a number of possibilities for achieving this and these may change as new techniques are approved by Network Rail. The environmental impact assessment has assumed that there will be noise barriers to protect housing on Station Path and planned new housing above the Elmsleigh Centre. However, there will be a noticeable increase in train noise for some residents on Gresham Road near the station, on the High Street near the Iron Bridge, and on Richmond Road, Eton Court and Laleham Road, where the chord joins the Reading/Guildford line. Opportunities to limit these effects will be sought during detailed design.

## Impacts on the Windsor Line

Along the Windsor line, west of the Iron Bridge on Staines High Street, there will be very little construction, apart from some work on the tracks where they are joined with the new lines in Staines in the east and by Staines Moor in the west.

Pedestrian level crossings over the Windsor line will be closed and the paths to them diverted onto new routes, one using an existing bridge and the other using a new footbridge to cross over the railway. This will provide a much safer way of getting onto Staines Moor. Both of these new crossings will link with a long new footpath created as part of the Airtrack scheme, which will extend between the edge of Staines, along the old railway embankment north of Moor Lane and then alongside the new railway to Horton Road.

Measures will be used to limit noise increases from the more frequent Airtrack trains. The environmental impact assessment has assessed the use of noise barriers alongside the track where it is closest to the largest number of houses, including the Moormede development and Wraysbury Gardens and Victoria Road. These would protect housing from receiving the largest noise impacts, and residents at over 50 dwellings around Waters Drive and Wraysbury Gardens would actually experience overall noise reductions.

Noise barriers are certainly one solution; however, they have disadvantages such as encouraging graffiti and trespass and causing visual impact. As the design progresses, other means of limiting noise impacts will be modelled to see if there are better ways of achieving the same ends using other developing technologies such as rail dampers or friction modifiers, either on their own or in combination.

Towards the western end of the line on Moor Lane, potential impacts from train noise will be less noticeable in an area where noise from the Staines by-pass and M25 traffic, as well as from aeroplanes is already quite high. In addition, with the removal of the pedestrian level crossings, trains will no longer be required to sound their horns as they pass. Increased noise from more passing trains will, however, be noticeable, especially at night (up to midnight and from around 5am in the morning).



## Impacts on Staines Moor



Staines Moor is the most sensitive natural environment affected by Airtrack. It is one of the remaining “Commons” of the medieval Manor of Staines and has been largely unaltered for over 1000 years. Its 117 hectares of flood-meadows provide vital flood protection for Staines, and support important communities of plants and animals, for which the Moor is designated a Site of Special Scientific Interest (SSSI).

The alignment and design of Airtrack has been devised to minimise impact on Staines Moor. The railway will be as close to the M25 as possible to minimise landtake on Common Land and designated ecological habitat. This has helped to avoid sensitive ecological areas and severance of open space.

Permanent landtake will affect a total of 5,440m<sup>2</sup> of Common Land located in two areas. Areas of matching size next to these will be designated as Common Land to ensure that the rights of Commoners and users are protected. Similarly, almost 15,320m<sup>2</sup> will be designated for public open space, mostly within the grounds of what is now The Willows off Moor Lane, to make up for a similar area occupied by the railway.

The railway will be on a very low viaduct across the Moor. This will help to limit the loss of flood storage space and reduce habitat loss. HAL’s ecologists have identified the most important habitats and these will be protected or, if they cannot be avoided, moved to a safer location nearby. HAL will use land bought from The Willows to create new space for flood water in order to make up for any that is lost to the railway. This land will also be used to create new ecological habitat.

During construction, contractors will be required to put in place strict protective measures (set out in the CoCP) to ensure that impacts on habitats, including the Wraysbury River, are minimised.

The house in The Willows, which is known to contain a bat roost, will be demolished. Several old trees

nearby also offer good bat roosts (although they are not used currently) and these will also be lost to the scheme. Artificial bat roosts will therefore be created to ensure that bats are protected in the area.

The construction of the railway at this location will create a significant impact on the landscape. Trees along the Wraysbury River, at the edge of The Willows and along the old railway embankment are important in defining the edge of the Moor. Their removal will cause a significant impact on the local landscape character, as well as on the views of people on footpaths in the area and some residents on Moor Lane. In the long term, new tree planting and the restoration and expansion of the habitat will help to restore the landscape. Views from the nearest footpaths, including the bridleway, cannot be mitigated however as they are so close to the new railway.

In the northern part of the Moor the railway and the new footpath on its eastern side will be kept away from Butts Pond, which contains some important wildlife, particularly invertebrates. A small area of the SSSI south of Butts Pond containing yellow meadow anthills will be affected. Anthills are important features of the Moor, with some believed to be over 200 years old. Any anthills that would be affected will be moved to a location where they are better protected. This has been successful on other projects, but given the importance of these features to Moor, there is a risk of a significant effect.

A long history of human settlement in the Colne Valley is known through numerous archaeological finds on the Moor, some dating back to the Stone Age. Without digging up the Moor in advance, possible impacts on archaeology cannot be determined but it is assumed that the potential for archaeological finds is high. HAL will agree a programme of excavation with the County Archaeologist in advance of construction. This will enable any important finds to be protected before works start.

## Impacts on Stanwell Moor

North of Staines Moor, the route passes within a tight corridor between the retained bridleway, the Wraysbury River and M25 on one side and a restored landfill site on the other. The landfill had been used mostly for inert construction waste, but also for household waste. Site investigations will be undertaken as part of the detailed design to ensure that impacts from this possibly contaminated material are avoided. Measures to minimise the risk of impact on the landfill will be agreed with the Environment Agency before works start. Some 47,400m<sup>3</sup> of spoil removed from the cut and cover tunnel construction and from piling on Stanwell Moor is, however, likely to be contaminated and will need to be carefully managed in accordance with environmental regulations.

The two reservoirs west and east of Staines Moor and Stanwell Moor have European protection owing to the populations of wintering ducks that they support. Environmental studies have been undertaken over a number of years to find out if and to what extent gadwall and shoveller (the ducks for which the reservoirs are designated) use the area for feeding. These studies have found that, although ducks are present, mostly at night, they are confined to areas some distance from the Airtrack route. HAL's contractors will put in place measures to ensure that construction works are screened and that the risk of disturbance is kept to a minimum.

Airtrack and Heathrow Express trains will use overhead electric power lines from Terminal 5 to Stanwell Moor and third rail electric power on Staines Moor and on the Windsor line. The changeover will be on Stanwell Moor, so the overhead lines will be kept away from



Staines Moor, thus avoiding significant visual impacts from this source. Fencing will be provided to prevent wildlife encroaching onto the line.

The proximity of the railway will cause significant visual impact for users of the retained bridleway. There is potential to introduce screening between the two but it may be more desirable to maintain open views and so reduce the possible risk of horses on occasions being worried by oncoming trains. The relative merits of each approach and the final solution will need to be agreed during detailed design and approved by Spelthorne Council in due course.

As the railway descends into cutting, it will cut across Greenhams pond, which is important for local wildlife as well as being used by fishermen. A new pond will be created to its east in advance of construction so that animals and plants in the old pond can be moved to it before work on the railway commences and the existing pond is lost.

### NORTHERN STANWELL MOOR



## Impacts on Bedfont Court and Heathrow



Once Airtrack is completed, the only thing visible at Bedfont Court will be the tunnel shaft buildings and the tarmac compounds around them. However, during construction a large worksite will be located here.

Tunnels will be excavated south to Stanwell Moor and east to Heathrow from within a substantial pit. Despite the large scale of these works, no significant environmental impacts are predicted. There are no residents close to the site and although the area has some importance for birds, such as snipe and teal, there are other areas they can use for feeding and roosting in the meantime.

The railway will be in tunnel under the reclaimed landfill sites. Records show that they contain only inert (non-contaminated) waste. Site investigations will, however, be undertaken in advance of construction to determine any risks from landfill gas.

The excavation chamber will be re-filled over the concrete box once tunnelling is complete and the new tracks are in place. Hedges, which are the most important landscape and ecological features currently, will be mostly replaced and will quickly re-establish within the local environment.

## Impacts on Feltham Depot

The site for Feltham depot has been vacant for the past 45 years and is now designated green belt and a nature conservation area of metropolitan importance.

The Airtrack depot will cause the permanent loss of some 60% and the temporary loss of a further 10% of an area that includes some botanically rich, although not rare, habitats. These are also of regional importance for insects. As much as possible will be done to protect the most important bits of habitat by moving them to parts of the site unaffected by the works.

Impacts on protected groups, such as reptiles and breeding birds, will be avoided through measures set out in the CoCP, but the overall loss of a large area of ecologically rich habitat will be significant.

The site is also of some importance for bats. Daubenton's bats use a roost within the river culvert east of the site and these and other species use the site for feeding and for commuting to other areas. The new access road over the culvert will be designed to minimise vibration on the structure beneath, and lighting will be kept off the river corridor so as not to deter bats.

The loss of vegetation, the new maintenance shed and other facilities and the introduction of lighting to the site will result in significant visual impacts,

both during construction and operation, for residents overlooking the site.

Landscaping will be introduced around the boundary of the site as early as possible, including a strip of land north of the railway, and this will help to mitigate visual impacts. Until this matures, significant visual impacts will affect residents on Durham Road to the north; on Gloucester Road, Norfolk Road, Hereford Road and Boundaries Road to the south-west; and on Wigley Road to the south.

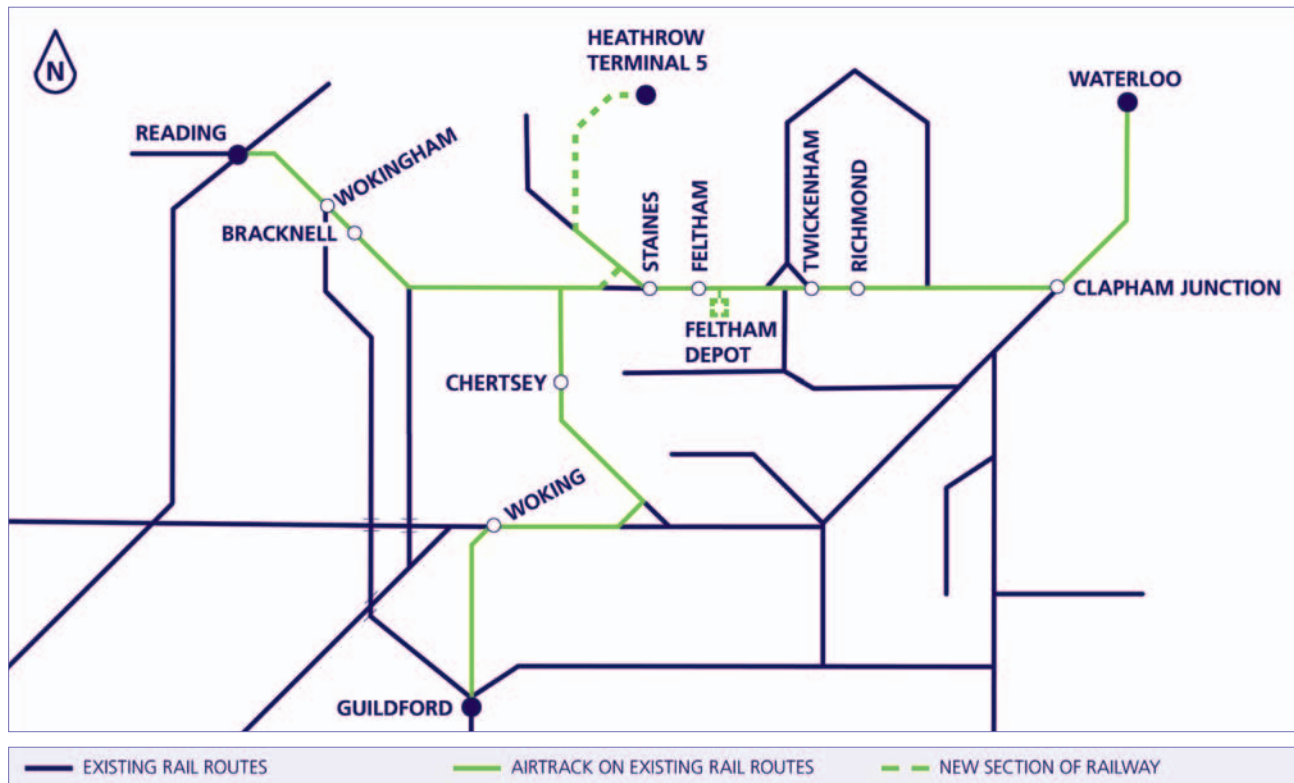
Residents on the south side of Cygnet Avenue to the north of the railway will have views of the maintenance shed and there is little space to provide screening for these people. A lighting scheme for the depot that limits light 'spillage' to adjacent houses will need to be approved by the local authority.

With the planned noise mitigation incorporated into the scheme, operation of the depot is unlikely to give rise to any significant noise increase to adjacent residents either during the day or at night. However, during construction of the depot there will be significant noise at various times during the day for residents at some 200 houses on Durham Road, Cygnet Avenue, Hereford Road, Queens Road, Carisbroke Close and Corfe Close, as well as for people using the Skills Centre at the end of Boundaries Road.



## Impacts on Airtrack Stations

### SERVICE AREA



Between Heathrow and Waterloo, Airtrack will serve stations at Clapham Junction, Richmond, Twickenham, Feltham and Staines. Guildford trains will serve Woking and Chertsey, and Reading trains will serve Wokingham and Bracknell. The likely additional number of people who will want to use these stations, especially during the busiest times in the morning and evening, has been predicted. This has enabled the environmental impact assessment to assess impacts on car parking and local roads around each station, and impacts on the operation of the stations themselves.

The relative increase in the number of people using these stations as a result of Airtrack is quite small, generally well below 5%.

A proportion of these new passengers will be going to and from each station by car. In the case of Guildford, Woking and Chertsey stations which are expected to see increases in the region of 5%, this may result in adverse effects on local roads during the busiest periods in the morning and afternoon.



## Impacts on Level Crossings

Airtrack services on the existing rail network will cross fifteen level crossings in south-west London (Richmond and Feltham), Surrey and Berkshire. Many of these are well known to local people because of the congestion they cause already. By running additional services over these crossings Airtrack is likely to increase the delay to pedestrians and motorists and in some places there may also be an increase in traffic congestion. This may in turn have impacts on the use of local shops and services. These and other issues have been examined as part of the environmental impact assessment.

The crossings where Airtrack services will have the most severe effects in terms of increased delay are at Staines (Thorpe Road), Egham (Vicarage Road and Station Road) and Wokingham (Barkham Road), where Airtrack could result in a barrier being down 10 to 15 minutes more over an average hour than it is at present. At Richmond (Sheen Lane and Manor Road) barriers will be down about five minutes more over an average hour, making the existing situation moderately worse. These are all likely to be significant effects.

Traffic delay at level crossings can give rise to secondary effects on community facilities depending both on how long the delays are and the types of community services affected. For example, facilities that require fast and possibly emergency access, such as hospitals and fire stations, are of greater sensitivity than schools; which are themselves more sensitive than say sports facilities or open space, where timely access is less important.

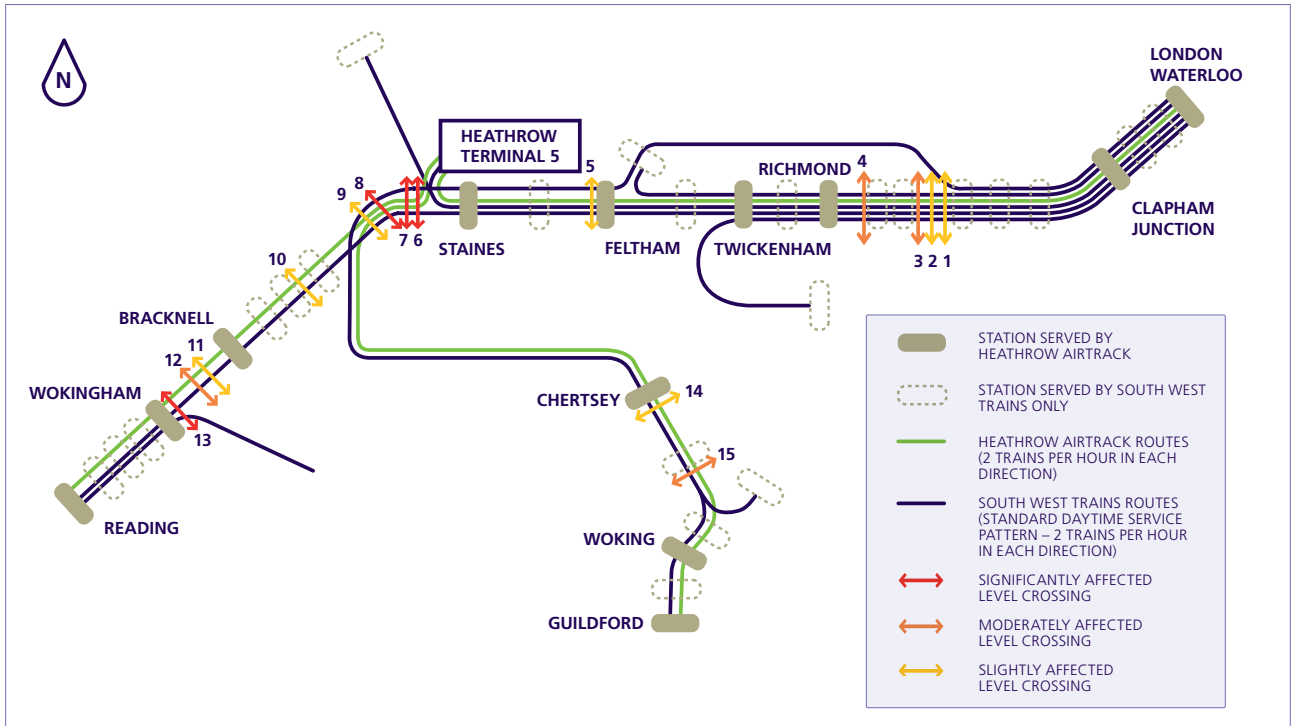
On this basis, significant adverse community effects are predicted in Richmond (Sheen Lane and Manor Road), Staines (Thorpe Road), Egham (Vicarage Road and Station Road) and Wokingham (Barkham Road).

Although delay at level crossings when the barriers are down is a cause of concern to local residents, the environmental impact assessment has established that the extra time when the barriers are down due to the Airtrack services is highly unlikely to result in significant effects from traffic noise or air quality.

The solutions to these problems will vary for each crossing. For some it may be possible to change the way that the crossing is operated. At others there is a possibility of providing new infrastructure; for example, Wokingham Council has plans for a new road that would avoid the need to use the Barkham Road crossing. In all cases responsibility for addressing these problems will involve a number of organisations working in collaboration, most importantly the relevant local councils, the highways authorities and Network Rail. Any solution will not be part of the Airtrack scheme.



LOCATION OF LEVEL CROSSINGS – SCHEME WIDE



1. VINE ROAD, BARNES	7. VICARAGE ROAD, POOLEY GREEN	12. STAR LANE (EAST HAMPSTEAD ROAD), WOKINGHAM
2. WHITE HART LANE, BARNES	8. STATION ROAD, EGHAM	13. BARKHAM ROAD, WOKINGHAM
3. SHEEN LANE, MORTLAKE	9. PRUNE HILL, RUSHAM	14. GUILDFORD ROAD, CHERTSEY
4. MANOR ROAD, NORTH SHEEN	10. LONDON ROAD, SUNNINGDALE	15. STATION ROAD, ADDLESTONE
5. BEDFONT LANE, FELTHAM	11. WATERLOO ROAD, WOKINGHAM	
6. THORPE ROAD, STAINES		

## Cumulative Effects

The environmental impact assessment has also considered the effects of Airtrack in combination with other developments in the area. The Crossrail scheme, which received approval in 2008, is expected to commence construction in 2010 and be in operation by 2017. There is no significant cumulative effect because Crossrail affects a different area to Airtrack and, although it serves Heathrow, it does not access Terminal 5.

Other schemes with which Airtrack might have cumulative effects are smaller projects within Staines. These schemes are mostly commercial or residential developments in and around Staines town centre. Although the timing of the main projects that have been identified cannot be known with certainty, there is a potential for cumulative construction effects due to loss of parking and as a result of construction traffic.

The potential for cumulative construction noise, visual, air quality and traffic impacts is slight. However, if the Bridge Street car park development is built at the same time as Staines chord there will be a significant cumulative reduction in town centre parking unless adequate mitigation is put in place. There are no significant cumulative long term impacts that can be identified at this stage.



## What Happens Next?



HAL is seeking the necessary powers and approvals to acquire land, and to build and operate the scheme by applying for an Order under the Transport and Works Act 1992. The application is made up of documents describing the works and powers sought, and it includes the Environmental Statement (including this summary). These documents are available to review at libraries near the route, as well as at the council offices of Spelthorne, Hillingdon, Hounslow, Richmond, Runnymede, Wokingham, Windsor and Maidenhead.

Statements of objection or support may be made by anyone with a direct interest in the scheme and must be sent to the Secretary of State within eight weeks of the date of application. Relevant objections and support will, if required by the Secretary of State, be considered at a Public Inquiry. Letters of objection or support should be sent to the Secretary of State by the date referred to in the newspaper notice advertising that the application has been made.

If required, the Public Inquiry will be presided over by an Inspector. Following the receipt of the Inspector's report the Secretary of State will determine the application, either making the Order (with or without changes) or refusing to make it.

For more information, you can email us at [heathrowairtrack@cjassociates.co.uk](mailto:heathrowairtrack@cjassociates.co.uk) or call **020 7529 4906**.

Further information on this scheme can be viewed at [www.heathrowairport.com/airtrack](http://www.heathrowairport.com/airtrack)

## Libraries

### Addlestone Library

Church Road, Addlestone, KT15 1RW  
Monday, Sunday: Closed  
Tuesday: 9am – 7pm  
Wednesday, Thursday, Friday, Saturday: 9am – 5pm

### Central Library, Uxbridge

High Street, Uxbridge, UB8 1HD  
Monday, Tuesday, Thursday: 9.30am – 8pm  
Wednesday: 9.30am – 5.30pm  
Friday: 10am – 5.30pm  
Saturday: 9.30am – 4pm  
Sunday: 12.30pm – 4.30pm

### Egham Library

High Street, Egham, TW20 9EA  
Monday, Sunday: Closed  
Tuesday: 9am – 7pm  
Wednesday, Thursday, Friday, Saturday: 9am – 5pm

### Feltham Library

210 The Centre, High Street, Feltham, TW13 4BX  
Monday, Thursday: 9am – 8pm  
Tuesday, Wednesday, Friday: 9am – 5.30pm  
Saturday: 9.30am – 5.30pm  
Sunday: Closed

### Richmond Reference Library

Old Town Hall, Whittaker Ave, Richmond, TW9 1TP  
Monday, Tuesday, Thursday, Friday: 9.30am – 6pm  
Wednesday: 9.30am – 8pm  
Saturday: 9.30am – 5pm  
Sunday: Closed

### Staines Library

Friends Walk, Staines, TW18 4PG  
Monday, Wednesday, Friday: 9am – 6pm  
Tuesday, Thursday: 9am – 7pm  
Saturday: 9am – 5pm  
Sunday: Closed

### Stanwell Community Library and Information Centre

65 Clare Road, Stanwell, TW19 7QW  
Monday, Wednesday, Thursday, Saturday:  
9.30am – 1pm  
Tuesday, Friday: 9.30am – 5pm  
Sunday: Closed

### Wokingham Library

Denmark Street, Wokingham, RG40 2BB  
Monday: 9.30am – 7pm  
Tuesday, Friday: 9.30am – 5pm  
Wednesday: 9.30am – 1pm  
Thursday: 9.30am – 8pm  
Saturday: 9.30am – 4pm  
Sunday: Closed

## Council Offices

### **London Borough of Hillingdon Civic Centre**

High Street, Uxbridge, UB8 1UW  
Monday to Friday: 8.30am – 5.30pm

### **London Borough of Hounslow Civic Centre**

Lampton Road, Hounslow, TW3 4DN  
Monday to Thursday: 8.45am – 5pm  
Friday: 8.45am – 4.45pm

### **London Borough of Richmond Civic Centre**

44 York Street, Twickenham, TW1 3BZ  
Monday to Thursday: 9am – 5.15pm  
Friday: 9am – 5pm

### **Royal Borough of Windsor and Maidenhead Maidenhead Customer Service Centre**

St Ives Rd, Maidenhead, SL6 1RF  
Monday to Thursday: 8.45am – 5.15pm  
Friday: 8.45am – 4.45pm

### **Royal Borough of Windsor and Maidenhead Windsor Customer Service Centre**

Sheet Street, Windsor, SL4 1DD  
Monday to Thursday: 8.45am – 5.15pm  
Friday: 8.45am – 4.45pm

### **Runnymede Borough Council Runnymede Civic Centre**

Station Road, Addlestone, KT15 2AH  
Monday to Thursday: 8.30am – 5pm  
Friday: 8.30am – 4.30pm

### **Spelthorne Borough Council Council Offices**

Knowle Green, Staines, TW18 1XB  
Monday to Thursday: 8.45am – 5pm  
Friday: 8.45am – 4.45pm

### **Wokingham Borough Council Place and Neighbourhood Services**

Shute End, Wokingham, RG40 1BN  
Monday to Friday: 8.30am – 5pm



**Airtrack and Rail Access to Heathrow**

**Policy CC4: Non-Car Access to Heathrow and Airtrack**

The Council will encourage measures to improve the accessibility of Heathrow Airport from the Borough by non car-based modes, where improvements can be achieved in an environmentally acceptable manner.

The Council will work with those involved in promoting the Airtrack scheme to ensure that potential alternatives are fully evaluated, and that the environmental impacts, particularly on Staines Moor and Staines town centre and those living near the track, are fully assessed and effective mitigation is proposed to minimize and compensate for adverse impacts. It will consider the extent to which detailed proposals overcome environmental impacts in deciding whether to support any proposal to construct the scheme that may be brought forward in the future.

The route of Airtrack through Spelthorne will be safeguarded.

- 1.1 Heathrow Airport is a major generator of road traffic and road journeys to and from the airport make a significant contribution to traffic on Spelthorne's roads. Heathrow has rail access but only to London via the Heathrow Express, Heathrow Connect and the London Underground. A rail link to the south connecting with the Waterloo line would represent a substantial improvement in the accessibility of Heathrow from the south by public transport. The Council therefore supports the principle of such a link.
- 1.2 However, the Council has serious concerns about the proposal known as Airtrack that is currently being promoted by a consortium of organisations and authorities. Airtrack would connect Staines with Heathrow and involve the construction of a new stretch of track in Staines town centre connecting the Reading and Windsor lines. It would then follow the route of the Windsor line to the north of Staines before turning north across Staines Moor and running alongside the M25 before leaving Spelthorne to enter Heathrow from the west. The scheme has the potential for serious adverse impacts. Specifically:
- a) in Staines town centre the new track and station risk causing disruption and disturbance to the operation of the centre, and those living near the track, in its construction and operation and the elevated section of track, alongside South Street is a potential eyesore.
  - a) on Staines Moor the works have a potential impact on a Site of Special Scientific Interest and Special Protection Area of national and international interest. It also has a potential impact on Common Land and on a visually important tree screen that shields Staines Moor from the M25
  - b) where the route follows the existing Windsor Line there is the likelihood of a substantial increase in the number of services increasing noise disturbance to residential areas close to the track.
- 1.3 In view of these concerns the Council consulted on and published the Planning Brief for the Airtrack Corridor in 2002 as Supplementary Planning Guidance. The brief identifies the potential impacts of the project and is intended to set the agenda for discussions with future promoters on how they may be addressed. The extent to which the requirements of the brief have been met will be a factor in the Council's



consideration of whether to support any future proposal to construct the scheme. It has yet to be demonstrated that the impacts identified can be overcome.

- 1.4 Airtrack is included in the Regional Transport Strategy, the County Council's Local Transport Plan, the draft Regional Spatial Strategy for the South East and the Structure Plan. In order to be in general conformity with the draft Regional Spatial Strategy for the South East this DPD 'safeguards' land for the possible future construction of Airtrack. Safeguarding means that development which might prejudice the implementation of a scheme will not be determined without consultation with those promoting the scheme. The safeguarded route is shown on the Proposals Map.
- 1.5 Policy CC4 supports appropriate non-car based transport to Heathrow and 'safeguards' the route of Airtrack through Spelthorne.

**ASSESSMENT OF AIRTRACK – PHASE 2 CONSULTATION PROPOSALS**

**1.0 Introduction**

- 1.1 The purpose of this assessment is to examine the Airtrack proposals as presented in BAA's Phase 2 – October 2008 consultation brochure.
- 1.2 Where relevant, cross reference will be made to the proposals as presented last March/April in the Phase 1 consultation brochure and the extent to which the Council's comments at that stage have been taken into account.
- 1.3 In responding to BAA's consultation in March/April, the Council had expected that the Phase 2 consultation would set out the proposals at this stage in some detail. The Phase 1 consultation brochure had acknowledged potential impacts on the community during construction and operation and that measures would be adopted to help mitigate the affects of the scheme. However, this has not been done. Whilst the plans in the brochure are now on an Ordnance base, they are small scale with only limited supporting information.
- 1.4 There is no comprehensive assessment of the benefits and disbenefits of the scheme as a whole or for specific communities through which the scheme passes. In particular there is no assessment of how all adverse impacts will be addressed – as had previously been promised.
- 1.5 A crucial omission at this stage is the lack of any published supporting information to provide both a detailed justification for the scheme as currently presented and to enable the full impact of the scheme to be understood.
- 1.6 BAA have confirmed verbally that various assessments have been undertaken and some are referred to in the latest consultation document – eg. revised passenger forecast, results of the previous consultation, assessment of the impact on level crossings. However, this, and other information and studies, some of which have been contributed to by a number of parties, including the Council, and which have clearly informed aspects of the scheme as currently presented, have been withheld from public scrutiny.
- 1.7 The following key areas of information have yet to be produced but is not exclusive of all that may need to be submitted by BAA at the Transport and Works Act stage.
  - a. An Environmental Assessment of the scheme as whole
  - b. Economic Impact of the scheme on the vitality and viability of Staines Town centre as a whole.
  - c. Construction implications including construction 'area', and 'code of construction, and associated mitigation'.

- d. Land and rights that need to be compulsory acquired both on a temporary and permanent basis.
  - e. Detailed passenger forecasts.
  - f. Assessment of changes that may be required to existing rail services.
  - g. Transportation impacts both during construction and permanently including potential impacts on Air Quality.
  - h. Detail of the design and appearance of new structures.
  - i. Noise impacts.
  - j. Landscape impacts and mitigation.
  - k. Flood Risk Assessment.
  - l. Comprehensive assessment of the schemes impact on rights of way as a whole.
- 1.8 There is just cause for considerable concern and disappointment by the Council, local residents and businesses that BAA have not conducted this consultation with the degree of openness expected and even at this stage have failed to clarify the justification for the scheme as a whole and its form as currently presented.

### **Recommendation**

Strong concern be expressed that:

- a. the proposals have not been presented with sufficient supporting details by way of plans and reports to enable the Council to fully understand the implications of the scheme and for it to come to a view on its benefits and disbenefits.
  - b. In particular supporting information that is understood to have been produced by BAA has not been made public.
- 1.9 The remainder of this assessment report considers the proposals in the consultation brochure in the order they are presented – starting at the northern end of the scheme. Page numbers in brackets after headings refer to pages in the consultation brochure at (**Appendix 2**).

### **2.0 Bedford Court (pages 11-12)**

- 2.1 This part of the scheme lies within the London Borough of Hillingdon and is due west of Terminal 5. At this point a junction box will be constructed, from which tunnels will be bored both to T5 and south to Stanwell Moor. The tunnel construction will be a significant undertaking with a large construction site. On completion of the work a few buildings will exist at the surface associated with ventilation, power and emergency access.

### **Comment**

- 2.2 The Council previously had no objection to the principle of what is proposed at this point but raised concern about the potential adverse

impact of construction on the residents of Stanwell Moor as a result of noise, vibration, dust and hours of operation.

- 2.3 The brochure (page 23) states that there will be disturbance during construction at four locations including Bedfont Court. A Code of Construction Practice for the whole scheme is proposed (page 23), but possible impacts on residents of Stanwell Moor are not explicitly recognised other than a commitment to prevent construction traffic going through the village.

**Recommendation**

- a. The principle of the tunnelled section is agreed with the associated construction.
- b. The potential adverse impact of construction on the village of Stanwell Moor needs to be explicitly recognised and clearly identified measures devised to address this.

**3.0 Tunnel Entrance (page 13)**

- 3.1 The proposed tunnel will come to the surface south of Airport Way. Much of the tunnel will be 'bored' but the last section will be constructed by the 'cut and cover' method. There will be a section of track descending between retaining walls before the tunnel entrance.
- 3.2 This section of the proposal will involve significant construction work. It is proposed a major temporary works compound is created in this area with an access off Leylands Lane.
- 3.3 The tunnel will go underneath an existing pond and which is designated as a Site of Nature Conservation Importance. It is proposed to 'move' the pond eastward prior to construction so as to preserve its ecological value.
- 3.4 Two compounds with buildings will be constructed above the tunnel at this southern end providing sub-stations, equipment room and an assembly area.

**Comment**

The Council previously agreed to the principle of the tunnel coming to the surface at this point and proposed that 'moving' the lake in the form now proposed might be the best way of preserving its ecological value. However, BAA have not published any evidence to demonstrate that this approach will properly safeguard the ponds 'interest'. The construction impact on Stanwell Moor Village could be significant and the concerns expressed above (para 2.3) also apply.

**Recommendation**

- a. Support the emergence of the tunnel at this point.
- b. Support the 'migration' of the pond subject to detailed evidence demonstrating this is the most appropriate approach.
- c. The adverse impact of construction on the village of Stanwell Moor needs to be explicitly recognised and measures devised to address this.

**4.0 Route from Stanwell Moor to Staines Moor and Proposals for Footpath, Bridleway and Cycle routes (Pages 14-18)**

- 4.1 The section of new track between the tunnel entrance to the junction with the Windsor line follows close to the M25. In the immediate vicinity of the Windsor line junction the track will be on a low viaduct to minimise any adverse impact on the flood plain.
- 4.2 At the junction with the Windsor line the track has been located as westerly as track alignment will allow and passes through a site known as 'The Willows'. Previously four other track alignment options had been proposed in this area and to which the Council had objected because they had failed to minimise the loss of common land and a part of the Staines Moor Site of Special Scientific Interest (SSSI) and resulted in significant loss of landscaping with consequent adverse impacts. Some common land and SSSI will nevertheless still be required both in the vicinity of the Windsor line and at the north west corner of Staines Moor near Butts Pond.
- 4.3 'The Willows' site which currently has a single house on it, has also been identified as a possible area for compensatory flood storage and replacement land for areas of SSSI that will be lost.
- 4.4 The precise alignment of the track along this whole section from Stanwell Moor to the Windsor line depends on how provision is made for the existing footpath, bridleway and cycleway which currently runs from Moor Lane and adjacent to the M25. A vehicular access is still required from the north by both the Environment Agency and Three Valleys Water to a pumping station and weir.
- 4.5 Three options for the footpath, bridleway and cycleway are proposed:
  - a. Option 1 – the route remains where it is and has the M25 on its west side and the new railway to the east. It would remain open during construction. The new railway line would therefore be on the most easterly alignment of the three options with the greatest land take from Staines Moor. The existing pedestrian crossing of the Windsor line at the north end of Moor Lane would be replaced by a new pedestrian bridge.

- b. Option 2 – the footpath/bridleway/cycleway would follow a new route to the east of the railway. At the southern end it would follow the line of the old section of railway embankment with crossings over the existing Windsor line and Wraysbury River being provided by new bridge decks (possibly using the original bridge piers which are still in place). The route provides access from Moor Lane south of the Staines By Pass at the track leading over the Windsor line to the ‘Little Moor’. The existing pedestrian level crossing previously referred to at the top end of Moor Lane would be closed. Part of the new route at the northern end of the embankment and Staines Moor would have to go onto what is currently part of the Moor and still involve some loss of SSSI and common land.
  - c. Option 3 – this retains the existing route as well as providing the new route. This enables the existing route to be retained during construction but in providing a new route as well involves the greatest loss of SSSI.
- 4.6 Under all three footpath/bridleway/cycleway options the level crossing close to the back of Two Rivers, and is the route of footpath No. 13, would be closed. All three options show the footpath from this point diverted instead along the former track line that lead to the Staines West Station up to the track over to the ‘Little Moor’.

### **Comment**

- 4.7 The Council previously commented that a comprehensive approach to alternative access to common land and existing rights of way was required. It is considered that to ‘sandwich’ a footpath/bridleway/cycleway between the M25 on one side with a railway on the other with 8 trains an hour in each direction (1 train less than every four minutes) would result in a route with little if any remaining amenity value – in fact likely to be very unpleasant. The only realistic option is to place the footpath/bridleway/cycleway to the east allowing the new rail line to be ‘squeezed’ toward the M25 as tight as is possible.
- 4.8 The suggested use of the existing embankment (option 2) has been made by the Council’s officers as it uses an existing feature in the landscape to enable the Windsor line and Wraysbury River to be crossed by re-providing a bridge deck (albeit less substantial) than the previous rail bridge. This avoids a completely new bridge with steps and ramps having to be constructed and which would inevitably be visually obtrusive and involve further construction on common land and SSSI. There is an existing pedestrian route from the embankment to the main part of Staines Moor.
- 4.9 Whilst the Option 2 route still involves incursion onto what is currently SSSI and Common Land at the north east west corner of the Moor, this is unavoidable due to the new railway and is considered preferable to

the line itself immediately abutting this part of the Moor. The proposal overall provides the scope for a route of an amenity value which is no worse. Option 2 is considered to provide the basis of the best option in amenity, ecological and access terms subject to it being 'tucked' as tight toward the M25 as is possible and the following qualification.

- 4.10 Option 2 currently only provides access to Moor Lane at a point south of the Staines By Pass. This reduces the number of existing access points and particularly disadvantages those living at the northern end of Moor Lane. This disadvantage could be resolved by a bridge from the northern end of Moor Lane across the Wraysbury River to the railway embankment in the vicinity of the flood relief off-take sluice at which point the embankment and Moor Lane are very close.
- 4.11 Under Option 2, no temporary route is proposed during the period of construction. This is a matter of concern as not only are the routes 'rights of way' but they also give access to common land where there are long held and valued rights to roam which are enjoyed by many local residents. This issue needs to be addressed. The final scheme will also need to demonstrate that access to rights of way generally in the area to which proposed amended routes connect, is not compromised. No assessment has been made of the impact on the wide rights of way network. At this stage there is insufficient information for people to come to a final view on this matter.
- 4.12 The footpath/bridgeway/cycleway proposals will need to be carefully formulated to ensure that unauthorised use by motor cyclists and riding/cycling on the Moor is prevented in accordance with the Byelaws and necessary to preserve its special scientific status.
- 4.13 Option 2 allows the proposed tack alignment at the junction with Windsor line to be placed the furthest west. The Council proposed this option in the previous consultation.
- 4.14 In this section, where new track will be provided, the area likely to be required for its construction will involve the loss of existing trees. Some of this landscaping was planted originally to mitigate the visual impact of the M25 and supplement what was already there. It will be essential that replacement landscaping firstly replaces that necessary to mitigate the visual impact of the M25 and then for the additional impact of Airtrack to be dealt with over and above this.
- 4.15 In the north west corner of Staines Moor the gap between the Moor and the Wraysbury River is very narrow and insufficient space for the rail line to be sited and not lose common land and the SSSI. This is also where the landscaping between Moor and the M25 is most limited but critical to an otherwise continuous screened belt on the west side of the main part of Staines Moor. At this point an extensive length of landscaping will be lost due to the construction area required. There are no details of how the impact will be mitigated, however,

replacement landscaping will be needed to assist in retaining the special quality of the Moor as a whole. Whilst this may increase the land-take from the Moor and additional compensation land will be required, it is considered essential that a comprehensive long term approach is taken.

- 4.16 In this stretch of the proposal part of 'The Willows' site is proposed for compensation areas for lost SSSI. This site is to the west of the Wraysbury river, does not immediately adjoin the main part of Staines Moor where SSSI land will be lost. A substantial part of the site has been raised with fill material and, when this is removed to provide flood compensatory storage, the site will have little if any inherent remaining ecological value. The area would require substantial works for it to act as compensation for lost SSSI and would also need to be managed and funded accordingly to ensure any new habitats created were maintained.
- 4.17 It is important that areas of proposed replacement SSSI and common land that are lost are of equal ecological value (or potential) and amenity value. As 'The Willows' is not contiguous with some of the most important areas being lost its potential to alone provide adequate compensation for all land to be lost has not been demonstrated.

### **Recommendation**

- a. a track alignment as close to the M25 as possible is supported.
- b. Option 2 for the footpath/bridleway/cycleway is supported subject to:
  - i. additional access from the new route to the north end of Moor Lane is provided.
  - ii. temporary alternative routes are provided during the construction period, but which do not compromise an appropriate comprehensive long term approach.
  - iii. appropriate design to prevent unauthorised use and access, other than by pedestrians to common land and SSSI.
- c. Concern that inadequate attention has not been given to appropriate compensation land for lost SSSI and common land. or for its long term management.
- d. No assessment of the landscape impact has been made or of land needed for landscaping to mitigate the schemes impact and replace M25 related landscaping that will be lost.

## **5. Staines High Street Station (page 7)**

- 5.1 The Phase 1 consultation brochure included five options for providing a new High Street Station. This was proposed to enable Airtrack services from Reading and Guildford (4 trains an hour each way) to



stop at Staines. That consultation brochure also identified one of the consequent benefits of Airtrack services as the opportunity for increased economic growth in Staines and the wider area. The High Street Station provided the facility for passengers to access a station at the heart of the town centre and for it to be integrated as a central part of its continued development.

- 5.2 This aspect of the proposal has now been deleted. This will now mean services from Staines to Heathrow will only compromise the 2 Waterloo Airtrack services per hour and 2 Heathrow Express train per hour. The reasons given in the Phase 2 consultation brochure for not providing the High Street Station are:
- a. concerns expressed by local residents.
  - b. insufficient passenger demand.

**Comment**

- 5.3 No published reports are available to substantiate these two matters, in particular the precise nature of the views of local residents. It is understandable that, in the absence of any supporting details at that Phase 1 consultation stage, concerns would be expressed about a range of matters including potential noise, light pollution, and general disturbance. However, no attempt had been made to show how such concerns may have been satisfactorily overcome.
- 5.4 A much enhanced rail service with direct links to Heathrow clearly has the potential to make Staines an even more attractive location for business, particularly those requiring close proximity and quick access to Heathrow. Opportunity for Airtrack trains from Reading and Guildford to stop at Staines would also have enhanced public transport links with these areas and generally further assisted the general promotion and use of public transport.
- 5.5 The Council recognises that, whilst the Airtrack proposals overall have benefits for the wider area it serves, Spelthorne is faced with much of the disbenefit from the impact of new structures and works, operation of the increased services and construction implications. The implications of Airtrack as now explained in this report shows that in some respects the collective adverse impacts may be more than previously envisaged as a result of the increased down time of level crossings, compromised access to the existing station from the town centre, and the disruptive and unattractive implications of arrangements for car parking, access and highways as a result of the new chord. Collectively these have a real risk of adversely affecting the attractiveness of the town centre as a whole.
- 5.6 The provision of a new station and the potential economic benefits BAA considered this could bring had the prospect of mitigating in part, the adverse impacts described above.

**Recommend**

BAA be informed:

- a. the Council is profoundly concerned that, despite BAA's view of the opportunities for increased economic growth in Staines, and the wider area, arising from the improved rail links, it is proposed to delete the new High Street Station from the scheme and with it the opportunity for 4 of the 6 Airtrack trains per hour in each direction to stop in the town and the associated economic benefit from the additional services.
- b. it objects to the deletion of Staines High Street Station and the wider public transport and economic benefits it could bring to both Staines and the wider area and opportunity to counter balance the many apparent disbenefits the Airtrack scheme brings to Staines.
- c. it asks BAA to reconsider its decision and reinstate the Staines High Street Station as part of the scheme.

**6. The Chord (pages 19-20)**

- 6.1 A short section of track needs to be constructed to enable trains from Reading and Guildford to connect to the Windsor line. The track will run broadly parallel to the South Street. It will be elevated to keep to the same height as the existing track over the Thames Street and High Street (Ironbridge) Bridges. It will have an average clearance between the ground and underside of the viaduct deck of 2.7 metres. Its junctions with the existing track are positioned to enable a 12 car train to be contained on the chord.
- 6.2 A plan in the consultation brochure shows that during the construction phase the whole of the Elmsleigh Surface Car Park and the Bupa Car Park in South Street are required as construction sites. An area within the Tothill and Elmsleigh multi-storey car park is also shown as required for works to connect the car parks. Public access between Station Path and South Street/High Street across the existing Elmsleigh Surface Car Park will be closed during the construction period. The construction area also includes the proposed bus-layover area in South Street, proposed as part of the Elmsleigh Phase 3 scheme, would also be taken temporarily as part of the construction site.
- 6.3 During the construction phase the existing ramped access to the Elmsleigh Multi Storey Car Park will be removed and replaced by a new ramp. The new ramp will be positioned between the edge of South Street and the new viaduct. Alternative access to the Elmsleigh multi storey car park during construction of the chord is proposed via the Tothill Car Park but will involve the loss of 10-15 car park spaces to achieve this.

- 6.4 The consultation brochure contains a plan (page 20) showing how access to the Elmsleigh Surface Car Park will be provided on completion of the construction work. This involves separate exit and entry points with South Street with the roadways going some 2.5 metres below ground level to provide some 5.2 metres head clearance to the underside of the viaduct. The exit point emerges at the point opposite the bus station and the entry point starts in the vicinity of the existing bridge into the Elmsleigh multi-storey car park. Some 70 spaces would be permanently lost from the car park on completion of construction.

**Comment**

- 6.5 The Chord involves significant impacts on Staines Town centre both during construction and permanently. Previously, concern was expressed that its alignment did not seem to have ensured the least prejudice to the Council's land holding and usability of the remaining car park. The Council reserved its position on the most appropriate temporary access arrangements to the Elmsleigh Multi-storey car park. Possible arrangements do not form part of the current consultation.
- 6.6 Those that have been prepared do involve a long and more tortuous access for car drivers to the Elmsleigh multi storey car park. This car park lies above the southern part of the Elmsleigh Centre. Firstly drivers have to go round the Elmsleigh Surface Road to get to the Tothill Car Park entrance and, once into this car park, would then have to negotiate narrow link sections between the two car parks. During construction of the chord this becomes the nearest public car park to the Elmsleigh Centre. Loss of the existing surface car park and compromising the ease of use of the multi storey car park has with it a serious risk of making the Elmsleigh Centre a less easy and therefore less attractive place for car bourn shoppers to get to with consequent implications for its level of success and attractiveness of Staines overall as a shopping centre.
- 6.7 There has been no assessment of the traffic implication of both multi-storey car parks being accessed via the Tothill Car Park entrance and exist or the impact of the additional traffic on the junction of Thames Street and the Elmsleigh Service Road.
- 6.8 The proposed permanent entry and exit points to the Elmsleigh surface car park will cause particular problems by preventing implementation and operation of the Elmsleigh Phase 3 reformatted bus station proposed as part of the current scheme. This is because:
- a. the proposed exit road-way from the surface car park enters South Street mid way along the section of highway where 4 bus lay-over bays are to be provided and the required road junction would not enable this to be created.

- b. the current turn around facility at the existing car park entrance is required for buses to exit the new bus station and turn to get across onto the lay-over bays. (this turn-round is also critical to traffic coming from or going to other premises in South Street and Thames Street and which would otherwise need to travel around the town centre via Two Rivers or via Fairfield Avenue to return to their sites). It was provided as an integral part of the satisfactory operation of the two way traffic system in Thames Street and South Street and also allows traffic generally to turn round at this point.
- 6.9 The proposed entry point to the surface car park only allow entry to vehicles travelling south along South Street where as at present it can be entered from either direction. A further concern is the new entry/exit ramps to the Elmsleigh multi-storey car park. It requires a new road junction with South Street less than 100 metres from the Ironbridge junction with movements required in each direction.
- 6.10 The entry and exits from the surface car park is via descending roadways results in a long length of the sites frontage with South Street where pedestrians cannot exit the site because of the barrier created by the structures. The existing pedestrian crossing, which is close to the south entrance into the Elmsleigh Centre, would have to be at a point north of the bridge providing elevated access to the multi-storey car park. This would mean those seeking to go from the car park via the Elmsleigh Centre and then into the rest of the shopping area of town would have to walk much further. This makes access to the southern end of the Elmsleigh Centre less convenient. It also means those walking from the Elmsleigh Centre across the surface car park to Station Path and the station would have a longer route. As it stands the proposals result in a worsening of the pedestrian links between the town centre and existing station.
- 6.11 Close scrutiny of the proposed arrangements show them to be designed to address car park access issues without regard to other developments (Elmsleigh Phase 3), needs of pedestrians generally or the necessity for proper integration with the highway system. It is a disjointed proposal about which it is understood Surrey County Council also have serious highway concerns.
- 6.12 The scheme requires all the undeveloped land on the south and east side of South Street during the construction phase. This would include the proposed bus-layover based proposed for the south side of South Street as part of the Elmsleigh Phase 3 scheme. This would have a fundamental impact on the ability of bus operators to use Staines Bus Station with potentially significant implications for services and public transport in Staines for several years during the construction phase. The Airtrack scheme appears to have failed to take proper account of this important issue.

**Recommendation**

- 6.13 As currently presented, this aspect of the proposal is unacceptable and strong objection should be made on the following basis:
- a. prejudices implementation of Phase 3 of the Elmsleigh Centre.
  - b. compromises the highway system in South Street with potential adverse traffic consequences for this part of the town centre as a whole.
  - c. produces significantly inferior access arrangements to the Elmsleigh Surface Car Park by allowing entry from only one direction.
  - d. makes pedestrian access to the Elmsleigh Centre from the south less easy and less attractive.
  - e. makes pedestrian access from this part of the town to Station Path and the existing Staines Station less attractive.
  - f. risks compromising the attractiveness and convenience of access to the southern part of the town centre and thereby the perceived attractiveness and convenience of the town centre as a whole to shoppers.
  - g. makes access to the Elmsleigh multi-storey car park by temporary linking of the two multi storey car parks, less attractive and further compromises the attractiveness of the town centre to shoppers.
  - h. fails to demonstrate that in traffic terms access to and from the combined Tothill and Elmsleigh Multi Storey Car Parks can operate within the capacity of the Thames Street Elmsleigh Surface Road Junction.
  - i. during the construction phase the scheme removes the proposed bus layover-bays in South Street and likely to have a fundamental impact on bus operators ability to satisfactorily operate bus services to Staines.
  - j. overall it has a detrimental impact on the attractiveness and ambience of Staines Town Centre as a place to shop and without any compensating benefits to local residents.

**7.0 Staines Station (page 21)**

- 7.1 A single proposal for the Staines Station is set out. It involves a third line terminating at Staines to provide for Heathrow Express services. To achieve this:

- a. the third line is constructed on the north side of the existing north (London bound) platform.
  - b. the existing main station building is demolished and a new building complex is built to the east of the existing station car park.
  - c. The existing footbridge is demolished and reprovided to span the additional line.
- 7.2 There is no requirement to use any of the land at Pulman Place as was previously proposed in the Phase 1 consultation.

**Comment**

- 7.3 The Council previously raised concerns about the demolition of the existing main station building and existing footbridge which are both 'locally listed' structures. There appears to be scope to at least keep the footbridge and simply extend it across the third line.
- 7.4 The proposed new footbridge steps/ramps on the north side are located directly at the end of Station Path preventing any clear sight of the station itself along this route but of equal importance ensure good visibility to enable uses of the route to feel safe and to generally ensure an attractive environment which encourages people to use the station when travelling to and from Staines.
- 7.5 The position of the new station building appears to lack a clear relationship to the existing station forecourt. Together with a large gap between the station building and footbridge steps from the new third line the layout fails to demonstrate that comprehensive and effective planning of the facilities for rail users has yet been achieved. It is essential that the most is made of any necessity to replace facilities to ensure the most is made of the opportunity to further stimulate the use of public transport and secure effective integration with other modes. The provision of new rail services needs to be accompanied by facilities which best encourage their use. The consultation brochure provides no details of how existing bus, taxi and cycle facilities will be accommodated to ensure the station functions as an integrated transport facility. Neither is there any assessment of any potential increase in car use to get to the station and how that might be managed in terms of traffic flows and parking.
- 7.6 The provision of the third line will entail significant construction activity on Station Path. Para 6.10 above has identified the impairment of the pedestrian route across the Elmsleigh Surface Car Park. Works in the vicinity of Station Path should be accompanied by comprehensive proposals to make this route more attractive and thereby overcome the adverse impact of new structures and reduce the perceived degree of

separation of the station from the town centre. It will also be important to ensure that works affecting this route are designed in a way that do not compromise the sense of security and safety necessary to encourage people to use it and the public transport facilities it links.

- 7.7 Whilst it is proposed that the station will continue to operate during this period of construction the existing station car park will be used as a temporary works site. It is critical that bus services via the station are maintained and inconvenience to passengers is minimised. No details have been provided on these aspects.

**Recommendation**

- a. there needs to be a clearer justification for the loss of two 'locally listed' structures.
- b. the proposed revised station complex, as shown in the brochure requires further assessment to ensure the opportunity to attract additional passengers is maximised.
- c. further details are required to demonstrate how facilities for buses, taxis and cycle parking will be provided to ensure proper integration of transport modes.
- d. the environment of Station Path and the route across the Elmsleigh Surface Car Park which connects to it provides an important pedestrian link to the town centre which requires additional assessment to maximise its attractiveness to existing and potential future users.
- e. there is no assessment of the potential for increased number of passengers using cars to get to the station as a result of the change services and the consequent impact on parking facilities and wider transport impacts.

**8.0 Feltham Depot (page 22)**

- 8.1 A new depot is proposed at the former Feltham Marshalling Yard in the Borough of Hounslow.

**Comment**

- 8.2 No evidence has been produced to show this is the best or only possible location for a depot. However, this aspect of the scheme has not direct impact on Spelthorne.

**Recommendation** – no objection to the proposed depot at Feltham.

**9.0 Overhead Electrification (OHLE) (pages 13.14)**

9.1 The scheme now proposes that Heathrow Express trains will have dual pick enabling them to use both the third rail and OHLE. This means OHLE does not need to be extended to Staines Station. Whilst OHLE only is required in the tunnel the 'switch over' is proposed within the 1km length of track south of the tunnel entrance.

**Comment**

9.2 This reduced use of OHLE is welcome as it avoids the significant visual harm that would have occurred. No technical evidence has been produced to demonstrate why the switch over section needs to be as long as 1km with the attendant adverse visual impact in the vicinity of Stanwell Moor. Neither is there explicit commitment that the change over length starts immediately trains leave the tunnel itself but it is merely stated it will start south of the tunnel.

**Recommendation** – no objection to the switch over being south of the tunnel entrance, subject to the length of switch over being justified and being kept to an absolute minimum and confirmation that switch over commences immediately trains leave the tunnel.

**10.0 Level Crossings (page 10)**

10.1 The additional train services will affect 15 existing level crossings along the three main directions Airtrack trains will travel. This will require longer periods of time when level crossing barriers are down. Whilst none are in Spelthorne those in Egham have the potential to cause greater road congestion affecting access to Spelthorne and Staines Bridge and in turn potential impact on Staines Town Centre. The section of track from Staines to Virginia Water will have both Reading and Guildford bound Airtrack trains and therefore more additional service affecting existing level crossings than any other part of the network affected by Airtrack.

10.2 BAA have confirmed verbally the following increase in the minutes in every hour when the three closest level crossing gates to Spelthorne will be 'down':

<u>Location</u>	<u>Existing down time</u>	<u>Down time with Airtrack</u>
Thorpe Road	23	37
Vicarage Road	32	44
Station Road	25	39

**Comment**

10.3 Thorpe Road is close to Staines Bridge and the 'Petters' roundabout and an increased down time of 14 minutes in every hour is significant.



There is already extensive queuing at 'peak' times which can extend back to the 'Petters' roundabout.

- 10.4 No highway assessment of the individual or commutative impact has been published. Currently BAA are seeking to suggest that existing delays on the highway network mean the increased down time will make little difference. No evidence has been produced to justify what appears to be an implausible suggestion.
- 10.5 The extent of delay that has been suggested is significant and has the potential to lead to very serious adverse impacts on traffic movement with wider economic and social implications including response times for emergency services. The risks to Staines Town centre in combination with the other impacts on the town centre area are a cause for particular concern. Means of mitigating the 'level crossing issue' need to be found through management and timetabling and if necessary physical works. The issue requires a comprehensive and substantial package of measures.

### **Recommendation**

- a. Very serious concern be expressed about the adverse social and economic implications arising from the traffic impact from increased 'down time' at level crossings in Egham and the wider area and, through increased congestion, the potential detrimental impact on the economy of Staines Town Centre.
- b. Management, timetabling and if necessary physical measures be adopted, to remedy the problem to the satisfaction of the local Council's, residents and businesses.

### **11.0 Other Impacts**

- 11.1 The current consultation focuses on describing the various physical elements of the scheme. Whilst page 23 contains a general section on the environment and identifies some broader issues, there has been no attempt at this stage to present the implications of the scheme in any detail or consider cumulative impacts.
- 11.2 At paragraph 1.5 above are identified some of the key areas of supporting information/justification that are considered essential. All of this will be required or is essential to support the Transport and Works Act submission but should be available now to both BAA and those it is consulting to enable the most appropriate scheme to be developed. Many of these supporting documents would benefit from consultation prior to their submission to ensure they accurately record all relevant issues, and thereby most effectively inform the proposed scheme.
- 11.3 A particularly important document is the required Environmental Assessment. This will cover a range of issues including biodiversity

and habitat (including an Appropriate Assessment under the Habitat Regulations) noise, air quality, contamination, heritage issues, and landscape. Some issues will require cumulative assessment with adjoining areas and existing conditions, e.g. on air quality. A Flood Risk Assessment will also be required for the areas where structures are to be erected, ground levels altered or water flows both above or below ground level are likely to be disturbed. Also, either within this document or in a separate statement of justification it will be important for BAA to show that the proposal is appropriate in Green Belt terms.

- 11.4 The assessment of individual elements of the scheme reveal a number of adverse impacts on Staines town centre, both in terms of traffic and issues (including traffic) which may have an adverse impact on the town as a whole both during construction and in the long term. The construction impacts alone could affect the timing of other investment with consequent longer term implications. The consequent impact of Airtrack on the vitality of Staines Town centre as a whole requires careful assessment, which so far has not been undertaken by BAA and mitigation of these impacts should be included as part of the proposal.
- 11.5 The potential adverse highway impacts and the extent to which existing public transport infrastructure and its improvement is compromised, raises fundamental questions about the net public transport benefit of Airtrack in this area.

**Recommend**

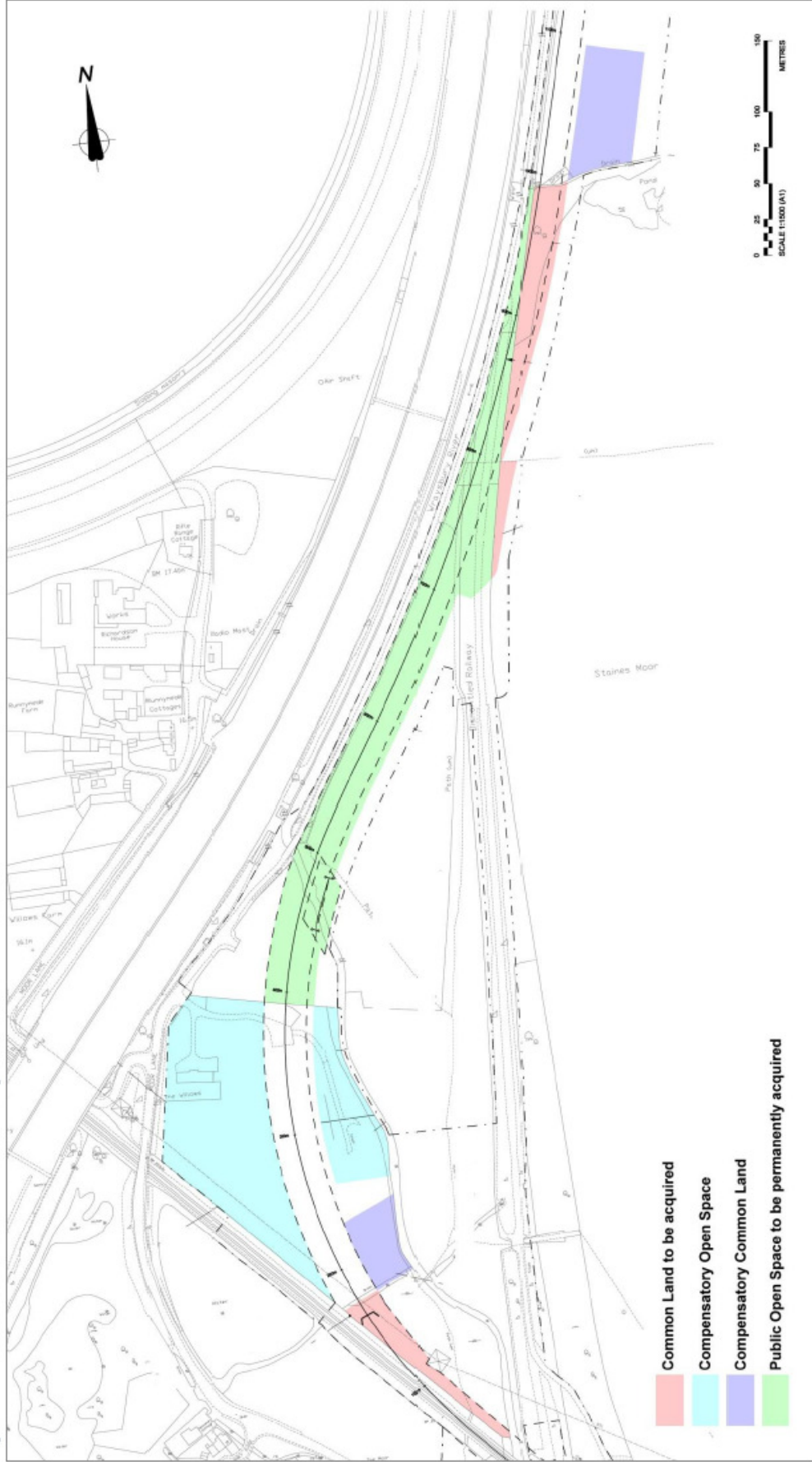
- (a) that all necessary supporting information is finalised urgently with appropriate consultation with all relevant parties prior to submission of the TWA application.
- (b) the very special circumstances which require the development will need to be fully demonstrated and the proposals impact on the openness of the Green Belt must be justified in accordance with PPG2.
- (c) all potential environmental impacts must be fully assessed and mitigated through appropriate design of the scheme.
- (d) assessment is made of the cumulative impact on:
  - (i) the vitality of Staines town centre as a whole
  - (ii) traffic movement and access to Staines and impact of Airtrack on the operation of existing and other proposed public transport infrastructure both in Spelthorne and Egham.

**Annex 3**  
**Executive Report 9.12.08**

- (iii) the scheme design is properly informed by the findings of this work and properly addresses all adverse impacts that arise.
  
- (e) appropriate comprehensive mitigation measures are drawn up to address both construction impacts and permanent impacts to:
  - (i) safeguard the vitality of Staines town centre, including highway and parking facilities that support it
  
  - (ii) appropriately address all environment impacts.

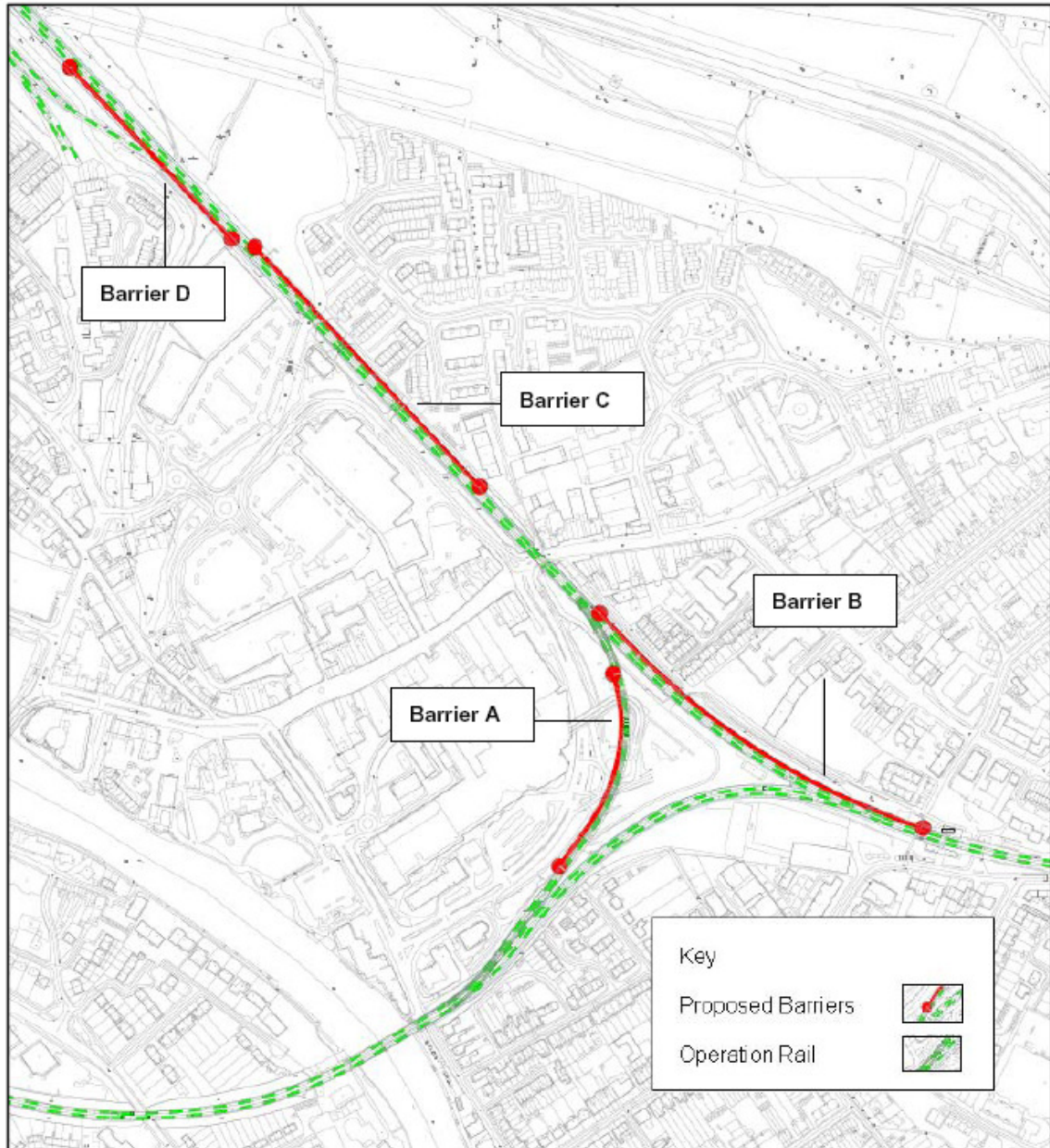
# Annex 4 Proposed Exchange Land

Figure A2.1.3 Proposed Land Use Changes



\* exact areas are provided in the Works and Lands Plans, Sheets 3 and 4.

**Figure 13.5 Location of Noise Barriers**



**TRANSPORT AND WORKS ACT 1992**

**TRANSPORT AND WORKS (APPLICATIONS AND OBJECTIONS PROCEDURE)  
(ENGLAND AND WALES) RULES 2006**

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**HEATHROW AIRTRACK ORDER**

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**RULE 10(6) REQUEST FOR PLANNING PERMISSION**

1. Heathrow Airport Limited request pursuant to rule 10(6) of the above mentioned Rules a direction from the Secretary of State under section 90(2A) of the Town and Country Planning Act 1990 that, subject to paragraphs 2 and 3 below, planning permission shall be deemed to be granted for the construction and use of:-
  - (a) the works specified in Schedule 1 to the draft Heathrow Airtrack Order; and
  - (b) the other development which is proposed to be authorised by the Order including the ancillary development specified in Schedule 1 to this request.
2. The development for which planning permission is requested is development which in respect of any works or matters, is carried out within any of the limits or at any of the places authorised by the draft Order.
3. The planning permission requested is intended to be granted subject to the conditions set out in Schedule 2 to this request. These include conditions reserving for subsequent approval of the local planning authority matters relating to construction, archaeology, contamination, means of access, landscaping, massing, height and external appearance of structures, noise attenuation measures, footpaths and bridleways, environmental mitigation, drainage, and external lighting.

***Winckworth Sherwood***

Winckworth Sherwood LLP, Solicitors and Parliamentary Agents, Minerva House, 5 Montague Close, London, SE1 9BB, on behalf of Heathrow Airport Limited.

**SCHEDULE 1****SCHEDULE OF ANCILLARY DEVELOPMENT****Staines station to Staines High Street****Ancillary development in connection with Works Nos 1, 1A, 1B and 1C**

Demolition of the existing Staines Station buildings on the north side of the railway and the construction of a replacement station building within plot numbers 2, 3, 4 and 6 shown on the deposited plans comprising 2 storeys up to 7 metres high above the adjacent platform level, provision of an additional bay platform and an underground car park and platform and alterations to station forecourt layout; embankments, abutments, retaining walls, culverts, electrical and mechanical equipment, and other works necessary or expedient for the construction of Works Nos 1, 1A, 1B and 1C; alteration of existing railways; alteration to proposed paid side footbridge at the eastern end of existing station, alteration to highways, cycleway and footways, provision of temporary working sites, diversion of statutory undertakers infrastructure, including mains, sewers, drains and cables; noise attenuation measures and landscaping and other works to mitigate any adverse effects of the construction, maintenance or operation of the proposed works.

**Staines Chord****Ancillary development in connection with Works Nos 2, 2A, 2B and 2C**

Embankments, abutments, retaining walls, culverts, electrical and mechanical equipment and other works necessary or expedient for the construction of Works Nos 2, 2A, 2B and 2C; the alteration of existing railways; alterations to highways and remodelling of private roads, cycleways and car parks; provision of temporary working sites, diversion of statutory undertakers infrastructure, including mains, sewers, drains and cables; alteration to car park accesses and works to link the Elmsleigh and Tothill multi-storey car parks, noise attenuation measures and landscaping and other works to mitigate any adverse effects of the construction, maintenance or operation of the proposed works.

**Staines High Street to Airport Way****Ancillary development in connection with Works Nos 3, 3A, 3B and 3C**

Bored tunnels, cut and cover tunnel, earthworks, embankments, cuttings, abutments, retaining walls, culverts, electrical and mechanical equipment and other works necessary or expedient for the construction of Works Nos 3, 3A, 3B and 3C; the alteration of existing railways; provision of footpaths and an access track; provision of temporary working sites, diversion of statutory undertakers infrastructure, including mains, sewers, drains and cables; noise attenuation measures, landscaping and other works to mitigate any adverse effects of the construction, maintenance or operation of the proposed works including flood compensation works and works of ecological mitigation and the laying out of replacement common land and public open space, the demolition of a house adjoining Moor Land ("the Willows") and the provision of bat barn as compensatory habitat, the recreation of Greenhams Pond and the provision of access to land adjoining that pond.

**Airport Way to Heathrow Terminal 5  
Ancillary development in connection with Works Nos 3 and 3H**

Cut and cover tunnel, earthworks, bored tunnels, embankments, cuttings, abutments, retaining walls, culverts, electrical and mechanical equipment and other works necessary or expedient for the construction of Works Nos 3 and 3H including asphalted and fenced assembly areas and highway access; provision of temporary working sites, diversion of statutory undertakers infrastructure, including mains, sewers, drains and cables; landscaping and other works to mitigate any adverse effects of the construction, maintenance or operation of the proposed works.

**Feltham Depot  
Ancillary development in connection with Works Nos 4, 4A, 4B and 4C**

Depot facilities including a maintenance building up to 12 metres high [on a footprint of up to 120 metres by 75 metres] with stores and facilities for maintenance staff and drivers; stabling tracks including sanitary cleaning facilities and water tanking areas; train wash facilities; electrical substation; car parking; access road; electrical and mechanical equipment, and other works necessary or expedient for the construction of Works 4, 4A, 4B and 4C; provision of temporary working site, diversion of statutory undertakers infrastructure, including mains, sewers, drains and cables; noise attenuation measures, landscaping and other works to mitigate any adverse effects of the construction, maintenance or operation of the proposed works including the laying out of replacement public open space and a new footpath.



**SCHEDULE 2  
DRAFT PLANNING CONDITIONS**

**Preamble**

Wherever in this schedule of conditions the local planning authority is given power within a condition to approve a variation to a requirement imposed by that condition, it shall only do so if it is satisfied that the relevant variation would not have significantly different environmental effects from that which otherwise would be permitted by that development.

In the following conditions: -

"Code of Construction Practice" means a code setting out:

- (a) the general principles and requirements to be applied during construction for site operations; and
- (b) details of how those principles and requirements are to be applied for each element of the development on a site-specific basis;

"development" means development permitted by the direction given in the accompanying letter;

"the deposited plans" has the same meaning as in article [x] of the Order;

"the local planning authority" means Spelthorne Borough Council, or the London Boroughs of Hillingdon or Hounslow, as the case may be, in relation to development within the area of that authority;

**General conditions**

1. The development hereby permitted must be commenced not later than the expiration of five years from the date the Order comes into force.

(Reason: to ensure the development is begun within a reasonable period of time.)

2. A Code of Construction Practice for each worksite shall be submitted to and approved in writing by the local planning authority before development commences on that worksite, and the development shall be carried out in accordance with the approved Code.

(Reason: to protect the amenities of neighbouring residents and the local area generally).

[Either a planning condition or a bilateral agreement]

3. Any trees or plants required by landscape details approved under conditions 9, 17, 25, 27, 33 or 40 which within a period of three years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless the local planning authority gives written consent to any variation.

(Reason: to secure a visually satisfactory setting for the station development.

4. Details of the design and acoustic specification of any noise barriers shall be submitted to and approved in writing by the local planning authority prior to construction. The barriers shall be implemented in accordance with the approved design prior to operation of the first services and shall be maintained thereafter.

(Reason: to protect the amenities of neighbouring properties).

**Site specific conditions**

**Staines Station to Staines High Street**

5. Before works are commenced on any part of the station site or the railway embankment adjacent to Station Path, detailed investigations shall be carried out on the land undergoing temporary or permanent works approved by the Order to establish if it is contaminated and to assess the degree and nature of the contamination present and the action proposed to be taken to deal with any contamination that is identified. An assessment shall be carried out to consider the risk to controlled waters (as defined by the Water Resources Act 1991), human health and ecological features. The measures or treatment to deal with contamination identified as a result and the timescales for implementation shall be approved by the local planning authority in writing prior to commencement of works on the site. Any measures or treatment approved under this condition shall be carried out in accordance with the approved proposals.

(Reason: To protect occupiers and users of adjoining land and the environment from the effects of potential harmful substances.

6. No development shall take place on the Staines station site until a Written Scheme of Archaeological Investigation has been submitted to and approved by the local planning authority and implemented in accordance with the approved Scheme.

(Reason: To ensure that archaeological artifacts and information are preserved.)

7. Details of the means of access to and around the station and alterations to Station Path shall be submitted to and approved in writing by the local planning authority before commencement of development at the site and thereafter implemented in accordance with the approved details. The details shall include bus interchange facilities, car parking, kiss and ride, and access for pedestrians and cyclists.

(Reason: to ensure appropriate access to and from the station).

8. Details of massing, height and external appearance, including facing materials, for the proposed station building, footbridge and associated buildings and structures shall be submitted to and approved in writing by the local planning authority before commencement of development at the site and the buildings shall be built in accordance with the approved details.

(Reason: to protect the amenities of adjacent properties and ensure satisfactory external appearance for the development).

9. Details showing the intended use and hard and soft landscape treatment of any part of the station car park site not occupied by buildings and land affected by the works

in and adjacent to Station Path shall be submitted to and approved in writing by the local planning authority before any works commence on the site. All planting, seeding or turfing comprised in approved landscaping details shall be carried out not later than the first planting and seeding seasons following completion of this part of the development.

(Reason: to secure a visually satisfactory setting for the station development.)

10. In areas adjacent to the existing platforms any new Public Address System installed at Staines station as a result of the development shall not increase the existing specific PA  $L_{Aeq,5min}$  noise level at 1 metre outside adjacent dwellings. In other areas any new PA system shall not result in an increase in the noise rating level (as defined by BS4142) of more than 5dB(A) above background level at 1 metre outside adjacent dwellings. Details of any new public address system to comply with these requirements shall be approved in writing by the local planning authority and implemented in accordance with the approved details prior to the public address system becoming operational.

(Reason: to minimise possible noise pollution to neighbouring properties).

11. Details of all proposed permanent external lighting in the station the car park area or on Station Path shall be approved by the local planning authority, and implemented in accordance with the approved details before the lighting comes into operation.

(Reason: to safeguard the amenity of the local area.)

12. Unless otherwise approved in writing by the local planning authority, noise barriers or other mitigation measures shall be provided from the station westwards on the whole length of the new retaining wall alongside Station Path shown in volume 3 of the Heathrow Airtrack Environmental Statement (Route Alignment Plan and Profile Sheet 1) so that the residual adverse noise effects to sensitive receptors is no worse than that identified in Chapter 13 and Appendix 13.1 of the Heathrow Airtrack Environmental Statement. These measures shall be provided before the Airtrack or Heathrow Express services to Staines become operational and shall thereafter be maintained.

(Reason: to minimise possible noise pollution to neighbouring properties).

### **Staines chord**

13. Before works are commenced on any part of the Elmsleigh Centre Surface Car Park site, detailed investigations shall be carried out on the site to establish if it is contaminated and to assess the degree and nature of the contamination present and the action proposed to be taken to deal with any contamination that is identified. An assessment shall be carried out to consider the risk to controlled waters (as defined by the Water Resources Act 1991), human health and ecological features. The measures or treatment to deal with contamination identified as a result and the timescales for implementation shall be approved by the local planning authority in writing prior to commencement of works on the site. Any measures or treatment approved under this condition shall be carried out in accordance with the approved proposals.

(Reason: To protect occupiers and users of adjoining land and the environment from the effects of potential harmful substances.

14. No development shall take place on the Elmsleigh Centre Surface Car Park site until a Written Scheme of Archaeological Investigation has been submitted to and approved by the local planning authority and implemented in accordance with the approved Scheme.

Reason: To ensure that archaeological artifacts and information are preserved.

15. Details of the means of access from the public highway to the Elmsleigh Centre Surface and Multi Storey Car Parks, access for pedestrians and cyclists including pedestrian and vehicular circulation within the Elmsleigh Centre surface car park site, shall be submitted to and approved in writing by the local planning authority before commencement of development at the site. The development shall be implemented in accordance with these approved details prior to the operation of the new rail services.

(Reason: to ensure appropriate access and circulation for vehicles and pedestrians).

16. Details of the external appearance including facing materials of the new Staines chord viaduct and the ramp to the Elmsleigh Centre Multi Storey Car Park shall be submitted to and approved in writing by the local planning authority before any work on the viaduct and ramp is commenced, and the structures shall be built in accordance with the approved details.

(Reason: to ensure that the external appearance of the structures are satisfactory and to safeguard the amenity of the area).

17. Details showing the intended use and the hard and soft landscape treatment of any part of the Elmsleigh Surface Car Park site shall be submitted to and approved in writing by the local planning authority before commencement of construction of the Staines chord viaduct; and the development shall be implemented in accordance with the approved details. All planting, seeding or turfing comprised in approved landscaping details shall be carried out not later than the first planting and seeding seasons following completion of this part of the development.

(Reason: to ensure that the setting for the viaduct is satisfactory and to safeguard the amenity of the area).

18. unless otherwise approved in writing by the local planning authority, a noise barrier of 1.5 metres height above the top of the nearest rail shall be erected on the western parapet of the new Staines Chord where it crosses the Elmsleigh Centre surface car park. The barriers shall be provided in accordance with the details approved under Condition 4 before the Airtrack services to Reading and/or Guildford become operational and shall be maintained thereafter.

19. Before the Airtrack services to Reading and/or Guildford become operational flange lubricators to minimise wheel squeal shall be installed on the new track on the

Staines chord viaduct and its junctions with the existing lines and shall thereafter be maintained at all times in effective working order.

(Reason: to ensure that airborne noise and vibration is maintained within acceptable limits)

**The Route between Staines High Street and Airport Way**

20. Before works are commenced on any part of the site between the Windsor Line and Airport Way, detailed investigations shall be carried out on the land undergoing temporary or permanent works approved by the Order to establish if it is contaminated and to assess the degree and nature of the contamination present and the action proposed to be taken to deal with any contamination that is identified. An assessment shall be carried out to consider the risk to controlled waters (as defined by the Water Resources Act 1991), human health and ecological features. The measures or treatment to deal with contamination identified as a result and the timescales for implementation shall be approved by the local planning authority in writing prior to commencement of works on the site. Any measures or treatment approved under this condition shall be carried out in accordance with the approved proposals.

(Reason: To protect occupiers and users of adjoining land and the environment from the effects of potential harmful substances.

21. No development shall take place on the site between the Windsor Line and Airport Way until a Written Scheme of Archaeological Investigation covering the ground to be disturbed by the works approved by the Order has been submitted to and approved by the local planning authority and implemented in accordance with the approved Scheme.

(Reason: To ensure that archaeological artifacts and information are preserved.)

22. No development, including any site clearance works, shall be commenced on the route between the Windsor Line and Airport Way until a baseline ecological survey of reptiles, bats, water voles and otters has been undertaken on the area affected by the works approved by this Order and appropriate mitigation has been submitted to and approved in writing by the local planning authority. The mitigation shall be carried out and maintained in accordance with the approved scheme.

(Reason: to protect and enhance the ecological value of the area).

23. Environmental mitigation for the areas affected by the works between the Yeoveney Ditch and the Staines By-pass shall be implemented in accordance with the Staines Moor Mitigation Strategy contained in Appendix 2.1 to the Heathrow Airtrack Environmental Statement, the precise details of which shall be approved in writing by the Local Planning Authority and implemented in accordance with agreed timescales as set out in the approved Mitigation Strategy.

(Reason: to protect and enhance the environment and amenity of Staines Moor).

24. Details of the external appearance, including facing materials, of the surface structures above the cut and cover tunnel shall be submitted to and approved in writing by the local planning authority before any work on the structures are commenced, and they shall be implemented in accordance with the approved details.

(Reason: to ensure that the external appearance of the structures and the tunnel approaches is of a satisfactory standard).

25. Details of routes surface treatment and associated landscaping of all new and diverted permanent footpaths, alterations to the bridleway, and permanent access for maintenance vehicles shall be submitted to and approved in writing by the local planning authority before any work on site is commenced. These works shall be implemented in accordance with the approved details.

(Reason: to ensure that a satisfactory standard of access is provided for pedestrians, cyclists, horses and maintenance vehicles)

26. Details of the design and external appearance of the new foot bridges across the Windsor Line and the Wraysbury River, including facing materials and screening, shall be submitted to and approved in writing by the local planning authority before any work on construction of these bridges is commenced, and the bridges shall be built in accordance with the approved details.

(Reason: to ensure that the appearance of the structure is satisfactory and to safeguard the amenity of the local area).

27. For all areas between the Windsor Line and Airport Way outside the boundary of the operational railway undergoing works approved by the Order, a landscaping scheme, incorporating where appropriate ecological enhancement, mitigation and compensatory measures, shall be submitted to and approved in writing by the local planning authority before commencement of the works. All planting, seeding or turfing comprised in approved landscaping details shall be carried out not later than the first planting and seeding seasons following completion of this part of the development.

(Reason: to protect and enhance the nature conservation value of the site and the visual amenity of the surrounding area)

28. Unless otherwise approved in writing by the local planning authority, noise barriers 2 metres height above the top of the nearest rail or other mitigation measures shall be provided at the following locations so that the residual adverse noise effects to sensitive receptors is no worse than that predicted in Chapter 13 and Appendix 13.1 of the Heathrow Airtrack Environmental Statement:

- i. On the north side of the Windsor Line 350 metres long, westwards from a point 80 metres west of the western end of the Iron Bridge parapet
- ii. On the south side of the Windsor Line 220 metres long, westwards from a point 430 metres west of the western end of the Iron Bridge parapet.

These measures shall be provided before the Airtrack or Heathrow Express services to Staines become operational and be maintained thereafter.

(Reason. To protect the amenities of the adjacent properties.)

**The Route between Airport Way and Heathrow Terminal 5**

29. Before works are commenced on any part of the site between Airport Way and Heathrow Terminal 5 detailed investigations shall be carried out on the land undergoing temporary or permanent works approved by the Order to establish if it is contaminated and to assess the degree and nature of the contamination present and the action proposed to be taken to deal with any contamination that is identified. An assessment shall be carried out to consider the risk to controlled waters (as defined by the Water Resources Act 1991), human health and ecological features. The measures or treatment to deal with contamination identified as a result and the timescales for implementation shall be approved by the local planning authority in writing prior to commencement of works on the site. Any measures or treatment approved under this condition shall be carried out in accordance with the approved proposals.

(Reason: To protect occupiers and users of adjoining land and the environment from the effects of potential harmful substances.

30. No development shall take place on the site between Airport Way and Heathrow Terminal 5 until a Written Scheme of Archaeological Investigation covering the ground to be disturbed by the works approved by the Order has been submitted to and approved by the local planning authority and implemented in accordance with the approved Scheme.

(Reason: To ensure that archaeological artifacts and information are preserved.)

31. No development, including any site clearance works, shall be commenced on the route between Airport Way and the Heathrow Terminal 5 until a baseline ecological survey of reptiles, bats, water voles and otters has been undertaken on the area affected by the works approved by the Order and appropriate mitigation has been submitted to and approved in writing by the local planning authority. The mitigation shall be carried out and maintained in accordance with the approved scheme.

(Reason: to protect and enhance the ecological value of the area).

32. Details of the external appearance including facing materials of the surface structures above the cut and cover tunnel shall be submitted to and approved in writing by the local planning authority before any work on the structures are commenced, and they shall be implemented in accordance with the approved details.

(Reason: to ensure that the external appearance of the station is of a satisfactory standard).

33. For all areas between Airport Way and Heathrow Terminal 5 undergoing works approved by this Order, a landscaping scheme, incorporating where appropriate ecological enhancement, mitigation and compensatory measures, shall be submitted to and approved in writing by the local planning authority before completion of the

Bedfont Court Tunnel. All planting, seeding or turfing comprised in the approved landscaping details shall be carried out not later than the first planting and seeding seasons following completion of the engineering works.

(Reason: to ensure a satisfactory standard of visual amenity)

**Feltham Servicing Facility**

34. Before works are commenced on the former Feltham Marshalling Yard site, detailed investigations shall be carried out on the land undergoing temporary or permanent works approved by the Order to establish if it is contaminated and to assess the degree and nature of the contamination present and the action proposed to be taken to deal with any contamination that is identified. An assessment shall be carried out to consider the risk to controlled waters (as defined by the Water Resources Act 1991), human health and ecological features. The measures or treatment to deal with contamination identified as a result and the timescales for implementation shall be approved by the local planning authority in writing prior to commencement of works on the site. Any measures or treatment approved under this condition shall be carried out in accordance with the approved proposals.

(Reason: To protect occupiers and users of adjoining land and the environment from the effects of potential harmful substances.)

35. No development shall take place on the site until a Written Scheme of Archaeological Investigation covering the ground to be disturbed by the works approved by the Order has been submitted to and approved by the local planning authority and implemented in accordance with the approved Scheme.

(Reason: To ensure that archaeological artifacts and information are preserved.)

36. No development, including any site clearance works, shall be commenced on the Feltham Marshalling Yard site until a baseline ecological survey of reptiles, bats, and water voles has been undertaken and appropriate mitigation has been submitted to, and approved in writing by, the local planning authority. The mitigation shall be carried out and maintained in accordance with the approved scheme.

(Reason: to protect and enhance the ecological value of the area).

37. Details of the vehicular access from Godfrey Way to the proposed train servicing facility, including the external appearance of the bridge over the River Crane, shall be submitted to and approved in writing by the local planning authority. The works shall be implemented in accordance with the approved details before the train servicing facility becomes operational.

(Reason: to ensure appropriate access and circulation for vehicles and pedestrians and to safeguard the amenity of the local area).

38. No development shall take place until foul and surface water drainage details incorporating the principles of sustainable urban drainage and including a timetable for implementation have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details and retained thereafter.



(Reason: To ensure that the surface and foul drainage systems have sufficient capacity to cope with the demand arising from the development so as to prevent increased risk of flooding and pollution of the water environment/improve water quality in accordance with Hounslow Unitary Development.)

39. Details of the external appearance of new train servicing facility buildings, including facing materials, shall be submitted to and approved in writing by the local planning authority before work on the buildings commences and the works shall be implemented in accordance with the approved details.

(Reason: to ensure that the external appearance of the facility is satisfactory).

40. For all areas of the former Feltham Marshalling Yard site undergoing works approved by this Order, a landscaping scheme, incorporating where appropriate ecological enhancement, mitigation and compensatory measures, shall be submitted to and approved in writing by the local planning authority before commencement of the works. All planting, seeding or turfing comprised in the approved landscaping details shall be carried out not later than the first planting and seeding seasons following completion of the depot facility.

(Reason: to ensure a satisfactory standard of visual amenity)

41. For the purposes of minimizing light spillage to adjacent residential properties, details of all proposed permanent external lighting at the servicing facility shall be submitted to and approved by the local planning authority, and implemented in accordance with the approved plans before the facility comes into operation.

(Reason: to safeguard the amenity of the local area and to minimise light spillage from the facility).

42. Noise attenuation measures shall be implemented such that noise sources from the proposed development, expressed as a Rating Level (assessed over a five minute reference period as defined in BS4142 1997) does not exceed the representative background level by more than 5dB during the night time period (23.00-07.00) at any dwelling adjacent to the servicing facility. This rating level shall apply to the following noise sources only on the development site:

- i. Stationary trains in the shunting area of the sidings
- ii. All operations carried out within buildings
- iii. Fixed plant items.

All works to comply with this condition shall be approved by the Local Planning Authority and shall be completed before the facility is brought into operation.

(Reason: to minimise possible noise nuisance to neighbouring properties).

43. Except on the turnouts and switches and crossings, continuous welded rail shall be used on all track leading to, and within, the maintenance facility.

(Reason: To protect the amenities of occupiers of nearby residential properties.)

44. As far as is reasonably practicable, all horn testing and all activities that could generate noise at a level that would be likely to give rise to complaints (assessed in accordance with BS4142:1997) shall be carried out within the maintenance building.

(Reason: To protect the amenities of occupiers of nearby residential properties.)

45. No loudspeakers or amplified address system shall be used outside the maintenance building without the prior written consent of the local planning authority.

(Reason: To protect the amenities of occupiers of nearby residential properties.)



### Proposed Amendments and Additions to Planning Conditions

#### Proposed Additions

1. A flood risk and drainage assessment will be submitted with the detailed scheme and appropriate mitigation and compensation measures approved in writing by the local planning authority prior to the commencement of development.

#### Reason

To ensure the safety of people and property.

2. Details of how the temporary car parking arrangements in Staines town centre will operate in a satisfactory manner must be submitted to and approved by the Borough Council prior to commencement of development. Details should include measures to mitigate any adverse impacts and potential for loss of attractiveness of parking arrangements for the town centre. Any costs of implementing the above arrangements over and above the Council's existing operating costs shall be at BAA expense.

#### Reason

To ensure maintenance of parking facilities throughout the construction period of a level of convenience to shoppers equal to current provision.

3. Any variation of the Code of Construction Practice must be subject to prior written approval by the local planning authority.

#### Reason

To ensure any variation would cause no greater detriment to the amenity of residents and businesses and to the satisfactory functioning of Staines town centre.

4. Condition controlling noise from fixed plant at all points along the route using wording as in condition 42, relating to the Feltham Depot, but to a level 5dB(A) below the minimum prevailing background noise level.

#### Reason

To minimise possible noise pollution to neighbouring properties.

5. An acoustic rail and wheel maintenance regime by Network Rail will be implemented along with intelligent wheel monitoring systems that detect wheel roughness, to further control noise radiating from the track.

#### Reason

To ensure effective control of noise in accordance with proposals in the Environmental Statement, Volume 1, para 13.7.9.

6. A condition similar to 12, 18 and 28 requiring noise barriers or other mitigation measures to apply to the section of track to the west of Stanwell Moor village.

#### Reason

To minimise possible noise pollution to neighbouring properties.

7. No development shall take place on the Staines Chord until a survey has been submitted and agreed by the local planning authority to establish the route and depth of the culverts leading to Sweeps Ditch and means to protect and/or replace sections of these culverts to maintain a water supply at all times.

**Reason**

To ensure the ecological interest of Sweeps Ditch is protected.

8. A condition requiring a baseline ecological survey for Staines Station to Staines High Street and the Staines Chord should be inserted with wording identical to Conditions 22 and 31.

**Reason**

To enhance the ecological value of the area.

9. Tree protection details required:
  - a) No demolition, site clearance or building operations shall commence until chestnut pale fencing of a height of not less than 1.2 m (4 ft) has been erected around each tree or tree group to be retained on the site in accordance with details to be submitted to and approved by the Local Planning Authority before any work on the development hereby permitted is first commenced, such details to include trenches, pipe runs for services and drains. Such fencing shall be maintained during the course of the development and no storage of materials or erection of buildings shall take place within the fenced area.
  - b) The destruction by burning of materials shall not take place within 6 m (19 ft 8 ins) of the canopy of any tree or tree group to be retained on the site or on land adjoining.

**Reason**

To prevent damage to the trees in the interest of the visual amenities of the area.

10. Tree protection details maintained:

The trees indicated for retention shall be protected with chestnut pale fencing not less than 1.2m (4ft) in height for the duration of the development and none of the trees shall be damaged or destroyed, uprooted, felled or pruned without the previous written permission of the Local Planning Authority until 12 months after completion of the development hereby approved. Any trees removed without such consent, or dying or being severely damaged or becoming seriously diseased before the end of that period shall be replaced with trees of such size, species and in positions as may be agreed by the Local Planning Authority.

**Reason**

The existing trees represent an important visual amenity which the Local Planning Authority consider should be maintained.

11. Extraction equipment:

Prior to the commencement of the development hereby permitted, details of suitable ventilation and filtration equipment to be installed as well as a

maintenance schedule shall be submitted to and approved in writing by the Local Planning Authority. These details shall be installed prior to the occupation of the premises for the use hereby permitted and such equipment shall thereafter be operated and maintained to the satisfaction of the Local Planning Authority.

### **Reason**

In the interests of the amenities of the area and the amenities of the occupiers of nearby premises.

**Amendments to Existing Conditions**

Condition 3: Landscape condition:

- c) in the first line, after the words 'Any trees and plants' add the words 'and seeding',
- d) in the second line, delete 'three years' and insert 'five years',
- e) in the 'Reason', delete the word 'station' so the condition and reason apply to the whole development.

Condition 4: Add 'No major maintenance should be required for the barriers for 20 years and each screen should remain serviceable for at least 40 years'.

Conditions 5, 13, 20, 29 and 34: Contamination:

- a) in the second line, after the words 'detailed investigations shall be carried out' add the words 'to a methodology agreed in writing by the Council',
- b) in the 'Reason' after 'adjoining land' add the words 'buildings and property'.

Conditions 6, 14, 21 and 30: Delete the current wording of the Archaeological condition and insert:

'No development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved in writing by the Planning Authority'.

Condition 7: Details relating to the station and Station Path:

- a) after the words 'implemented in accordance with the approved details' add the words 'and thereafter maintained to the satisfaction of the LPA'.
- b) in the last line, add 'cycle parking and footpath across the Elmsleigh Surface Car Park' as additional matters for which details are to be submitted.

Condition10: Should be amended to set appropriate requirements in relation to night time use – after 11pm and before 7am. Add to end of condition 'and thereafter maintained'.

Condition11: Add to the end of the lighting condition the words 'and thereafter maintained'.

Conditions 12, 18 and 28: Evidence should be provided to demonstrate that the proposed noise barriers in terms of type and extent are adequate for the intended level of sound attenuation.

Condition13: Contamination condition applying to Elmsleigh Surface Car Park. The condition should apply to the whole length of the Staines Chord.

Condition15: Details of car park alterations:

- a) after the words 'shall be implemented in accordance' and before the words

'with those approved details' add the words 'with a programme of work agreed in writing by the local planning authority',

- b) at the end of the condition add the words 'and thereafter maintained to the satisfaction of the LPA',
- c) add to the end of the 'Reason' the words 'and the programme of works to ensure the minimum loss of car parking provision at any one time'.

Condition18: Noise barriers. Add:

**Reason**

To minimise possible noise pollution to neighbouring properties.

Condition19: Delete 'flange lubricators' and insert 'using the best available and approved noise reduction technology at the time of construction to reduce noise due to wheel squeal'.

**Reason**

To ensure use is made of the best technology including those not yet approved by Network Rail.

Conidtion 26: New footbridges:

- a) in the first line, after the words 'external appearance' add the words 'and landscaping'.
- b) at the end of the condition, add the words 'and thereafter maintained to the satisfaction of the LPA'.